



UNIVERSAL DENTISTRY

Family comprehensive dentistry clinic

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# Privacy Policy

How we collect, process and protect the personal data of patients and visitors to [universal-dentistry.net](https://universal-dentistry.net)

Version dated 10 August 2026

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[universal-dentistry.net](https://universal-dentistry.net)

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## 1. General provisions

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This Privacy Policy (the **Policy**) sets out how personal data of individuals is collected, processed, stored, used, disclosed and protected by the dental clinic Universal Dentistry (the **Clinic**) when they contact the Clinic, use the website universal-dentistry.net (the **Website**), complete booking forms, request a consultation or receive medical services.

The Policy has been prepared in accordance with the Constitution of Ukraine, the Law of Ukraine "On Personal Data Protection" No. 2297-VI of 1 June 2010, the Fundamentals of Ukrainian Healthcare Legislation, the Civil Code of Ukraine, and – to the extent it applies to individuals located in the European Union – Regulation (EU) 2016/679 (the General Data Protection Regulation, **GDPR**).

By contacting the Clinic, using the Website or submitting your data through it, you confirm that you have read this Policy and understand what data is processed and for what purposes.

This Policy does not apply to third-party websites and services that may be linked from the Website. The Clinic is not responsible for the privacy practices of such resources.

## 2. Definitions

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### **Personal data**

any information relating to an identified or identifiable natural person.

### **Data subject**

the natural person to whom the personal data relates: a patient, a patient's legal representative, or a visitor to the Website.

### **Processing**

any operation performed on personal data: collection, recording, accumulation, storage, adaptation, alteration, use, disclosure, anonymisation or erasure.

### **Owner (controller)**

the Clinic, which determines the purposes and means of processing personal data.

### **Processor**

a party engaged by the Clinic to process personal data on its behalf.

### **Health data**

a special category of personal data relating to a person's physical or mental health, including the provision of healthcare services, subject to enhanced protection (Art. 7 of Law No. 2297-VI; Art. 9 GDPR).

### **Cookie**

a small text file stored in the user's browser that allows a device to be recognised on a subsequent visit to the Website.

## 3. Data controller

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The controller of the personal data processed under this Policy is the dental clinic Universal Dentistry.

|               |                                                                         |
|---------------|-------------------------------------------------------------------------|
| Name          | Universal Dentistry — family comprehensive dentistry clinic             |
| Address       | 28D M. Maksymovycha St., Nova Anglia residential complex, Kyiv, Ukraine |
| Phone         | +380 98 575 75 31                                                       |
| Website       | universal-dentistry.net                                                 |
| Opening hours | Mon–Fri: 09:00–20:00; Sat: 09:00–15:00; Sun: closed                     |

Enquiries regarding the processing of personal data are accepted by phone at the number above and in person at the Clinic during opening hours.

## 4. Categories of personal data we process

### 4.1. Identification and contact data

Full name; date of birth; gender; phone number; email address; messenger handle; city of residence; where necessary, identity document details to the extent required to complete medical records.

### 4.2. Health data (special category)

Complaints and medical history; previous and concurrent conditions; allergy history; prescribed and current medication; diagnoses; treatment plan, protocol and outcomes; examination and functional diagnostic findings; CT and X-ray images; 3D scans of the jaws and face; intraoral and portrait photographs and video; digital models of the projected outcome; discharge summaries and reports.

### 4.3. Financial data

Description and price of services provided; the fact, date and method of payment; instalment or insurance coverage details. The Clinic does not receive, process or store full payment card details — these are transmitted directly to the payment provider over a secure channel.

### 4.4. Communications data

The content of your enquiries and correspondence with the Clinic; appointment and cancellation history; data entered into Website forms; where technically available, recordings of telephone calls, of which the caller is notified at the start of the call.

### 4.5. Technical data

IP address; device, browser and operating system type; interface language; pages viewed, time and duration of visits; referral source; cookie and other tracking technology identifiers.

### 4.6. Marketing data

The fact and scope of consent given to receive informational and promotional messages; reviews you leave; before-and-after photo and video material. Material that allows a patient to be identified is published solely on the basis of separate, voluntary written consent, which may be withdrawn at any time.

## 5. Sources of data

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- directly from you — in person, in writing, by phone, through Website forms, messengers or email;
- from legal representatives — where the patient is a minor or lacks legal capacity;
- from other healthcare providers, physicians and diagnostic centres — on your referral or with your consent;
- automatically — when you use the Website (technical data and cookies).

## 6. Purposes of processing

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- identifying the patient and maintaining medical records as required by Ukrainian law;
- booking consultations and appointments, confirming, rescheduling and sending reminders;
- carrying out diagnostics, establishing a diagnosis, planning, agreeing and delivering treatment;
- digital modelling of the expected treatment outcome and monitoring progress at every stage;
- manufacturing prosthetic and orthodontic appliances together with dental laboratories;
- calculating the cost of services, processing payments, and keeping accounting and tax records;
- communicating with the patient about treatment progress, aftercare advice and check-ups;
- quality assurance of medical services and handling enquiries, complaints and reviews;
- protecting the rights and legitimate interests of the Clinic and the patient, including in the event of a dispute;
- operating, securing and improving the Website and analysing its traffic;
- sending informational and promotional messages — only where separate consent has been given.

