

Information notice about data protection to patients

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In a nutshell:

- **We are contracted by your healthcare provider to provide radiologist services.**
- **We will use your data as expressly mandated by your healthcare provider for which they are responsible.**
- **We also use your data under our responsibility:**
 - to ensure the quality of our services,
 - to deal with discrepancies,
 - for investigation purposes and
 - to anonymise your personal data so it can be used for training, research and analysis purposes.
- **As we do not have direct contact with you, we have asked your healthcare provider to inform you directly of this information notice (we also call it "notice"), and it is important that you read it.**



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Identity and contact details of TMC

This notice has been created in accordance with the "data protection laws". For us, this is 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 data protection laws, your personal data will be processed by EUROPEAN TELEMEDICINE CLINIC, S.L. C/Marina, 16-18, floor 21, 08005 Barcelona, Spain and associated organisations (we refer to all of our entities as "TMC", "we", or "us");:

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

Healthcare organisations in UK, Spain, Denmark and Sweden have signed Service Agreements with TMC for the provision of diagnostic reporting of radiology and pathology scans, for which TMC processes your personal data under the instructions of the healthcare organisations. When we do this we are a data processor and the healthcare organisations are your data controller.

We do not have direct contact with the patients. Therefore, we have asked your healthcare organisation to inform you about our processing.

Safeguards for the processing of patient data are in place at TMC and implemented as per instructions from the Controllers.

Purpose and Legitimation

When we process our personal data under the instructions of your healthcare provider

Due to the services we provide, your healthcare provider will share PACS and RIS services¹ with us so we provide them with the radiological diagnostic reports that you as a patient need. If requested by your healthcare provider, we will also use your data to investigate any discrepancies or claims, or for your healthcare provider to comply with its obligations.

¹ RIS means Radiology Information System, and PACS means Picture Archiving Communication system, both applications are used to perform the diagnosis of the radiology images.



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As a data processor, we will proceed to deal with your data in a lawful, loyal, transparent, appropriate, pertinent, limited, accurate and up-to-date manner, and we commit ourselves to take all reasonable measures to be abolished or rectify without delay when inaccurate.

When we process your personal data as your data controller

We will also process your personal data will for the following purposes and in accordance with the legal basis and retention periods as set out below:

Purposes	Legal basis	Retention period
Manage quality (Quality management include: quality processes when performing medical diagnosis activities, manage quality documentation. Training of internal staff to quality standards, and perform continuous improvement activities)	Legitimate interest to maintain and improve our operational standards and customer satisfaction.	5 years after termination of contract with your healthcare provider
Manage non-conformities (incidents) and complaints	Incident Management	5 years after termination of contract with your healthcare provider
Manage legal claims	Legitimate interest to establish, exercise or defence of legal claims	5 years after termination of contract with your healthcare provider
Develop product and process	Legitimate interest to improve its business and its customers satisfaction	5 years after termination of contract with your healthcare provider
Invoice clients for services performed and perform credit control activities	Performance of a contract	Maximum 10 years but bear in mind it can be shorter periods according to local legislation

If you want to know more about exact retention periods applicable to your country, contact us [here](#).

Indirect collection of data

Categories of personal data indirectly collected	Source
Identification data	Referral and clinical information obtained through your healthcare provider
Health data	

Categories of recipients of the personal data

Your personal data will be shared with service providers acting on our behalf and assisting us in the processing of our activities.

Transfer

Due to the international dimension of the TMC Group and depending on the Service Agreement TMC has with your healthcare provider, your personal data may be transferred outside of the European Union to Australian Telemedicine Clinic located in Sydney, Australia.

According to the data protection laws, to ensure the protection of personal data, we have 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 more information:

Dataprotection@telemedicineclinic.com

Data Subject Rights

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



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Means of exercising rights

To exercise the rights related to diagnostic services please contact your healthcare organisation in first place. , To exercise the rights related to the purpose we listed above ([click on link to see list](#)), for which we are responsible, contact us by means of an email to dataprotection@telemedicineclinic.com or in writing to European Telemedicine Clinic S.L., 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.

Please be aware that some of your data protection rights are subject to limitations. We will inform you if this applies when responding to your request.

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 data protection laws.

Contact details of the Data Protection Officer

We have appointed a Data Protection Officer.

You may also contact the TMC – Unilabs DPO in writing to:

dpo@unilabs.com