

Information Notice – marketing messages

The information contained in this Information Notice will help you to understand what personal data Synevo sp. z o.o. processes, for what purpose the data are used and what rights you have in relation to the above.

The obligation to provide this Notice arises from Article 13 of the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation, the “GDPR”).

1. The Controller of your personal data is Synevo sp. z z o.o., ul. Zamieniecka 80 / 401, 04-158 Warsaw (the “Controller”, “Synevo”, or “Company”) and may be contacted by sending a message to the e-mail address: kontakt@synevo.pl or by sending a letter to the Company’s address listed above.
2. The Controller appointed a Data Protection Officer, who may be contacted by sending a message to the e-mail address: iod@synevo.pl or by sending a letter to the address: Synevo sp. z o.o, Data Protection Officer, ul. Zamieniecka 80/401, 04-158 Warsaw.
3. Personal data may be processed accordance with:
 - a) Article 6(1)(f) of the GDPR – on the basis of the Controller’s legitimate interest, which is considered to be the marketing of the Controller’s own products and services, including through the use of mechanisms based on profiling and selected forms of communication in connection with the consents given for a specific source of electronic messages (text messages, voice calls, e-mail, push notifications), not excluding traditional communication channels (e.g. post). The Controller conducts marketing activities through: newsletter (newsletter mailing), voice calls (telephone marketing), sending commercial messages (e-mail, text messages, push notifications), sending promotional materials by post;
 - b) Article 6(1)(f) of the GDPR – on the basis of the Controller’s legitimate interest, which is considered to be the desire to know your opinion on the services we provide, for the purpose of conducting customer satisfaction surveys, by means of the indicated sources of electronic communication to which you have consented (e-mail, voice calls, text messages, push notifications), and subsequently for the purpose of archiving the forms;
 - c) Article 6(1)(f) of the GDPR - on the basis of the Controller’s legitimate interest, for statistical purposes related to improving the efficiency of the work, the quality of the services provided and adapting them to the recipients;
 - d) Article 6(1)(f) of the GDPR – on the basis of the legitimate interest of the Controller to establish, secure, assert and defend claims, if there is a circumstance justifying the processing of data for this purpose;
 - e) Article 6(1)(a) of the GDPR – based on your consent to collect and analyse data about your activity on the app and how you use the app in order to improve its performance;
 - f) Article 6(1)(a) of the GDPR – on the basis of the consent given for the processing of standard personal data (e.g. city, age, gender, first name) for marketing purposes, including their use to match the content presented in the app (e.g. banners, general articles) and recommendations to the demographic profile of the individual, in order to receive commercial messages about Synevo’s services, preventive campaigns and promotions in selected (preferred) channels of

marketing communication, e.g. e-mail, voice calls, text messages, push notifications (so-called BASIC consent);

- g) Article 6(1)(a) of the GDPR – on the basis of your consent to receive from Synevo – exclusively via the app – commercial messages about the services and products offered by the Medicover Group entities or partners, such as Well Fitness gym, Medicover outpatient clinics and hospitals, dental facilities, opticians, dieticians' offices;
- h) Article 6(1)(c) of the GDPR – for the purposes of complying with legal obligations;
- i) Article 9(2)(a) of the GDPR – based on your consent to accessing, collecting and analysing data about the use of the app and to processing of special categories of data, including health-related data (e.g. test results, medical history), for the following purposes: (i) for using the interpretation of test results, (ii) for creating a health profile, (iii) for analysing and predicting aspects of your health, personal preferences and medical interests in order to present you with personalised educational and preventive materials and tailored service recommendations, including commercial offers of Synevo. Recommendations are suggestions only and are not binding. This process involves automated profiling that may affect the offers and recommendations presented – therefore you have the right to request human intervention, to express your position and to challenge the outcome of the profiling (so-called SMART consent).

The answers given in the app are used to create a health profile and are only used to better tailor content and recommendations. Matching recommendations and offers takes place automatically based on the tags assigned, which reflect activity in the app and answers to health-related questions. The consent covers the use the medical profile and special categories of data, including health-related data, for automated matching of offers and marketing messages. We only send marketing messages via the channels you have agreed to in your BASIC preferences (e.g. e-mail, text messages, push notifications). If the consent for the given channel is withdrawn, we will stop sending marketing messages through that channel. Withdrawing the SMART consent means that we will stop profiling and personalising Synevo's offers, but you may still receive general marketing messages from us based on your basic data (BASIC).

- 4. Personal data related to marketing and commercial activities will be processed for the duration of these activities, but no longer than until the withdrawal of consents to electronic messages expressed for this purpose or the submission of an objection to data processing.
Data processed in connection with customer satisfaction surveys are processed for the duration of the survey and then 12 months for archiving purposes or until you withdraw your consent to electronic messages or object to data processing.
Data collected in connection with statistical surveys will be processed until the purpose for which the data were collected has been fulfilled or until an objection is raised.
Data processed on the basis of consent will be processed for the duration of the purpose or until consent to data processing is withdrawn, whichever occurs first. Once consent has been withdrawn or an objection has been raised, personal data may be retained for the purpose of demonstrating the correctness of the fulfilment of legal obligations incumbent on the Controller and related claims.
- 5. Recipients of your personal data may include entities providing services to the Controller with whom data processing agreements have been concluded, if required by law. In particular, recipients of the data may include providers of services in the area of marketing, including digital marketing, personal data protection, e-mail delivery, IT services and solutions, document shredding and archiving, courier companies and the Polish Post Office, authorised state authorities.
- 6. The provision of personal data is entirely voluntary, however, failure to do so will prevent Synevo from fulfilling the purposes indicated above, in particular with regard to the promotion and marketing of the Controller's services.

7. Personal data may be shared/transmitted to our service providers, transferred and/or stored outside the European Economic Area (the "EEA"), where data protection laws may be less stringent than those in your country. If your personal data is transferred outside the EEA, additional steps may be taken to protect your personal data. Our recipients outside the EEA, in accordance with a decision of the European Commission, provide an adequate level of protection of personal data in accordance with EEA standards. For recipients residing within the territory of countries not covered by the European Commission's decision, in order to ensure an adequate level of this protection, the Controller will make agreements with the recipients of your personal data, based on the standard contractual clauses issued by the European Commission in accordance with Article 46(2)(c) of the GDPR or apply other legal bases permitted by the applicable legal requirements.
8. Personal data will be subject to profiling in order to offer products and services tailored to the customer's needs. Profiling consists of Synevo assessing certain characteristics of the customer based on the customer's personal data so as to send the customer tailored messaging. We use the following data for profiling: age, gender, place of residence, place of performing tests, and, if you have given your consent, health data, including purchase history, information on performed tests and their results. Profiling will not have legal or similarly significant effects.
9. You have the following rights: to request access to personal data, to have your personal data rectified, erased, or to have the processing of your data restricted, the right to data portability, copying and to lodge a complaint with the supervisory authority - the President of the Office for Personal Data Protection. If we process personal data on the basis of a legitimate interest of the Controller, you have the right to object at any time to the processing of your personal data on the grounds relating to your particular situation.
10. With regard to the processing of data on the basis of consent, you may withdraw your consent at any time. Withdrawal of consent does not affect the compliance with the law of the processing that had been carried out pursuant to such consent before it was withdrawn.
To exercise your rights, please contact the Data Protection Officer at the address set out in point 2 above.