

DATA PROTECTION POLICY

Unilabs Middle East L.L.C

1st Floor, Block B,
Al Hudaiba Awards Building,

Dubai

P.O Box 57294,
and

Unilabs Diagnostics L.L.C

0 Floor, C18 Building, Corniche

Abu Dhabi

P.O Box 46520

(Hereinafter indifferently referred to as “**Unilabs UAE**” or the “**Data Controller**”), follows the "CARE BIG" principles of personal data protection. The latter means we always treat your personal data with the highest level of security and in accordance with the relevant data protection legislation. Where personal data processing is entrusted to a Third Party, we do so with utmost care to ensure that our data processors are subject to the due diligence regarding data protection enforceable by contractual provisions.

We consider the security and accurate processing of personal data to be of the utmost importance and therefore provide you with the following information on how your personal data are processed with regards to the Data Controller's e-commerce at <https://ae.unilabs.online/> hereinafter referred to as “Unilabs Online”).

1. Your Personal Data Controller's identity and contact details, Data Subject.

Your personal data you have provided or will provide to us as the Data Subject (when you register and create a user account on Unilabs Online), and as a Customer, and the personal data of a Third Party you have provided or will provide to us as a legal representative of the Third Party, the personal data that you have provided or will provide to us as a potential receiver of marketing communications and newsletters (hereinafter referred to as the “**Personal Data**” or “**Your Personal Data**”) will be processed by the Data Controller detailed below, in accordance with the relevant legislation on personal data protection:

Unilabs UAE has appointed a person responsible for personal data processing, available at any time via the e-mail address: dpo@unilabs.com. The responsible contact person may be contacted to assist you to exercise your data protection rights, and to answer any questions, requests, or suggestions regarding your personal data protection.

You and the Third Party that appointed you to be its legal representative are the Data Subject because Unilabs UAE will process your personal data.

The Unilabs Online e-shop was not designed for minor users, and the website Unilabs Online may not be used by them. However, the services offered through Unilabs Online may also be provided to minors, subject to the consent of the child's representatives.

2. Personal data processing

The Controller processes your personal data in accordance with the applicable data protection legislation, in particular in accordance with Personal Data Protection Law (PDPL), Federal Decree Law No. 45 of 2021 regarding the Protection of Personal Data, and ADGM Data Protection Regulations 2021 (“**DPR**”).

3. Scope of collected and processed data

The Data Controller processes all personal data in the printed and digital format provided by you, in particular:

- a) name, surname, birth certificate number, date of birth, age, sex, nationality, post address or business address (including the street, street number, town/city, post code, country), billing address (street, street number, town/city, post code, optionally the Company ID, Tax ID, VAT ID), email address, telephone number, history of purchased products and services, and other data provided when you register your user account and for the Third Party's account, to be used for the laboratory diagnostics services at Unilabs Online;
- b) information about your health condition and the health condition of the Third Party's you legally represent, especially the test results, treatment, and other relevant health-related facts, as well as data related to the healthcare procedure, the scope of provided healthcare, data on provided healthcare services, and relevant epidemiological data.

Unilabs UAE receives your personal data directly from you. In particular, the personal data (i) contact form completed on our website, or (ii) included in contracts you sign with us, or (iii) sent or communicated by you in the correspondence we exchange, or (iv) derived by us from other data you provide to us.

4. The purpose and legal regulations for your personal data processing by the Data Controller

The Data Controller processes the personal data only to the extent strictly necessary to create and use your user account or a Third Party's account, especially to book services, to conclude a contract on laboratory diagnostic services between you, the Customer, and the Data Controller, the Provider, on the website Unilabs Online, and to fulfil such contract on laboratory diagnostic services, healthcare and related services. The Data Controller process the personal data you provide, especially:

A. to create, manage and use your user account and the Third Party ' s account on Unilabs

Online, namely to:

- identify when your Unilabs Online user account is created and used;
- identify the Third Party which your legally represent, when you create a Third Party's account under your Unilabs Online account;
- to maintain, register, manage and administer your user account and the account of the Third Party you legally represent.

relevant legal regulations:

The processing of personal data for purposes explained in par. A) is conditioned by your voluntary **consent to the processing of your personal data**, necessary to create, manage and use your user account and a Third Party's account. To create and validate your user account and a Third Party's account it is necessary to book a test via Unilabs Online, and to have the booking accepted and completed.

