



Website Privacy Statement



SYNLAB: Template (external) website privacy statement

Website Privacy Statement

SYNLAB and data privacy

Integrated Pathology Partnerships Limited and its associated companies (part of the Synlab group of companies) (“Synlab”) are committed to protecting and respecting your privacy.

The Synlab entities on whose behalf this privacy statement is made are identified [here: [insert hyperlink](#)] [in the appendix to this privacy statement]. [Hyperlink to Synlab entities on whose behalf this privacy statement is given is to be: (i) included in the website version of this privacy statement; and (ii) included as an appendix where this privacy statement is provided to individuals in hard-copy form (e.g. a physical location). To be implemented by local business units accordingly. See also comment at the Appendix] We will inform you which entity (within our group of companies) will be the controller for your data if you purchase a product or service from us. [Integrated Pathology Partnerships Limited is the data controller responsible for this website].

1. THIS PRIVACY STATEMENT (TOGETHER WITH ANY FAIR PROCESSING NOTICE WHICH WE MAY ISSUE TO YOU IN SUPPLEMENT TO IT) SETS OUT THE BASIS ON WHICH WE WILL PROCESS ANY PERSONAL INFORMATION THAT WE MAY COLLECT ABOUT YOU AS A VISITOR TO OUR WEBSITE OR PREMISES OR AS A CONTACT WHERE YOU ARE ONE OF OUR CUSTOMERS, SUPPLIERS OR OTHER BUSINESS PARTNERS. WE THEREFORE ASK YOU TO READ THIS PRIVACY STATEMENT CAREFULLY. THE INFORMATION THAT WE COLLECT ABOUT YOU

We may collect and process the following information (also known as “personal data”) about you:

- 1.1 **Information that you give us:** This is information about you that you give to us by:
 - 1.1.1 filling in forms on our website (or other forms that we ask you to complete),
 - 1.1.2 giving us a business card (or similar); or
 - 1.1.3 corresponding with us by telephone, post, email or otherwise.

The information may include, for example, your name, address, email address and telephone number; information about your business relationship with Synlab; and information about your professional role, background and interests.

- 1.2 **Information that our website and other systems collect about you:**
 - 1.2.1 If you visit our website it will automatically collect some information about you and your visit, including the internet protocol (IP) address used to connect your device to the internet and some other information such as your browser type and version and the pages on our site that you visit.
 - 1.2.2 Our website may also download "cookies" to your device – this is described in our separate [cookie statement](#)
 - 1.2.3 If you exchange emails, telephone conversations or other electronic communications with our employees and other staff members, our information technology systems will record details of those conversations, sometimes including their content.

- 1.2.4 Some of our premises have closed circuit TV systems which may record you if you visit our premises. Recording is undertaken at our premises for security and safety purposes.
- 1.3 **Other information:** We may also collect some information from other sources. For example:
 - 1.3.1 If we have a business relationship with the organisation that you represent, your colleagues or other business contacts may give us information about you such as your contact details or details of your role in the relationship.
 - 1.3.2 We sometimes collect information from third party data providers or publicly available sources for anti-money-laundering, background checking and similar purposes, and to protect our business and comply with our legal and regulatory obligations.

2. THE USES THAT WE MAKE OF YOUR INFORMATION

- 2.1 We will only use your use your information when the law allows us to. Most commonly, we will use your information for the following purposes:
 - 2.1.1 to operate, administer and improve our website and premises and other aspects of the way in which we conduct our operations;
 - 2.1.2 to comply with our legal and regulatory obligations and bring and defend legal claims;
 - 2.1.3 to operate, manage, develop and promote our business and, in particular, our relationship with the organisation you represent (if any) and related transactions – for example, for marketing purposes; and
 - 2.1.4 to protect our business from fraud, money-laundering, breach of confidence, cyber-attack, theft of proprietary materials and other financial or business crimes.

We may from time to time review information about you held in our systems – including the contents of and other information related to your email and other communications with us – for compliance and business-protection purposes as described in paragraph 2.1 above.

- 2.2 This may include reviews for the purposes of disclosure of information relevant to litigation and/or reviews of records relevant to internal or external regulatory or criminal investigations.
- 2.3 To the extent permitted by applicable law these reviews will be conducted in a reasonable and proportionate way and approved at an appropriate level of management. They may ultimately involve disclosure of your information to governmental agencies and litigation counterparties as described in paragraph 2.7 below.
- 2.4 Your emails and other communications may also occasionally be accessed by persons other than the member of staff with whom they are exchanged for ordinary business management purposes (for example, where necessary when a Synlab staff member is out of the office or has left Synlab).

