

TMC, a Unilabs company – Information Notice

INFORMATION NOTICE TO WEBSITE VISITORS

Pursuant to Regulation (EU) 2016/679 of the European Parliament and the Council of April 27, 2016 (hereinafter "GDPR"), we notify you that all personal data that the User provides through the Website www.telemedicineclinic.com (hereinafter, the "Website") will be incorporated and processed in the files property of the company EUROPEAN TELEMEDICINE CLINIC, S.L., (hereinafter, "TMC") in order to be able to respond to your requests and keep you informed, including by electronic means, about our products and services, as well as to be able to manage enrolment and online participation in our Academy courses.

It is necessary to fill in all data requested through the Website in order to achieve optimum provision of the services that we make available to you. If you do not provide the data requested by TMC, then there is no guarantee that the information and services that we make available can be provided, are provided correctly or are adapted to the User's needs.

Section 1 – Identity and contact details of controller

According to the relevant data protection law, your personal data will be processed by:

EUROPEAN TELEMEDICINE CLINIC, SL, whose registered office is at C/ Marina 16-18, floor 33, 08005 Barcelona, Spain, and Organisation and Tax number: ESB62799689, ("ETMC").

Email address: dpo@unilabs.com

Section 2 – What personal data we collect

TMC collects the following personal data related to you:

- **Identification Data:** personal identification data (i.e. Mr/Mrs/Ms/Miss, first name, last name, gender), personal contact details (i.e. address, telephone number - home or mobile -, e-mail address, fax number), insurance data.
- **Traffic Data:** log data, IP address.

Section 3 – Purposes of the processing and legal basis

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

Purpose	Legal basis
Manage website and incoming queries and if needed, send information and conduct commercial research Respond to the User's requests and be able to keep them informed, including by electronic means, about our products and services, as well as the management of inscription and online participation in our Academy courses.	The processing is in the legitimate interests of TMC to improve and manage its website.
Completion of e-form related to queries	The processing is in the legitimate interests of TMC to give possibilities to individuals to contact TMC for any queries.
Commercialise services	The processing is necessary for the performance of a contract.
Do marketing and create business relations	The processing is in the legitimate interests of TMC to develop services.

Section 4 – Profiling or Automated Decision Making

Your preferences and interests expressed related to our Academy courses may be evaluated and analyzed in order to offer you tailored courses which we believe you will be interested in.

Section 5 – Indirect collection of data

Your personal data may also have been indirectly collected from different sources:

Categories of personal data indirectly collected	Source
Identification data	Cookies and web analytics service
Traffic data	

Section 6 – 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 commercial activities, management.
- Within Unilabs Group, including other Unilabs companies, with authorised personnel in charge of commercial activities.
- With service providers, acting on our behalf and assisting us in the management of our activities.

TMC may communicate the user's processed personal data to course mentors and other staff of Academy with whom we have a service contract and who are equipped with the proper technical and organizational measures to preserve the security and the privacy of the data, based on the applicable regulations concerning data protection.

Section 7 – Data retention period

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

When personal data is no longer needed or has reached its retention period it is deleted.

Personal data might be kept for a longer period where it is necessary in accordance with legal requirements.

We retain the data related to user accounts on the Academy platform for a total of five years from the last user login after which the user is first notified before the data gets deleted. On the Academy site where personal data is stored related to the user account the user can go in and delete their data by deleting their account. When a user account is deleted on the Academy site it is possible that copies of the data can still be present in encrypted backups for up to six months.

Section 8 – Transfer of personal data

Due to the international dimension of the TMC Group, your personal data will be transferred outside of the European Union to Telemedicine Clinic located in Sydney, Australia and to New Zealand, Auckland.

As TMC is part of the Unilabs group, the data may also be transferred to the headquarters in Switzerland, which is a country recognized as ensuring an adequate level of protection.

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 or, in the United Kingdom, the Information Commissioner's Office. If you wish to obtain more information, please write to the following address: dpo@unilabs.com.

