

Privacy Policy

Labplus S.A.

If:

1. **You are using the website www.labplus.pl** – by visiting the site, using the contact form, proceed to Part A;

PRIVACY POLICY PART A - contains rules regarding the processing of personal data by the Administrator on the websites www.labplus.pl, www.labtestchecker.pl and on related websites, e.g. English-language websites. The Policy specifies the basis, purposes and periods of processing of personal data and the rights of data subjects, as well as information on the use of cookies when using the functionality of the Administrator's websites. The Privacy Policy specifies personal data that the Administrator processes directly as the owner of the websites, as well as when the Administrator processes personal data as a Processor, i.e. performs data administration activities commissioned by the Administrator, which is another entity.

2. **you are the Lab Test Checker user** or other applications for analyzing laboratory test results produced by Labplus S.A., also by making these applications available on external websites, for example, our contractors', proceed to Part B

PRIVACY POLICY PART B - contains rules regarding the processing of personal data by the Administrator within the Lab Test Checker tool, which is an application used to perform analytical tests on diagnostic test results. These are various diagnostic tests that can be performed through the application. The Lab Test Checker application is used in the form of a "plug-in" on various websites of the Administrator (e.g., www.labtestchecker.pl), as well as by third parties, for example, on the websites of medical laboratories, health clinics. As part of administering the Lab Test Checker application, the Company obtains and processes data as the Administrator, as well as processes personal data entrusted as the Processor, and this division is included in the Privacy Policy in the form of a table.

3. **you are a user of other tools and applications located** on www.labplus.pl, or on other sites of ours and our affiliates, and you are referred to this Policy, go to Parts A and B as a user of the website or as a user of the application, respectively;
4. **you are a person whose data we process, regardless of the source of the data and the purpose of the processing** (i.e. you are our contractor, contractor, employee, also a user of the application and using the website) go to the Common Provisions section, there the common principles of personal data processing, personal data retention periods or security rules for all types of personal data and purposes of processing are presented.



COMMON PROVISIONS

ADMINISTRATOR, CONTACT

The Administrator of the personal data described in this Privacy Policy is **Labplus S.A** headquartered at Wyspa Słodowa 7 Street, 50-266 Wrocław, Poland registered in the National Court Register under the number 0001018188, NIP number 8961622267; Regon number 524450039. Contact regarding personal data protection is possible **by e-mail to the following address:** Wyspa Słodowa 7 Street, 50-266 Wrocław, Poland or by e-mail: rodo@labplus.pl, **which we prefer for contacting you**

PRINCIPLES OF PERSONAL DATA ADMINISTRATION

The Administrator takes special care to protect the interests of individuals whose personal data it processes, and in particular, it is responsible for ensuring that the data collected by it are:

- I) collected for designated legitimate purposes and not subjected to further processing incompatible with those purposes;
- II) substantively correct and adequate in relation to the purposes for which they are processed;
- III) stored in a form that prevents identification of data subjects by third parties and kept no longer than necessary to achieve the purpose of the processing;
- IV) processed in a manner that ensures adequate security of personal data, including protection against unauthorized or unlawful processing, accidental loss, destruction, damage or access by means of appropriate technical or organizational measures;

Taking into account the nature, scope, context and purposes of the processing and the risk of violation of the rights or freedoms of natural persons, the Administrator implements appropriate technical and organizational measures so that the processing is carried out in accordance with the RODO Regulation, the Act and the safety of data subjects. These measures are reviewed and updated. The Administrator shall apply technical measures to prevent the acquisition and modification by unauthorized persons, of personal data transmitted by means of electronic communication.

THE RIGHTS OF THE INDIVIDUAL WHOSE DATA IS BEING PROCESSED

1. Any person whose data we process has the right to:
 - i) access to data, rectification, restriction of processing, deletion or portability i.e. the "right to be forgotten" or restriction of data processing, and has the right to object to processing, and has the right to portability of his/her data. The detailed conditions for the exercise of the rights indicated above are indicated in Articles 15-21 of the RODO Ordinance; withdrawal of consent at any time - a person whose data is processed by the Administrator on the basis of expressed consent (pursuant to Article 6(1)(a) or Article 9(2)(a) of the RODO Ordinance) has the right to withdraw consent at any time without affecting the legality of the processing that was performed on the basis of consent before its withdrawal;
 - ii) lodging a complaint with the supervisory authority - the person whose data is processed by the Administrator has the right to lodge a complaint with the supervisory authority in the



manner and procedure specified in the provisions of the RODO Regulation and Polish law, in particular the Personal Data Protection Act. The supervisory authority in Poland is the President of the Personal Data Protection Office;

