

INFORMATION NOTICE
ON HOW WE COLLECT, USE AND STORE INFORMATION ABOUT
OUR PATIENTS
INF-PR-10-3

1. PURPOSE

SYNLAB Lietuva UAB taking care of your data protection and valuing your privacy, aims to act transparently and provides all information about how we collect, use and store your personal data in compliance with the General Data Protection Regulation of the European Union (EU 2016/679), the Law of the Republic of Lithuania on the Legal Protection of Personal Data and other legal acts of the European Union and the Republic of Lithuania.

2. WHO IS RESPONSIBLE FOR PROTECTING MY INFORMATION?

SYNLAB Lietuva UAB (legal entity code 125375183, registered office address Kalvarijų st. 137A-15, Vilnius, e-mail address: LT.info@synlab.com, phone number +370 6 853 98 01) is responsible for the protection of your personal data.

3. WHY DO YOU COLLECT MY PERSONAL DATA?

This is necessary when you wish to conclude a contract for healthcare services with us, or to become a party in such a contract concluded with us. Please note that, pursuant to Article 6.725 of the Lithuanian Civil Code, the patient is always the party to a contract for personal healthcare services regardless of the form of such a contract (usually such a contract is concluded with the patient's consent for the provision of personal healthcare services) or for the method of payment for such services (through obligatory or voluntary health insurance, by the employer, by another person or personally).

We also have legal obligations in the areas of healthcare, taxes, accounting and others, which are related to information about the contracts concluded with natural persons and/or the provision of personal healthcare services.

For these reasons, we need to collect, use and store information about you.

4. WHAT INFORMATION SHOULD I PROVIDE TO YOU AND WHY?

To be able to conclude and perform a contract with us you must provide the following types of information:

- Identification data (name, surname, personal ID number, etc.) (where services are provided anonymously, an identifier should be provided);
- Data from your ID document;
- Contact information (address, e-mail address, telephone number, etc.);
- General demographic data (age, gender, etc.);
- Data about a relationship (where it is relevant due to the legal representative of the patient or due to medical inheritance issues);
- Health data, including data about your health history, personal healthcare services which were previously provided, tests and their results, and diagnoses insofar as they are needed in order to provide the services;
- Any other information necessary for the provision of the personal healthcare services (data about the payer for the provided services, various terms and conditions of the services, etc.)

In a case where we do not receive your relevant information, we shall not be able to provide the personal healthcare services to you.

In a case where you want the provided services to be covered by your insurance company, employer or any third person who has concluded a contract with us, or who shall pay for the services under any other grounds set forth by law, you should provide us with the data about such an insurance company, employer or third person. In a case where you do not provide this data, you will have to cover the cost of the services at your own expense.

In order to evaluate and ensure the quality and efficiency of our activities, we collect data on your satisfaction with the quality of provided services, which is necessary to ensure the minimum quality requirements for personal health care services.



If you give your consent, we will collect other contact data (address, telephone number, e-mail address) about you or about any other person who collects the results of the test, in order to be able to present the results of the tests. If we do not receive your consent, you can collect the results of the test in person at our location.

5. WHAT INFORMATION DO YOU COLLECT ABOUT ME FROM OTHER SOURCES?

For the purpose of the payment for the provided services from the obligatory health insurance fund we may obtain information about you from your insurers, finance companies or other third persons who have undertaken to cover cost of the services provided to you.

We may also obtain information about your health condition and health history from other healthcare institutions where you were a patient, insofar as it is necessary in order to provide the services properly.

6. WHAT IS THE LEGAL BASIS FOR COLLECTING MY PERSONAL DATA?

We collect the information about you legally because your information is necessary for the following:

- To conclude and perform a contract with you, and to provide personal healthcare services (GDPR 6(1)(b), 9(2)(h));
- To perform legal obligations in the areas of healthcare, taxes, accounting and others (GDPR 6(1)(c)).

7. DO YOU COLLECT SENSITIVE INFORMATION ABOUT ME?

We can collect sensitive information about your racial or ethnic origin, genetic data, biometric data, health data, as well as information about your sexual life and sexual preferences, insofar as it is necessary in order to provide safe and high-quality healthcare services (GDPR 9(2)(h)).

