

PRIVACY NOTICE FOR PATIENTS

Igenomix Spain Lab S.L.U. and its affiliates (“Igenomix” or “us/we”) as part of Vitrolife Group www.vitrolifegroup.com care about your privacy. Therefore, Igenomix always strives to protect your personal data in the best possible way and to comply with all applicable laws and regulations for the protection of personal data.

In this privacy notice, Igenomix wants to inform you as a direct patient and customer of our genetic service or a patient of a referral clinic about how we process your personal data when you request a genetic test from us or by a health care provider. This privacy notice shall not apply for other purposes but for processing activities related to the performance of a genetic test when Igenomix is a data controller.

1. Who is responsible for your personal data?

Igenomix Spain Lab S.L.U., Spanish company TAX number B-40592867, with address Calle Narcís Monturiol 11B, Edificio Europark, Parque Tecnológico de Paterna (46980), Valencia, Spain is responsible for the processing of your personal data (the controller).

If you have any questions or queries regarding Igenomix’s processing of your personal data, you are welcome to contact our Data Protection Officer by sending an e-mail to privacy@igenomix.com.

2. Information about the processing of your personal data

2.1. Type of personal data we are collecting about you

Igenomix will obtain your personal data via the Test Requisite Form filled out by the prescribing doctor and directly from you.

Personal data about you that Igenomix processes:

- Name
- Date of birth
- Gender
- Ethnicity
- Nationality
- Medical information from your physician’s referral or directly from you
- Family history and relationships
- Biological sample (blood, saliva, biopsy tissue)
- Identifiable genetic information
- Email, phone number, address
- Bank account number

Please note that the below list is a list of examples only and is not intended as an exhaustive list. Igenomix will not necessarily process all the data listed below about you, and some of the purposes for processing will overlap and there may be several purposes which justify our use of your personal data.

Igenomix may also process personal data about you that is unstructured, for example, any personal data that you randomly share with us without us requesting such data. Such information will not be stored in our systems and will be deleted without prior notice.

2.2. Purpose of the processing with the legal basis for the processing

The purpose of the data collection is 1) to perform the genetic test and to communicate with you in relation to the service (transactional information) 2) to send you information about related genetic testing services.

Our legal basis of processing your personal data depends on the purpose we collected the data. Please find below a comprehensive table about our data processing.

Performance of the genetic test in case Igenomix’s authorised and certified personnel prescribed the genetic test for you

Purpose of the data management	Provision of healthcare services (genetic testing), the conclusion, modification and termination of the contract related thereto, fulfilment of the obligations related to the contract, enforcement of rights and claims which may arise, defence against claim enforcement, performance of legal obligation, as well as correspondence.
Legal basis of the data management	<ul style="list-style-type: none">• Fulfilment of contract for provision of healthcare (GDPR Article 6(1) (b))• Performance of legal obligation (GDPR Article 6(1) c))• Legitimate interest of Igenomix to enforce claims (GDPR Article 6 (1) f))• Processing is necessary for the purpose of medical diagnosis (GDPR Article 9 (2) h)).• Your consent to send commercial communications. (GDPR Article 6 (1) a))
Scope of the personal data concerned	<ul style="list-style-type: none">• Name• Date of birth• Gender• Ethnicity• Nationality• Medical information from your physician’s referral or directly from you• Family history and relationships• Biological sample (blood, saliva, biopsy tissue)• Identifiable genetic information• Email, phone number, address• Bank account number to send you invoice

Duration of the data management; erasure	5 years from the issue of the genetic report, unless you have consented to research purposes. For research purposes we store personal data up to 30 years
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Performance of the genetic test in the case we received your data from a referral health care provider for the purpose of directly charging you the test fee. Please note that the data controller of your health data is your healthcare provider.

Purpose of the data management	To comply with legal requirements of accounting and bookkeeping acts
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Legal basis of the data management	<ul style="list-style-type: none">• Legitimate interest of Igenomix to administrate you in our financial systems and records (GDPR Article 6 (1) f))• Performance of legal obligation (GDPR Article 6(1) c))
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Scope of the personal data concerned	<ul style="list-style-type: none">• Name• Email, phone number, address• Bank account number
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Duration of the data management; erasure	6 years from the end of the fiscal year
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Marketing purpose

Purpose of the data management	Sending you personalized information about Igenomix's related genetic services.
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Legal basis of the data management	If you are not a customer of Igenomix, we rely on your freely given, unambiguous consent until you unsubscribe (GDPR Article 6 (1) a))
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If you are a customer of Igenomix's services, we rely on our legitimate interest to send you relevant, and personalized information about related services to the one, you have ordered from us. (GDPR Article 6 (1) f))

Scope of the personal data concerned	<ul style="list-style-type: none">• Name• Date of birth• Gender• Email, phone number, address
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Duration of the data management; erasure	2 years from the last interaction with you as customer
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To participate in research

Purpose of the data management

Developing genetic analysis techniques in the field of reproductive medicine

Legal basis of the data management

Processing personal data is based on legitimate interest (Art. 6 (1) f) and also necessary for scientific research (Art. 9 (2) j)) in accordance with GDPR Art. 89. When the purpose of the processing is research, we ensure that technical and organizational measures are in place, and we key-coding your data. Key coding means that your data cannot be tracked back to you without a key code in the secure possession of Igenomix's relevant employee.