- III) Objection - the person whose data concerns has the right to object at any time - for reasons related to their particular situation - to the processing of their personal data based on Article 6(1)(e) (public interest or official authority) or (f) (legitimate interests pursued by the controller), including profiling based on these provisions. In such a case, the Administrator may no longer process this personal data unless they demonstrate compelling legitimate grounds for the processing which override the interests, rights, and freedoms of the data subject or for the establishment, exercise, or defense of legal claims;
 - IV) Objection to direct marketing - If personal data is processed for direct marketing purposes, the data subject has the right to object at any time to the processing of personal data concerning him or her for such marketing, including profiling, to the extent that the processing is related to such direct marketing;
2. In order to exercise the rights referred to in paragraph 1 above of the Privacy Policy, the Administrator may be contacted by sending an appropriate message in writing or by e-mail to the Administrator's address indicated at the beginning of the Privacy Policy or by using the contact form available on the website www.labplus.pl
 3. In case of a violation of data protection laws, the data subject may file a complaint with the President of the Office for Personal Data Protection. After investigating the case, the President of the Office - if there has been a violation - orders the restoration of the lawful state by administrative decision. A complaint to the President of the Office may be filed by an individual if the incorrect processing of data concerns his personal data. Before filing a complaint with the Office, however, you should exercise your rights. The controller is obliged to respond to your request as soon as possible - within a maximum of one month. If for some reason this is not possible, he or she must inform you why he or she is extending the response period by up to another two months. Also within one month, the Administrator should inform you of the failure to fulfill your request and the reasons for it. If the Administrator ignores your request or the response is not satisfactory to you, you can file a complaint with the Authority. Read the Authority's detailed information on exercising your rights: <https://uodo.gov.pl/pl/383/579> and remember that rights do not necessarily apply in every situation. They may, for example, be limited by Polish law.

TRANSFER OF DATA TO THIRD COUNTRIES

The transfer of data controlled by the Administrator to third countries and international organizations may be carried out only after meeting the conditions provided for in Chapter V of the RODO.

Transfers of data to third countries may take the form of:

- ✓ entrustment of personal data processing;
- ✓ sharing of personal data;

which means that, depending on the type of transfer, the RODO provisions of the data entrustment or sharing agreement must also be taken into account.



Transfers of personal data to a third country may take place if the European Commission has issued a decision stating that the third country, territory or specific sector(s) within that third country or the international organization in question ensures an adequate level of protection. Such transfer does not require special authorization.

In cases where there is no decision of the European Commission as mentioned above, the transfer of personal data to a third country is possible if the Controller himself provides adequate safeguards and provided that there are enforceable rights of data subjects and effective legal remedies. Adequate safeguards can be provided by means of:

- ✓ a legally binding and enforceable instrument between public authorities or entities;
- ✓ binding corporate rules approved by the supervisory authority applicable to each member of a group of companies or a group of entrepreneurs engaged in joint business activities;
- ✓ standard data protection clauses adopted or approved by the European Commission;
- ✓ standard data protection clauses adopted by the supervisory authority and approved by the European Commission;
- ✓ an approved code of conduct containing binding and enforceable commitments by the controller or processor in the third country to apply appropriate safeguards, including with respect to the rights of data subjects,

or

- ✓ an approved certification mechanism with binding and enforceable obligations on the controller or processor in the third country to apply appropriate safeguards, including with respect to the rights of data subjects. Subject to the authorization of the competent supervisory authority, the appropriate safeguards referred to above may be provided in particular by means of:
 - i) contractual clauses between the Controller or Processor and the Controller, Processor or recipient of personal data in a third country or international organization;

or

- ii) provisions of administrative agreements between public authorities or entities that will ensure enforceable and effective rights of data subjects.

In special cases, it is permissible to transfer personal data to a third country despite the absence of the decision of the European Commission referred to above and without providing the appropriate safeguards described above. These special cases include the transfer of data provided that:

- ✓ the data subject, informed of the possible risks to him or her of the proposed transfer, expressly consents to it;
- ✓ the transfer is necessary for the performance of the contract concluded with the data subject;



- ✓ the transfer is necessary for the conclusion or performance of a contract concluded in the interest of the data subject;
- ✓ the transfer is necessary due to important public interest;
- ✓ The transfer is necessary because of the claims held;
- ✓ the transfer is necessary to protect the vital interests of the data subject, or the transfer will be from a public record

As a rule, the administrator does not transfer your data to third countries. The renter of the server and support services has guaranteed the location of the support tools within the EU and EEA. However, as part of the Administrator's use of tools to support day-to-day operations provided, for example, by Google, your Personal Data may be transferred to a country outside the European Economic Area, in particular to the United States of America (USA) or any other country in which the Administrator's cooperating entity maintains tools to process Personal Data in cooperation with the Administrator. Adequate security of processed Personal Data outside the EEA is guaranteed through the use of external data processing entrustment agreements based on standard contractual clauses that meet the requirements of the GDPR. The description and scope of the standard contractual clauses are provided by providers of external software and tools:

- ✓ Google on the privacy policy tab: <https://policies.google.com/privacy/frameworks?hl=pl>, where you can find the exact details of the standard contractual clauses;
- ✓ OVH, server provider: <https://www.ovhcloud.com/pl/hosted-private-cloud/>

