



EXTENDED PRIVACY NOTICE REGARDING THE PROCESSING OF PERSONAL DATA

As data controller, either directly or through its processors, **SYNLAB (hereinafter referring to as: Laboratoarele Synlab SRL - Bvd. Tudor Vladimirescu, no. 45, floor. 5, office no.1, Bucharest, District 5, phone: 0314.379.374, e-mail: office.ro@synevo.ro, www.synlab.ro, CUI 17656582, CMI Doctor Iacobescu C. Anca SRL - Bvd. Tudor Vladimirescu, no. 45, floor. 4, office no.4, Bucharest, District 5, phone: 0314.379.374, e-mail: office.ro@synevo.ro, www.synlab.ro, CUI 25693115, CMI Dr. Marinescu Dana-Mihaela SRL - str. Cetatea Histriei no.12, Buchrest, District 6, phone: 0314.379.374, e-mail: office.ro@synevo.ro, www.synlab.ro, CUI 31067060, Zostalab SRL - Bvd. Tudor Vladimirescu, no. 45, floor. 4, office no.3, Bucharest, District 5, phone: 0314.379.374, e-mail: office.ro@synevo.ro, www.synlab.ro, CUI 32393048)** processes personal data in accordance with the principles and applicable legislation on personal data protection. In order to make sure that the data subjects are fully informed about the aspects of data processing and their rights under the applicable law, SYNLAB will make available all the information provided by the law regarding this processing, which you should read carefully.

Purposes and lawful basis: SYNLAB processes its **patients'** personal data through manual and automated systems, for the following purposes:

- (1) within the medical act, for the provision of medical assistance, the performance of services such as the scheduling of appointments, collecting samples, generating test reports and performing the tests requested by the patients, the necessary counseling/consultations needed before and/or after testing (as applicable), communicating the test report results, informing the referring physician (as applicable), reporting the results in case of critical values, other reporting activities, managing healthcare services;
- (2) carrying out the contractual relationship with the patients, including the billing operation, payment processing, and debt collection, as well as the improvement of our services;
- (3) by requesting feedback for the performance of the contract or fulfilling the legitimate interests of Synlab. Certain personal data categories of patients' are processed by Synlab based on its legal obligations under specific applicable legislation, such as healthcare, finance and accounting, tax and archiving law;
- (4) if you expressed your consent for direct marketing with processing of digital interaction data, the lawful basis for processing is consent;
- (5) Based on the contractual relationship with the patients, before or after the data retention periods have expired, or following a request to delete data or withdraw consent, Synlab may anonymize the data (thus removing its identifying characteristics) and continue to process anonymous data for statistical purposes.

Synlab processes the personal data of the legal representatives (parents, guardians, trustees) of minor and adult patients without legal capacity/ close relatives/ spouses/authorized persons and healthcare professionals for the purpose of performing services to the patients they represent based on their legal obligations, the execution of the contract or in order to fulfil the legitimate interests of Synlab or for marketing purposes based on the given consent.

Patients' personal data categories that may be processed are: (i) general personal data – identification data (e.g. last name, first name, gender, age, date of birth, signature, customer identification code), contact data (e.g. phone number, e-mail address), personal data regarding the address (e.g. domicile/ residence address), data resulting from the identity document, including a copy of the document, where applicable, (e.g. personal identification number - PIN, citizenship, any other identity data on the ID card), civil status documents, including a copy of the document, where applicable, (e.g. marital status), professional data (e.g. profession, occupation, the capacity as insured and other information deriving from such capacity), financial and solvency data (e.g. bank details, information regarding the contract) and image; (ii) special personal data – data concerning health (e.g. data resulting from the medical referral, medical data, information regarding the medical history on being infected with Covid-19 and on Covid-19 vaccine, information regarding the medical history) genetic data and data regarding ethnic origin. Regarding the **legal representatives (parents, guardians, trustees) of the minors and adults without legal competence/ close relatives/ husbands/ wives/ authorized persons and healthcare professionals**, the following personal data categories can be processed: identification data (first name, last name, signature, domicile), professional data (e.g. profession, workplace), contact data (e-mail address, phone), data from the ID card (e.g. PIN, any other identity data on the ID) and image.