You grant your consent by providing your personal data and ticking the personal data consent box. The consent may be withdrawn at any time. Please note that by withdrawing your consent your user account and the Third Party's account will be cancelled and you will not be able to place an order on the Unilabs Online website. A withdrawn consent does not affect the legal grounds for personal data processing based on your previous consent.

B. To perform the contract on laboratory diagnostic services, with the Customer (you) and the Data Collector as parties thereto, especially:

B1) to conclude and perform the contract, especially to:

- Identify you and the Third Party you legally represent, as the party(ies) to the concluded contract, to perform and terminate the contract;

- to perform the Data Controller's obligations and duties under such contract;
 - to prove, enforce, or defend the Data Controller's legal claims related under such contract;
 - to discuss how the contract is to be complied with;
- B2) to fulfil the Data Controller's legal obligation established by the contract, especially to :**
- record and provide information on the provision or delivery of healthcare or related services under the contract;
 - provide healthcare in compliance with the obligations under the contract;
 - fulfil obligations under the regulations on the National Healthcare Information System;
 - comply with tax and accounting regulations;
 - fulfil the obligation to report security incidents to individuals and authorities, or other competent bodies;
 - provide mandatory inspections and requests from public authorities;
 - process and respond to requests and complaints filed by Data Subjects, and related duties;

relevant legal regulations:

For the purpose referred to in par. B), your consent to provide your personal data and the personal data of the Third Party is voluntary, but necessary for the proper performance of the contract and the rights and obligations arising therefrom, and related appropriate healthcare services. To process personal data for the purpose defined in par. B), your consent is not required. The **legal regulations which allow the processing of your personal data:**

1) the contract on laboratory diagnostic services;

2) **generally binding legal regulations**, in particular UAE Health Data, Federal law 2, Federal law No:2, 2019 and Abu Dhabi Healthcare Information and Cyber Security Standard (ADHICS)

C. To fulfil the Data Controller's legal obligations under specific legal regulations, in particular to

- deal with check-ups, inspections and requests from the relevant public authorities;
- to comply with the basic principles on the processing of personal data and with the regulations, and to ensure personal data protection, to process it securely, to prevent data loss, destruction or unauthorised disclosure.

relevant legal regulations:

The legal basis for your personal data processing under par. C) is **the specific legal regulation**. In this case, your consent to the processing of your personal data is not required.

D. When applicable, to process data on other legal bases such as:

- when the processing is necessary for the purposes of occupational or preventive medicine in order to assess the employees' ability to work, for medical diagnosis, for health or social care, for treatment, for health insurance services or for the management of health or social care systems and services in accordance with the applicable legislation in the UAE;
- the processing is necessary for the protection of the public interest;
- when the processing is necessary to protect public health, including protection from communicable diseases and epidemics, or for the purposes of ensuring the safety and quality of healthcare, medicines, drugs and medical devices, in accordance with the applicable legislations in the UAE;
- when the personal data is necessary to perform a contract with the data subject or to take measures at the request of the data subject with the aim of concluding, amending or terminating a contract;
- when the processing is necessary to initiate or defend any claim or legal proceedings or when the processing is in connection with judicial or security proceedings;
- for direct marketing, to know your (Customer's) satisfaction with the quality and level of laboratory diagnostic and healthcare services provided by the Data Controllers, and its Unilabs Online activities, and to inform you about news, offers and business notifications on the Unilabs Online website.

E. For the purpose of marketing communication, especially:

- to inform you (i) about content; (ii) to send you questions and customer survey questionnaires to evaluate the Data Controller, its products and services; (iii) to send advertisements and emails;

relevant legal regulations:

The processing of personal data for the purposes explained in par. E), unless there is a legitimate interest, **your consent to the provision and processing of your personal data** is voluntary, but necessary in order to be informed by the Data Controller about its latest products, services, promotions or other commercial offers.