DELETION DEADLINE FOR SPECIFIC TYPES OF PERSONAL DATA

Lp.	TYPE OF PROCESSING ACTIVITY	DATA CARRIERS	DATE OF DATA PROCESSING	THE EVENT FROM WHICH WE COUNT THE TIME TO DELETE DATA
1	Recruitment of employees	CV, resume, application form	For the period of the recruitment - if the person agrees, then also in future recruitments.	After recruitment immediately, if the person gives consent, after future recruitment (up to 3 years from the date of the last recruitment)
2	Internships/traineeships	Internship documents, contract, cv	10 years	Since the end of the contract
3	Employment	Subsidized training/courses, civil law contracts with employees,	10 years or 50 years	From the termination of the employment contract. Note: With



		documentation related to handling of benefits, e.g., multisport card, course of occupational diseases		regard to employment relationships established before January 1, 2019, the storage period of employee records must be determined on the basis of the regulations in force before that date (Article 7(2) of the Act of January 10, 2018 amending certain laws in connection with the shortening of the period of storage of employee records and their electronization - Journal of Laws of 2018, item 357). This means that employee records pertaining to this period must be kept for 50 years, counting from the date of termination of employment with the employer - in the case of personnel records; production - in the case of payroll records
		Resume, CV, employee documentation (personnel file).	10 years or 50 years	
4	Civil law contracts of cooperation	Contract, additional documents e.g. grants, fringe benefits e.g. multisport.	10 years or 50 years	Termination of the contract
5	Accidents at work	Description of the accident, supporting documents.	10 years	The day of the incident - the accident



6	Commercial contracts with individuals	Contract, orders, e-mail correspondence, executive documentation	3 years	Termination of services, termination of the contract
7	Trade agreement with entrepreneurs	Contract, orders, e-mail correspondence, executive documentation	3 years	Termination of services, termination of the contract
8	Marketing services	Newsletter, customer database, e-mail data, telephone.	No refusal after withdrawal of consent, unless another decision is made, e.g.:	After withdrawal of consent

FINAL PROVISIONS

The Administrator's website may contain attachments to other websites. The administrator encourages you to download the privacy policy established there on other websites. We reserve that the privacy policy applies only to the website www.labplus.pl

Services and functions on the website may change, which means that you will be able to use the Privacy Policy in the future. We publish new versions of publications on the website.

PART A

For:

- i) Users of the website www.labplus.pl – visitors to the website, users of the contact form;
- ii) Users of other websites of ours and our partners, if they have been referred to this Privacy Policy;

WHERE DO WE OBTAIN YOUR PERSONAL DATA FROM AND IS IT NECESSARY?

- **By visiting the Administrator's website www.labplus.pl, www.labtestchecker.pl or other websites that refer to this Privacy Policy**

– You leave us information that is not personal data, but in certain circumstances, this data can become personal data, for example, Your IP address, which is stored in browser settings, is not personal data in itself because we cannot identify the user based on it. The IP address will be considered personal data only when the Administrator simultaneously has access to data linking the IP address with other identifying information about you (Legal basis Art. 6 (1) of the Act of 29 August on the protection of personal data Directive 94/46/EC of the European Parliament.) or possessing characteristics of personal information, as it is possible to identify "some physical person" based on it. The Administrator has decided that in accordance with the



principles of personal data protection, and data that may become personal data, they protect your data obtained while using the Administrator's websites.

➤ **Contact terms available via the website www.labplus.pl:**

Each contact user provides his/her personal data: e-mail address, telephone number, name, surname. The content of the message contains information contained in the users' personal data. The use of the website www.labplus.pl and other websites of the Administrator is installed. In terms of connections via the contact form, not providing personal data, using functions. Providing personal data in this case is related to the data subject who, wishing to submit to the contact obligation on the Administrator's website, is obliged to provide this data.

A detailed description of the data processed by the Administrator is provided in the table below.

PURPOSE, BASIS AND PERIOD OF DATA PROCESSING

Purpose of data processing	Basis of data processing	Functional personal data	Data retention period
CONTACT WITH THE ADMINISTRATOR VIA THE CONTACT FORM			
Contact with the Administrator, contact form on the website www.labplus.pl and other websites of the Administrator	art. 6 section 1 letter a, b RODO: it is necessary to perform the contract or take action before entering into the contract, art. 6 section 1 letter f RODO: is necessary for the Administrator's legitimate interests, e.g. product marketing, statistics of visits and inquiries, art. 9 section 2 letter f RODO: is required for use, investigation or application.	name, surname, name, contact details: e-mail address, telephone number. Providing this data is necessary to provide you with contact services. The User may also store other data that is not required by the Administrator, including elements sent in the contact form and controlled, which are then stored by the Administrator under your control and are not available when placing an order in a Member State.	For the time spent on processing the order for you, providing the service ordered in this form, answering questions and for the time of publication in order to protect the law and the specific Administrator and you. In the scope of data made available after division, until consent is withdrawn.
USING AND BROWSING THE ADMINISTRATOR'S WEBSITE			
Browsing a website	art. 6 section 1 letter a, b RODO: it is necessary to perform the contract or take actions that will take place before the contract is launched, i.e.	We save information regarding usage, internet data and operating system, date and date of stay, as well as your IP address. These	Through time to analyze visit and website data. In the scope of data made available after division, until consent is



