

## **PRIVACY POLICY – LAB AT HOME**

This Privacy Policy ("Policy") sets out how LAB AT HOME ("we", "us", or "our") uses personal information of users, dependents, relatives or acquaintances ("you" or "your") of our website and mobile application (the "Platform") and explains what kind of information is collected, how it is collected, how it is managed and stored, how it is used, and how you, as a patient/user, can access and update information relating to you.

Before continuing, please carefully read this Policy.

This Policy applies to information acquired from users of LAB AT HOME that have completed the Patient Registration process and other accompanying forms that are required to administer their requests.

We recognize the responsibilities tied with the collection, storage, processing, and use of the personal data you have entrusted to us. Providing us with your personal data is purely voluntary. However, choosing not to disclose your personal data to us may limit our ability to provide services to you.

Information collected and held by LAB AT HOME is subject to the Republic Act No. 10173, also known as the Data Privacy Act of 2012. We are committed to respect your right to privacy and to comply with the provisions of the Data Privacy Act of 2012 and its related rules and issuances.

### **Section 1. General Provisions**

- A. By using the Services and having yourself registered as a user, you acknowledge and agree that you accept the practices, requirements, and/or policies outlined in this Policy, and you hereby consent to our collecting, using, disclosing and/or processing your personal data as described herein. If you do not consent to the processing of your personal data as described in this Policy, please do not use our services or access our platform.
- B. This Policy applies in conjunction with other notices, forms, contractual clauses, consent clauses that apply in relation to the collection, storage, use, disclosure and/or processing of your personal data by us and is not intended to override those notices or clauses unless we state expressly otherwise.

### **Section 2. Collection and Use of Personal Information**

- A. Kind of Information Collected –

LAB AT HOME collects and holds information relating to users requests. This information includes details describing the user which may include, but is not limited to your name, age, gender, address, date of birth, telephone number, mobile number, email address, bank account and payment information, physician's name (if any), and related medical information.

- B. As with most websites and mobile applications, your device sends information which may include data about you that gets logged by a web server when you browse our Platform. This typically includes without limitation your device's Internet Protocol (IP) address, computer/mobile device operating system and browser type, type of mobile device, the characteristics of the mobile device, the unique device identifier (UDID) or mobile equipment identifier (MEID) for your mobile device, the address of a referring web site (if any), the pages you visit on our website and mobile applications and the times of visit, and sometimes a "cookie" (which can be disabled using your browser preferences) to help the site remember your last visit. If you are logged in, this information is associated with your personal account. The information is also included in anonymous statistics to allow us to understand how visitors use our site.
- C. Our mobile application may collect precise information about the location of your mobile device using technologies such as GPS, Wi-Fi, etc. We collect, use, disclose and/or process this information for one or more purposes including, without limitation, location-based services that you request or to deliver relevant content to you based on your location. For most mobile devices, you are able to withdraw your permission for us to acquire this information on your location through your device settings. If you have questions about how to disable your mobile device's location services, please contact your mobile device service provider or the device manufacturer.
- D. Use of Personal Data –

LAB AT HOME uses the personal data collected from its users primarily for managing and administering the medical diagnostic tests requested by users directly or via their employers to complete their requirements. In addition, LAB AT HOME utilizes the information held for the purpose of statistical analysis, executing marketing campaigns, demand and supply strategic planning, product/service development, and other similar purposes.

LAB AT HOME may likewise collect and use your personal data for any or all of the following purposes:

- i. Managing and administering the medical diagnostic test/s;
- ii. Performing obligations in the course of, or in connection with, our provision of goods and/or services;
- iii. Transmittal to any third party, including our third party service providers, their agents, and any relevant government and/or regulatory authorities in compliance with any applicable laws, regulations, codes of practice, guidelines, or rules, or to assist in law enforcement and investigations conducted by any governmental and/or regulatory authority;
- iv. Identity verification;
- v. To notify you of your appointment;
- vi. To respond to, handle, and process queries, requests, applications, complaints, and feedback from the client/user;
- vii. To manage, maintain and improve your relationship with LAB AT HOME;
- viii. To process payment or credit transactions;
- ix. To audit our business and services provided;

- x. To send marketing information about LAB AT HOME's products and services to the patient/user;
- xi. To notify patients/users of marketing events, initiatives, memberships, reward schemes, and other existing promotions;
- xii. Any other purposes for which patient/user has provided the information;
- xiii. To assist in law enforcement purposes, investigations by government agencies and to meet requirements imposed by applicable law and regulations
- xiv. Any other incidental business purposes related to or in connection with any of the above.

