

## Ladies and gentlemen,

The information contained in this Privacy Policy will help you understand what personal data is collected and processed by the medical entity – Synevo sp. z o.o., for what purpose it is used and what rights you have in this regard.

The obligation to provide the following information arises from Articles 13 and 14 of 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; 'GDPR').

### 1. Administrator of Your Personal Data

The administrator of your personal data is Synevo sp. z o.o. with its registered office in Warsaw, ul. Zamieniecka 80/401, 04-158 Warsaw, a medical entity, registered in the Register of Entrepreneurs kept by the District Court for the Capital City of Warsaw, 14th Commercial Division of the National Court Register, under KRS number 0000235526, NIP: 527-24-71-288, Regon: 140136840.

- by post to the following address: Synevo sp. z o.o. ul. Zamieniecka 80/401, 04-158 Warszawa,
- by e-mail: [kontakt@synevo.pl](mailto:kontakt@synevo.pl)
- by telephone: [+48 22 120 24 00](tel:+48221202400)

### 2. Data Protection Officer

Synevo sp. z o.o. has appointed a Data Protection Officer who can be contacted:

- by e-mail: [iod@synevo.pl](mailto:iod@synevo.pl)
- by post to the following address: Inspektor Ochrony Danych, ul. Zamieniecka 80/401, 04-158 Warszawa.

### 3. Categories of personal data we process

The categories of data we process are based on the laws we're bound by and are needed to do the diagnostic test. The type of personal data we collect also depends on the type of diagnostic test. Not every test means we have to collect all the data listed below:

- Personal data: first name, surname, date and place of birth, PESEL (Personal Identification Number), identity document number and series for persons without a PESEL number, gender, age, address, parents' names, purpose of the examination.
- Sensitive data concerning health: diagnosis of a medical condition, medications administered, results of current and previous diagnostic tests, relevant medical documentation.
- Genetic data – in the case of genetic testing.
- Contact details – we may also obtain your telephone number and e-mail address. This data is not necessary for us to perform the tests, but it will enable us to contact you when necessary (e.g. to inform you of alarming results or the need to re-collect material for testing), and to provide you with medical documentation via electronic communication and through the MySynevo Service, as well as to inform you when the test results are ready for collection and to send you an access code to collect the test results on the MySynevo Service.
- Data concerning your place of employment – in the case of diagnostic tests covered by your employer's funding. In the case of tests covered by your employer's funding, Synevo does not disclose any personal data to your employer, in particular concerning your health, and the test results may be disclosed on the basis of your authorisation.

### 4. The source from which we obtain your data

The source of the above data may be:

- The patient, in which case we will obtain personal data directly from you,
- An entity providing medical services to you, which commissions Synevo to perform tests,
- An entity (natural person, legal person) that commissioned Synevo to perform tests, in particular by purchasing a test for you in an online shop or at a collection point.

### 5. Legal basis for the processing of personal data

The legal basis for the processing of your data in the field of medical activities, including the maintenance of medical records, is Article 9(2)(h) of the GDPR, in conjunction with the provisions of medical law, in particular: the Act of 15 April 2011 on medical activities, the Act of 6 November 2008 on the rights of patients and the Patient Ombudsman, and the Act of 15 September 2022 on laboratory medicine. The basis for data processing to the extent necessary to protect the vital interests of the patient is Article 6(1)(d) of the GDPR.

In the scope of bookkeeping and tax settlements, the basis is provided by tax law provisions, including, among others, the Accounting Act of 29 September 1994 and Article 6(1)(c) of the GDPR.

With regard to services provided electronically, your data may be processed on the basis of Article 6(1)(b) of the GDPR.

Within the scope of our legitimate interest, which is pursuing claims, defending against claims, settling accounts with your employer, handling complaints, submitted reports and opinions, telephone requests, ensuring the safety of persons and property, in particular through video surveillance, providing materials promoting products and services, conducting opinion and satisfaction surveys on our services, conducting surveys for analytical and statistical purposes aimed at managing the services we provide, and in the case of recording telephone conversations: enabling telephone contact, improving security, reliability and the level of customer service provided, and possible unambiguous assessment of the course of the conversation in disputes between the controller and the caller, your data may be processed on the basis of Article 6(1)(f) of the GDPR.

In terms of exercising your rights under the GDPR, your data may be processed on the basis of applicable law, in connection with Article 6(1)(c) of the GDPR.

### 6. Purpose of personal data processing

Personal data will be processed for the purpose of conducting medical activities by Synevo sp. z o.o., in particular for the purpose of providing medical services in the field of laboratory medical diagnostics, maintaining and providing access to medical documentation required by law, preventive healthcare, and managing the provision of these services.