	viewing the content on the website, Art. 6 section 1 letter f RODO: is necessary for the Administrator's legitimate interests, e.g. product marketing, statistics of visits and inquiries, art. 9 section 2 letter f RODO: is required for use, investigation or application.	data are necessary for use, but they cannot be assigned to a specific person without work and with the available resources and access of the Administrator. We do not store any personal data through our website without your consent and also in the form of cookie consent.	withdrawn.
USER'S ACCOUNT			
User account on the website www.labplus.pl - function under development, currently not available, possible use from 2023	art. 6 section 1 letter a, b RODO: performance of the contract or prior action before concluding the contract is required, Art. 6 section 1 letter f RODO: it is necessary to use the legitimate interests of the Administrator, including: examination statistics, results of medical interviews and examination analyses, art. 6 section 1 letter c RODO: the transfer is necessary for the Administrator to perform legal activities, including: in the field of medical duties and collecting documentation, Art. 9 section 2 letter f RODO: is required for use, research or application.	IP address, data on diagnostic test criteria, user opinions, complex features of technical errors, registration data in the system: name(s) and surname, gender, birth data, correspondence address, designation of the given patient is not resident in Poland to the address place of stay in Poland, telephone number, e-mail address, medical interview, test results.	For the period of storing the user account in the system, for the provision of analytical services and for a further period to protect the rights and obligations of the Administrator and you. In the scope of data made available after division, until consent is withdrawn.

DATA RECIPIENTS

In order to use the tool on the website www.labplus.pl and other websites of the Administrator, it is necessary for the Administrator to use the services of external entities, e.g. software supplier, server leaser, internet operators, programmers. The Administrator only uses executive services that are covered by guarantees of the use of technical and organizational measures, personal data against their violation, to a degree no higher than the Administrator and in accordance with the RODO.



The transfer of data by the Administrator does not occur automatically to all recipients or categories of recipients specified in the Privacy Policy. The Administrator transfers data only when necessary for the fulfillment of a specific purpose of personal data processing and only to the extent necessary for its fulfillment.

Personal data of users of the websites www.labplus.pl and other websites of the Administrator may be transferred to the following recipients or categories of recipients:

- I) Service providers supplying the Administrator with technical, IT, and organizational solutions enabling the Administrator to manage and maintain the website and contact form;
- II) suppliers on the Administrator's website of social plug-ins, scripts and other tools enabling access to a person visiting the website www.labplus.pl downloading content from suppliers receiving plug-ins;
- III) suppliers of marketing and positioning products, including: Google Ads, Google Analytics, disk tools and data cloud, among others. Google Clouds, in the scope of performance services for the Administrator, covers only the scope of users' personal data, the disclosure of which is necessary, e.g. analytical data regarding users. The most important basic tools of the Administrator are:
 - > Google Analytics - a website monitoring analysis service from Google Inc. Google Analytics only works through cookies and only if you request it or set your configuration settings to do so. Google Analytics enables the use of the website. The information created by Google analytics is stored on a Google Inc. server. in Ireland or at home. On behalf of the website operator, Google uses this information to analyze the use of the website or to trigger activities on the website, including access to the website and the Internet. Detailed information on the terms of use of Google Analytics tools and personal data protection provided at <https://www.google.com/analytics/terms/pl.html> or at <https://policies.google.com/?hl=pl>.
 - > Google Ads - the Google Conversion Tracking service. Entry to the user or user concerned on the website via Google advertising
 - > HotJar - the service of Hotjar Limited enables the collection of information about users on the website, such as navigation, execution and mouse clicks, visited subpages, the source from which the visit to the website comes. They do not contain plug-ins, forms or other elements that may contain personal data. This data is anonymized on the basis of recorded information. Privacy policy of the service provider: <https://www.hotjar.com/legal/policies/privacy>.

The Administrator indicates that logging in to the user account on the www.labplus.pl website, with this function currently unavailable and planned for implementation in January 2023, using login data from social media services such as Facebook, Twitter, Google mail, or other plugins, results in the transfer of the visitor's personal data to providers. This includes information about the user's preferences and activities on the www.labplus.pl website, in accordance with the privacy policies available at <https://www.facebook.com/about/privacy/>. Such data comprises actions on the website - including device information, visited pages, purchases, displayed advertisements, and service usage - regardless of whether the user has a Facebook account or is logged into Facebook.