This consent is granted when you provide your personal data and tick the consent box to have your personal data processed for marketing purposes. You may withdraw your consent at any time by clicking the unsubscribe link at the end of each commercial email, or by sending an email to info@Unilabs Online. A withdrawn consent does not affect the legal grounds for personal data processing before such consent is withdrawn.

F. To send electronic newsletters, especially:

- to send (i) general advertisements, promotions and news, offers, information about the Data Controller's products, products offered by its partners (general newsletter); (ii) personalized ads (targeted newsletter);

relevant legal regulations:

Regarding the processing of personal data for purposes explained in par. F), unless there is a legitimate interest, your **consent to provide and have your personal data processed** is voluntary, but necessary in order to be informed by the Data Controller about products, services, events, healthcare news, medicines, or other of the Data Controller's offers and activities made available after you subscribe to the newsletter.

You can withdraw your consent at any time by clicking the unsubscribe link at the end of each newsletter, or by sending an email to info@Unilabs Online. A withdrawn consent does not affect the legal grounds for personal data processing based on your previous consent.

CONSENT TO NEWSLETTERS AND MARKETING CONTENT

By **registering**, you grant the Data Collector your consent to receive the newsletter in addition to a personalised newsletter. You also grant the Data Collector your consent to profiling - the collection and analysis of your personal data, by which we try to get as close to what you requested as possible and may be of interest to you, to address you with information tailored to you based on the creation of a personalised customer profile for a targeted newsletter (hereinafter referred to as '**personalized newsletter**'). The Customer may also object to this data processing at any time by clicking the unsubscribe link included in each newsletter or by contacting us at dpo@unilabs.com.

The Data Controller will create a profile based on the personal data you provide to us while using the services, or data the company obtains while using its services, or data you explicitly provide to us for this purpose specified in the wording of the consent, e.g. in a questionnaire, particularly the following personal data: name, surname, date of birth, contact details (correspondence address, e-mail address), purchase order history, reactions to previous orders, your interests and preferences, online identifiers and customer activity on the company website (e.g. use of cookies consented by customers), etc. This profile is the customer profile, which outlines the process of 'classifying' customers into several groups with similar profiles for the purposes of customised profiling, based on data processed by the Data Controller (i.e., it profiles its customers).

The primary goal of developing a customer profile, followed by classification into customer groups with similar profiles (i.e., customer segmentation) is to (i) enable Unilabs UAE to deliver advertising content to you with a personalised newsletter tailored to the preferences of a specific customer, taking into account the customer's real needs and corresponding interests, and to (ii) develop products and services aligned with the preferences of our

customers.

In this case, however, we do not use your data for profiling, which consists of automated decisions that may affect your legal situation (i.e., we do not use algorithms to adopt decisions affecting your individual claims).

The data collected for the purposes of profiling for the personalised newsletter will be kept for the duration of your consent with the newsletter subscription.

The Unilabs Online website allows you to subscribe to newsletters and marketing emails by clicking

“*Confirm*”. In order to send this information, we need your consent to process your personal data, namely your email address, first name and surname. You may provide us with a phone number and address, which are optional data.

You grant your consent by **ticking the box next to** “*have read the Privacy Policy and I would like to receive special offers as well as be informed about promotions and news.*” and “

I have read the Privacy Policy and consent to Unilabs using my purchase history, which may include data concerning health or other special categories of personal data, for sending promotions or offers customised to my purchases. Marketing can also be carried out on the basis of profiling aimed at adapting commercial offers addressed to your interests based on the information obtained in the course of our cooperation.

After submitting the completed form with all mandatory data, such as name, surname and email address, we will send you an email with a confirmation link (the double opt-in). If you click on the link in the confirmation email within 2 days of the date of its receipt, you will be subscribed to the newsletter/marketing emails. Unfortunately, we cannot send you the newsletter/marketing emails without your consent - expressed by a ticked Consent box or activated confirmation link.

You can withdraw your subscription to newsletters/marketing emails in the future at any time by clicking the unsubscribe link in one of the newsletters/marketing emails you receive. Afterwards, we will no longer send newsletter/marketing emails to you, and your personal data as a recipient that we had processed up to then based on your granted consent will be immediately blocked and deleted without undue delay.

