

Section 1 – Identity and contact details of the data controller

This notice is primarily governed by the Swiss Federal Act on Data Protection (FADP) and other applicable Swiss laws. Where the EU General Data Protection Regulation (GDPR) applies to a processing activity, its requirements apply in parallel and are retained in this notice as the data-protection baseline.

Unilabs, Laboratoire d'analyses médicales SA

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Section 2 – What personal data do we collect?

Unilabs collects the following personal data about you:

- **Identification data:** first name, surname, gender, address, telephone number, email address, date of birth.
- **Diagnostic and analytical data:** laboratory and pathology results, analytical values, clinical reports, radiology or pathology images where applicable, specimen, tissue, examination and clinical-episode identifiers, dates or date ranges, diagnostic findings, biomarkers and derived structured clinical variables.
- **Pseudonymised linkage data:** project-specific pseudonymous identifiers and limited demographic or clinical attributes required for approved cohort, statistical or pathway analyses.
- **AI-generated or analytically derived data:** structured findings, classifications, quality indicators and aggregate statistical outputs generated during approved analytical or AI-supported processing.
- **Technical data:** such as metadata associated with medical imaging data.
- **Genetic data:** DNA samples
- **Financial data:** bank details
- **Marketing and communications data:** your preferences regarding the receipt of marketing material from us and third parties, as well as your communication preferences

Section 3 – Purposes of processing and legal basis

Your personal data is processed for the following purposes and in accordance with the legal basis set out below:

Purposes of processing	Legal bases
Scheduling appointments and medical examinations	Processing is necessary to take steps requested by the patient and to conclude or perform a contract for healthcare services (Article 6(1)(b) GDPR). Under the FADP, the relevant justification for data processing is that it is directly related to the conclusion or performance of a contract (Article 31(2)(a) FADP).
Collection of samples (blood, urine or other bodily fluids) and carrying out X-ray examinations The healthcare services provided by Unilabs may include the following: • Diagnostic services such as clinical biochemistry, haematology, coagulation, microbiology, specialised chemistry, serology, immunology, transfusion medicine, nuclear medicine, molecular biology, drug abuse testing, therapeutic drug monitoring, point-of-care tests and genetic testing; • Radiology and imaging examinations;	Processing is necessary for the performance of the contract with the patient for the provision of healthcare services (Article 6(1)(b) GDPR). Under the FADP, the relevant justification for data processing is that it is directly related to the conclusion or performance of a contract (Article 31(2)(a) FADP). Health data is processed where necessary for medical diagnosis or the provision or management of healthcare by, or under the responsibility of, a professional subject to secrecy (Article 9(2)(h) and Article 9(3) GDPR). Under the FADP, health and genetic data are sensitive personal data; their processing is subject to the FADP principles, an applicable justification under Article 31 where required, and medical

Personalised diagnostic services for the treatment and monitoring of genetic, chronic and infectious diseases.	professional secrecy under Article 321 of the Swiss Criminal Code.
Delivery of samples to a Unilabs laboratory by a Unilabs courier	Processing is necessary for the performance of the contract with the patient for the provision of healthcare services (Article 6(1)(b) GDPR). Under the FADP, the relevant justification for data processing is that it is directly related to the conclusion or performance of a contract (Article 31(2)(a) FADP). Health data is processed where necessary for medical diagnosis or the provision or management of healthcare by, or under the responsibility of, a professional subject to secrecy (Article 9(2)(h) and Article 9(3) GDPR). Under the FADP, health and genetic data are sensitive personal data; their processing is subject to the FADP principles, an applicable justification under Article 31 where required, and medical professional secrecy under Article 321 of the Swiss Criminal Code.
Sample and X-ray analyses (carried out by our experienced technicians and scientists)	Processing is necessary for the performance of the contract with the patient for the provision of healthcare services (Article 6(1)(b) GDPR). Under the FADP, the relevant justification for data processing is that it is directly related to the conclusion or performance of a contract (Article 31(2)(a) FADP). Health data is processed where necessary for medical diagnosis or the provision or management of healthcare by, or under the responsibility of, a professional subject to secrecy (Article 9(2)(h) and Article 9(3) GDPR). Under the FADP, health and genetic data are sensitive personal data; their processing is subject to the FADP principles, an applicable justification under Article 31 where required, and medical professional secrecy under Article 321 of the Swiss Criminal Code.
Analysis of the results and report	Processing is necessary for the performance of the contract with the patient for the provision of healthcare services (Article 6(1)(b) GDPR). Under the FADP, the relevant justification for data processing is that it is directly related to the conclusion or performance of a contract (Article 31(2)(a) FADP). Health data is processed where necessary for medical diagnosis or the provision or management of healthcare by, or under the responsibility of, a professional subject to secrecy (Article 9(2)(h) and Article 9(3) GDPR). Under the FADP, health and genetic data are sensitive personal data; their processing is subject to the FADP principles, an applicable justification under Article 31 where required, and medical professional secrecy under Article 321 of the Swiss Criminal Code.
Communication of the results to patients	Processing is necessary for the performance of the contract with the patient for the provision of healthcare services (Article 6(1)(b) GDPR). Under the FADP, the relevant justification for data processing is that it is directly related to the conclusion or performance of a contract (Article 31(2)(a) FADP). Health data is processed where necessary for medical diagnosis or the provision or management of healthcare by, or under the responsibility of, a professional subject to secrecy (Article 9(2)(h) and Article 9(3) GDPR). Under the FADP, health and genetic data are sensitive personal data; their processing is subject to the FADP principles, an applicable

