

Privacy Policy

1. General

At **ABC Labs AB** ("ABC", "we" or "us") we protect the personal integrity of individuals and always strive for a high level of data protection. This privacy policy explains how we collect and use your personal information, both as a customer of ours or as a test subject. It also describes your rights and how you can assert them. It is important that you read and understand the privacy policy and feel safe in our processing of your personal data. You are always welcome to contact us if you have any questions.

Who is covered by this policy?

This privacy policy applies to you who:

- Perform a laboratory test (e.g. alcohol or drug test) through us (**test person**)
- Book or administer alcohol and drug tests or other tests including test results by us via our platform (**user**)
- Contact us with questions about our services via telephone or our website (**interested party**)
- Are employed by or represent a customer, partner, treatment center or other third party we collaborate with within the framework of our clinical laboratory services (**partner**).

This policy does not cover privacy or data protection issues regarding data handled by our business partners, external service providers and resellers. These third parties are responsible for complying with applicable data protection regulations and have their own privacy policies. To understand how these actors use your personal data, we refer to their respective policies.

2. About us and our services

ABC is a laboratory and offers diagnostic laboratory services within clinical laboratory medicine such as drug and alcohol tests. Our services also include the development and provision of a digital platform for secure management of the entire test flow, including logistics around the tests, analysis in the laboratory and communication of test results.

ABC's role in personal data processing

A data controller is the entity that decides for what purposes personal data shall be processed, and how the processing shall be carried out. The data controller may use a so-called data processor. A data processor is an entity that may only process personal

data in accordance with instructions from the data controller and may not use the personal data for its own purposes.

We are data controllers when we process your personal data in accordance with this privacy policy.

3. What personal data do we collect about you and when?

Personal data in this context refers to all information that is attributable to a natural person and that can be used directly or indirectly to identify them (e.g. name, contact details, social security number, location information, employer).

We may collect personal data about you in several different ways, as we describe below. We primarily collect information directly from you, for example when you create an account with us or perform one of our alcohol or drug tests. However, we may also receive information from other parties, such as your employer, a testing center or another customer.

We collect the following personal data from you when you:

- Register an account in our digital platform, CareOS (name, username, email, contact details).
- Order alcohol or drug tests or other laboratory analyses that require identification (name, contact details).
- Perform our alcohol or drug tests or other laboratory tests (name, social security number, contact details, health information, medical records, human samples (blood, urine, saliva)).
- Pay for our services (payment information, billing address).
- Apply for a job with us (application, contact details).
- Contact us by phone, email or website (name, contact details).

We may also collect information from:

- Your employer for testing (name, social security number, contact details).
- Treatment center or partner for testing, laboratory analysis and referrals (name, personal identification number, contact information).
- Authorities in case of legal requirements.

4. How are we using your personal data and on what legal ground?

Purpose	Legal ground
Create and manage user accounts In order for you to use our services, we need to register your contact details and login details including, among others, name, username, email address, telephone number, job title and employer. This may also include personal data in content that you upload to our digital service, e.g. staff lists, and/or that you share with other users based on your privacy settings or features in the Services.	<i>The use is necessary for us to: (i) perform our contractual obligations, pursuant to GDPR Article 6(1)(b), with our users, or (ii) pursue our customers' legitimate interests, pursuant to GDPR Article 6(1)(f), before an account is created. For certain features of the Services and the website where we are the data controller, we will obtain the individual user's explicit consent, pursuant to GDPR Article 6(1)(a), or, where relevant, GDPR Article 8.</i>
Providing and administering our testing and laboratory services We process personal data, including health-related data, human samples and test results, to manage bookings, conduct drug and alcohol tests, and ensure quality assurance and reporting.	<i>The legal basis for providing our laboratory services and processing health data is GDPR Article 6(1)(f) as the processing is necessary for purposes relating to our legitimate interests and, where applicable, our legal obligation under the GDPR Article 6(1)(c) and 9.2(h) and 9.3, for example, according to the Patient Data Act and health and medical care legislation. When we work with employers and companies that are not healthcare providers, we collect the test subject's explicit consent in accordance with GDPR Article 6(1)(a) and Article 9.2(a) to clarify which personal data we process and why.</i>
Invoicing and financial management We process personal data to handle payments and comply with accounting requirements.	<i>The legal basis is the fulfillment of a contract, in accordance with GDPR Article 6(1)(b) and legal obligation GDPR</i>

