

## Information notice about data protection to patients

### Contents

Information notice about data protection to patients .....	1
In a nutshell .....	1
Identity and contact details of TMC .....	2
When we process our personal data under the instructions of your healthcare provider.	2
When we process your personal data as your data controller .....	3
Indirect collection of data .....	4
Categories of recipients of the personal data .....	4
Systems and tools .....	4
Transfer .....	4
Data Subject Rights .....	5
Means of exercising rights .....	5
Right to lodge a complaint with the Data Protection Authority .....	5
Contact details of the Data Protection Officer.....	5

### In a nutshell:

- **We are contracted by your healthcare provider to provide radiologist services.**
- **We use your personal data:**
  - **To provide radiologist diagnosis,**
  - **to ensure the quality of our services,**
  - **to deal with discrepancies,**
  - **for investigation purposes and**
  - **we use an anonymised version of your personal data for training, research and analysis purposes to improve the quality of our services.**
- **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.**

**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 33, 08005 Barcelona, Spain and our associated organisations (we refer to all of our entities as "TMC", "we", or "us"), which are:

- TELEMEDICINE CLINIC Ltd, whose registered office is at Mazars, 2 Chamberlain Square, Birmingham , B3 3AX, UK, and Registration number 06958314 ("**UTMC**"). Visitor's office is in Davidson House, Forbury Square, Reading, RG1 3EU
- 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 and visitor's office is at 13th floor, 25 Bligh Street, Sydney NSW 2000, Australia, and Registration number ABN: 99125092597 ("**ATMC**").

Healthcare organisations in the United Kingdom, Spain, Denmark and Sweden have signed Service Agreements with us to provide diagnostic reporting of radiology scans for which we need to process your personal data.

We are responsible for ensuring that your personal is handled in compliance with the data protection laws, and here we inform you about how we do it and your rights.

Sometimes, your healthcare provider may give us specific instructions on how we must use your data for a purpose, in which case they will let you know as they will be responsible for your data in those cases.

To keep your data secure, we have implemented safeguards in our organisation. These safeguards are discussed with your healthcare provider to ensure that they also are aligned with your healthcare provider's standards.

We do not have direct contact with patients like you. Therefore, we have asked your healthcare organisation to give you a copy of this notice or let you know where you can find it. Type of data, Source, 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 services<sup>1</sup> 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. When we use your data for these purposes under our discretion, we will do so according to the legal basis and retention periods set out in the table below. However, if to produce radiological diagnostic reports we use your data under precise written instructions of your healthcare provider (for example, as to how to access your data and how to produce the diagnosis report), then we will be a "data processor" and as a data processor and the legal basis to use

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

Information Notice Patients Version 1.5 31/01/2023 in English

your data as well as the periods during which your data will be stored will be determined by your healthcare provider.

In any case 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:

Type of data	Purposes	Legal basis	Retention period <sup>2</sup>
Identification data Hospital accession data Health data Location data	Develop radiologist diagnosis services	Provision and management of health care services.	10 years after provision of diagnosis report.
Identification data Hospital accession data Health data Location data	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.  Health care provision and management.	5 years after termination of contract with your healthcare provider
Identification data Hospital accession data Health data Location data	Manage non-conformities (incidents) and complaints	Incident Management	5 years after termination of contract with your healthcare provider
Identification data Hospital accession data Health data Location data	Manage legal claims	Legitimate interest to establish, exercise or defence of legal claims	10 years after termination of contract with your healthcare provider or as long as an ongoing legal claim last.
Identification data Health data (Unless data is anonymised)	Develop product and process	Legitimate interest to improve its business and its customers satisfaction	5 years after termination of contract with your healthcare provider

<sup>2</sup> \*Please note that these are TMC estimated retention periods used to provide you with a reference. They may slightly vary for each territory. If you want to know more about exact retention periods applicable to your country, contact us [here](#).

Information Notice Patients Version 1.5 31/01/2023 in English

Type of data	Purposes	Legal basis	Retention period <sup>2</sup>
Identification data Hospital accession data Health data	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
Identification data Any other relevant data	Perform internal and external audits to assess level of internal control and comply with regulations.	Legitimate interest of TMC to assess level of internal control and to ensure that TMC complies with all applicable regulations.	10 years after the performed audit.
Identification data	Register referrals and samples	Legitimate interests of TMC to maintain and improve services quality standards and customer satisfaction. Provision of health care services and medical diagnosis.	Maximum 10 years

### 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 such as IT services providers, external consultants and between our TMC entities.

### Systems and tools

TMC uses state of the art systems and procedures to process patient data. The Radiology Information System used by TMC (Optemis) has been developed in-house and we use Sectra PACS to manage the radiology images, as well as several advanced ad-ins (including AI tools) to support the radiologists when performing the diagnosis.

### 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.

To provide you with best quality services we use services providers, some of which process your personal data from countries such as the United States, where the level of protection of your personal data requires the implementation of additional measures. 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 or (in the United Kingdom) the Information Commissioner's Office (ICO). Please write to the following address if you wish to obtain more information: [Dataprotection@telemedicineclinic.com](mailto: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

## 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](mailto:dataprotection@telemedicineclinic.com) or in writing to European Telemedicine Clinic S.L., C/ Marina, 16-18, Pl. 33, 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 the Data Protection Authority

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.

In Spain, this is the "[AEPD](#)".

In the United Kingdom, the "[ICO](#)".

In Denmark, the "[Datatilsynet](#)".

In Sweden, the "[IMY](#)".

In Norway, the "[Datatilsynet](#)".

## Contact details of the Data Protection Officer

We have appointed a Data Protection Officer who you can contact by email:  
[dpo@unilabs.com](mailto:dpo@unilabs.com)