No persons other than LAB AT HOME, its employees, agents, representatives, and contractors of those persons, are authorized to access patient/user information held. All persons who can access the information are required to maintain its confidentiality and comply with relevant privacy laws.

- E. You agree not to submit any information to us which is inaccurate or misleading, and you agree to inform us of any inaccuracies or changes to such information. We reserve the right at our sole discretion to require further documentation to verify the information provided by you.
- F. If you sign up to be a user of LAB AT HOME using your social media account ("Social Media Account"), link your LAB AT HOME account to your Social Media Account or use any LAB AT HOME social media features, we may access information about you which you have voluntarily provided to your Social Media Account provider in accordance with such provider's policies, and we will manage and use any such personal data in accordance with this Policy at all times.
- G. If you do not want us to collect your personal information, you may withdraw your consent at any time by notifying our Data Protection Officer in writing. Further information on withdrawal of consent can be found in the Section 5 below.

### **Section 3. How Collected**

- A. Confidential information is collected from patients/users whenever he/she requests for any of the services of LAB AT HOME by completing registration, testing, and consent forms. In addition, on each occasion when a patient is tested, details of that transaction are recorded and kept in the database including medical diagnostic testing results information related to the patient/user.
- B. We or our authorized service providers and advertising partners may from time to time use "cookies" or other features to allow us or third parties to collect or share information in connection with your use of our Platform. These features help us improve our Platform and the Services we offer, help us offer new services and features, and/or enable us and our advertising partners serve more relevant content to you, including through remarketing. "Cookies" are identifiers that are stored on your computer or mobile device that record data about computer or device, how and when the Services or Platform are used or visited, by how many people and other activity within our Platform. This information is used to keep track of your purchases, to deliver content specific to your interests, to enable our third party advertising partners to serve advertisements on sites across the internet, and to conduct data analysis and to monitor usage of

the Services. You may refuse the use of cookies by selecting the appropriate settings on your browser or device.

- C. The above does not purport to be exhaustive and sets out some common instances of when personal data about you may be collected.

#### **Section 4. Disclosure of Personal Data**

- A. Your personal data will be kept confidential and will only be accessed or shared to accomplish the purposes for which the data was collected for.
- B. We may disclose your personal data where such disclosure is required for the performance of obligations in the course of or in connection with our provision of goods and/or services. Likewise, personal data may be disclosed to service providers, agents, affiliates, subsidiaries, joint ventures, or other companies under common control with us and other organizations we have engaged to perform any of the functions as provided in Section 1(B) on the use of personal data.
- C. We may share user information, including statistical and demographic information, about our patients/users and information about their use of the Services with advertising partners and third party suppliers of advertisements, remarketing, and/or other programming
- D. In the event of a corporate sale, merger, reorganization, sale of assets, dissolution, or similar event, some or all of the Personal Information may be part of the transferred assets.
- E. To the extent permitted by law, we may also disclose Information when required by law, court order, or other government or law enforcement authority or regulatory agency, or whenever we believe that disclosing such information is necessary or advisable, for example, to protect the rights, property, or safety of us or others.

#### **Section 5. Your Rights over Your Personal Data**

You have the right to access the personal data that you provided us, to make rectifications to your information, as well as the right to withdraw consent, delete, or object to the data collected. However, choosing not to disclose your personal data to us may limit our ability to provide services to you.

The rights herein mentioned are not an exclusive list thereof. Please check Chapter IV, Section 16 of the Data Privacy Act of 2012 for the exact list and rights you may have as a data subject. If you would like to make any request in relation to your rights, please contact our Data Privacy Officer.

