

Section 1 – Identity and contact details of controller

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

Unilabs Middle East LLC.

404 – 405, 4th Floor, Building 12, Al Jalila Foundation, Dubai Healthcare City

P.O Box 57294 | Dubai, UAE

United Arab Emirates

Email address: 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 (blood, urine or other body fluids), 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
Scheduling appointments and medical tests	The processing is necessary to enter into a contract with the patient who requested an appointment for the provision of a health service.
Collect samples (blood, urine or other body fluids) Health services provided by Unilabs could involve: <ul style="list-style-type: none">• Diagnostic service such as 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;• Personalised diagnostic services for the treatment and monitoring of genetic, chronic, infectious diseases	The processing is necessary for the performance of the contract with the patient for the provision of health services. 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.
Transfer the samples to a Unilabs laboratories via a Unilabs courier	The processing is necessary for the performance of the contract with the patient for the provision of health services. 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.
Interpret results and report	The processing is necessary for the performance of the contract with the patient for the provision of health services.

	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.
Provide the results to patients	The processing is necessary for the performance of the contract with the patient for the provision of health services. 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.
Provide the patients with requested clarifications on the results	The processing is necessary for the performance of the contract with the patient for the provision of health services. 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.
Process the payment for the required health service	The processing is necessary for the performance of the contract (i.e. payment against a service).
Sending to existing patients marketing communications related to Unilabs products and services	The processing is in the legitimate interests of Unilabs to inform existing patients on relevant information regarding similar used products and services previously purchased.
Sending to new patients marketing communications related to Unilabs products and services	The patient has given their consent to receive marketing communications related to Unilabs products and services. For further information on this specific processing activity, please see the marketing consent privacy notice.

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
Identification, Health and Genetic data	Hospital and clinics that are sending health samples to our laboratories for testing purposes

Section 6 – Categories of recipients of personal data

Your personal data will be shared with the following recipients:

- Within Unilabs Group, including other Unilabs companies, with authorised personnel in charge of Operations and commercial activities.
- With service providers, acting on our behalf and assisting us in the management of our activities such as:
 - Siglo
 - Crelio
 - Unilabs Online
 - Ziwo
 - Appointy
 - Office 365
 - Verloop

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

Given the global operations of Unilabs Group and in compliance with the data protection regulations in the United Arab Emirates (UAE), your personal data may be transferred to locations outside the UAE. This transfer is undertaken with due consideration for privacy and data protection.

The transfer of personal data may occur to countries or entities that provide an equivalent level of data protection as mandated by the UAE data protection laws. Such transfers may involve countries that have been recognized by the UAE authorities as ensuring an adequate level of protection or through mechanisms such as contractual agreements, binding corporate rules, or other lawful means.

Unilabs Group adheres to the UAE data protection laws, including the UAE Federal Law No. 2 of 2019 Concerning the Use of Information and Communication Technology in the Health Sector (UAE Health Data Law), which governs the cross-border transfer of personal data in the health sector. We are committed to ensuring that your personal data is treated securely and in accordance with these regulations. For more information contact: dpo@unilabs.com.

Section 9 – Data subjects rights

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

- **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.

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

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 UAE Data Protection Authority ('UAE Data Office').

15.03.2024