Section 9 – Data subjects rights

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

- **(a) Right to object:** You can object to our processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this basis. Please contact us, providing details of your objection.
- **(b) Access to your personal data:** You can request access to a copy of your personal data that we hold, along with information on what personal data we use, why we use it, who we share it with, how long we keep it for and whether it has been used for any automated decision making. You can make a request for access free of charge. In compliance with the GDPR, we will respond to a valid subject access request without undue delay and at the latest within one month of receiving the request. In some circumstances, we can extend the time to respond by a further two

months. For example, when the request is complex. In this case, we will let you know within one month of receiving your access request and explain to you why the extension is necessary.

- **(c) Consent:** Where you have given us your consent to use personal data, you can always withdraw your consent at any time. If you withdraw your consent, Unilabs will cease to process your personal data.
- **(d) Rectification:** You can ask us to change or complete any inaccurate or incomplete personal data held about you.
- **(e) Erasure:** You can ask us to delete your personal data where it is no longer necessary for us to use it, you have withdrawn consent, or where we have no lawful basis for keeping it.
- **(f) Portability:** You can ask us to provide you or a third party with some of the personal data that we hold about you in a structured, commonly used, electronic form, so it can be easily transferred.
- **(g) Restriction:** You can ask us to restrict the personal data we use about you where you have asked for it to be erased or where you have objected to our use of it.
- **(h) No automated-decision making:** Automated decision-making takes place when an electronic system uses personal data to make a decision without human intervention. You have the right not to be subject to automated decisions that will create legal effects or have a similar significant impact on you, unless (i) you have given us your consent (ii) it is necessary for a contract between you and us, or (iii) is otherwise permitted by law. You also have certain rights to challenge decisions made about you. We do not currently carry out automated decision-making in connection with our relationship with you, but we will notify you in advance if this changes.

Section 10 – Means of exercising

To exercise your rights please fill out the web form available at this [link](#).

You can also exercise your rights by sending an e-mail to the following address: dpo@unilabs.com.

The exercise of your rights is free of charge.

Section 11 – Contact details of the Data Protection Officer

If you have any comments or questions regarding this Privacy Notice or our data handling practices, please contact the Data Protection Officer.

Email: dpo@unilabs.com

Section 12 – Right to lodge a complaint with DPA

If you are unsatisfied with the way in which we have handled your personal data or any privacy query or request that you have raised to us and you didn't receive a satisfied answer by us and/or our DPO, you have the right to lodge a complaint with a Data Protection Authority (DPA).

Please consult the table below for the contact details of the DPAs of the countries where we are established.

Data Protection Authority	Contact Details
Data Protection Authority of Spain	Agencia Española de Protección de Datos (AEPD) C/Jorge Juan, 6 28001 Madrid Tel. +34 91 266 3517 Fax +34 91 455 5699 Email: internacional@aepd.es
Data Protection Authority of UK	The Information Commissioner's Office Water Lane, Wycliffe House Wilmslow - Cheshire SK9 5AF Tel. +44 1625 545 745 E-mail: international.team@ico.org.uk
Data Protection Authority of Denmark	Datatilsynet Carl Jacobsen Vej 35 2500 Valby Tel. +33 19 32 00 Email: dt@datatilsynet.dk
Data Protection Authority of Sweden	Integritetsskyddsmyndigheten Drottninggatan 29 104 20 Stockholm Tel. +46 8 657 6100 Fax +46 8 652 8652 Email: imy@imy.se
Data Protection Authority of Australia	The Office of the Australian Information Commissioner 175 Pitt Street Sydney NSW 2000 Tel. 1300 363 992 +61 2 9942 4099 Fax +61 2 6123 5145
Data Protection Authority of New Zealand	The Privacy Commissioner's Office Level 13, 15 Shortland Street, Auckland 1010 New Zealand Tel. 0800 803 909 Email: enquiries@privacy.org.nz

If you are located in the European Union, you have the right to lodge a complaint with the DPA of the Member State of your habitual residence, place of work or place of the alleged infringement.

To find the appropriate contact details of the Data Protection Authorities members of the European Data Protection Board, please visit the EU Commission's [directory of DPAs](#).