

Section 1 – Identity and contact details of controller

According to the relevant data protection laws and depending on your clinic's contract and the type of radiologists' services TMC provide, your data will be processed by one of the entities.

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").

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

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").

TELEMEDICINE CLINIC NEW ZEALAND LIMITED, with registered office at BDO Auckland, 4, Graham Street, Auckland Central, Auckland, 1010, New Zealand, Company number: 8595286, ("NZTMC").

Email address: dpo@unilabs.com

Section 2 – What personal data we collect

TMC collects the following personal data related to you:

- **Identification Data:** name, surname, gender, telephone number, e-mail address, home address, date of birth.
- **Professional Data:** working hours, job title, function, working department, rank, seniority, current position.
- **Financial Data:** bank account details, pay details.
- **Marketing and Communications Data:** your preferences in receiving marketing communications from us and our third parties.

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 relationship with Health Facilities, Hospitals and Health Professionals Manage relationship with healthcare facilities, hospitals and health professionals involves exchanging patient information such as medical records and test results to ensure coordinated and efficient care.	The processing is necessary for the performance of a contract.
Manage quality Quality management ensures the accuracy and reliability of test results through standardized procedures, regular calibration and maintenance of instruments, the implementation of internal and external quality controls and training of internal staff to quality standards.	The processing is in the legitimate interest of TMC to maintain and improve its operational standards and customer satisfaction.
Perform audits Perform internal and external audits to assess level of internal control and comply with regulations.	The processing is in the legitimate interests of TMC to assess levels of internal control and is necessary to comply with all applicable regulations.
Process payments Payment and invoice processing involves issuing invoices for services or products provided, then receiving and recording payments, and maintaining accurate accounting and financial records.	The processing is necessary for the performance of a contract and to comply with legal obligations.

<p>Communicate with existing and potential customers</p> <p>Communicating with existing and potential customers involves collecting and analysing customer information to create targeted communication strategies such as email marketing, social media and advertising campaigns.</p>	<p>The processing is in the legitimate interests of TMC to develop and improve its services and business (in the case of potential customers may, under certain conditions, be a legal basis for consent).</p>
<p>Manage the relationship with clients and prospects</p>	<p>The processing is in the legitimate interests of TMC to develop and improve its services and business.</p>
<p>Management of Medical diagnosis of patients (registration of referrals, management of images, reporting, distribution of report, communication with staff during process)</p>	<p>The processing is necessary for the performance of a contract.</p>
<p>Develop product and process</p>	<p>The processing is in the legitimate interests of TMC to improve its business and its customers satisfaction.</p>
<p>Managing non-conformities (incidents) and claims Manage legal claims</p>	<p>The processing is in the legitimate interests of TMC to manage incidents, and as necessary to establish, exercise or defend legal claims.</p>

Section 4 – Profiling or Automated Decision Making

Not applicable – no profiling or automated decision making are involved in the processing activities of your personal data.

Section 5 – Indirect collection of data

To increase our network, manage contact with clients and prospects and due to our legitimate interest in developing our relationship with clients and prospects, we process information that we obtain indirectly from, for example, webpages we visit as detailed in the table below.

Categories of personal data indirectly collected	Source
Identification data	Healthcare organisations websites
Professional contact details	

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

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 of time where it is necessary in accordance with legal requirements.

Please consult the specific retention periods below.

Type of data	Purposes	Retention period
Identification Data Professional Data	Manage relationship with Health Facilities, Hospitals and Health Professionals Manage quality	Up to 10 years after termination of the contract
Identification Data Professional Data	Perform audits	10 years following the undertaking of an audit
Identification Data Financial Data	Process payments	10 years following the year when data was obtained
Identification Data Professional Data Marketing and Communications Data	Communicate with existing and potential customers	For the duration of the contractual relationship

Section 8 – Transfer of personal data

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

To provide you with the best quality services, we use service providers such as Enterprise Resource Planning (“ERP”) software services provider, for example to raise and manage invoices, with presence in other 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, 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, TMC 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	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 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](#).

29.04.2024