Your IP address, name and surname, phone number and address, and the date and time of your consent will be recorded with your consent to receive the newsletter/marketing emails, to process the personal data required therefore.

Your consent to having your personal data processed to receive newsletters/marketing emails is recorded by Brevo, also used to send newsletters/marketing emails.

G. In order to provide services related to the Live & CARE loyalty programme, in particular to:

- your identification when obtaining membership in the Live & CARE club;
- maintaining, keeping, recording, managing, and administering your Live & CARE Club membership account;
- to identify you for the purpose of providing benefits and discounts under the Live & CARE loyalty programme.

Legal Basis:

The legal basis for the processing of personal data for the purpose set out in (G) above, is your consent to the provision and processing of your personal data, which is voluntary but necessary for obtaining and maintaining your membership of the Live & CARE Club. **This consent is given by submitting your personal data and checking the appropriate box to consent to the processing of personal data for the purpose of providing services related to the Live & CARE loyalty**

programme. This consent can be revoked at any time by sending an e-mail to infome@unilabs.com. Please note that by withdrawing your consent, your membership in the Live & CARE Club will be cancelled. Withdrawal of consent does not affect the lawfulness of the processing of personal data based on consent prior to its withdrawal.

5. Categories of recipients of your personal data

Your personal data and the personal data of a Third Party may be disclosed and made available to the following recipients who comply with the Data Protection Policy:

- The Data Controller's authorised employees mainly (but not exclusively) responsible for laboratory tests, IT, marketing and commercial activities;
- subcontractors (e.g. subsidiaries) who act on behalf of the Operator to provide laboratory diagnostic services;
- subcontractors who provide services to the Data Controller under contract on the processing of personal data signed with the Data Controller (e.g. providers of IT services and applications, lawyers, auditors, etc.),
- providers of standard software, cloud or hosting services databases, analytics and software systems and tools as acknowledged by you.

6. Data retention period

The Data Controller will store the Data Subject's personal data for the period strictly needed to achieve the relevant purpose of personal data processing>

- should personal data be processed for pre-contractual measures based on a request by the Data Subject and/or to fulfil the contract*, especially the personal data you provided to the Data Controller upon creation of a user account and registration to your and the Third Party's account, and personal data provided by you associated, related or interlinked with orders and bookings of laboratory diagnostic services, the contract signed with the Data Controller – the Unilabs Online Provider - and compliance therewith, will be stored by the Data Controller until the contract is valid and in force, and until all claims and requests induced by or related to such contract are settled after the contract has been terminated, if required and strictly necessary to fulfil the purpose for which the data were processed, especially for billing, receipt and recording of payments, to solve complaints, and to claim rights and enforcement of duties under the applicable regulations.
- should personal data be processed to comply with the Data Controller's legal obligation*, personal data will be processed for the period of the Data Controller's legal obligation defined by the applicable regulations or an international treaty by which UAE is bound, i.e. especially your personal data obtained while you are being provided with healthcare services, will be processed and stored by the Data Controller for this purpose for 25 years from when you receive medical care.
- should personal data be processed based on other lawful bases*, personal data will be processed until the reason for data processing is no longer applicable, i.e., for example, when legal claims are presented under the contract, your personal data will be processed until the maximum possible prescription period to exercise the right granted by the contract expires. The prescription period begins from the first entitlement to exercise the right. In the event that court, administrative, liquidation, or other proceedings are begun, and the Data Controller claims its rights against the Data Subject therein, the retention period of the Data Subject's personal data shall not expire before such proceedings end;
- in case personal data are processed for marketing emails and electronic newsletter* (to send business notifications, ads and offers, notifications about events and the Data Controller's news) based on your consent, i.e. on the basis of the Data Subjects' separate consent to have their personal data processed for this purpose, provided that the Data Subject granted such consent to the Data Controller, the personal data will be processed until the date when the Data Subject's consent is withdrawn, or for a specified period of time, whichever occurs sooner, i.e. the personal data provided by you for marketing emails and newsletter subscription are stored until the date your consent is withdrawn by clicking the unsubscribe link or by sending an email to: infome@unilabs.com or by a written request sent to the Data Controller's registered seat; but for a maximum of 5 years from the date when the consent was given.