PROFILE

The administrator may inform users about the profiling of personal data and key information about the principles of their division, as well as about the expected rules of conduct for data subjects. In this point of the



Privacy Policy, the Administrator provided information regarding possible profiling, i.e. presenting content, publishing by definition the user's personal name or disclosing it.

Particular form of profiling is profiling in order to solve the decision of an individual who in its entirety, i.e. in relation to each of its further effects, is deprived of human help and support. In the case of full automation, the data subject cannot be stimulated during this process, cannot be identified as a person who, as a result of determining that the solution is artificial intelligence.

Profiling on the website www.labplus.pl involves automatic analysis or forecast of the behavior of people visiting the website www.labplus.pl and other websites of the Administrator, including: by determining the behavior of website recipients, how they browse content, user behavior according to individual windows and the selection of tabs.

Profiling by the Administrator will not result in legal consequences for the user and will then be accepted by the natural person as a result of profiling. The data subject always has the right to be subject to a decision that is based solely on automated treatment, including profiling, and that occurs in the face of the person, the consequences of which are legal or, in principle, significantly influences it.

COOKIES AND ANALYTICS

Cookies - cookies are a set of text information in the form of text files sent by the server and reserved by the person visiting the website, e.g. on the hard disk of a computer, laptop or on a smartphone's memory card - depending on the device used for access.

Detailed information full stop. cookies, available at https://ec.europa.eu/info/cookies_pl.

Cookies that may be sent by the website www.labplus.pl and other websites of the Administrator can be distinguished by various features, depending on the criteria:

- i) Because of their supplier:
 - own (created by the Administrator's website) or belonging to individuals/entities other (other than the Administrator)
- ii) due to the storage period on the website visitor's device:
 - session (stored until you log out or turn off the Internet device) or permanent (stored for the time specified by the parameters of each file or until it is manually destroyed)
- iii) due to the purpose of their use:
 - necessary (enabling the proper functioning of the website) ➢ funkcjonalne/preferencyjne (umożliwiające dostosowanie strony do preferencji osoby odwiedzającej stronę),
 - analytical and performance (collecting information about how the website is used),
 - marketing, advertising and social media (collecting information about a person visiting the website for the purposes of localization, advertising and conducting other marketing activities, including on websites leaving the Administrator's websites, e.g. social networking sites))



The Administrator may process data contained in Cookies while visitors use the website for the following specific purposes:

- identification of Service Users as logged in to their user account and displaying that they are logged in (essential),
- storing products for the purpose of placing an Order (essential).
- storing data from completed surveys (functional and preference-based, not necessary).
- customizing the content of the website to the individual preferences of the user (e.g., regarding preferred diagnostic tests) and optimizing the use of the website (functional and preference-based, not necessary).
- conducting anonymous statistics presenting the way of using the website (analytical and performance-related, not necessary).
- remarketing involves analyzing the behavior of website visitors through anonymous analysis of their actions (e.g., repeated visits to specific pages, keywords, etc.) to create their profile and deliver them ads tailored to their anticipated interests, even when they visit other websites in the advertising network of companies like Google Ireland Ltd. and Facebook Ireland Ltd. (marketing, advertising, and social, not necessary).

Information about the location in the most popular web browsers, which cookies are sent immediately by the Administrator, is possible in an accessible way:

- in Chrome: (1) in the address bar, click the lock icon on the left, (2) go to the "Cookies" tab, ➤ in Firefox: (1) in the address bar, click the shield icon in the address bar on the left, (2) go to the "Allowed" or "Blocked" tab, (3) click the "Cookies sent between sites", "Items subject to social networking sites" or "Content with elements compatible with" tab,
- in Internet Explorer: (1) click on the "Tools" menu, (2) go to the "Internet Options" tabs, (3) go to the "General" tabs, (4) go to the "Settings" tabs, (5) click "View files" field",
- in Opera: (1) in the address bar, click the lock icon on the left, (2) go to the "Cookies" tab,
- in Safari: (1) click the "Preferences" menu, (2) go to the "Privacy" tabs, (3) click the "Manage website data" box,
- Regardless of the browser, using tools available, for example, on the website: <https://www.cookie-matrix.com/> lub: <https://www.cookie-checker.com/>

Most web browsers available on the market typically accept cookies by default. Everyone has the option to determine the conditions for using cookies through their own web browser settings.

Examples of cookies sent to the Administrator's websites:

- Google Analytics by Google LLC. The purpose of implementing the legally introduced interest of the Administrator, generated on statistics and their feeder in order to optimize the website.



