

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

Section 2 – What personal data we collect

Unilabs collects the following personal data related to you:

- **Identification Data:** Name, surname, gender, e-mail address, home address, date of birth, ID card and/or passport number, GPS geolocation.
- **Professional Data:** Contracts of employment and associated HR records, curriculum vitae, working hours, job title, function, working department, rank, starting date of the current position, seniority, current position, annual leave and public holiday records, emergency contact details.
- **Financial Data:** bank account details, pay details, salary arrangements, bonus payments, allowances, benefits, social security numbers, personal details of spouses and/or dependants which includes marital status, family details for benefits entitlement.
- **Performance Details Data:** performance review, formal notes of performance review meetings, performance improvement plan documentation.
- **Investigation Data:** Copies of any formal employee complaint, formal investigation and/or disciplinary meeting notes, formal witness statements, associated CCTV footage, documented outcomes of any such investigations and/or disciplinary hearings.
- **Technical Data:** Unilabs email, internet browsing history, Unilabs mobile & office phone call records, IP Address, Log Data.
- **Medical Data:** medical certificates, sick leave records, sick pay records, occupational health assessments.

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
Personnel file Comply with employment and Revenue laws and to ensure that terms and conditions of employment are properly adhered to and managed as well as to manage planning and organisational structure within Unilabs.	The processing is necessary to comply with various employment and Revenue laws. The processing is also necessary for the performance of the employment contract. Emergency contact details are collected from employees to protect employees' vital interests in the event of an accident or emergency. Where the individual does not provide the requested data, the organisation may be unable to continue their employment.
Training and Development Provide training and develop our staff.	The processing is necessary for the performance of the employment contract.
Business Trips Management Organise and enable business trips.	The processing is in the legitimate interests of Unilabs to manage trips and mobility of human resources (enable staff to travel safely and be reimbursed).
Whistleblowing schemes Management	The processing is in the legitimate interests of Unilabs to enable employees to raise concerns regarding suspected

Manage whistleblowing schemes.	conduct or practices that are illegal or in violation of corporate policy and correct inappropriate conduct and actions
Conference call and remote trainings Run internal web-shops through our third parties.	The processing is in the legitimate interests of Unilabs to develop its brand.
Payroll Ensure employees are paid in line with their contractual entitlements and that any regulatory and statutory deductions are paid under our obligations to Revenue as an employer.	The processing is necessary to comply with various employment and Revenue laws. The processing is also necessary for the performance of the employment contract. Where an employee does not provide the requested data, the organisation may be unable to pay employees their contractual entitlements.
Illness Benefit Refund Allocate state illness benefit to correct staff.	The processing is necessary to comply with legal obligations.
Pension administration Properly administer the employee's pension entitlement and to comply with necessary pension rules of the State.	The processing is necessary to comply with pension laws. The processing is also necessary for the performance of the employment contract. Processing of special categories of personal data is carried out for pension purposes in line with applicable data protection laws. Where the individual does not provide the requested data, the organisation may be unable to administer their pension.
Performance management Manage employee performance in accordance with relevant company policies.	The processing is necessary for the performance of the employment contract and is in the legitimate interests of the employer to manage employee performance in circumstances where such interests are not overridden by the rights and freedoms of employees.
Grievance, disciplinary and bullying & harassment investigations Ensure employee complaints and/or disciplinary matters are managed appropriately and that they are properly investigated in accordance with the principals of natural justice as well as the relevant Unilabs policies and employment legislation.	The processing is necessary to comply with an employer's legal obligations to apply fair procedures to any employee investigation, for the performance of the employment contract and in the legitimate interests of the employer to fully investigate employee complaints in circumstances where such interests are not overridden by the rights and freedoms of employees.
Manage network, security and IT assets and tools Protect against the dangers associated with e-mail and internet use and to ensure employees are using such systems in accordance with Unilabs policies. This also includes providing proper IT assets and tools.	The processing is in the legitimate interests of Unilabs to manage employee performance and ensure the security of e-mail and internet systems in circumstances where such interests are not overridden by the rights and freedoms of employees.
Assessment of the working capacity Manage employee absences, to manage sick pay in accordance with the contract of employment and employee handbook, to allow Unilabs to assess the fitness to work of relevant employees.	The processing is necessary to assess, subject to appropriate safeguards, the working capacity of the employee and to carry out obligations and exercise rights under employment law and health & safety legislation.
Employment termination management Adequately manage the termination of the employment relationship.	The processing is necessary to comply with the employment contract and is in the legitimate interests of the employer to manage the termination of the employment relationship in line with company policies in circumstances where such interests are not overridden by the rights and freedoms of employees.
Cartrack Fleet Management Enhance the security of the Unilabs fleet and further augment the safety of drivers throughout the Unilabs Group.	The processing is in the legitimate interests of Unilabs to improve efficiency and cost savings, ensure the safety of its

The system uses GPS technology to provide real time location information for Unilabs fleet vehicles, and to alert the organization and the authorities in the event of serious incidents including vehicle theft, traffic collisions, or other driver emergency.	drivers and compliance with road regulations and protect its assets, including its fleet of vehicles.
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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

Not applicable – no indirect collection of data is involved in the processing activities of your personal data.

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 charge of HR, payroll, controlling and finance, IT, commercial activities. It will also be shared with your line manager. Identification data, professional data and work organization will be more widely shared internally and for specific events with the events' organisers.
- With service providers, acting on our behalf and assisting us in the management of our activities, such as Karooooo Limited and its subsidiary Cartrack for the purpose of Cartrack Fleet Management.

Section 7 – Data retention period

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, tax, accounting, reporting or contractual requirements. 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.

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:** Most of the time, we won't need your consent to use your personal data as we will be using it only to fulfil our obligations and exercise our rights as an employer. There are limited circumstances where we may ask for your consent to process your information. Where you have given us your consent to use personal data, you can withdraw your consent at any time.
- **(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. Please be aware that we may have legal obligations to retain employee records for a certain period after your employment.
- **(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 your employment, 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 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

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