	Article 6(1)(c), for example, the Accounting Act 1999:1078).
Support and customer service When you contact us for support matters, we process your contact details and the information you provide in order to be able to answer your request.	<i>The use is necessary for us to either: (i) perform our contractual obligations, pursuant to GDPR Article 6(1)(b), with our users, or (ii) pursue our customers' legitimate interests, pursuant to GDPR Article 6(1)(f).</i>
Communication and reminders We use personal data to send service updates, reminders and important information about our services.	<i>The use is necessary for us to either: (i) perform our contractual obligations, pursuant to GDPR Article 6(1)(b), with our users, or (ii) pursue our customers' legitimate interests, pursuant to GDPR Article 6(1)(f).</i>
Marketing and newsletters If you have given your consent, we may use your contact details to send you information about our services.	<i>Consent, pursuant to GDPR Article 6(1)(a).</i>
Development and improvement of services We analyze user behavior and collected data in the platform, excluding test results and sensitive personal data at the person level, to quality assure and improve our services, including our digital platforms.	<i>This use is necessary, equally GDPR Article 6(1)(b), in order for us to be able to fulfill our contractual obligations with our users and also necessary, equally GDPR 6(1)(f), in view of our legitimate interest in improving, upgrading and increasing the security of the services.</i>
Anonymized data for research and product development We may anonymize personal data for use in research and product development, for example to improve our drug and alcohol tests, the platform, etc. Since anonymized data is no longer personal	<i>This use is necessary, pursuant to GDPR Article 6(1)(b), for us to be able to fulfill our contractual obligations with our users and also necessary, pursuant to GDPR 6(1)(f), in view of our legitimate</i>

data, it falls outside the scope of the GDPR.	<i>interest in improving, upgrading and increasing the security of the services.</i>
Recruitment and similar We collect your personal data from you in connection with your application and during any interviews with us. Where relevant, we also collect information from recruitment agencies, previous employers, our employees, publicly available information, social media (e.g. LinkedIn) in cases where you have used such a service for your application, and references.	<i>This use is necessary, pursuant to GDPR 6(1)(f), in view of our legitimate interest in administering the recruitment process and evaluating job applicants.</i>

All processing of personal data is carried out in accordance with the GDPR and we ensure that only necessary data is processed for the purposes stated above.

Our services are aimed at adults only and we do not intend to use personal data linked to children. For children under 16 years of age, consent from guardians is required before we use their personal data.

5. Automated Personal Data Processing

When you use our Services or interact with our web and hosting platforms, we may receive or collect information about your use of them, such as:

- a) Details of the online content you have viewed or interacted with, such as your browser software, pages you have viewed and what you have "clicked" on.
- b) Services, software or server logs that store information about your use of our Services or websites, including, for example, your IP address, browser information (including HTTP user agent strings), HTTP client request information and the time and location of your activities, domain, device and application settings, errors and hardware activity.
- c) Information about the physical location of your hardware, geolocation service or application.
- d) Interests and preferences that you specify when setting up your browser, account or other product or service via the internet.
- e) Information about your physical location and other information that our support staff needs to maintain, protect and/or provide the Services or websites.

Generally, such online or system information is collected through the use of digital identifiers such as browser cookies, plugins or your IP address. These identifiers are used to distinguish information provided through the hardware, browser or account that you use. However, we may associate the information collected with one of your accounts, for example, if you are logged into our services when the information is collected.

6. Who has access to your personal data?

Employees and consultants

Only those employees and consultants within ABC Labs who need access to your personal data to perform their duties are authorized to process them.

