

# COMPLAINT MANAGEMENT REGULATION

*For the Investigation of Complaints Related to Healthcare Services*

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The companies listed in Appendix 1 and belonging to the Swiss Clinic corporate group, in order to comply with the provisions of Act CLIV of 1997 on healthcare and Act CLV of 1997 on consumer protection, regulate the procedures for handling complaints received from clients as follows.

## 1. PURPOSE OF THIS REGULATION

The purpose of this Regulation is to establish the process for handling customer complaints received by the Swiss Clinic corporate group, regulate the tasks and deadlines related to complaint handling, and designate the individuals involved in the proceedings with the aim of maintaining and strengthening client trust and maintaining high standards of healthcare services.

## 2. DEFINITIONS

**Complaint:** Any communication aimed at remedying an individual legal or interest violation, the resolution of which is not subject to other—in particular judicial or administrative—proceedings. A complaint may also include a suggestion and may address conduct, omission, or any action, circumstance that violates legal, ethical, or moral rules, thereby disturbing, harming, or endangering the medical activity. Any information that draws attention to a patient rights, ethical, or professional error or deficiency (complaint situation) shall be deemed a complaint, the remedy of which serves the interest of the individual receiving care or the Swiss Clinic corporate group.

**Complainant:** The person affected by or reporting the complaint during or in connection with healthcare (patient, relative, or legal representative, other interested party).

**Record:** A document for registering perceived problems without containing personal data (e.g., regarding cleanliness, equipment malfunction, etc.).

**Minutes:** An authentic report concerning interest violation containing the complainant's personal data (or their representative).

**Case Handler:** The person(s) substantively handling the investigation of the complaint.

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## 3. DESCRIPTION OF THE COMPLAINT HANDLING PROCESS

### **3.1. Persons Authorized to File Complaints**

A complaint may be filed by:

- A person receiving healthcare services from the Swiss Clinic corporate group;
- Their legal representatives;
- Any other person affected by the complaint situation.

Complaints may be filed in Hungarian or English. Following receipt of the complaint, the case handler designated by the Swiss Clinic corporate group to investigate the complaint maintains contact with the complainant, during which it may request clarification, specification, clarification of facts, and provision of additional information.

If the nature of the complaint requires it, the person conducting the investigation shall hear the complainant. If, during the investigation, the investigating person notices that the resolution of the complaint falls under another procedure, the complainant shall be notified of this.

At all stages of the proceedings, efforts should be made to ensure the conditions for independent and impartial investigation and to ensure protection of good-faith informants and other affected persons.

### **3.2. Method of Filing a Complaint**

#### **3.2.1. Oral Complaint Filing**

Oral complaints can be filed:

- By phone at the Swiss Clinic corporate group's customer service (Call Center) at +36 1 255 0566 on weekdays between 8:00 and 20:00; or
- In person at the Swiss Clinic Health Centers, at the reception desks during the opening hours listed on the Health Centers' website.

#### **Health Centers Contact Information:**

- Swiss Prémium Health Center Buda – 1123 Budapest, Nagyenyed Street 8-14
- Swiss Prémium Health Center Pest – 1132 Budapest, Váci Road 30
- Swiss Prémium Health Center Újbuda – 1119 Budapest, Bikszádi Street 6/A
- Swiss Prémium Health Center Pest2 – 1106 Budapest, Méhes Street 1/B

Opening hours are available at: <https://swissclinic.hu/klinikaink/>

In case of oral complaint filing, the case handler registering the complaint shall inform the complainant of the accessibility of this Regulation and shall document the complaint in writing using available means, forwarding it directly to their supervisor – the Call Center manager or clinic managers of the Health Centers – and to the complainant at the e-mail address indicated during the complaint filing, with the opportunity to comment, without delay.

### **3.2.2. Written Complaint Filing**

Written complaints can be submitted:

- By e-mail to [hello@swissclinic.hu](mailto:hello@swissclinic.hu); or
- By mail to Swiss Medical Hungary Zrt., 1123 Budapest, Táltos Street 15/B, 2nd Floor, Unit 1.

For written complaints submitted by e-mail, it is recommended to attach the complaint as a separate file and include only basic data regarding the complaint in the letter body. For complaints submitted by mail, the envelope should indicate "complaint notification, for CEO s.k. opening".

### **3.3. Rights and Obligations of Persons Conducting Complaint Investigation**

The senior managers of the Swiss Clinic corporate group, the medical director, and the person designated by them to investigate the complaint are authorized to independently investigate patient complaints.