Google Analytics automatically obtains information about the use of websites. Collected in ten ways in which information is often delivered to a Google server in Ireland or local and available there. The anonymized IP address is transmitted by your browser as part of Google Analytics and is generally not combined with other data held by Google. In terms of data protection by Google Analytics, please refer to the website: <https://policies.google.com/privacy/frameworks?hl=pl>, which describes the personal data protection solutions used by Google and standard contractual principles

- Google Adwords from Google LLC. Using Google Adwords, we promote the website in search results and on the websites of people whose goal is to fulfill the legally required marketing request of the Administrator. When you visit our website www.labplus.pl, a dangerous remarketing cookie is automatically stored in the Google cookie file, which is available on the website www.labplus.pl, which allows you to display advertisements based on your searches. Further processing is only with your treatment. For comments regarding the fact that Google LLC is based in the USA and uses available knowledge located in the USA, please refer to the following pages: <https://policies.google.com/privacy/frameworks?hl=pl>, description of the data protection solutions used by Google principles and general contractual principles.
- Hotjar by Hotjar Limited, Level 2, St Julian's Business Centre, 3, Elia Zammit Street, St Julian's STJ 1000, Malta. Hotjar monitors information such as time spent on individual stages, and then connects to the subpages clicked, discovered and captured. We use this service to optimize our website, based on the influence and actions of users, which is the implementation of our legally required action. Hotjar uses cookies and other technologies, e.g. save video, collect information about behavior on the website and make it available for use on the website. It obtains an anonymized IP number, screen size, information about waste, location, language. Hotjar pseudonymised data. More in Hotjar's privacy policy: <https://www.hotjar.com/privacy/>.
- Logical server. Using the page to submit an inquiry to the server on which our website is stored. A detailed query to the server is sent to the server logs. The logs include, among others: IP address, server date and time, information about Internet access and the operating system you are using. Logs using and are applied. Additional data contained in server logs are not associated with additional functions that come from websites and are not made available by us in order to obtain them

PART B

For users of the Lab Test Checker application and other Administrator's applications published on the Administrator's websites and of external entities using application "plug-ins".

WHERE DO WE OBTAIN YOUR PERSONAL DATA FROM AND IS IT NECESSARY??

- ***By using the Lab Test Checker application, both on the websites www.labplus.pl, www.labtestchecker.pl and on other websites of the Administrator and third parties, our clients include: diagnostic companies, laboratories, you provide us with personal data. Currently, this data is anonymous, but as our technology develops, the scope of personal data will be increased in order to optimize the service and effectiveness of tests..***



A detailed description of the data processed by the Administrator is provided in the table below.

PURPOSE, BASIS AND PERIOD OF DATA PROCESSING

Purpose of data processing	Basis of data processing	Functional personal data	Data retention period
USING THE LAB TEST CHECKER APPLICATION VIA THE PLUGIN LOCATED ON THE WEBSITES OF THE ADMINISTRATOR'S CLIENTS			
PERSONAL DATA ADMINISTRATOR			
<p>Performing an analysis using the Lab Test Checker tool on behalf of the responsible person, e.g. medical laboratories, health clinics, medical offices.</p> <p>Personal data is currently anonymized.</p> <p>From the end of 2022 The admissibility of proprietary personal data from a medical interview together with personal data of patients covered by third parties and the possibility of sending tests to the patient's e-mail address.</p>	<p>art. 6 section 1 letter a, b RODO: it is necessary to perform the contract or take action before entering into the contract,</p> <p>art. 6 section 1 letter c RODO: the transfer is necessary for the Administrator to perform legal activities, including: regarding the obligations of medical entities and collecting documentation,</p> <p>art. 6 section 1 letter f RODO: it is necessary to use the Administrator's legitimate interests, e.g. statistics of tests, medical interviews and test analysis results,</p> <p>art. 6 section 1 letter c RODO: the transfer is necessary for the Administrator to perform legal activities, including: regarding medical duties and documentation collection,</p> <p>art. 9 section 2 letter f RODO: is required for use, research or application.</p>	<p>Medical survey including data about the user's health condition, data from a related person or legal guardian, e.g. data on other test results, disease history.</p> <p>The administrator makes this data available under an entrustment agreement to processors, i.e. medical laboratories, clinics or medical offices (open catalog), on the basis of cooperation between the parties, mainly on these health effects - the function is available from the end of 2022..</p> <p>These data are transferred to the patient's or user's account in the system of the entity, our client, i.e. laboratories or medical offices, as data from the medical interview and results of medical analyses, for the purpose of control and reagents.</p>	<p>For the period of analysis of research results and for the period after legal provisions imposed on protected documents (storage of documentation) and for the period of possibility of initiating court proceedings by the Administrator or the person providing or storing personal data.</p>
PERSONAL DATA PROCESSOR			



