



Information Notice Healthcare Professionals Version 1.4 10/12/2018

## INFORMATION NOTICE ABOUT DATA PROTECTION TO HEALTHCARE PROFESSIONALS

### Identity and contact details of Data Controller

This information notice has been created in accordance with what is stipulated in the EU regulation (UE) 2016/679 approved by the EU Parliament on 14 April 2016 (GDPR) and relevant national data protection law.

According to the above regulations, your personal data will be processed by EUROPEAN TELEMEDICINE CLINIC, S.L. (TMC), C/Marina, 16-18, floor 21, 08005 Barcelona, Spain, by the company that you have an agreement with and the company you are in daily contact with during Service Delivery. Please refer to the Appendix A to have the full contact details of the TMC companies.

### Purpose and Legitimation

TMC will proceed to deal with the data in a lawful, loyal, transparent, appropriate, pertinent, limited, accurate and up-to-date manner, committing itself to take all reasonable measures to be abolished or rectify without delay when inaccurate.

Your personal data will be processed for the following purposes and in accordance with the legal basis as set out below:

Purposes	Legal bass
Register referrals and samples	Performance of a contract
Interpret results and report	
Send report and images to client (and/or statutory bodies)	
Manage relationship with Health Facilities, Hospitals, Health Professionals, and Patients	
Invoice clients for services performed and perform credit control activities	
Manage quality (Quality management include: quality processes when performing medical diagnosis activities, manage quality documentation, manage quality audits, Training of internal staff to quality standards, manage non-conformities and claims, and perform continuous improvement activities)	Compliance with a legal obligation when applicable, including maintenance of external quality certifications.  Otherwise legitimate interest of TMC to maintain and improve operational standards and customer satisfaction

<b>Purposes</b>	<b>Legal bass</b>
Develop product and process	Legitimate interest of TMC to improve its business and its customers satisfaction.
Invoice clients for services performed and perform credit control activities	Performance of a contract
Manage contact with customers and prospects	Legitimate interest of TMC to develop its relationship with clients/prospects
Manage client satisfaction surveys	
Communicate to clients and prospects (including newsletters and promotional information)	

**Profiling**

Your preferences and interests will be evaluated and analyzed in order to offer you tailored communications which we believe you will be interested in.

**Categories of recipients of the personal data**

Your personal data will be shared with the following recipients:

- Within TMC Group, including other TMC companies: with authorised personnel in charge of Operations, Accounting & Finance, IT and commercial.
- With Unilabs group: with authorised personnel in charge of Operations, Accounting & Finance, IT and commercial.
- With service providers acting on our behalf and assisting us in the management of our activities.

**Retention period**

In accordance with applicable data protection law, your data is retained during the validity of the contract, and after that for 5 years, any relevant document for commercial purposes 6 years and for tax purposes 10 years.

**Transfer**

Your personal data may be transferred to companies that provide us with support to send out surveys and to manage contacts ( for example the CRM - Client Relationship Management system).

Due to the international dimention of TMC and Unilabs your personal data may be transferred to Australian Telemedicine Clinic, Pty Limited and to Unilabs Switzerland, when so required, for purposes connected with the employment or the management of the company’s business.

According to the data protection regulation, to ensure the protection of your personal data, TMC put in place relevant safeguards such as the signature of data transfer agreements based on the standard contractual clauses issued by the European Commission. Please write to the following address if you wish to obtain copies of such contracts:

[Dataprotection@telemedicineclinic.com](mailto:Dataprotection@telemedicineclinic.com)

## **In relation to your personal data, you have the following rights**

- A right of access that you may exercise by asking a copy of your personal data;
- A right to correct your personal data if they are inaccurate or incomplete and a right to obtain the restriction of the processing of your personal data;
- A right to erase your personal data, in cases where your personal data are processed on the basis of your consent, the performance of a contract to which you are party and our legitimate interests;
- A right to data portability, in cases where your personal data are processed on the basis of your consent and/or the performance of a contract to which you are party;
- A right to object, on grounds relating to your particular situation, to the processing of your personal data in cases where your personal data are processed on the basis of our legitimate interests.

You may also object to the processing of your personal data for direct marketing purposes and to the profiling that is related to such direct marketing by contacting us at the below address or by using the unsubscribe link provided in each communication.

## **Means of exercising rights**

To exercise the rights, you should contact the Company by means of an email to [dataprotection@telemedicineclinic.com](mailto:dataprotection@telemedicineclinic.com) or in writing to C/ Marina, 16-18, Pl. 21, 08005, Barcelona, Spain providing a copy of your Identification card, and indicating the full address - email with the purposes of notifications related to the requests from TMC, and specifically pointing out the data on which the right in question exercises. However, you are hereby informed that the exercise of some of the abovementioned privacy rights could hinder or impede the performance of the purposes before indicated.

## **Right to lodge a complaint with DPA**

You have also the right to lodge a complaint with a Data Protection Authority, either in the Member State of your habitual residence, place of work or place of an alleged infringement of the GDPR.

## **Contact details of the Data Protection Officer**

You may also contact the TMC – Unilabs DPO in writing to: [dpo@unilabs.com](mailto:dpo@unilabs.com)



## Appendix A TMC Companies

EUROPEAN TELEMEDICINE CLINIC, SL, whose registered office is at C/ Marina 16-18, 08005 Barcelona, Spain, and Organisation and Tax number ESB62799689 ("**ETMC**").

TELEMEDICINE CLINIC Ltd, whose registered office is at Mazars, 45 Church Street, Birmingham West Midlands B3 2RT, UK, and Registration number 06958314 ("**UKTMC**").

TELEMEDICINE CLINIC SKANDINAVIEN AB, with registered office at BDO, BOX 24115, 118 94 Stockholm, Sweden, Registration number: 556907-6358

AUSTRALIAN TELEMEDICINE CLINIC PTY LIMITED, whose registered office is at 13th floor, 25 Bligh Street, Sydney NSW 2000, Australia, and Registration number ABN: 99125092597 ("**ATMC**").