## 7. Legal bases for processing

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The Clinic processes personal data only where at least one of the following applies:

- **consent of the data subject** — Art. 11(1)(1) of Law No. 2297-VI; Art. 6(1)(a) and Art. 9(2)(a) GDPR;
- **performance of a contract** for medical services to which the data subject is a party, or steps taken at their request prior to entering into a contract — Art. 6(1)(b) GDPR;
- **compliance with a legal obligation** of the Clinic — maintaining medical records, reporting to health authorities, accounting and tax compliance — Art. 11(1)(2) of Law No. 2297-VI; Art. 6(1)(c) GDPR;
- **provision of health care**, medical diagnosis and treatment by a health professional subject to the obligation of professional secrecy — Art. 9(2)(h) GDPR;
- **protection of vital interests** of the data subject or another person, including in emergencies — Art. 6(1)(d) and Art. 9(2)(c) GDPR;
- **legitimate interests of the Clinic** — security, quality assurance and the defence of legal claims — Art. 6(1)(f) GDPR, provided such interests are not overridden by the rights and freedoms of the data subject.

## 8. Consent and its withdrawal

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Consent to the processing of personal data is given freely and is specific, informed and unambiguous. Consent to the processing of health data is obtained separately from consent to marketing communications.

You may withdraw your consent at any time, in whole or in part. Withdrawal has no retroactive effect and does not affect the lawfulness of processing carried out before it.

Withdrawal of consent does not stop processing carried out on another legal basis. In particular, medical records are retained by the Clinic for the periods prescribed by Ukrainian law regardless of any withdrawal of consent.

## 9. Disclosure to third parties

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The Clinic does not sell personal data and does not transfer it to third parties for their own independent use. Data is shared only to the extent necessary to achieve the purposes set out in section 6, with the following categories of recipients:

- **the medical information system operator** — the Cliniccards service, in which the electronic medical record is maintained and every treatment stage is documented;
- **dental laboratories, diagnostic centres and consulting physicians** — to the minimum extent required for a specific stage of treatment;
- **banks and payment providers** — to execute and confirm payments;
- **communication service providers** — telephony, messengers and messaging platforms;
- **web analytics and advertising providers** — in anonymised or pseudonymised form;
- **legal, audit and accounting advisers** — within the scope of their professional duties and under confidentiality obligations;
- **public authorities** — upon a written request issued in accordance with statutory requirements and only within the limits set by law.

The Clinic enters into agreements with all processors that impose confidentiality obligations, limit the purpose of processing and require appropriate security measures.

## 10. International data transfers

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Electronic medical record data is stored in a cloud database hosted in a data centre in the Federal Republic of Germany — an EU Member State whose legislation ensures an adequate level of personal data protection in accordance with the GDPR and Art. 29 of Law No. 2297-VI.

Transfers to countries that do not ensure an adequate level of protection take place only where one of the safeguards under Chapter V GDPR is in place (in particular Standard Contractual Clauses), or on the basis of your separate informed consent.

## 11. Retention periods

|                            |                                                                                                                                                        |
|----------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------|
| Medical records            | for the periods prescribed by Ukrainian law and Ministry of Health regulations for the relevant record forms, counted from the date of your last visit |
| Accounting and tax records | for the periods prescribed by Ukrainian tax law, and in any case no less than 1,095 days                                                               |
| Marketing data             | until consent is withdrawn or the relevant purpose ceases to apply                                                                                     |
| Communications data        | for as long as necessary for quality assurance and to handle potential enquiries                                                                       |
| Cookies                    | according to the lifespan of the individual file — from a single session up to 24 months                                                               |

Once the retention period expires, data is erased or anonymised in a way that prevents it from being restored.

## 12. Security measures

The Clinic applies organisational and technical measures designed to protect personal data against unauthorised access, loss, alteration and disclosure:

- role-based access control — each member of staff can access only the data required for their duties;
- the duty of medical confidentiality and signed non-disclosure undertakings;
- encryption of data in transit (TLS) for the Website and the medical information system;
- user authentication in the medical system and logging of actions performed on medical records;
- regular data backups;
- contractual security requirements imposed on all processors;
- regular staff briefing and training on handling personal data.

No method of transmission over the internet and no method of electronic storage is completely secure. The Clinic takes all reasonable measures but cannot guarantee absolute security of data.

## 13. Your rights

Under Art. 8 of Law No. 2297-VI and Articles 15–22 GDPR you have the right to:

- be informed of the sources of collection, the location of your data, the purposes of processing and the identity of the controller;
- receive information about the conditions of access to your data, including about third parties to whom it is disclosed;
- access your personal data and obtain a copy of it;
- have inaccurate or incomplete data rectified;
- have data erased where processing is unlawful or the purpose of processing has been fulfilled;

- restrict processing on the grounds provided by law;
- object to processing based on legitimate interests, and to direct marketing — at any time and without giving reasons;
- data portability — receiving your data in a structured, machine-readable format;
- withdraw consent previously given;
- not be subject to a decision based solely on automated processing that produces legal effects concerning you;
- lodge a complaint with a supervisory authority and to seek a judicial remedy.