- 2.5 We will only process your personal information as necessary so that we can pursue the purposes described above, and then only where we have concluded that our processing does not prejudice you or your privacy in a way that would override our legitimate interest in pursuing those purposes.
- 2.6 In exceptional circumstances we may also be required by law to disclose or otherwise process your personal information. We will tell you, when we ask you to provide information about yourself, if provision of the requested information is necessary for compliance with a legal obligation or, on the other hand, if it is purely voluntary and there will be no implications if you decline to provide the requested information. Otherwise you should assume that we need the information for our business or compliance purposes (as described in paragraph 2.1 above).
- 2.7 If you are uncertain as to Synlab's need for information that we request from you, please contact the Synlab representative asking for the information, or [Contact us](#) (see paragraph 7 below), with your query.

3. DISCLOSURE AND INTERNATIONAL TRANSFER OF YOUR INFORMATION

- 3.1 We may disclose personal information about you where we have obtained your consent to do so or where it is reasonably necessary for the purposes set out in paragraph 2 above:
- 3.1.1 to the other entities within the Synlab group of companies;
 - 3.1.2 to your colleagues within the organisation that you represent;
 - 3.1.3 to service providers who host our website or other information technology systems or who otherwise hold or process your information on our behalf (including doctors and other health professionals), in which case, such providers are placed under equally strict conditions of confidentiality and security to those set out in this statement;
 - 3.1.4 to a person who takes over our business and assets, or relevant parts of them; or
 - 3.1.5 in exceptional circumstances:
 - to competent regulatory, prosecuting and other governmental agencies, or litigation counterparties, in any country or territory; or
 - where we are required by law to disclose the relevant information.
- 3.2 The disclosures referred to in paragraph 3.1 above may involve transferring your personal information overseas. If you are dealing with us within the European Economic Area (or the UK, after it has left the European Economic Area), you should be aware that this may include transfers to countries outside the European Economic Area/ UK. Where we transfer personal information to other members of the Synlab group or our service providers who are based in countries outside of the European Economic Area/ UK, we

will ensure that our arrangements with them are governed by data transfer agreements or mechanisms, designed to ensure that your personal information is protected (including, where appropriate, under an agreement on terms approved for this purpose by the European Commission).

- 3.3 Please [Contact us](#) (see paragraph 7 below) if you would like to know whether any such agreements referred to in paragraph 3.2 are in place or, if so, to see a copy.

4. DATA SECURITY

- 4.1 We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.
- 4.2 We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

5. RETENTION AND DELETION OF YOUR INFORMATION

- 5.1 We intend to keep your personal information accurate and up-to-date. We will delete the information that we hold about you when we have fulfilled the purpose for which it was collected (including for the purpose of satisfying any legal, accounting or reporting requirements).
- 5.2 To determine the appropriate retention period for personal information, we consider the amount, nature and sensitivity of the personal information, the potential risk of harm from unauthorised use or disclosure of your personal information, the purpose for which we process your personal information and whether we can achieve those purposes through other means, and the applicable legal requirements.
- 5.3 In some circumstances, we may anonymise your personal information (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.
- 5.4 Where you are a Customer or Supplier or other party to a contract with Synlab, we will retain your information for 6 years after our most recent dealings with you, after which it will be deleted or anonymised. [Contact us](#) for more information if you have a query regarding the retention or deletion of your information.

6. YOUR RIGHTS

- 6.1 You may have a right of access to the personal information that we hold about you, and to some related information, under data protection law. You can also require any inaccurate personal information that we hold, to be corrected or deleted by us.
- 6.2 You can object to our use of your personal information for direct marketing purposes at any time and you may have the right to object to our processing of some or all of your personal information (and to require that we delete that information) in some other circumstances.
- 6.3 You may also have a "data portability" right in certain circumstances which will enable you to require us to transfer your personal data to you or to a different provider who is providing you with services.
- 6.4 Where we are relying on consent to process your personal information you may withdraw your consent at any time, however this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you, We will advise you if this is the case at the time you withdraw your consent.
- 6.5 If you wish to exercise any of the rights referred to above in this paragraph 6, please [Contact us](#) as set out in paragraph 7 (*Contact us*) below.
- 6.6 You will not have to pay a fee to access your personal data (or to exercise any of your other rights), However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.
- 6.7 You are able to lodge a complaint about our processing of your personal information with the body regulating data protection in your country (details are available here: http://ec.europa.eu/justice/data-protection/article-29/structure/data-protection-authorities/index_en.htm). In the UK, the relevant regulatory body is the Information Commissioner's Office (ICO) (see: www.ICO.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach your regulatory body and so please contact us in the first instance.

7. CONTACT US

- 7.1 We welcome questions, comments and requests regarding this privacy statement and our processing of personal information.



7.2 Please email our Local Data Protection Manager Charles.lilley@ipp-uk.com

8. CHANGES TO THIS POLICY

Any changes we make to this privacy statement in the future will be posted to our website (at <https://www.synlab.co.uk/en/data-privacy/>) and also available if you [Contact Us](#) at:

- email: [contact@ipp-uk.com]

address: SYNLAB Specialist Services

4th Floor

One Kingdom Street

Paddington Central

London W2 6BD

- telephone: [02037551003]

Please check back frequently to see any changes.

Last updated: [15] May 2018

APPENDIX