



Privacy Notice

I. General information

We are Company for information technologies THE RENAL TRAVELER DOOEL Skopje (hereinafter referred to as RENAL TRAVELER, Controller or We), which, among other activities, has designed and developed The Renal Traveller, a dialysis booking platform (hereinafter referred to as the Platform).

The Platform is used for booking and reservation management activities related to renal care treatments. The Platform can be accessed on the following website <https://renaltraveller.com> or through the app (available at Google Store and App Store).

When you use our Platform, RENAL TRAVELER processes your personal data, and as we are committed to privacy, we pay special attention to the processing of personal data.

When processing personal data, we adhere to the principles of processing, namely: i) lawfulness, fairness, and transparency; ii) purpose limitation; iii) data minimization; iv) accuracy; v) storage limitation; vi) integrity and confidentiality; and vii) accountability.

This Privacy Notice aims to provide you with information on how we process, i.e. collect, use, disclose, transfer and store your personal data when you use our Platform and Website.

This Privacy Notice contains information on how RENAL TRAVELER processes your personal data in accordance with the Law on Personal Data Protection of the Republic of North Macedonia ('Official Gazette of the Republic of North Macedonia' No. 42/20) (the 'Law') and article 13 of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons concerning the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC ('GDPR') when you use our Platform in order to book a dialysis service in a medical facility that meets your needs.

II. Our contact information

Renal Traveler ('Controller' or 'we') processes your personal data as data controller and is responsible for the processing of your personal data. Our contact details are:

Company for information technologies THE RENAL TRAVELER DOOEL Skopje,

registered seat at Pirinska Str., no. 25/1-1, 1000 Skopje, Republic of North Macedonia.

e-mail address: privacy@renaltraveller.com

III. Data protection officer

If you have any questions regarding the protection of personal data, you can contact our Data Protection Officer via e-mail renal-traveller-dpo@chino.io

IV. EU Representative

Since we are based in North Macedonia, we have appointed an EU representative acting as a point of contact for the Data Protection Authorities and data subjects, on all issues related to the processing of personal data, for the purposes of ensuring compliance with GDPR.

D.Med Healthcare GmbH & Co. KG
Klaus-Bungert-Str. 3, 40468 Düsseldorf

Email: info@dmed-healthcare.com

V. Definitions

Personal data: Any information relating to an identified or identifiable natural person.

Personal data processing: Any operation or set of operations which is performed upon personal data, whether or not by automatic means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Data Subject: Natural person who is using The Renal Traveller.

Controller: Company for information technologies THE RENAL TRAVELER DOOEL Skopje, registered seat at Pirinska Str., no. 25/1-1, 1000 Skopje, Republic of North Macedonia.

Processor: Natural or legal person, or governmental body processing personal data on behalf of the controller.

Platform: The Renal Traveller, a dialysis booking platform (<https://renaltraveller.com>).

Medical facilities: The health facility, with whom Controller has a Business Cooperation Agreement and whose dialysis services the Controller offers to Users.

Recipient: Natural or legal person, or governmental body to whom personal data are disclosed, whether a third party or not, another controller or processor.

Personal data protection laws: GDPR and North Macedonian Law on Personal Data Protection with relevant bylaws.

Agency: North Macedonian Personal Data Protection Agency.

Supervisory Authority: The independent authority established by an EU Member State to monitor the application of data protection law and handle complaints.

VI. What personal data do we process, for what purposes, on what legal basis, and what is the retention period for personal data?

Below is information on how RENAL TRAVELER processes your personal data, i.e. for what purposes, what type of data, on what legal basis and what is the data retention period.

Purpose: Providing our website and answer website users requests

We process browsing data such as browser, device used, IP address, date and time of access, requested URL, unique identifiers, operating system, language, network settings, mobile operator or Internet service provider to allow you to browse our website and deliver the services you request (e.g. contact requests, information etc). This processing is based on the performance of a contract which starts when you send an access request to our platform or the adoption of pre-contractual measures taken at your request prior to entering a contract.

Some of this information is collected through cookies and other tracking technologies present in the user's browser or device. For more details about cookies, please refer to our [Cookie Policy](#).

If you send us messages by filling in the personal data requested in our contact forms we will process your personal data in order to reply to your inquiries and communicate with you. The legal basis for the processing is the performance of a contract or the adoption of pre-contractual measures taken at your request prior to entering a contract.

Purpose: Providing the Platform and its related functionalities to patients ("Provision of the Service")

This purpose encompasses several activities essential for you to use our platform:

- **Account creation and management:** we process your email, username, password and age. This data is necessary to register on our platform, create and manage your account. You can also choose to add a photo in your profile.
- **Arrange dialysis service at selected clinic (Dialysis Booking):** we process your name, surname, e-mail, phone number, medical data (HIV,HBV,HCV Status) - also call health related data under the GDPR - , type of insurance card (EHIC or GHIC).
- **Chat support and customer services:** your name, surname, e-mail, phone number, data related to our communication including contact details depending on your method of communication (e-mail, telephone or chatbot).