Purpose of data processing	Basis of data processing	Functional personal data	Data retention period
<p>Performing the analysis using the Lab Test Checker tool on behalf of the person responsible for, among others: medical laboratories, health clinics, doctor's offices</p>	<p>The processing of personal data begins with a personal data entrustment agreement.</p> <p>The administrator who obtains your personal data, including: via the medical laboratory user account or medical office patient data, it is automatically transferred to our Company after disclosing information about your consent to the test results from the Lab Test Checker results.</p> <p>Current data on diagnostic test results is not personalized. From the end of 2022, it enables the analysis of personalized data and saving information about the analysis results on the customer's account.</p> <p>From the end of 2022, it also contains profiled personal data, presenting further tests as a supplement to the medical interview with data or as a conclusion. Information about what tests can be performed will also be automatically sent to Lab Test Checker users. The results of the analysis of test results will include information about the purchase of medical tests and their sending to the</p>	<p>User ID in the system of the administrator providing the data – until the end of 2022.</p> <p>From the beginning of 2023: registration data in the system: name and surname, PESEL number (in the case of patients who do not have a PESEL number assigned – passport number or other document confirming identity), e-mail address, residential address, results of laboratory research.</p> <p>Applies to: data of the legal representative, legal guardian, legal guardian of the user in the scope of: name and surname, PESEL number (in the case of a person who does not have an assigned PESEL number – passport number or other identity document of the signatory), contact telephone number, e-mail address.</p> <p>Applies to: data of the person designated to act on behalf of the user, such as name(s) and surname, PESEL number (in the context of a person who does not have a PESEL number, passport or other identity document), contact telephone number, e-mail address.</p>	<p>For the duration of the personal data entrustment agreement, as well as after its disclosure, to medical data that must be processed by the entity in accordance with the Act on healthcare entities or in order to protect the rights of users or legal provisions.</p>



	<p>laboratory.</p> <p>The administrator verifies our personal data security, the scope of data and constantly monitors whether the data is adequate. Personal data obtained by us from the administrator is not controlled for any purpose other than analyzing the results for you. Performance in the provision of services also constitutes Art. 6 section 1 letter r RODO: i.e. exercise of copyright in order to interest the Administrator in the provision of contractual services</p>		
--	---	--	--

DATA RECIPIENTS

For the proper functioning of the tools offered by the Lab Test Checker tool, regardless of where it is installed, i.e., on which website, the Administrator needs to use services provided by external entities, such as software providers, server lessors, internet operators, and programmers. The Administrator exclusively utilizes services from processing entities that guarantee the implementation of technical and organizational measures to safeguard personal data against breaches, to at least the same extent as the Administrator and in accordance with the RODO.

The transfer of data by the Administrator does not occur automatically to all recipients or categories of recipients indicated in the Privacy Policy. The Administrator transfers data only when necessary to achieve the specific purpose of processing personal data and only to the extent necessary for its fulfillment.

Personal data of Lab Test Checker users, currently anonymized, but as of the end of 2022, personal data will be sent in the form of information assigned to the device and account with the recipients of our services, i.e. customers or in the form of a user account in the application: / Personal data of Lab Test Checker users, currently anonymized, but as of the end of 2022 in the form of information attributed to a specific patient and account with the recipient of our services, namely Customers or in the form of a user account within the application, will be transferred to:

- developers, providers of user account management tools where this feature is active and is not activated,



- to entities handling electronic payments or credit/debit card payments - in the case of a user who uses paid tests and has chosen electronic payment or credit/debit card as the payment method. The Administrator provides the collected personal data to the selected entity handling the aforementioned payments, at the request of the Administrator, to the extent necessary to process the payment made on behalf of the user, whereby this entity becomes the Administrator of personal data and conducts its own authorization of the entity, over which the Administrator has no control;
- data cloud channel providers, including: Google Clouds, solely with regard to the personal data of users whose data is necessary to be shared;
- Hotjar Limited, which collects information about the threats the user is exposed to when using the application, such as navigation, mouse clicks, visited subpages and the source from which the user's activity comes. This does not apply to the recording of non-anonymized elements that may contain personal data. These data are anonymized based on recorded information. Service provider's privacy policy: <https://www.hotjar.com/legal/policies/privacy>.

PROFILING

The administrator may inform users about the profiling of personal data and key information about the principles of their division, as well as about the expected rules of conduct of data subjects. In this point of the Privacy Policy, the Administrator provided information regarding possible profiling, i.e. presenting content, publishing the user's name by definition or disclosing it.

A particular form of profiling is profiling leading to automatic decision-making regarding an individual, which is carried out entirely, i.e., at every stage, without human intervention or support. In the case of full automation of processing, the data subject has no possibility to influence the course of this process, cannot address the person making the decision, as the decision is made by artificial intelligence.

The Administrator uses profiling but does not engage in automatic decision-making when analyzing results in Lab Test Checker. After analyzing the results, the program provides information about the analysis of diagnostic test data combined with information from the medical interview. Currently, there is no link between Lab Test Checker and users' personal data, and the data is anonymized. From the end of 2022, these will be personalized data. Upon implementation of this functionality, Lab Test Checker will also have the functionality to provide recommendations for further laboratory tests as indicated, necessary, or preventive. There will be automatic redirection to the website of the collaborating laboratory that provided your data in the form of test results, and if you provided them yourself on the www.labplus.pl website or on another site, then to the laboratory with which we have entered into a cooperation agreement.

The function of suggesting further laboratory tests will be linked to an automatic payment option with a specific service provider.