Sharing of personal data

We do not share your personal data with third parties unless it is necessary to be able to provide our services in a quality-assured manner, such as to

- **External service providers and subcontractors:** We may use external IT and logistics providers and business partners to provide technical services, logistics, support, payment, cybersecurity and other necessary processing of personal data. These actors only process data according to our instructions and according to concluded personal data processing agreements.
- **Statutory obligations:** We may share information with authorities and the like if required by law, court order or other legal obligation.

A current list of our personal data processors can be provided upon request.

Transfer outside the EU/EEA

In some cases, personal data may be transferred to countries outside the EU/EEA. When this happens, we ensure that appropriate safeguards are taken, for example through agreements that comply with the EU Commission's standard contractual clauses.

7. Storage, verification and deletion of personal data

We only save your personal data for as long as it is necessary to fulfill the purpose, i.e. for our users and customers to be able to utilise our services including the performance of quality-assured alcohol and drug tests and laboratory services.

Deletion: Data that is no longer necessary for the performance of our services, quality assurance or customer relations is continuously deleted to ensure that we only process relevant personal data. We conduct an annual review to identify and delete information that is no longer needed.

- Data linked to your account in our platform is saved as long as you have an account with us and up to 12 months thereafter.
- Sensitive health data and laboratory results are saved for a maximum of 12 months after the ongoing case with the client has been concluded unless there are special reasons to save the data longer.
- Human samples (blood, saliva or urine) are saved for at least 1 month after the sample is submitted and as long as we have an ongoing case linked to the test result, but no longer than 6 months.
- Payment and invoicing information is saved as long as we have an ongoing customer relationship and as long as we have statutory requirements to retain the information according to, for example, the Accounting Act.
- Marketing information is only saved with your consent and is deleted if you withdraw your consent.
- Applications and such are saved for a maximum of 12 months after employment.

Security measures: We use technical and organizational security measures such as:

- Encryption when storing and transferring sensitive information.
- Limited access to personal information based on the need-to-know principle.
- Regular security review and risk analysis.
- Access minimization to sensitive personal information.
- Training for employees.

8. Your rights

Regarding personal information for which we, ABC, are the personal data controller, users have, among other things, the following rights:

- **Right to access.** Upon request, we will confirm whether we are processing your personal data and, if so, provide you with a copy of it, including why we are processing the data.
- **Right to data portability.** In certain cases, you have the right to receive your personal data from us in a structured, commonly used and machine-readable format, which you can then use elsewhere.
- **Right to rectification.** If your personal data is inaccurate or incomplete, you have the right to have it corrected or completed. If we have shared your personal data with others, we will, as far as possible, notify them of the corrections.
- **Right to erasure.** You can ask us to erase or remove your personal data and we will do so, e.g. when it is no longer needed. Notwithstanding this, we also have the right to refrain from erasing certain data as stated in this policy, for example due to legal requirements to save certain data under healthcare legislation or due to accounting requirements.
- **Right to object to processing of personal data.** You can ask us to stop processing your personal data at any time and we will do so: (i) where we base

the processing on legitimate interests - unless we can demonstrate compelling reasons for the processing; or (ii) where we process your personal data for direct marketing.

- **Rights regarding automated decision-making and profiling.** You have the right not to be subject to decisions based solely on automated processing of your personal data, including profiling, unless such profiling is necessary for entering into or performing a contract.
- **Right to withdraw consent.** You can withdraw your consent at any time. However, this does not affect the lawfulness of processing based on your previous consent.
- **Right to complain to the Swedish Data Protection Authority.** If you have any comments about this policy, including how we have handled your personal data, you can report this to the Swedish Data Protection Authority via <https://www.imy.se/>.

If you have any comments or questions regarding our compliance with this Policy or other information, please contact us using the contact details below and we will clarify our use of your personal information and answer your questions.

9. Contact

If you have any questions about this Policy or wish to exercise your rights, please contact our Data Protection Officer, Ann Cheng.

- E-mail: privacy@abclabs.se
- Address: Hagaplan 4, 113 68 Stockholm
- Web site: www.abclabs.se

10. Changes to this Policy

We will update this policy as necessary and will post any changes via our website.