#### **Section 6. Withdrawal of Consent**

- A. The consent that you provide for the collection, use and disclosure of your personal data will remain valid until such time it is withdrawn by you in writing. You may withdraw consent and

request LAB AT HOME to stop using and/or disclosing your personal data for any or all of the purposes listed above by submitting your request in writing or via email to our Data Protection Officer at the contact details provided below.

- B. Upon receipt of your written request to withdraw your consent, we may require reasonable time, depending on the complexity of the request and its impact on our relationship with you, for your request to be processed and for us to notify you of the consequences of us acceding to the same, including any legal consequences which may affect your rights and liabilities to us. In general, we shall seek to process your request within **ten (10) business days** of receiving it.
- C. Whilst LAB AT HOME respects your decision to refuse signing this agreement. Please note that we may not be in a position to continue providing our services to you as the information collected is critical to the service and goods we provide. We shall, in such circumstances, notify you before completing the processing of your request. Should you decide to cancel your withdrawal of consent, please inform us in writing in the manner described in Section 5(A) above.
- D. Please note that the withdrawal of your consent does not affect LAB AT HOME's right to continue to collect, use and disclose personal data where such collection, use and disclose without consent is permitted or required under applicable laws.

## **Section 7. Storage and Management of Personal Data**

- A. The patient/user registration and other physical copies of testing and consent forms are securely in the office, while the digital records are stored electronically in an encrypted computer database managed by LAB AT HOME.
- B. We apply reasonable security measures to protect your personal data from loss, misuse, and unauthorized access, disclosure, alteration, or destruction.
- C. Patient data and information will be stored for **10 years**.
- D. The processing of personal data may continue to apply even in situations where your relationship with LAB AT HOME has been completed, terminated, or altered in any way, for a reasonable period thereafter. This shall include, where applicable, a period of time to enable us to enforce our rights under any contract with the patients/users.
- E. We shall retain your personal data only for as long as necessary to fulfill the purposes for which the data is collected. Once retention of your personal data is no longer necessary, we shall delete or destroy your personal data from our records.

## **Section 8. Data Quality and Security**

We are committed to taking all reasonable steps to make sure the information acquired using manual forms, and digital information held on its databases, are accurate and secure.

We implement a variety of security measures and strive to ensure the security of your personal data on our systems. Patient's/User's personal data is contained behind secured networks and is only accessible by a limited number of employees who have special access rights to such systems.

### **Section 9. Access and Update of Personal Information**

If you have an account with us, you may personally access and/or correct your personal data currently in our possession or control through the Account Settings page on the Platform.

If you do not have an account with us, you may request to access and/or correct your personal data currently in our possession or control by submitting a written request to us. We will need enough information from you in order to ascertain your identity as well as the nature of your request so as to be able to deal with your request. Hence, please submit your written request by sending an email to our Data Protection Officer at [aj.supan@labatomeph.com](mailto:aj.supan@labatomeph.com)

We may charge you a reasonable fee for the handling and processing of your requests to access your personal data. If we so choose to charge, we will provide you with a written estimate of the fee we will be charging. Please note that we are not required to respond to or deal with your access request unless you have agreed to pay the fee.

### **Section 10. How to Contact Us**

For any queries, clarifications, or requests on any aspect of this Privacy Policy, the exercise of your rights pertaining to your personal information, or the provision of any feedback that you may have about our processing of personal information, please get in touch with our Contact Center via our Corporate Hotline at (02) 5322 7460. You may also email us at [conciierge@labathomeph.com](mailto:conciierge@labathomeph.com)

You may also write our Data Privacy Officer at:

#### **DATA PRIVACY OFFICER**

LAB AT HOME INC.

+639493644998

[aj.supan@labathomeph.com](mailto:aj.supan@labathomeph.com)

### **Section 11. Changed to Our Privacy Policy**

We may modify or amend this Privacy Policy from time to time to keep up with any changes in relevant laws and regulations applicable to LAB AT HOME or how we collect, use, protect, store, share, dispose, or otherwise process your personal information. Relevant updates shall be posted on the Platform.