The person conducting the complaint investigation has the right to:

- Conduct justified and documented investigations covering the entire personnel and infrastructure of the Swiss Clinic corporate group;
- Within this framework, access documents containing qualified data, business and trade secrets related to the subject of the investigation;
- In compliance with the data protection provisions of separate legislation, prepare/have prepared copies, excerpts, photographs, and certificates;
- Request information in writing or orally from any employee of the investigated organizational unit.

The person conducting the complaint investigation is obligated to:

- Keep complete and accurate records or minutes of the investigation;
- Inform the investigated organizational unit or person of the commencement of their activities (unless an exclusion reason arises);
- Examine the documents and circumstances necessary for careful consideration of the complaint;
- Document their findings, conclusions, and recommendations objectively, truthfully, with reference to supporting evidence;
- If, during the investigation, suspicion of criminal conduct, violation, tort, or disciplinary proceedings arises, promptly inform the senior managers of the Swiss Clinic corporate group.

### **3.4. Deadlines for the Proceedings**

The Swiss Clinic corporate group is obligated to investigate the complaint and inform the complainant in writing of the results as soon as possible, but no later than 30 (thirty) days. The deadline is calculated from the day following receipt of a written complaint or from the day following the written record of an oral complaint. If the investigation underlying the resolution of the complaint is anticipated to take longer than 30 days, the complainant must be informed of this—specifying the expected resolution date and the reasons for extending the investigation. In this case, the deadline for resolving the complaint shall not exceed three months.

### **3.5. Omission of Complaint Investigation**

Complaint investigation may be omitted if:

- The notification was made by an unidentifiable complainant;
- The notification was not made by an authorized person;
- The notification is a repetition of the same content by the same complainant as a previous complaint;
- The complainant submits the complaint more than 6 months after becoming aware of the disputed activity or omission.

A complaint by an unidentifiable complainant may be investigated if it is based on serious legal or interest violation. The complainant shall not suffer any disadvantage as a result of filing the complaint, except if, during the investigation, it becomes apparent that the complainant maliciously provided false data or information, in which case the investigation may be terminated without action.

### **3.6. General Process of Complaint Investigation**

Complaints are generally investigated in the following steps, with the understanding that the procedure outlined here is not mandatory; the elements and order of the procedure as applied shall be determined by the person conducting the investigation within their authority with the interests of the investigation in mind:

- Receipt of the complaint notification, assignment of an identification number
- In case of oral complaint filing, written documentation of the complaint, the purpose of which is to record the content, time, name of the complainant (possible anonymity), and all relevant data and circumstances that assist in investigating the complaint.
- Review of the notification, during which the accuracy of the circumstances stated in the complaint should be evaluated and any grounds for omitting the investigation should be identified.
- During the investigation, the complainant's claims must be examined, with particular attention to those that help verify the factual basis of the complaint.
- Where justified and possible, continuous contact with the complainant should be maintained.
- Where justified, prompt personal hearing of persons affected or likely affected by the complaint should be pursued to obtain detailed data and evidence regarding the complaint.
- The established and proven facts must be recorded with supporting evidence attached.
- If, based on the complaint, it appears justified to initiate criminal, violation, tort, or disciplinary proceedings, steps shall be taken immediately to notify the appropriate persons.
- Upon closure of the proceedings, written notification must be sent to the complainant, which shall inform in sufficient detail of the established facts and the measures taken by the Swiss Clinic corporate group (written notification may be omitted if the complainant has been properly informed orally, provided that the complainant has acknowledged receipt of the information).

### **3.7. Measures Taken Following Complaint Investigation**

Based on a well-founded complaint, the following should be ensured:

- Restoration of lawful status and taking of any other necessary measures;
- Elimination of the causes of identified errors;
- Remediation of the harm caused;
- Where justified, initiation of accountability.

### **3.8. Persons Providing Maliciously False Data or Information**

If, during the investigation, it becomes apparent that the complainant or a person involved in the proceedings maliciously provided false data or information and circumstances suggesting the commission of a crime or violation arise, their personal data shall be transferred to the authority authorized to conduct the proceedings.

If there is reasonable cause to believe that a person who provided maliciously false data or information during the investigation has caused or is causing unlawful harm or other legal violation to another, their personal data shall be transferred to the authority authorized to conduct the proceedings.

### **3.9. Registry of Complaint Investigation Documentation**

The Swiss Clinic corporate group maintains a registry of the investigations conducted and ensures the preservation of investigation documents created during the investigations in accordance with its General Data Processing Information. The document retention period is 5 years.