	justification under Article 31 where required, and medical professional secrecy under Article 321 of the Swiss Criminal Code.
Providing patients with the requested explanations regarding the results	Processing is necessary for the performance of the contract with the patient for the provision of healthcare services (Article 6(1)(b) GDPR). Under the FADP, the relevant justification for data processing is that it is directly related to the conclusion or performance of a contract (Article 31(2)(a) FADP). Health data is processed where necessary for medical diagnosis or the provision or management of healthcare by, or under the responsibility of, a professional subject to secrecy (Article 9(2)(h) and Article 9(3) GDPR). Under the FADP, health and genetic data are sensitive personal data; their processing is subject to the FADP principles, an applicable justification under Article 31 where required, and medical professional secrecy under Article 321 of the Swiss Criminal Code.
Processing of payment for the requested healthcare service	Processing is necessary for performance of the contract, including payment for the healthcare service (Article 6(1)(b) GDPR). Under the FADP, the relevant justification for data processing is that it is directly related to the conclusion or performance of a contract (Article 31(2)(a) FADP).
Sending marketing communications about Unilabs' products and services to existing patients	Processing is based on Unilabs' legitimate interests in informing existing patients about similar products and services, subject to the applicable balancing assessment and marketing rules (Article 6(1)(f) GDPR). Under the FADP, Unilabs relies, where justification is required, on an overriding private interest under Article 31 FADP, taking account of the patient's reasonable expectations and right to object.
Sending marketing communications about Unilabs' products and services to new patients	The patient has consented to receive marketing communications about Unilabs' products and services (Article 6(1)(a) GDPR). Where consent is also relied upon under Swiss law, it must be free and informed and, where sensitive personal data or profiling presenting a high risk is involved, explicit, in accordance with the FADP. Further information on this specific processing activity can be found in the privacy notice on marketing consent
Carrying out quality controls in the laboratory (e.g. conducting tests and analyses in accordance with standardised procedures)	Processing is based on Unilabs' legitimate interests in ensuring the integrity of laboratory services and the accuracy and quality of processes (Article 6(1)(f) GDPR). Under the FADP, Unilabs relies, where justification is required, on an overriding private or public interest under Article 31 FADP, subject to necessity, proportionality and appropriate safeguards.
Notification of state health organisations (e.g. exchange of information in connection with the reporting of infectious diseases, incidents or for epidemiological studies)	Processing and disclosure are carried out where necessary to comply with applicable Swiss legal obligations, including reporting obligations concerning infectious diseases, incidents or epidemiological surveillance. For GDPR purposes, the corresponding legal basis is Article 6(1)(c) GDPR and, where health data is involved, Article 9(2)(i) GDPR where its conditions are met. Under the FADP, processing required by Swiss law is permitted on that statutory basis and remains subject to the applicable data-protection principles and confidentiality requirements.

Use of pseudonymised data for analysis and improvement of healthcare services, including scientific and statistical research	We may process health data in pseudonymised form to conduct specifically approved scientific, statistical and feasibility activities. These may include assessing data availability and quality, constructing cohorts, analysing diagnostic and testing pathways, evaluating testing patterns, and developing or validating methods for extracting predefined clinical information using analytical or artificial intelligence tools. Processing is carried out in accordance with the Swiss Federal Act on Data Protection. Where justification is required, the processing relies on the overriding private or public interests pursued by the approved healthcare, scientific, statistical or feasibility activity under Article 31 FADP, subject to necessity, proportionality and appropriate safeguards. Where consent or another provision of Swiss law is required for a particular activity, that requirement will be applied separately. Whenever the purposes can be achieved using anonymous or aggregated data, such data will be used. Where it is necessary to link examinations, reports or episodes relating to the same patient, pseudonymised identifiers will be used, and the additional information enabling re-identification will be kept separately and subject to restricted access. These activities are not intended to identify or contact patients, create individual profiles, make individual clinical or solely automated decisions, or produce outputs at the level of a specific patient.
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Section 4 – Automated decision-making and A.I.

