

**Section 1 – Identity and contact details of controller**

According to the relevant data protection law, your personal data will be processed by:

**Unilabs, Ltd**  
**24-32 Stephenson Way**  
**London**  
**NW1 2HD**  
**United Kingdom**  
**Email address:** [dpo@unilabs.com](mailto:dpo@unilabs.com)

**Section 2 – What personal data we collect**

Unilabs collects the following personal data related to you:

- **Identification Data:** Mr/Mrs/Ms/Miss, first name, last name, gender, address, telephone number, e-mail address, date of birth.
- **Health Data:** samples (tissue, blood, urine or other body fluids), medical scans, health data history.
- **Genetic Data:** DNA sample.
- **Economic and Financial Data:** pay details, bank account details.
- **Marketing and Communications Data:** your preferences in receiving marketing from us and our third parties and your communication preferences.

**Section 3 – Purposes of the processing and legal basis**

Your personal data is processed for the following purposes and in accordance with the legal basis as set out below:

Purposes	Legal Basis
<b>Scheduling appointments and medical tests</b>	The processing is necessary to enter into a contract with the patient who requested an appointment for the provision of a health service (art. 6 UK GDPR, par. 1, point b).
<b>Collect samples (tissue, blood, urine or other body fluids) and carry out medical scans</b>  Health services provided by Unilabs could involve: <ul style="list-style-type: none"> <li>• Diagnostic service such as Histology, Clinical biochemistry, Haematology, coagulation, Microbiology, Special chemistry, Serology, Immunology, Transfusion medicine, Nuclear medicine, Molecular biology, Drug abuse testing, Therapeutic drug monitoring, Point of care testing, Genetic testing;</li> <li>• Radiology and Imaging examination;</li> <li>• Personalised diagnostic services for the treatment and monitoring of genetic, chronic, infectious diseases.</li> </ul>	The processing is necessary for the performance of the contract with the patient for the provision of health services (art. 6 UK GDPR, par. 1, point b).  Processing of special categories of personal data (health data) is carried out for the purposes of medical diagnosis pursuant to contract with a health professional (art. 9 UK GDPR, par. 2, point h).
<b>Transfer the samples to Unilabs laboratories via a Unilabs’ or service providers’ courier</b>	The processing is necessary for the performance of the contract with the patient for the provision of health services (art. 6 UK GDPR, par. 1, point b).  Processing of special categories of personal data (health data) is carried out for the purposes of medical diagnosis pursuant

	to contract with a health professional (art. 9 UK GDPR, par. 2, point h).
<b>Analyse samples and medical images (this is done by our experienced technicians and scientists)</b>	<p>The processing is necessary for the performance of the contract with the patient for the provision of health services (art. 6 UK GDPR, par. 1, point b).</p> <p>Processing of special categories of personal data (health data) is carried out for the purposes of medical diagnosis pursuant to contract with a health professional (art. 9 UK GDPR, par. 2, point h).</p>
<b>Interpret results and report</b>	<p>The processing is necessary for the performance of the contract with the patient for the provision of health services (art. 6 UK GDPR, par. 1, point b).</p> <p>Processing of special categories of personal data (health data) is carried out for the purposes of medical diagnosis pursuant to contract with a health professional (art. 9 UK GDPR, par. 2, point h).</p>
<b>Provide the results to patients</b>	<p>The processing is necessary for the performance of the contract with the patient for the provision of health services (art. 6 UK GDPR, par. 1, point b).</p> <p>Processing of special categories of personal data (health data) is carried out for the purposes of medical diagnosis pursuant to contract with a health professional (art. 9 UK GDPR, par. 2, point h).</p>
<b>Provide the patients with requested clarifications on the results</b>	<p>The processing is necessary for the performance of the contract with the patient for the provision of health services (art. 6 UK GDPR, par. 1, point b).</p> <p>Processing of special categories of personal data (health data) is carried out for the purposes of medical diagnosis pursuant to contract with a health professional (art. 9 UK GDPR, par. 2, point h).</p>
<b>Process the payment for the required health service</b>	The processing is necessary for the performance of the contract, i.e. payment against a service (art. 6 UK GDPR, par. 1, point b).
<b>Sending to existing patients marketing communications related to Unilabs products and services</b>	The processing is in the legitimate interests of Unilabs to inform existing patients on relevant information regarding similar used products and services previously purchased (art. 6 UK GDPR, par. 1, point f).
<b>Sending to new patients marketing communications related to Unilabs products and services</b>	<p>The patient has given their consent to receive marketing communications related to Unilabs products and services (art. 6 UK GDPR, par. 1, point a).</p> <p><b>For further information on this specific processing activity, please see the marketing consent privacy notice.</b></p>

#### Section 4 – Profiling or Automated Decision Making

Not applicable – no profiling or automated decision making are involved in the processing activities of your personal data.