When the patient (personally or represented by the persons mentioned above) requests the communication of the results in electronic format, depending on the options expressed by the patient, the categories of data that may be processed are: (i) for e-mail communications: general personal data - identification data (e.g. last name, first name, gender), contact data (e-mail address); in addition (ii) for the accounts based on the test request: general personal data – financial data (e.g. details from the test request, including bank information), identification data (client code,



contract details, user and password) and contact data (email); in addition (iii) for web accounts: personal identification number (PIN), e-mail address.

If you expressed your consent for direct marketing, the following personal data categories may be processed: name, surname, email address, gender, phone number, age, date of birth, address, shopping cart, including its value, location visited, number of visits to the reception, date of visits to the reception, services purchased, data on marketing campaigns that have been addressed to him/her and previously accessed, the communication channel chosen, the payment method chosen, whether or not there is a referral from the doctor, details of interaction with the account of accessing your test results (e.g. how often he/she uses the account, most frequently visited sections, existence of the account with access to medical data, any other such information regarding interaction with the account as new features are developed), any other information the data subject provides, as well as tracking data (hereinafter also referred to as device data and/or digital interaction data) in order to analyze the degree of interest that commercial communications represent for the recipient (e.g. IP address, clicks, views, location, device). Withdrawal of consent may take place at any time and will take effect for the future, without affecting the lawfulness of the processing previously carried out.

Recipients: The processed data may be disclosed/ transferred to: other companies within the group to whom SYNLAB belongs, contractual partners assisting SYNLAB in the performance of its activities, authorized entities, referring physicians, insurance companies, Health Insurance Authorities, other public authorities. The personal data may be transferred outside Romania, to countries from the European Economic Area or to non-EU countries. Currently the data may be transferred to Turkey and to the USA. We will always ensure data protection in the context of the transfer to non-EU countries by implementing the standard clauses approved by the Commission or by implementing other guarantees acknowledged by Regulation (EU) 2016/679.

Affiliates and partners: SYNLAB will not transfer personal data to its affiliates and partners, but if you have given your consent to receive the aforementioned marketing communications, you may receive commercial messages from SYNLAB regarding their activities.

Processing duration: The personal data of the patients and/ or of the persons mentioned in the **Data Categories** section shall be processed for the duration required for the performance of the medical act, the performance of the contract, debt recovery, where applicable, and afterwards, to the extent necessary, for the fulfilment of the legal obligations, including the obligations applicable to archiving, and also when there is a legitimate interest of SYNLAB (such as the improvement of services, to settle any received complaints, performing internal statistics, to defend the rights and interests). If you expressed your consent for direct marketing activities, the data may be processed for that purpose until the right to object is exercised or the withdrawal of consent. The withdrawal of consent will take effect for the future without affecting the lawfulness of previous processing.

Rights: In the context of personal data processing you have the following rights, under the conditions set by the law, the right to: be informed, access to data; rectification; erasure of data, restriction of processing; data portability; object; the right not to be subject to a decision based solely on automated processing; the right to address the National Supervisory Authority or the competent courts, as applicable. After completion of the duration for the retention period or as a result of a request to delete data, SYNLAB may decide to render the data anonymous (thus depriving them of the identification character) and to continue the processing of anonymous data for statistical purposes.

For further details on the processing activities carried out by SYNLAB and on the related rights, you can contact us at: dpo.ro@synevo.ro or at the address mentioned in paragraph 1 of this Note. You can also consult the Privacy Policy on the website at <https://www.synlab.ro/politica-de-confidentialitate>.

In the event that the email address provided belongs to another person, or in the event that transmission to the referring physician, other third parties, or disclosure of other personal data belonging to other data subjects is requested (including when patient data is provided by the persons mentioned in the Data Categories section), you confirm that you have informed these persons about how their personal data will be processed, their rights under the law, and that you have obtained their consent for this operation (as applicable), so that the processing (e.g., in the context of medical care, for the transmission of test results) can be carried out without further formalities on the part of SYNLAB.