8. DO YOU MAKE AUTOMATIC DECISIONS? ARE YOU PROFILING ME?

Automatic decisions are not made, and you are not profiled.

9. DO YOU GIVE MY PERSONAL DATA TO OTHERS?

Information about you can be forwarded to:

- State authorities (State Tax Inspectorate, SODRA (State Social Insurance Fund Board), Territorial Patient Fund, National Health Centre under the Ministry of Health, Centre of Infectious Diseases and AIDS, etc.) in the cases and to the scope stipulated in the legislation;
- Our service providers, e.g. the providers of archiving, information, communication, business management systems services, etc., who assume the related liabilities in the field of data protection as stipulated in the laws;
- Your insurers, finance companies and other third parties that cover the services provided to you, insofar as it is related to the payment for the services;
- Other medical laboratories, when the tests are conducted in other institutions;
- The persons you have indicated and issued written consent for obtaining your data;
- The insurers of our civil liability, whenever there is a dispute over the compensation for potential damage caused;
- The companies or law firms providing legal services;
- The public or private persons performing audits or inspections, who undertake the obligations regarding the non-disclosure of this data.

10. DO YOU TRANSFER MY PERSONAL DATA TO OTHERS OUTSIDE THE EUROPEAN ECONOMIC AREA (EEA)? The EEA consists of all EU member states and Norway, Iceland and Liechtenstein.

Usually, no information is transferred beyond the European Economic Area. If a test ordered by you is conducted by our partners in the United States of America, the data can be transferred to the company Verinata Health Inc., legal entity code: Federal ID 01-0577067, office address: 800 Saginaw Dr, Redwood City, CA 94063-4740 (a subsidiary of Illumina Inc.), which is included in the list of the *EU-US Privacy Shield*. The General Data Protection Regulation allows for the sending of data to the aforementioned companies because they ensure a high level of the protection of personal data.

11. HOW LONG DO YOU STORE MY PERSONAL DATA?



We store the information about you following the General Data Storage Periods Index approved by the Chief Archivist of Lithuania, as well as the periods for the storage of medical documents established by the legislation (by the Order of the Minister of Health of the Republic of Lithuania regarding the procedure for the accounting and reporting of the activities of healthcare institutions) or for the limitation period of a potential suit, depending on which period is longer.

12. WHAT ARE MY RIGHTS?

You have the following rights related to the protection of your personal data:

- To request access to the available information about you;
- To submit a request to correct the information about you;
- To submit an objection to the use of your contact data for the sending of inquiries and/or proposals of goods, services;
- To submit a request to delete the information about you that is being kept without any legal basis;
- To submit a request to limit access or the deletion of the information about you that is being kept without any legal basis;
- To challenge the collection, usage and storage of your information by our company;
- To submit a request to export your data;
- To submit a complaint to the State Data Protection Inspectorate.

Please note that these rights are subject to statutory conditions and exclusions. If you wish to exercise your rights above, or have any questions, comments or complaints about how we collect, use and store information about you, please contact us using the contacts listed in section 13.

Please note that in order to protect your health data:

- It is necessary to provide your personal document at the moment of submitting a request to our company (any territorial unit thereof);
- It is necessary to attach a notarised copy of your personal document to the request when sending it by post or via courier;
- Requests may be submitted by e-mail only if they are sent from the email address stated at the moment of your registration with the company;
- Your data may be transmitted by e-mail only if it is transmitted to the e-mail address stated at the moment of your registration with our company.

13. HOW CAN YOU HELP ME?

If you have questions, comments or complaints related to how we collect, use and store your personal data, please contact our Data Protection Officer by e-mail LT.DPO@synlab.com or by mail at the address Kalvariju st. 137A-15, Vilnius.

14. VALIDITY

Please note that we regularly review and update this information notice, taking into account changes in our operations and legal requirements.

Last update: 30/11/2022.

Approved by the CEO of SYNLAB Lietuva UAB 30-11-2022, No. 2022/11-PK082.