We process your personal data to provide you our platform and its related features, based on the performance of a contract between you (the Patient) and us (the Controller). Health-related data (medical information) will only be processed with your explicit consent, as outlined in Article 9(2)(a) GDPR. Your personal data will be shared with the selected clinic solely after we have obtained your explicit consent.

The provision of the above mentioned data is necessary to provide you with the requested service. You may withdraw your consent at any time by contacting us. We will process your data for as long as your account remains active—that is, until you withdraw your consent.

Specific concerning documentation management with selected Medical Facilities

Once your dialysis booking is confirmed, the selected Medical Facility may require additional documentation to ensure your treatment is delivered safely. This may include medical records such as serology reports, blood tests, or allergy information.

For this specific purpose, the Medical Facility serves as the Data Controller, while we act solely as a Data Processor on their behalf. This means we process and store your medical data strictly in accordance with the Medical Facility's instructions. We do not use, analyze, or process this information for any purposes of our own.

Please be aware that if you do not provide the necessary documentation, the Medical Facility may be unable to confirm your booking.

As a Data Processor, we will retain the medical data shared with the Medical Facility only until the completion of your dialysis treatment. Once treatment is complete, your data will be deleted from our systems.

Should you make future bookings, you will be required to provide the relevant documentation again.

Purpose: Direct Marketing

If you give us your consent, we may process your name, surname and e-mail address, to provide you with our newsletter, informing you about our products, services or events offered by us. The legal basis for this processing activity is your consent. You can withdraw your consent at any time by contacting us or by unsubscribing from our newsletter.

Purpose: Improvement of the Service

- Follow up on incomplete booking status: we process usage data related to incomplete booking processes (e.g., if you initiated a booking but didn't complete it).
- Improve UI, analyze traffic, show relevant prices: we process usage data, traffic data, IP address (for relevant pricing).
- Patient reviews collection: we process feedback provided by you (e.g., responses to questionnaires, reviews regarding your experience with the Platform).
- Arrange dialysis at user's preferred destination when destination is not available (Answer user queries on website - related to clinic availability): we process data related to user inquiries (e.g., location preferences, specific service needs).

For the activities described above, we rely on our legitimate interests as the legal basis. These interests include: follow up on incomplete bookings to encourage completion and optimize the booking process; improve user experience, such as refining the platform interface, analyzing traffic patterns, and showing geographically relevant prices; collect and analyze feedback and reviews to improve service quality and address areas of concern; assist patients who inquire about unavailable destinations, helping them find suitable alternatives and potentially expanding our clinic network based on demand. In all cases, we ensure that these processing operations are necessary, proportionate, and respect the rights and expectations of the individuals involved. Data is stored only for the limited period necessary to fulfill the purposes described.

Purpose: Sending Birthday Greetings.

We process your date of birth based on your consent to send you birthday greetings.

Purpose: Providing the best price applicable to you, depending on where you are based.

We process your IP address to show you most relevant prices depending on your location based on your consent.

Provision of Renal Traveler Service to Clinics.

This purpose outlines how we interact with clinics as B2B customers and entails the following activities:

- Account creation and management (for clinic employees): we process data related to clinic employees (e.g., name, contact details).
- Chat support: we process data related to communication with clinic employees (clinic contact person name, email, chats).

The legal basis for processing this data is our legitimate interest in providing and maintaining access to our platform and to provide customer support while ensuring effective communication with clinic staff, as part of the contractual relationship with the clinic. Data will be stored as long as the contract with the clinic is active, or as required by law.

VII. Use of HubSpot Chat

When you use this chat feature, certain personal data may be collected, including your IP address, chat content, and any other information you provide. This data is processed to respond to your inquiries and improve our customer support.

Data Processing and Security: HubSpot processes your data on our behalf as a third-party service provider. Data transmitted via the chat system may be stored and analysed by HubSpot in accordance with their privacy and data security standards. All data processing is conducted under strict security protocols to protect your personal data and ensure compliance with applicable data protection laws.

Purpose of Data Collection: The data collected through the HubSpot chat system is solely used to facilitate communication with our support team and provide you with a better customer experience. We do not sell or share your data with unauthorized third parties.

For more information about HubSpot's data practices, please visit [HubSpot's Privacy Policy](#).

VIII. With whom do we share your personal data (recipients of personal data)

First, we want to inform you that we do not sell or otherwise disclose personal data collected in the manner described above, except as described in this Privacy Notice.

We share your personal data with Medical Facilities, in order to provide you with dialysis services.

For data storage purposes, we use AWS servers in their Datacentre located in Frankfurt, Germany.

If your actions on the Application involve elements of unauthorized activities or criminal offenses, we may share your personal data with competent state authorities for the purpose of sanctioning such behaviour and/or criminal prosecution.

Finally, if we should share your personal data with any other recipient, we will always ensure that they act in accordance with our instructions, applying the highest standards of personal data protection. We will update this Privacy notice so that you are informed about whom we have shared your data with and why.

