

## INFORMATION NOTICE ON HOW WE COLLECT, USE AND STORE INFORMATION ABOUT **OUR PATIENTS** INF-PR-10-2

SYNLAB Lietuva UAB takes care of the protection of your information. We comply with the European Union General Data Protection Regulation (GDPR) and the other laws designed to protect your information. Read this notice carefully, in order to learn more.

### 1. Why should I read this notice?

This notice will answer some key questions about how we collect, use and store the information about you. If you have any questions, or if any part of this notice is unclear, our Data Protection Officer is ready to assist you as described in Section 13 of this notice. Please note that any form of "we" in this notice means our Company, as described in Chapter 2 of this notice.

### 2. Who is responsible for protecting my information?

We are: SYNLAB Lietuva UAB;  
Legal entity code: 125375183;  
Our address is: Kalvariju St. 137A-15, Vilnius;  
E-mail address: [LT.info@synlab.com](mailto:LT.info@synlab.com)  
Our data protection officer: UAB Duomenų apsaugos tarnyba, [synlab@dat.lt](mailto:synlab@dat.lt)

### 3. Why do you collect information about me?

This is necessary when you wish to conclude a contract for healthcare services with us, or to become a party in such a contract concluded with us. Please note that, pursuant to Article 6.725 of the Lithuanian Civil Code, the patient is always the party to a contract for personal healthcare services regardless of the form of such a contract (usually such a contract is concluded with the patient's consent for the provision of personal healthcare services) or for the method of payment for such services (through obligatory or voluntary health insurance, by the employer, by another person or personally).

We also have legal obligations in the areas of healthcare, taxes, accounting and others, which are related to information about the contracts concluded with natural persons and/or the provision of personal healthcare services.

For these reasons, we need to collect, use and store information about you.

### 4. What information should I provide to you and why?

To be able to conclude and perform a contract with us you must provide the following types of information:

- Identification data (name, surname, personal ID number, etc.) (where services are provided anonymously, an identifier should be provided);
- Data from your ID document;
- Contact information (address, e-mail address, telephone number, etc.);
- General demographic data (age, gender, etc.);
- Data about a relationship (where it is relevant due to the legal representative of the patient or due to medical inheritance issues);
- Health data, including data about your health history, personal healthcare services which were previously provided, tests and their results, and diagnoses insofar as they are needed in order to provide the services;
- Any other information necessary for the provision of the personal healthcare services (data about the payer for the provided services, various terms and conditions of the services, etc.)

In a case where we do not receive your relevant information, we shall not be able to provide the personal healthcare services to you.

In a case where you want the provided services to be covered by your insurance company, employer or any third person who has concluded a contract with us, or who shall pay for the services under any other grounds set forth by law, you should provide us with

the data about such an insurance company, employer or third person. In a case where you do not provide this data, you will have to cover the cost of the services at your own expense.

In order to evaluate and ensure the quality and efficiency of our activities, we collect data on your satisfaction with the quality of provided services, which is necessary to ensure the minimum quality requirements for personal health care services.

If you give your consent, we will collect other contact data (address, telephone number, e-mail address) about you or about any other person who collects the results of the test, in order to be able to present the results of the tests. If we do not receive your consent, you can collect the results of the test in person at our location.

#### **5. What information do you collect about me from other sources?**

For the purpose of the payment for the provided services from the obligatory health insurance fund we may obtain information about you from your insurers, finance companies or other third persons who have undertaken to cover cost of the services provided to you.

We may also obtain information about your health condition and health history from other healthcare institutions where you were a patient, insofar as it is necessary in order to provide the services properly.

#### **6. What is the legal basis for collecting information about me?**

We collect the information about you legally because your information is necessary for the following:

- To conclude and perform a contract with you, and to provide personal healthcare services (GDPR 6(1)(b), 9(2)(h));
- To perform legal obligations in the areas of healthcare, taxes, accounting and others (GDPR 6(1)(c)).

