

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

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

**Medicina Laboratorial Dr. Carlos Torres, S. A.**

**Rua do Campo Alegre n.º 231 5.º piso, sala 7,**

**4150-178 Porto**

**Portugal**

**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:** name, surname, gender, telephone number, e-mail address, home address, date of birth.
- **Professional Data:** working hours, job title, function, working department, rank, seniority, current position.
- **Financial Data:** bank account details, pay details.
- **Marketing and Communications Data:** your preferences in receiving marketing communications from us and our third parties.

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

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

| Purpose                                                                                                                                                                                                                                                                                                     | Legal basis                                                                                                                                                                                                 |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Manage relationship with Health Facilities, Hospitals and Health Professionals</b><br><br>Manage relationship with healthcare facilities, hospitals and health professionals involves exchanging patient information such as medical records and test results to ensure coordinated and efficient care.  | The processing is necessary for the performance of a contract.                                                                                                                                              |
| <b>Manage quality</b><br><br>Quality management ensures the accuracy and reliability of test results through standardized procedures, regular calibration and maintenance of instruments, the implementation of internal and external quality controls and training of internal staff to quality standards. | The processing is in the legitimate interest of Unilabs to maintain and improve its operational standards and customer satisfaction.                                                                        |
| <b>Perform audits</b><br><br>Perform internal and external audits to assess level of internal control and comply with regulations.                                                                                                                                                                          | The processing is in the legitimate interests of Unilabs to assess levels of internal control and is necessary to comply with all applicable regulations.                                                   |
| <b>Process payments / invoices for self-payers</b><br><br>Payment and invoice processing for self-payers involves issuing invoices for services or products provided, then receiving and recording payments, and maintaining accurate accounting and financial records.                                     | The processing is necessary for the performance of a contract and to comply with legal obligations.                                                                                                         |
| <b>Communicate with existing and potential customers</b><br><br>Communicating with existing and potential customers involves collecting and analysing customer information to                                                                                                                               | The processing is in the legitimate interests of Unilabs to develop and improve its services and business (in the case of potential customers may, under certain conditions, be a legal basis for consent). |

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| create targeted communication strategies such as email marketing, social media and advertising campaigns. |  |
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#### 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 and Professional Data             | Websites |

#### Section 6 – Categories of recipients of the personal data

Your personal data will be shared with the following recipients:

- Within Unilabs Group, including other Unilabs companies, with authorised personnel in the laboratories, as well as authorised personnel in charge of finance and IT and logistics.
- With service providers, acting on our behalf and assisting us in the management of our activities.

#### 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 by the European Commission as ensuring an adequate level of protection on the basis of an adequacy decision 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 European Commission. 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 of the Member State of your habitual residence, place of work or place of the alleged infringement.

The DPA of Portugal is:

[Comissão Nacional de Proteção de Dados - CNPD](#)

Av. D. Carlos I, 134, 1º

1200-651 Lisboa

Tel. +351 21 392 84 00

Fax +351 21 397 68 32

Email: [geral@cnpd.pt](mailto:geral@cnpd.pt)

To find the appropriate contact details of the other Data Protection Authorities, please visit the EU Commission's [directory of DPAs](#).