IX. Transfer of personal data to other countries

When you make an appointment for dialysis services, we transfer personal data to Medical Facilities located in the European Union.

Also, we store personal data on AWS servers in their Datacentre located in EU, Germany.

When personal data is transferred to another country, the transfer is carried out based on an adequate level of protection, i.e., by applying appropriate measures in accordance with data protection regulations.

For EU-based Users: we are a company based in North Macedonia and have a branch in Tunisia. As a result, in certain cases, your personal data may be transferred to countries outside the European Economic Area (EEA). These transfers are carried out in accordance with Chapter V of the GDPR, using appropriate safeguards—such as Standard Contractual Clauses approved by the European Commission— and additional security measures, to ensure an adequate level of data protection. You may request further information or a copy of the safeguards in place by contacting us.

X. Your rights regarding the processing of personal data

In relation to the processing of personal data, you have the following rights:

Right of Access

You have the right to access your personal data and obtain information about how it's processed. You also have the right to request a copy of your personal data that we process about you.

Right to Rectification

You can request the correction of inaccurate or incomplete personal data.

Right to Erasure (Right to be Forgotten)

You have the right to have your personal data erased under certain circumstances, such as when the data is no longer necessary for the purposes it was collected or processed, or when you withdraw consent on which the processing is based, also when you object to the processing based on legitimate interest and there are no overriding legitimate grounds for the processing, or the you object to the processing for the purpose of direct marketing. Also, personal data will be erased when personal data have been unlawfully processed and when personal data have to be erased for compliance with a legal obligation.

Right to Restriction of processing

You have the right to obtain from the Controller restriction of processing where the accuracy of the personal data is contested by the data subject, for a period enabling the controller to verify the accuracy of the personal data; Or when the processing is unlawful and you oppose the erasure of the personal data and request the restriction of their use instead; or when RENAL TRAVELER no longer needs the personal data for the purposes of the processing, but we are required by the data subject for the establishment, exercise or defense of legal claims; and when you have objected to processing based on legitimate interest, pending the verification whether the legitimate grounds of the controller override those of the data subject.

Right to Data Portability

You have the right to receive your personal data in a structured, commonly used, and machine-readable format, and to transmit it to another controller, in a situation the processing is based on consent or on a contract, or the processing is carried out by automated means.

Right to Object

You have the right to object at any time to the processing of your data based on a legitimate interest. You can submit an objection via the e-mail address: privacy@renaltraveller.com. If you submit a complaint, we are obliged to stop processing your data, unless there are legal reasons for processing that outweigh your interests, rights or freedoms or are related to the submission, exercise or defense of a legal claim.

Where personal data are processed for direct marketing purposes, you have the right to object at any time to processing of personal data for such marketing, which includes profiling to the extent that it is related to such direct marketing.

You can submit a request to exercise your rights to the email address privacy@renaltraveller.com and by mail to the address of our headquarters.

We are obliged to act upon your request within 30 days, which period may be extended for another 60 days in justified cases, about which you will be promptly informed. Handling your requests to exercise your rights is completely free of charge.

At the same time, you can lodge a complaint with the Agency at any time if you believe that the processing of personal data is not in accordance with the relevant regulations in the field of personal data protection. The contact details of the Agency are bul. Goce Delchev no. 18, PO Box 417, 1000 Skopje, email address info@privacy.mk, phone: +389 (2)3230 635.

Also, you can lodge a complaint with the supervisory authority in your country in EU regarding the processing of your personal data.

Filing a complaint does not affect your ability to protect your rights by initiating appropriate judicial or administrative proceedings.

XI. Consent and withdrawal of consent

When we process your personal data based on consent, providing personal data for the stated purposes is entirely voluntary, not a legal or contractual requirement, nor a precondition for using the Platform, but by providing it, you may have additional benefits from using the Application.

You have the right to withdraw the explicit consent you previously gave us for processing your sensitive data, which are necessary for service provision, at any time.

In any case, you can withdraw your consent by submitting a request for withdrawal to the email address privacy@renaltraveller.com and by mail to the address of our headquarters.

We emphasize that withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal.

XII. Retention periods

Unless otherwise specified in the section on purposes, we will retain your personal data only for as long as necessary to fulfill the purposes for which it was collected, including any obligations related to legal, tax, or accounting requirements. A longer retention period may be required in the event of a legal complaint or in the event of disputes related to our existing contractual relationships.

To determine the retention period of personal data, we take into account:

- the purposes for which we process the personal data, and whether we can achieve those purposes by other means;
- the amount, nature and sensitivity of the data processed;
- the potential risk of harm to individuals derived from unauthorized use or disclosure.

If personal data is no longer necessary for the purposes or legitimate interests pursued by us, and no other legal basis applies, we will delete your data.

XIII. Amendments to the privacy notice

This Policy may be subject to changes and reviews.

All personal data processed is subject to this Policy effective at the time it was collected.

Any changes to this Policy will be posted on this page and, if necessary, notified to you. We encourage you to consult our Policy periodically so that you are always informed about how we process your personal data.

This Policy was last updated on 2025-10-22