#### Section 5 – Indirect collection of data

Your personal data may also have been indirectly collected from different sources:

Categories of personal data indirectly collected	Source
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Identification, Health and Genetic data	Hospitals and clinics that are sending health samples to our laboratories for testing purposes.
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## Section 6 – Categories of recipients of personal data

Your personal data will be shared with the following recipients:

- With other companies in Unilabs Group under the terms of an Intra-Group Data Transfer and Processing Agreement, with authorised personnel in charge of Operations and commercial activities.
- With service providers, acting on our behalf such as HCA, Circle Health Group (CHG) and others.
- With business partners, assisting us in the management of our activities, such as CDW, Dedalus, GCM, MediOffice, Dscribe and others.

## Section 7 – Data retention period

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

When personal data is no longer needed or has reached its retention period it is deleted.

Personal data might be kept for a longer period of time where it is necessary in accordance with legal requirements.

## Section 8 – Transfer of personal data

Due to the international dimension of Unilabs Group, your personal data may be transferred outside of the European Economic Area ('EEA') to countries recognised as ensuring an adequate level of protection such as Switzerland where the Unilabs headquarters is based, and to other countries with different levels of protection.

According to the data protection regulation, to ensure an appropriate level of protection to your personal data transferred to those countries, Unilabs puts in place relevant safeguards such as the signature of data transfer agreement based on the standard contractual clauses ('SCCs') issued by the Information Commissioner's Office. Please write to the following address if you wish to obtain copies of such contracts: [dpo@unilabs.com](mailto:dpo@unilabs.com).

## Section 9 – Data subjects rights

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

- **(a) Right to object:** You can object to our processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this basis. Please contact us, providing details of your objection.
- **(b) Access to your personal data:** You can request access to a copy of your personal data that we hold, along with information on what personal data we use, why we use it, who we share it with, how long we keep it for and whether it has been used for any automated decision making. You can make a request for access free of charge. In compliance with the GDPR, we will respond to a valid subject access request without undue delay and at the latest within one month of receiving the request. In some circumstances, we can extend the time to respond by a further two months. For example, when the request is complex. In this case, we will let you know within one month of receiving your access request and explain to you why the extension is necessary.
- **(c) Consent:** Where you have given us your consent to use personal data, you can always withdraw your consent at any time. If you withdraw your consent, Unilabs will cease to process your personal data.
- **(d) Rectification:** You can ask us to change or complete any inaccurate or incomplete personal data held about you.
- **(e) Erasure:** You can ask us to delete your personal data where it is no longer necessary for us to use it, you have withdrawn consent, or where we have no lawful basis for keeping it.
- **(f) Portability:** You can ask us to provide you or a third party with some of the personal data that we hold about you in a structured, commonly used, electronic form, so it can be easily transferred.

- **(g) Restriction:** You can ask us to restrict the personal data we use about you where you have asked for it to be erased or where you have objected to our use of it.
- **(h) No automated-decision making:** Automated decision-making takes place when an electronic system uses personal data to make a decision without human intervention. You have the right not to be subject to automated decisions that will create legal effects or have a similar significant impact on you, unless (i) you have given us your consent (ii) it is necessary for a contract between you and us, or (iii) is otherwise permitted by law. You also have certain rights to challenge decisions made about you. We do not currently carry out automated decision-making in connection with our relationship with you, but we will notify you in advance if this changes.

## **Section 10 – Means of exercising**

To exercise your rights please fill out the web form available at this [link](#).

You can also exercise your rights by sending an e-mail to the following address: [dpo@unilabs.com](mailto:dpo@unilabs.com).

The exercise of your rights is free of charge.

## **Section 11 – Contact details of the Data Protection Officer**

If you have any comments or questions regarding this Privacy Notice or our data handling practices, please contact the Data Protection Officer.

Email: [dpo@unilabs.com](mailto:dpo@unilabs.com)

## **Section 12 – Right to lodge a complaint with Data Protection Authority (DPA)**

If you are unsatisfied with the way in which we have handled your personal data or any privacy query or request that you have raised to us and you didn't receive a satisfied answer by us and/or our DPO, you have the right to lodge a complaint with the Data Protection Authority.

The DPA of UK is:

[Information Commissioner's Office](#)

Wycliffe House

Water Lane

Wilmslow

Cheshire SK9 5AF

T +0303 123 1113 (or +44 1625 545745 if calling from overseas)

F 01625 524510

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