



## DATA PROTECTION NOTICE

### 1. PURPOSE AND SCOPE OF NOTICE

In order to provide Covid-19 testing services, Complete Laboratory Solutions (CLS), 'we', 'us', 'our') must process information ("Personal Data") of those who interact with us. We respect and value your privacy. That is why we have set out in this Data Protection Notice (this "Notice") how and why Personal Data relating to you will be collected and processed by us and/or on our behalf by our third party service providers.

### 2. DATA CONTROLLER

For the purposes of this notice, the controller of your Personal Data is Saotharlann Chonamara Teoranta, trading as Complete Laboratory Solutions with registered offices at, Ros Muc, Co. Galway.

### 3. INFORMATION WE MAY COLLECT FROM YOU

We may collect and process the following Personal Data about you:

- Personal Details

This may include general Personal Data about who you are, such as your name, contact details, date of birth, gender, company name, payment details and your doctor's contact details. We may obtain this information directly from you or indirectly from your employer.

- Technical Information

We may collect and process the following Personal Data about you when you use our Website including your device type, operating system, browser, IP address, location and details of your visits including resources accessed.

### 4. COOKIES

Cookies are small data files automatically downloaded to your browser when you visit certain websites. We use only functional cookies to ensure that we give you the best experience on our website. We do not use tracker or analytical cookies or any other means for recording or sharing browsing behaviour, interests or Personal Data of Website visitors with third-parties during or after Website visits. Functional cookies are ephemeral and expire at the end of your browsing session.

### 5. LEGAL BASES & PURPOSES

The legal bases under which ("Legal Basis") and the reasons why ("Purposes") we collect, obtain and process your Personal Data include:



### 5.1 Consent

Purposes for which consent will be requested may include:

- Your requests for information.

### 5.2 Legitimate Interests

It is in our legitimate interests to collect and process your Personal Data for a range of business purposes. When we process your Personal Data based on our legitimate interests, we make sure to consider and balance any potential impact on you and your data protection rights. We will not process your Personal Data for activities where our interests are overridden by the impact on you.

The purposes for which we process Personal Data with legitimate interests are:

- To develop and maintain our relationship with you or your organisation;
- For CLS quality improvement, administrative and operational processes;
- To manage our Website.

### 5.3 Performance of a Contract

Where Personal Data is collected and processed to fulfil a contract with the data subject or their organisation, consent is not required. This will be the case where the contract cannot be completed without the personal data in question e.g. a Covid-19 PCR test result cannot be communicated without contact details.

The purposes for which we process Personal Data for contractual performance includes:

- Performing your medical test.
- Communicating your test results to you or your organisation.

### 5.4 Compliance with a Legal Obligation

We may process your Personal Data where it is necessary to comply with legal obligations to which we are subject, the purposes of which may include our obligations under Irish and EU laws relating to conduct of business with public bodies, notifiable illness and public health.

The purposes for which we process Personal Data for legal obligation includes:

- Reporting test results to the Health Service Executive (HSE).

### 5.5 To Defend, Establish or be a party to Legal Claims

We may process your Personal Data as necessary in order for us to establish, investigate, exercise or defend a legal claim to which you are a party for the purposes of filing legal proceedings.

## 6. SHARING AND DISCLOSURE OF PERSONAL DATA

We will not disclose your Personal Data to third parties unless you have consented to this disclosure or unless the third party is required to fulfil a request you have made or contract that you have entered into. We will only disclose your Personal Data to third parties in the following circumstances:



## 6.1 Contracted Service Providers and Third Parties

When:

- We contract service providers and suppliers to carry out work on behalf of CLS.
- For the reporting of corporate positive cases, we inform the company occupational health contacts, if they have been provided.

Note that CLS applies measures to ensure that the processing of Personal Data by contracted third-parties complies with applicable data protection and confidentiality laws.

## 6.2 Law Enforcement Agencies

When:

- We believe in good faith that we are required to disclose it to comply with an applicable law; or
- Obligated to comply with court orders, summons, search warrants, or any other statutory, legal or regulatory obligation or request to which CLS is subject;

## 7. DATA RETENTION

We will store your personal Data only for as long as necessary for the purposes of providing services to you or, as required by law.

In accordance with our policy on data retention we shall keep your Personal Data which we process on the basis of your relationship with CLS, for a period of time after your engagement with CLS which depends on why you have interacted with us.

Please contact [info@cls.ie](mailto:info@cls.ie) for further information about our data retention periods.

## 8. STORING OF AND TRANSFERS OF YOUR PERSONAL DATA

CLS is committed to protecting your privacy and ensuring the security of your information. To prevent unauthorised access or disclosure, to maintain the accuracy of all data and to ensure the appropriate restrictions on use of information, we have put in place appropriate physical, electronic and strict managerial procedures to safeguard your privacy and secure the information we collect online. We will continue to update policies and implement additional security features as new technologies become available.

Your Personal Data may be stored and transferred inside or outside the European Economic Area (“EEA”). We only transfer your Personal Data outside the EEA where the EU Commission has decided that the third country in question ensures an adequate level of protection in line with EU data protection standards or if there are appropriate safeguards in place to protect your Personal Data.

If you would like to find out more about the appropriate safeguards that we have in place to govern the transfer of your Personal Data you can contact us at [info@cls.ie](mailto:info@cls.ie)

Unfortunately, the transmission of information via the internet is not completely secure. Although we will always do our best to protect your Personal Data, we cannot guarantee the security of any information you transmit to us; any transmission is at your own risk. Once we have received your information, we will endeavour to use strict procedures and security features to try to prevent unauthorised access.



## 9. YOUR RIGHTS AND HOW TO EXERCISE THEM

This section sets out the rights which you can exercise to address any concerns or queries with us about our processing of your Personal Data.

You can exercise any of these rights by making a subject access request (SAR), i.e. by submitting an email with your request to [info@cls.ie](mailto:info@cls.ie) or by calling our landline telephone number. We may request proof of identification to verify your request.

We will provide you with information on any action taken upon your request in relation to any of these rights without undue delay and at the latest within one month of receiving your request. We may extend this timeframe by two more months if necessary having regard to the circumstances of the request. However, we will inform you if this arises.

Subject to certain restrictions, you can exercise these rights in relation to your personal data that is processed by CLS:

- The right to be informed about the processing of your personal data;
- The right to access your personal data;
- The right to rectification of your personal data;
- The right to erasure of your personal data;
- The right to data portability;
- The right to object to processing of your personal data;
- The right to restrict processing of your personal data;
- Rights in relation to automated decision making, including profiling.

## 10. QUESTIONS AND COMPLAINTS

If you have any concerns about the way your Personal Data are being used or processed by CLS, please contact [info@cls.ie](mailto:info@cls.ie)

If you have any concern in relation to how your Personal Data is used or processed, you have the right to lodge a complaint with the Irish Data Protection Commissioner on its Website: <https://www.dataprotection.ie/>

## 11. CHANGES TO THIS NOTICE

We reserve the right to change this Privacy Policy statement from time to time at our sole discretion. If we make material changes to our privacy policy, these changes will be posted to our privacy policy page and effective immediately upon communicating the revised notice to you.

If at any time we decide to use your Personal Data in a manner significantly different from that stated in this notice, or otherwise disclosed to you at the time it was collected, we will notify you and you will have a choice as to whether or not we use your information in the new manner.