If we use completely anonymized data of yours it is not under the scope of GDPR

Scope of the personal data concerned

- Gender
- Ethnicity
- Nationality
- Medical information from your physician's referral or directly from you
- Family history and relationships
- Biological sample (blood, saliva, biopsy tissue)
- Identifiable genetic information

Duration of the data management; erasure

For research purposes we store personal data for up to 30 years

2.3. Recipients or categories of recipients of the personal data and Transfer of personal data Who can gain access to your personal data?

As a starting point, only Igenomix Spain Lab S.L.U. processes your data, as the genetic service provider. In case we need to outsource any part of our genetic testing we primarily do it with an Igenomix affiliate laboratory or we engage a carefully chosen service provider.

If you need information about our service providers (sub-processors), please contact privacy@igenomix.com

In principle, Igenomix only process your personal data within the EU/EEA. However, In the event that your personal data is transferred to a recipient in a third country or to an international organisation Igenomix will take suitable and appropriate safeguards to protect the personal data being processed. We inform you that Igenomix has implemented a Group Data Transfer Agreement that secures the international data transfers within Vitrolife Group, and that we will use the Standard Contractual Clauses together with additional safeguards as applicable issued by the European Commission for international data transfers.

Igenomix is not sharing your personal information or the genetic report with Insurance companies unless you have requested us.

2.4 For how long do we process and store your personal data?

In general, we retain personal data as long as it is necessary to fulfil the purpose of the data processing. In some cases, we may be required to retain personal data for a longer period of time by law or for other necessary purposes. Whenever possible, we aim to anonymize the information or remove unnecessary identifiers from records that we may need to keep for periods beyond the specified retention period.

2.5 Is your data secure with us?

We are committed to protecting your personal data and ensuring that your choices are honoured. We have taken strong security measures to protect your personal data from loss, misuse, unauthorized access, disclosure, alteration, or destruction.

3. How can you affect our processing of your personal data?

Right to information (Art. 12,13 and 14)	You can obtain further information on the personal data which we store and process about you by contacting us at privacy@igenomix.com , stating this request.
Right to object (Art.21)	You may object to your personal data being processed. If you wish to object to your personal data being processed, please contact us at privacy@igenomix.com , stating this request.
Right to rectification and restriction of processing (Art.16. and 18)	You may request that your personal data is rectified if you think your data is inaccurate or incomplete. You have the right to restrict the processing of your personal data in certain situations, such as when you contest the accuracy of the data or when you have objected to the processing and we are considering whether our legitimate interest grounds override your grounds. If you wish to have your data rectified or restrict the processing, please contact us at privacy@igenomix.com , stating this request.
Right to a copy of your personal data (Art. 15)	You may be entitled to obtain a copy of your personal data in a structured, commonly used and machine-readable format by contacting us at privacy@igenomix.com , stating this request. If technically feasible, you may request that the personal data is transmitted directly to another company or person acting as a data controller.

Right to make a complaint (Art.77)	If you have any complaints about our processing of your personal data, you may contact the relevant data supervisory authority. Our Members European Data Protection Board (europa.eu)
Right to withdraw your consent	If we rely on your consent to process your personal data, you can always revoke it by contacting us at privacy@igenomix.com , stating this request. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal. Prior to giving consent, the data subject shall be informed thereof.
Object to automated decision making including profiling (Art. 22)	You have the right not to be subject to a decision based on solely on automated processing that significantly affect you by contacting us at the e-mail at privacy@igenomix.com . There are exceptions, such as when the decision is necessary for a contract, based on the individual's explicit consent or authorised by EU or member state law.
Right to data portability (Art.20)	This right enables you to obtain and reuse your personal data for your own purposes by contacting us at the e-mail at privacy@igenomix.com . You can request your data in a structured, commonly used, and machine-readable format, and you may request that it is transmitted to another controller directly.
Right to be forgotten (Art.17)	You may request by contacting us at privacy@igenomix.com , stating this request. that we delete or remove your personal data.

4. Contact us

If you wish to exercise one of your rights, please send an email to: privacy@igenomix.com

or a letter to:

Legal Department

Igenomix Spain Lab S.L.U., address Calle Narcís Monturiol 11B, Edificio Europark, Parque Tecnológico de Paterna (46980), Valencia, Spain

We kindly inform you that Igenomix may not always be obliged to comply with a request of deletion, restriction, objection or data portability. Assessment may be made on a case by case basis of our legal obligations and the exception to such rights.

Please note that we may require proof of your identity and full details of your request before processing it. The data will only be used to verify your identity and will not be stored for longer than needed for this purpose.

We will reply without delay, in accordance with the applicable regulations.