Your data may also be processed for the purposes of bookkeeping and tax settlements, the provision of electronic services, including ordering tests and other products and services, as well as for the purpose of defending rights and pursuing claims.

If you contact us by phone, the calls will be recorded and stored, and the personal data provided during the call will be processed in order to improve the security, reliability, and level of customer service provided, as well as for the possible evaluation of the course of the conversation in situations of dispute between the administrator and the caller.

Personal data will also be processed for the following purposes: ensuring the safety of employees, persons, and property, in particular through video surveillance using image recording devices on the premises of our facilities, archiving your data in accordance with the law, processing requests concerning your rights under the GDPR, sending materials promoting products and services, conducting quality and service satisfaction surveys, creating statistics and summaries (including anonymous ones) that will be used to manage and optimize the level of services provided and to develop a business strategy,

handling complaints, opinions, and reports, handling your request by phone when you call us, e.g., to check the readiness of a result, verify data in your MySynevo account, or obtain assistance in logging into that account.

## 7. Automated decision-making

Synevo sp. z o.o. will not use automated decision based on profiling.

## 8. Access to your data

In addition to Synevo sp. z o.o., the following entities may have access to your data:

- Entities that process data on behalf of Synevo sp. z o.o., in particular entities providing medical services in connection with the continuation of treatment, payment processing companies, IT solution providers, other subcontractors acting as processors, in particular companies transporting biological material and medical documentation.
- Entities whose powers derive from applicable law, in particular the Act on the Rights of Patients and the Patient Ombudsman, e.g., the National Health Fund, insurance companies—with the patient's consent.
- Authorized state authorities that request access to your personal data.
- Persons authorized by you.

## 9. Period of personal data processing at Synevo sp. z o.o.

We are required to store medical records for at least 20 years, data processed for accounting and tax purposes is stored for 5 years from the end of the tax year. If we have processed data for the purpose of pursuing claims, we store it until the claims expire. We process data concerning your place of employment only for the time necessary to settle accounts with your employer, if a diagnostic test covered by your employer's financing has been performed.

Recordings from telephone call recording systems will be stored for up to 12 months, from the date of recording, recordings from video surveillance systems will be stored for up to 3 months, from the date of recording. In cases where a telephone or video surveillance recording constitutes evidence in proceedings conducted under the law, the storage period is extended until the proceedings are legally concluded.

After this period, paper documentation will be destroyed and electronic data will be deleted in a manner that prevents the identification of the Patient.

Personal data may be processed until a justified objection to data processing is raised due to a specific situation – in cases where we process your data on the basis of Article 6(1)(f) of the GDPR, i.e., our legitimate interest.

## 10. Transfer of data to third countries

As a rule, the personal data you provide will not be disclosed to entities based outside the European Economic Area (EEA), i.e. in so-called third countries. Your personal data may be transferred outside the EEA if the proper performance of the diagnostic test requires the involvement of subcontractors or associates of the Administrator based outside the EEA, as well as when using the services of suppliers based outside the EEA. In such cases, we transfer personal data with appropriate measures in place including the use of Standard Contractual Clauses approved by the European Commission or other safeguards indicated in Article 46(2) of the GDPR.

## 11. Rights of data subjects

You have the following rights under the GDPR: the right to object to the processing of data, right of access to your personal data, request the rectification of your personal data, request the restriction of the processing of personal data, request the erasure of personal data, transfer personal data and copies thereof.

However, due to applicable legal regulations, we will not be able to comply with all requests. In particular, Synevo sp. z o.o., as a healthcare entity, is required to store medical records for the period specified by law (Act on Patient Rights and the Patient Rights Ombudsman). Each request will be considered individually.

If you have any concerns regarding our processing of your personal data, please contact our Data Protection Officer so that we can take appropriate action.

You also have the right to lodge a complaint with the supervisory authority – the President of the Personal Data Protection Office - via the website [www.uodo.gov.pl](http://www.uodo.gov.pl) or at the following address: President of the Personal Data Protection Office.

## 12. Obligation to provide personal data

The use of Synevo sp. z o.o. medical services is voluntary, however, as a medical entity, we are required to maintain medical records in accordance with applicable law, therefore, failure to provide personal data will prevent us from accepting orders for laboratory tests.

Providing data for the purpose of using other types of services, or for the purpose of concluding a contract or handling a request, is voluntary, but failure to provide data will prevent us from performing services, concluding a contract or handling a request.

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