

## Privacy Notice

**Eurofins Covid Testing Services Limited** is committed to the responsible handling and security of personal data and all information entrusted to us. **We**, the **Eurofins Covid Testing Services Limited**, will process personal data only in accordance with applicable laws, specifically the Data Protection Act 2018 with respective amendments and the retained General Data Protection Regulation ((EU) 2016/679) (“UK GDPR”).

The purpose of this Privacy Notice is to inform you about how we process your personal data

- in connection with ordering, sending in and analysing a COVID-19 Test I Sample collection kit or appointing for performing and analysing the test for detection of SARS-CoV 2 (section 2., 3.) that you order by yourself as our customer or which is ordered on your behalf as a registered group member of a multi user group profile by a lead user (e.g., family member) whom you have appointed and authorized to do so,
- during registration and use of our TrustOne registration pages as well as during use of our TrustOne app (sections 2., 3., 4.), and
- in connection with statutory reporting obligations (section 3.).

Moreover, this Privacy Notice provides information about the recipients of your information (section 4.), international data transfers (section 5.), erasure of your personal data and retention periods (section 6.), measures to ensure data security (section 7.), your rights as a Data Subject (section 8.) and about automated decision-making (section 9.).

### 1. Data controller

The data controller for the processing of your data is:

**Eurofins Covid Testing Services Limited**

I54 Business Park, Valiant Way, Wolverhampton, United Kingdom, WV9 5GB, United Kingdom

[covid19administration@eurofins.co.uk](mailto:covid19administration@eurofins.co.uk)

+44 01925 980595

### 2. Categories of personal data processed

We process the following categories of personal data:

- **Data concerning health within the meaning of Art. 9(1) UK GDPR:** The test result (specifically the determination of whether or not you are infected with coronavirus SARS-CoV-2), result date, sample, sample kit ID, result status, result lab code, type of sample material, sample date and detection method used and the **combination** of these data with your contact details and identity as well as further data to handle delivery and processing by means of a barcode as well as to provide you with the test result.

- **Contact details and identity:** first and last name, gender, nationality, date of birth, your passport number, address, telephone number (mobile), email address, delivery address (for shipments).
- **Data required for technical purposes to provide our websites to you:**
  - Inquirer's public IP address
  - Inquiry time and date, including time zone
  - Requested URL, including query parameters and request header
  - Access status/HTTP status code
  - Data volumes transmitted
  - Referring website (known as "referrer URL")
  - Your browser type and version
  - Your operating system and interface
  - Language and version of your browser software
- **Data required for technical purposes to provide our TrustOne app to you:** your device related information including but not limited to manufacturer, type, model, serial number, operating software type and version, chosen language.
- **Access credentials:** access name and password
- **Payment data**
- **Other data required to handle delivery and processing:** customer ID, order ID, registration ID, order quantity, event tracking data, communication language, tracking status of your parcel
- **Other data required to process with appointment for test:** chosen testing location address, time and date of the appointment

### 3. Purposes for which your personal data will be processed and bases for processing

Your personal data will be processed on the basis of Art. 6(1)(b) UK GDPR, i.e. for the performance of a contract with you for mail-order delivery of a COVID-19 Test | Sample collection kit or for an appointment and performance of a test for the detection of SARS-CoV 2, and in order to take steps preparatory to entering into such a contract. If you register on our TrustOne registration pages or use our TrustOne app to order a COVID-19 Test | Sample collection kit or to appoint, perform and receive result of a test for the detection of SARS-CoV 2, the information we will process for this purpose includes, but is not limited to, your access credentials, first and last name, address, email address, telephone number (mobile) and payment data. In this context, we also process other personal data which are internally assigned to you to handle delivery and processing, e.g. your customer ID, order ID, registration ID, order quantity, communication language, tracking status of your parcel and event tracking data or to handle appointment, performance of the test and presenting the result, e.g. chosen testing location address, time and date of the appointment, detection method used, your phone number (mobile), e-mail address, your TrustOne app account credentials. In the course of the performance of the contract with you, we will also process personal data (first name, last name, address, date of birth, passport number, parcel tracking status or appointment location and date and telephone number (mobile)) to enable you to track your order and to support you if you have any inquiries. For example, we (or a call centre and customer support service provider engaged by us) track the progress of shipments and proactively notify you by calling the telephone number (mobile) you

provided or by email if shipments cannot be delivered or picked up (e.g., if the address was not provided correctly). Processing for these purposes may also be based on our legitimate interest in providing customer support services pursuant to Art. 6(1)(f) UK GDPR.