With the user's consent, it will be possible to send information about follow-up tests if the validity period of the already performed tests has expired or if such recommendations were the result of Lab Test Checker's medical analysis.



Despite profiling, the individual freely decides whether they want to undergo a particular test, recommendation, and can limit their choice to several options or expand the scope of tests with their own proposals. Therefore, profiling by the Administrator will not entail legal consequences for the user until the individual accepts the profiling result.

Profiling will be based on artificial intelligence. The result of the analysis and profiling will be based on the personal data provided, information data from the medical interview, and laboratory test results. The program will use an algorithm that indicates the type of testing that is recommended for that person wherever the testing should be performed. Profiling results will not be monitored due to human disease.

COOKIES AND ANALYTICS

Cookies - cookies are a set of text information in the form of text files sent by the server and reserved by the person visiting the website, e.g. on the hard disk of a computer, laptop or on a smartphone's memory card - depending on the device used for access.

Detailed information full stop. cookies, available at https://ec.europa.eu/info/cookies_pl.

Cookies that may be used by the Lab Test Checker application can be divided into various types according to the following criteria:

- i) due to their supplier:
 - own (created by the Administrator's website) or belonging to auxiliary persons/entities (other than Administrator),
- ii) due to the storage period on the website visitor's device:
 - session (stored until you log out or are disabled from the Internet) or persistent (stored for a duration determined by the parameters of each file or until manual removal),
- iii) due to the purpose of their use:
 - necessary (enabling the proper functioning of the website),
 - functional/preferential (allowing the website to be adapted to the presence of the visitor side),
 - analytical and performance (collecting information about how the website is used),
 - marketing, advertising and social media (collecting information about the person visiting the website for the purpose of localization, advertising and conducting other marketing activities, including on websites accessed by the Administrator's websites, such as social networking sites),

The administrator may use the data contained in cookies when using the website available:

- ✓ identify service recipients as logged in to the user account and show that they are logged in (essential),
- ✓ remembering products in order to complete orders (essential),



- ✓ remembering data from completed surveys (functional and preferential, not necessary),
- ✓ adapting the content of the website to your individual preferences (e. g. regarding preferred diagnostic tests) and optimizing the use of the website (functional and preferential, not necessary),
- ✓ keeping anonymous statistics showing how the website is used (analytical and performance, not necessary),
- ✓ remarketing, i.e. examining the behavioral characteristics of website visitors through anonymously available activities (e.g. repeated access to external resources, keywords, etc.) in order to create their profile and provide an advanced application appearance (HotJar, not necessary)

Localization of information in the most popular web browsers, which Cookies are sent at a given moment by the Administrator, is possible in the following way:

- ✓ in Chrome: (1) in the address bar, click the lock icon on the left, (2) go to the "Cookies" tab,
- ✓ in Firefox: (1) in the address bar, click the shield icon on the left, (2) go to the "Allowed" or "Blocked" tab, (3) click "Cross-Cookies", "Social Networking Elements" or "Content from accompanying elements",
- ✓ in Internet Explorer: (1) click the "Tools" menu, (2) go to the "Internet Options" tabs, (3) go to the "General" tabs, (4) go to the "Settings" tabs, (5) click the box "View files",
- ✓ in Opera: (1) in the address bar, click the lock icon on the left, (2) go to the "Cookies" tab,
- ✓ in Safari: (1) click the "Preferences" menu, (2) go to the "Privacy" tabs, (3) click the "Manage website data" box,
- ✓ Configuration from configuration, using the configuration tool, e.g. on the website: <https://www.cookie-matrix.com/> or: <https://www.cookie-checker.com/> Standard for Internet network administrators on the cookie monitoring market. Any possible application of the terms of use with cookies is possible by using your own internet settings. Cookie access settings are important for consent to the use of cookies by the Administrator's website - in accordance with access, such consent may also be limited by Internet access settings.

Examples of cookies sent to the Administrator's websites:

- Hotjar by Hotjar Limited, Level 2, St Julian's Business Centre, 3, Elia Zammit Street, St Julian's STJ 1000, Malta. Hotjar monitors information such as: time spent on each stage, the key and links you click, subpages discovered and their discovery. We use this service to optimize our website, based on the influence and actions of users, which is the implementation of our legally required action. Hotjar uses cookies and other technologies, e.g. save video, collect information about behavior on the website and make it available for use on the website. It obtains an anonymized IP number, screen size, information about waste, location, language. Hotjar pseudonymised data. More in Hotjar's privacy policy: <https://www.hotjar.com/privacy/>;
- Server logs. Using the website involves sending requests to the server where our website is hosted. Each request sent to the server is recorded in server logs. Logs include, among others, the IP address, date, and time of the server, information about the internet browser and



operating system you are using. Logs are recorded and stored on the server. Data stored in server logs is not associated with specific individuals using the website and is not used by us for identification purposes.

UPDATE: 09.02.2023