Unilabs may use artificial-intelligence and analytical tools to extract or structure predefined clinical information, support radiology or other diagnostic workflows, and support scientific, statistical, quality, feasibility or service-management analyses. Where AI-supported tools are used in the context of healthcare delivery, they are used only to support professional review and clinical decision-making by qualified healthcare professionals. They do not replace human clinical judgement.

For the scientific, statistical, quality, feasibility or service-management activities described in this notice, Unilabs will use anonymous or aggregated data whenever the relevant purpose can reasonably be achieved in that way. Where it is necessary to link examinations, reports or episodes relating to the same patient, pseudonymised identifiers may be used, and any additional information enabling re-identification will be kept separately and subject to restricted access.

For the activities described in this notice, AI-supported or analytical tools are not used to make solely automated decisions that produce legal effects or similarly significant effects for individual patients. These activities are not intended to identify or contact patients, create individual profiles, make individual clinical decisions without human involvement, or produce patient-level outputs for secondary-use purposes. Any AI-supported output used in a healthcare context remains subject to appropriate professional review, validation and human responsibility.

Section 5 – Indirect collection of data

Your personal data may also have been collected indirectly from various sources:

Categories of personal data collected indirectly	Source
Identification, health and genetic data.	Referring doctors, hospitals and clinics that send health samples to our laboratories for testing.

Section 6 – Categories of recipients of personal data

Personal data may be disclosed to the following recipients:

- Health insurance providers, insofar as this is necessary for the billing of the tests carried out;

- authorised staff of the relevant Swiss Unilabs healthcare organisation, to the extent necessary for the provision of healthcare services, the maintenance of source records, pseudonymisation, the validation of data quality or the fulfilment of legal and governance-related obligations;
- authorised companies within the Unilabs Group acting as data processors for specifically commissioned data processing, analysis, AI or platform activities;
- research institutions, universities and pharmaceutical companies, to support secondary use activities described in Section 3 above;
- approved technology providers, including cloud-infrastructure, data-analytics and digital-pathology providers, acting as processors and providing hosting, storage, computing, analytics, security or image-management services;
- professional advisers, including solicitors, auditors and insurers;
- payment service providers;
- authorised experts from the healthcare or scientific sectors, insofar as their access is necessary for clinical or methodological validation; and
- competent authorities or other recipients, insofar as disclosure is required or permitted under Swiss law.

Recipients may process the data solely for the specified purpose and in compliance with the applicable contractual, confidentiality and security requirements. The re-identification key will not be made available to analytical users or service providers unless this is expressly required, permitted by law and specifically authorised.

Section 7 – Pseudonymisation and anonymisation

Whenever the relevant purpose can reasonably be achieved using anonymous or aggregated data, Unilabs will use such data. Where records relating to the same patient must be linked across examinations, reports, clinical episodes or systems, Unilabs may instead use pseudonymised data, subject to appropriate technical and organisational safeguards.

Pseudonymisation replaces or separates direct identifiers so that data cannot be attributed to you without the use of additional information. Pseudonymised data remains personal data for as long as the relevant Swiss Unilabs unit, or another party acting on its behalf, retains information that could reasonably be used to re-establish the link to you. That additional information, including any re-identification key, is stored separately, protected by appropriate access controls and made available only to specifically authorised persons where necessary for an approved purpose.

Anonymisation is a technical process that aims to remove or modify identifying information so that could be used to identify you are. Once data has been anonymised, it can no longer be identifiable by means reasonably likely to be used in the relevant context. Data is treated as anonymous only where identification is no longer reasonably possible; in that case, it is no longer personal data under applicable law and cannot be linked back to you, and data-protection laws. If attribution remains reasonably possible through additional information, the data is pseudonymised rather than anonymised and continues to be protected as personal data no longer apply to it.

Section 8 – Medical confidentiality:

Patient data may be protected by medical confidentiality in accordance with Article 321 of the Swiss Criminal Code, as well as by other applicable confidentiality obligations. Access is restricted to healthcare professionals and other expressly authorised persons whose involvement is necessary for the relevant medical, technical, scientific or analytical activity and who are subject to the applicable professional, statutory or contractual confidentiality obligations.