#### **7. Do you collect sensitive information about me?**

We can collect sensitive information about your racial or ethnic origin, genetic data, biometric data, health data, as well as information about your sexual life and sexual preferences, insofar as it is necessary in order to provide safe and high-quality healthcare services (GDPR 9(2)(h)).

#### **8. Do you make automatic decisions? Are you profiling me?**

Automatic decisions are not made, and you are not profiled.

#### **9. Do you give information about me to others?**

Information about you can be forwarded to:

- State authorities (State Tax Inspectorate, SODRA (State Social Insurance Fund Board), Territorial Patient Fund, National Health Centre under the Ministry of Health, Centre of Infectious Diseases and AIDS, etc.) in the cases and to the scope stipulated in the legislation;
- Our service providers, e.g. the providers of archiving, information, communication, business management systems services, etc., who assume the related liabilities in the field of data protection as stipulated in the laws;
- Your insurers, finance companies and other third parties that cover the services provided to you, insofar as it is related to the payment for the services;
- Other medical laboratories, when the tests are conducted in other institutions;
- The persons you have indicated and issued written consent for obtaining your data;
- The insurers of our civil liability, whenever there is a dispute over the compensation for potential damage caused;
- The companies or law firms providing legal services;
- The public or private persons performing audits or inspections, who undertake the obligations regarding the non-disclosure of this data.

#### **10. Do you transfer any information about me beyond the European Economic Area (the European Economic Area consists of all member states of the European Union as well as Iceland, Norway and Liechtenstein)?**

Usually, no information is transferred beyond the European Economic Area. If a test ordered by you is conducted by our partners in the United States of America, the data can be transferred to the company Verinata Health Inc., legal entity code: Federal ID 01-

0577067, office address: 800 Saginaw Dr, Redwood City, CA 94063-4740 (a subsidiary of Illumina Inc.), which is included in the list of the *EU-US Privacy Shield*. The General Data Protection Regulation allows for the sending of data to the aforementioned companies because they ensure a high level of the protection of personal data.

#### 11. How long do you store the information about me?

We store the information about you following the General Data Storage Periods Index approved by the Chief Archivist of Lithuania, as well as the periods for the storage of medical documents established by the legislation (by the Order of the Minister of Health of the Republic of Lithuania regarding the procedure for the accounting and reporting of the activities of healthcare institutions) or for the limitation period of a potential suit, depending on which period is longer.

#### 12. What are my rights?

If you would like to take the steps mentioned below, please contact our Data Protection Officer as described in Chapter 13. Please note that these rights are subject to statutory conditions and exceptions.

- To request access to the available information about you;
- To submit a request to correct the information about you;
- To submit an objection to the use of your contact data for the sending of inquiries and/or proposals of goods, services;
- To submit a request to delete the information about you that is being kept without any legal basis;
- To submit a request to limit access or the deletion of the information about you that is being kept without any legal basis;
- To challenge the collection, usage and storage of your information by our company;
- To submit a request to export your data;
- To submit a complaint to the State Data Protection Inspectorate.

#### 13. How can you help me?

If you have any questions, comments or complaints about how we collect, use and store the data about you, our Data Protection Officer can help you. If you need help, please contact us by e-mail at: [synlab@dat.lt](mailto:synlab@dat.lt).

#### **Please note that in order to protect your health data:**

- It is necessary to provide your personal document at the moment of submitting a request to our company (any territorial unit thereof);
- It is necessary to attach a notarised copy of your personal document to the request when sending it by post or via courier;
- Requests may be submitted by e-mail only if they are sent from the email address stated at the moment of your registration with the company;
- Your data may be transmitted by e-mail only if it is transmitted to the e-mail address stated at the moment of your registration with our company.

#### 14. Confirmation

Approved by the CEO of SYNLAB Lietuva UAB 04-1-2022, No. 2022/01-PK002.