The personal data provided by you and collected by the Data Controller will thus **always** be stored within the scope and period:

- i. set out in generally binding legal regulations (e.g. tax and accounting rules, healthcare regulations, etc.),
- ii. is strictly needed and necessary to fulfil the individual purposes for which the personal data were collected, adhering to the principle of minimisation, which means the Data Controller does not store your personal data for longer than for a mandatory and justifiable period of time.

When this personal data becomes unnecessary or the retention period expires, the data is removed from the Data Controller's databases and information systems without undue delay, or destroyed if in written form.

7. Automated processing of personal data

Your personal data are primarily processed electronically by Unilabs UAE automated information systems operated by the Data Controller or its business partners - providers of analytical services.

If you use our website for informational purposes only, i.e. if you do not register, make purchases in the online shop, do not use any other services where you need to enter your personal data, and if you do not sell your personal data to us in any other way, we may nevertheless collect your personal data that is automatically transmitted to us by your browser. With the help of third-party data and analytics service providers, certain data are collected when you visit our website. We use these data to analyse how visitors use and navigate our website. Collected data include your IP address, the geographic location of your device, browser type, browser language, your request date and time, the duration of your visits, page views, and the page components (e.g. links) you click on.

We may use cookies, pixel tags, web beacons, transparent GIF files or similar tools on our website or emails to help us collect and analyse that information. The information is used to provide better and more relevant content on our website, to identify and troubleshoot problems, and to improve the overall impression of our website.

If you do not wish to have your data collected by these technologies, most browsers have a simple option to automatically block many of them, or your browser gives you the option to reject or accept them. Notwithstanding the tools mentioned in the previous sentence, if the regulations require your consent to the processing of your personal data using automated systems, we will always only process personal data after obtaining your consent. Further information on this regarding the use of cookies may be found below.

Automated individual decision-making. Profiling

'Profiling' means any form of automated personal data processing that uses personal data to evaluate certain personal aspects related to a natural person, in particular, the analysis or prediction of aspects of the Data Subject, such as work performance, property, health, personal preferences, interests, reliability, behaviour, location, or movement.

In such cases, the Data Controller shall primarily inform the Data Subject about the procedure, the significance, and the likely consequences of such processing of the Data Subject's data.

8. Personal data transfer abroad

Due to the international activities which the Unilabs Group, the Data Controller, participates in, your personal data may be transferred outside the UAE.

Personal data may be transferred to countries outside the UAE subject to prior special approval when applicable. No additional safeguards are required for the transfer of personal data to countries with special legislation that provides an adequate level of personal data protection or committed to multilateral agreements with the UAE to protect personal data (e.g. Switzerland, are where the headquarters of Unilabs, Guernsey, are located, etc.

No health data would be transferred outside the UAE without the required approval by the concerned health authority or Ministry.

9. Rights of Data Subjects

You may have the following rights related to your personal data:

- the right to access your data, which you can exercise by requesting a copy of your personal data;
- the right to request to be informed about which personal data are processed;
- the right to have your personal data corrected, if inaccurate or incomplete, and the right to request their processing be limited;
- the right to have your personal data deleted should your personal data be processed with your consent,
- the right to data transfer when your personal data are processed on the basis of your consent and/or to fulfil a

- contract you concluded;
- the right to object to the processing of your personal data, on grounds relating to your particular situation when your personal data are processed;
 - the right to be informed about profiling and its possible consequences and the right to object to personalization and automated decision-making. The Data Subject shall have the right to be excluded from decisions based solely on automated processing, including profiling, that produces legal effects for the Data Subject or similarly and significantly affects the Data Subject.

10. Enforceable rights and complaints

You can exercise the rights referred to in Section 9 above by contacting the responsible person in writing by sending an email to: dpo@unilabs.com, or by sending your request to the Data Controller's registered address.

The same procedure – an email sent to the responsible person at dpo@unilabs.com applies if you believe that the Data Controller has breached your rights by breaching personal data protection regulations when your personal data were processed. You also have the right to file a complaint with the Data Protection Authority either in your Member State of habitual residence, place of work or at the place of the alleged GDPR breach.

The Policy entered into force in UAE on 01.06.2023