Where authorised service providers process patient data on behalf of the relevant Swiss Unilabs unit, access is restricted to what is necessary for the commissioned service and is subject to requirements regarding confidentiality, security, purpose limitation and access control. The use of a service provider does not permit the independent use of patient data.

Section 9 – Data Retention Period

We retain your personal data only for as long as is necessary to fulfil the purposes for which it was collected. When determining the appropriate retention period for personal data, we take into account the volume, nature and sensitivity of the personal data, the potential risk of harm arising from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes by other means, as well as the applicable legal requirements.

Where personal data is no longer required or the retention period has expired, it will be deleted.

Personal data may be retained for longer where required by law.

Personal data used in a limited feasibility or analysis project will only be retained for the approved duration of the project and will be deleted or anonymised upon completion of the project, subject to any applicable statutory, healthcare-related, scientific or evidential retention obligations.

For the current feasibility pilot project, the pseudonymised analysis dataset and the associated personal data artefacts will be deleted upon completion of the project and no later than the approved project-specific deletion date. The text of clinical reports, which is used exclusively for the extraction of predefined structured variables, will not be retained after this extraction, unless a separately documented requirement applies.

Anonymous aggregate outputs may be retained where the applicable assessment confirms that individuals are no longer identifiable.

Section 10 – Transfer of personal data outside Switzerland

Personal data may be processed in Switzerland and, insofar as this is necessary for an authorised purpose, in another country by an entity of the Unilabs Group or an authorised service provider.

Where personal data is disclosed abroad, Unilabs applies the requirements of the Swiss FADP. Data may be disclosed to a country recognised by the Swiss Federal Council as providing an adequate level of protection. Where the destination does not provide adequate protection, Unilabs applies appropriate safeguards, such as recognised contractual data-protection clauses, unless another statutory exception applies.

Additional restrictions arising from medical confidentiality are assessed separately from the requirements for international data transfers.

Section 11 – Rights of data subjects

You have the following rights in relation to your personal data:

- **(a) Right to object:** You may object to our processing of your personal data where we rely on a legitimate interest (or that of a third party) and there is something in your particular situation that leads you to object to the processing on that basis. Please contact us and provide details of your objection.
- **(b) Access to your personal data:** You may request a free copy of your personal data held by us, together with information about what personal data we use, why we use it, who we share it with, how long we keep it and whether it has been used for automated decision-making.

We will respond to a valid request for access to your data without undue delay and at the latest within one month of receiving the request. In certain circumstances, we may extend the response period by a further two months. For example, if the request is complex. In this case, we will inform you of this within one month of receiving your request for access and explain the reasons for the extension.

- **(c) Consent:** If you have given us your consent to use personal data, you may withdraw this consent at any time. If you withdraw your consent, Unilabs will cease processing your personal data.
- **(d) Rectification:** You may request that we rectify or complete any inaccurate or incomplete personal data that we hold about you.
- **(e) Erasure:** You may request that we erase your personal data if we no longer need it, if you have withdrawn your consent, or if we have no legal basis for retaining it.
- **(f) Portability:** You may request that we provide you or a third party with the personal data we hold about you in a structured, commonly used electronic format, so that it can be easily transferred.
- **(g) Restriction:** You may request that we restrict the personal data we hold about you if you have requested its erasure or objected to our use of that data.
- **(h) Automated decision-making:** Automated decision-making occurs when an electronic system uses personal data to make a decision without human intervention. You have the right not to be subject to solely automated decisions that produce legal effects or similarly significant effects for you, unless (i) you have given us your consent, (ii) this is necessary for a contract between you and us, or (iii) this is otherwise permitted by law. You also have certain rights to challenge decisions affecting you. For the activities described in this notice, Unilabs does not use artificial-intelligence or analytical tools to make such decisions concerning tools make solely automated decisions that produce legal effects or similarly significant effects for individual patients.

Section 12 – Exercising your rights

To exercise your rights, please complete the online form available via this [link](#). You may also exercise your rights by sending an email to the following address: dpo@unilabs.com

Exercising your rights is free of charge.

Section 13 – Contact details of the Data Protection Officer

If you have any comments or questions regarding this privacy notice or our data processing practices, please contact the Data Protection Officer.

Email: dpo@unilabs.com

Section 14 – Right to lodge a complaint with the Data Protection Authority (DPA)

If you are dissatisfied with the way in which we have processed your personal data or with a request or application you have made to us regarding data protection, and have not received a satisfactory response from us and/or our Data Protection Officer, you have the right to lodge a complaint with the Swiss Data Protection Authority:

Federal Data Protection and Information Commissioner

Feldeggweg 1, CH - 3003 Bern

Telephone: +41 (0)58 462 43 95

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22 September 2026