We will process data concerning your health within the meaning of Art. 9(1) UK GDPR on the basis of your consent (Art. 9(2)(a) UK GDPR) given during the ordering process or during registration on the TrustOne website or in the TrustOne app for the purposes of analysing the sample you sent in or collected by us and providing the test result to you, and to allow you to check the status of your test. This applies to the above data concerning your health, specifically to the analysis of your sample, your test result, result date, sample kit ID, result lab code, sample date, sample collection location, the detection method used and result status and the combination of these data with your contact details, and further data to handle appointment / delivery and processing, if you send in your sample or appoint for a test and submit your contact details through our TrustOne website or through the app.

There may also be other legal bases which justify the processing of your data, including, without limitation, the following:

- If processing is necessary for compliance with a legal obligation to which we are subject and no special categories of personal data (in particular data concerning your health) are processed, this will be done on the basis of Art. 6(1)(c) UK GDPR in conjunction with the applicable law, regulation or other legal requirement.
- If your contact data and data concerning your health are disclosed to the competent public health office, this will be done on the basis of Art. 9(2)(i) UK GDPR in conjunction with the Health Protection (Notification) Regulations (2010) and other respective legal provisions regulating infectious diseases prevention in the United Kingdom. These legal requirements may require us / our testing facilities which provide infectious disease diagnostics services to report all cases in which the coronavirus SARS-CoV-2 was directly or indirectly detected to the competent public health office, stating the name of the person tested, if the test indicates that the infection is acute. Therefore, processing of these data is necessary on the basis of the publicly binding law for reasons of public interest in the area of public health, such as protecting against serious cross-border threats to health.
- Where processing of your personal data falls within the definition of legitimate interests pursued by us or a third party, we process your personal data on the basis of Art. 6(1)(f) UK GDPR, for example data required for technical purposes, to operate and provide our websites and our TrustOne app to you and to ensure our websites and our TrustOne app are safe and working properly.

The provision of your data is a requirement necessary to enter into the contract between us. Without the provision of your data we cannot process your order or appointment for a test and cannot comply with our statutory reporting obligations.

#### **4. Transfer of personal data to recipients**

We will transfer personal data to third parties only to the extent necessary for the provision of our services or if required by law in this context.

For the purposes set out above, we will also transfer personal data to service providers and other third parties who work for us or otherwise assist us in providing our services to you. In addition to having a statutory obligation to comply with all applicable data protection requirements, these service providers are also bound, if applicable, by further contractual terms agreed with us regarding data protection. If the recipient concerned acts as data processor for us, this includes, in particular, the obligations of a data processor pursuant to Art. 28 UK GDPR. The categories of recipients to whom we will transfer personal data as aforesaid include, but are not limited to:

- Providers of IT, hosting and infrastructure services for our websites and our app, including invoice creation, providers of cloud services (including shop or test appointment solutions), specifically:
  - Eurofins Genomics Europe Shared Services GmbH, Anzingerstr. 7a, D-85560 Ebersberg
  - Eurofins Genomics Europe Applied Genomics GmbH, Anzingerstr. 7a, D-85560 Ebersberg
  - TE-FOOD International GmbH, Johannes-Brahms-Strasse 4., 72461 Albstadt, Germany
- Providers of laboratory and other services:
  - Eurofins Genomics Europe Applied Genomics GmbH, Anzingerstr. 7a, D-85560 Ebersberg
  - Eurofins Forensic Services Limited I54 Business Park, Valiant Way, Wolverhampton, WV9 5GB, United Kingdom
  - Sirane Ltd., Stafford Park 6, Telford TF3 3ATne, United Kingdom
  - Sante Group, Maxx House, Western Road, Bracknell, Berkshire, RG12 1QP, United Kingdom
  - Ventrica Ltd., 4th Floor Tylers House Tylers Avenue Southend-on-Sea, Essex, SS1 3BE, United Kingdom
  - Immensa Health Clinic Limited, Dante Labs, Landsdowne House, 57 Barkeley Square 36, London, W1J 6ER, United Kingdom
  - Royal Mail, Remittance Centrepapyrus Road Werrington, Peterborough, PE4 5PG, United Kingdom
- Payment services providers:
  - Stripe, 9th Floor, 107 Cheapside, London 107 Cheapside, EC2V 6DN, United Kingdom

We will disclose your data to official authorities only within our legal obligations or to comply with an official order or court decision or on the basis of your consent and only to the extent permitted by applicable data protection laws, particularly in the following cases:

- To the competent public health office in line with our reporting obligation as described in section 3 of this Privacy Notice.