The right to erasure does not extend to medical records during the periods for which their retention is mandatory under law, nor to data required to meet tax obligations or to establish, exercise or defend legal claims.

## 14. How to exercise your rights

A request to exercise any of the rights listed in section 13 may be submitted in person at the Clinic upon presentation of an identity document, or by telephone with subsequent verification of the requester's identity.

Identity verification is mandatory: it protects your medical data from being disclosed to an unauthorised person. A request concerning a minor's data must be submitted by a parent or other legal representative, with proof of authority.

Requests are handled within 30 calendar days of receipt (Art. 16 of Law No. 2297-VI). For requests made under the GDPR, the response period is one month, extendable by a further two months where the request is complex; you will be informed of any extension.

## 15. Cookies and web analytics

The Website uses cookies and similar technologies. Depending on their purpose they fall into the following categories:

|                           |                                                                                                                            |
|---------------------------|----------------------------------------------------------------------------------------------------------------------------|
| <b>Strictly necessary</b> | enable core Website functionality, security and correct page rendering; without them the Website does not work properly    |
| <b>Functional</b>         | remember your preferences, such as the selected interface language                                                         |
| <b>Analytics</b>          | collect anonymised statistics about visits — which pages are viewed, how long a visit lasts, and which source referred you |
| <b>Marketing</b>          | allow the effectiveness of advertising campaigns to be measured and relevant messages to be shown                          |

You can manage cookies in your browser settings: view, delete or block them, and set a warning before a cookie is stored. Disabling strictly necessary cookies may cause parts of the Website to malfunction.



## 16. Children's data

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The Clinic provides dental care to children. The personal data of a person under 18 is processed with the consent of a parent or other legal representative, who also signs the informed consent to medical treatment.

The Website is not intended for independent use by children and does not knowingly collect their data directly. If you become aware that a child has submitted data without the consent of a legal representative, please notify the Clinic and the data will be deleted.

## 17. Complaints

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We encourage you to contact the Clinic first – this is the fastest way to resolve an issue. If you believe your rights have been infringed, you may also:

- contact the Ukrainian Parliament Commissioner for Human Rights, the authority supervising compliance with personal data protection law in Ukraine;
- lodge a complaint with the supervisory authority of the EU Member State of your residence or workplace – if the GDPR applies to you;
- bring proceedings before a court in accordance with applicable law.

## 18. Changes to this Policy

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The Clinic may amend this Policy to reflect changes in legislation, in the services offered or in the technologies used. The current version is always available on the Website and states the date it was last updated.

Where changes materially affect the scope of your rights or the scope of data processed, the Clinic will notify you separately – via the Website or using the contact details you have provided.

Continued use of the Website and of the Clinic's services after a new version takes effect means that you have been made aware of the changes.

## 19. Annex. Terms of dental care as a public offer

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These Terms constitute a **public offer** within the meaning of Articles 633 and 641 of the Civil Code of Ukraine and are addressed to an indefinite range of persons who approach the Clinic for dental care. The Clinic provides its services on equal terms to all patients who approach it.

Acceptance of the public offer occurs when the patient books an appointment and begins treatment after being made aware of the treatment plan. From the moment of acceptance, these Terms become binding on the Clinic and the patient as a contract.

This annex reproduces the terms of dental care and the warranty commitments that the patient is made aware of before treatment begins. It governs the provision of services and does not concern the processing of personal data, which is addressed in sections 1–18 of this Policy.

### Treatment procedure and warranty

- The doctor prepares a treatment plan for the patient and explains it to them.
- If the patient disagrees with the proposed treatment plan, it may be amended at the patient's request and at the patient's own responsibility.
- During treatment the diagnosis and the scope of work may change, which entails a change to the treatment plan and its cost.
- The warranty takes effect from the moment the full course of treatment is completed.
- If, during the warranty period, teeth need to be re-treated and the material replaced with a more expensive one, the patient pays the difference in the cost of materials.

### The warranty is void and the doctor bears no liability for the treatment provided where:

- the work was carried out without a warranty at the patient's request;
- the patient failed to observe oral hygiene rules;
- the patient failed to attend a dental check-up every 6 months after the completion of treatment and throughout the warranty period, as recorded in the patient's medical file;
- the treatment concerned primary (milk) teeth;
- the patient has endocrine or gastrointestinal disorders, malignant tumours, radiation injuries, severe mental disorders, chronic alcoholism, substance abuse, multiple caries, inflammation of the salivary glands, tooth position anomalies, malocclusion or jaw deformities, or presents with dysfunction, parafunction (bruxism), pathological attrition of hard dental tissues, arthritis or arthrosis of the temporomandibular joint, adentia, or a previously sustained jaw fracture;
- fissure sealing was performed;
- a filling or dental prosthesis was damaged by the direct impact of physical or chemical factors;
- prosthetic and endodontic treatment had been carried out previously and a chronic inflammatory process is present in the periapical tissues;
- generalised periodontitis of grade II or III severity is present.