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## **4. COMPLAINT HANDLING OUTSIDE THE SWISS CLINIC CORPORATE GROUP FACILITIES**

The exercise of the right to complain does not affect the complainant's right to contact other authorities—as provided for in separate legislation and to investigate the complaint—such as patient rights representatives, client rights representatives, or child rights representatives or courts. The complainant is also entitled to appeal if they believe that the Swiss Clinic corporate group did not properly investigate their complaint, reached incorrect conclusions during the investigation, or applied incorrect legal consequences.

In case of complaint rejection, the complainant must be informed in detail about the means of appeal, including the contact details of the relevant bodies and organizations.

The complainant may contact the following authorities to pursue legal remedies:

### **4.1. Integrated Legal Protection Service (Patient Rights Representative for Patient Rights Matters)**

The complainant may contact the territorially competent patient rights representative of the Integrated Legal Protection Service, which operates as an independent organizational unit of the Ministry of Interior, with a patient rights complaint. The patient rights representative—within the framework prescribed by laws and regulations—protects patients' rights and helps them understand and assert these rights. Patient rights

representatives' contact information is published by the Integrated Legal Protection Service at: <https://www.ijsz.hu/kepviselok1.html>

#### **4.2. Consumer Protection**

A complainant who qualifies as a consumer may contact the consumer protection authority organization of the district office in their place of residence or stay – as well as the competent dispute resolution bodies. The contact information for dispute resolution bodies can be found at: <http://www.bekeltetes.hu>

#### **4.3. Data Protection Officer for Data Protection Matters**

The data protection officer for members of the Swiss Clinic corporate group:

##### **Dr. Krisztina Vauver**

Mailing address: 1062 Budapest, Andrásy Street 113

E-mail: [adatvedelem@swissclinic.hu](mailto:adatvedelem@swissclinic.hu)

Phone: +36 1 451 1060

#### **4.4. Court for Initiating Civil Litigation**

The competent district court or court of first instance for reviewing the private law claims of the complainant is determined by the location of the seat of the Swiss Clinic corporate group member involved in the complaint.

For Swiss Medical Services Kft:

##### **Pest Central District Court**

Address: 1055 Budapest, Markó Street 25

Mailing address: 1887 Budapest, P.O. Box 28

Central phone number: +36 1 354 6000

E-mail: [pkkb@birosag.hu](mailto:pkkb@birosag.hu)

For Swiss Medical Hungary Zrt. and Swiss Emergency Services Kft:

##### **Buda Central District Court**

Address: 1021 Budapest, Budakeszi Street 51/B

Mailing address: 1525 Budapest, P.O. Box 223

Central phone number: +36 1 391 4930

E-mail: [bkkb@birosag.hu](mailto:bkkb@birosag.hu)

For All Members of the Swiss Clinic Corporate Group:

**Metropolitan Court of Justice**

Address: 1055 Budapest, Markó Street 27

Mailing address: 1363 Budapest, P.O. Box 16

Central phone number: +36 1 354 6000

E-mail: [ft@birosag.hu](mailto:ft@birosag.hu)

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## 5. OTHER MATTERS

This Regulation is available on the <https://swissclinic.hu/adatkezelesi-tajekoztato/> website.

The Swiss Clinic corporate group reserves the right to unilaterally modify this Regulation for the future. The affected parties will be informed of any modifications through the Swiss Clinic corporate group's website.

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## APPENDIX 1

### MEMBERS OF THE SWISS CLINIC CORPORATE GROUP

**SWISS MEDICAL SERVICES Limited Liability Company**

- Registered Office: 1092 Budapest, Kinizsi Street 22, Ground Floor, Unit 4
- Company Registration Number: 01-09-561648
- Tax Number: 12171864-2-43
- Statistical Code: 12171864-8622-113-01

**SWISS MEDICAL HUNGARY Closed Private Limited Company**

- Registered Office: 1125 Budapest, Táltos Street 15/B, 2nd Floor, Unit 1
- Company Registration Number: 01-10-046809
- Tax Number: 22989143-2-43
- Statistical Code: 22989143-8622-114-01

**SWISS EMERGENCY SERVICES Limited Liability Company**

- Registered Office: 1113 Budapest, Ibrahim Street 26, 1st Floor, Unit 103
- Company Registration Number: 01-09-293357
- Tax Number: 25865370-1-43
- Statistical Code: 25865370-8621-113-01