## **5. International data transfers**

We use service providers located outside the United Kingdom, mainly in the European Union and the European Economic Area (“EEA”), however we may also transfer your personal data to other countries like Canada, USA, or India. As far as potential transfers of data outside the UK will take place (so called restricted data transfers), they will be based on the relevant adequacy decision issued by the competent authorities in line with the UK GDPR. At

the present time UK “adequacy regulations” include the EEA and all countries, territories and international organisations covered by European Commission “adequacy decisions” valid as at 31 December 2020. More detailed information on the UK “adequacy regulations” can be found [here](#). The UK intends to review these adequacy regulations over time. More detailed information about the European Commission adequacy decisions can be found [here](#).

Where we transfer data to countries outside the UK that do not offer an adequate level of data protection, we have safeguards in place to ensure the safety of the processing of your data in third countries in line with the applicable legislation, for example we sign the standard contractual clauses created by the European Commission of the European Union in versions retained in the UK.

For more information about the safeguards we have in place, please contact us via [covid19administration@eurofins.co.uk](mailto:covid19administration@eurofins.co.uk).

## **6. Erasure**

We will erase your personal data according to standard procedures we have in place when your data are no longer necessary in relation to the purposes of processing stated above or, in the event that you have objected to their processing, if there is no compelling legitimate interest to the contrary or, in the event that you have withdrawn your consent, if there is no other legal basis for their processing. In certain cases, e.g. if statutory retention periods apply, your personal data will be first blocked and then erased following the expiration of the retention period. Data acquired in relation to the processing of samples and reporting of results will be retained for a minimum of 8 years to ensure we have allowed a sufficient period for you to exercise your statutory consumer rights.

## **7. Data security**

We have implemented technical and organisational safeguards to protect the personal data you provided against loss, destruction, falsification and unauthorised access. Our staff and all others involved in their processing are required to abide by all relevant legislation pertaining to data protection and to maintain confidentiality in handling personal data. We use a secure transmission protocol known as Secure Socket Layer (SSL) to keep the personal data of our users secure. You can tell that SSL is in use when the address in your browser’s address bar changes from http:// to https:// or a green closed padlock icon appears on your browser status bar. By clicking the padlock icon, you can view information about the SSL certificate being used. The look and location of the padlock icon may vary depending on the browser you use. SSL encryption ensures that the transmission of your data is secure and complete.

## 8. Your rights

As the Data Subject, i.e. as the natural person whose personal data are processed, you have the right to obtain confirmation as to whether or not personal data concerning you are being processed by us and, where that is the case, access to the data we hold about you and the right to obtain a copy of the personal data undergoing processing (Art. 15 UK GDPR). If inaccurate personal data are being processed, you have a right to rectification (Art. 16 UK GDPR). If the statutory conditions for this are met, you have the right to request erasure or restriction of processing of your data (Art. 17 and 18 UK GDPR).

If the processing is based on your consent pursuant to Art. 6(1)(a) or Art. 9(2)(a) UK GDPR, you have the right to withdraw your consent with effect for the future at any time (Art. 7(3) UK GDPR). Please note that if you withdraw your consent with effect for the future, this does not affect any processing carried out on the basis of that consent prior to its withdrawal.

If the processing is based on your consent or your data are processed for the performance of the contract with you and the processing is carried out by automated means, you have the right to data portability of the data you provided to us (Art. 20 UK GDPR).

**You have the right to object, on grounds relating to your particular situation, at any time to processing of personal data concerning you which is based only on lit. (e) or (f) of Art. 6(1) UK GDPR (Art. 21(1) UK GDPR). Where your personal data are processed for direct marketing purposes on the basis of Art. 6(1)(f) UK GDPR, you have the right to object at any time to such processing (Art. 21(2) UK GDPR) without having to demonstrate grounds relating to your particular situation.**

Moreover, you have the right to lodge a complaint with the competent supervisory authority:

Information Commissioner's Office  
Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF  
Telephone: 0303 123 1113  
Fax: 01625 524510  
<https://ico.org.uk/global/contact-us/>

If you have any queries or complaints regarding the subject of data protection, please do not hesitate to reach out to us via our contact point using the contact details provided in section 1.

## 9. No automated individual decision-making

We will not use your personal data for automated individual decision making within the meaning of Art. 22(1) UK GDPR.

## **10. Changes to this Privacy Notice**

We will continually review and update this Privacy Notice to accommodate any changes in the law, business decisions or technical progress. The current version will always be available on our websites and / or in our TrustOne app (as applicable).