



Privacy Policy under GDPR regulation

This privacy policy describes how our company collects, uses and discloses your personal information and data when you use our services through our websites and/or digital services.

1. Consent

Fortress Clinical Laboratory Ltd. understands 'consent' to mean that it has been explicitly and freely given, and a specific, informed and unambiguous indication of the data subject's wishes that, by statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her. The data subject can withdraw their consent at any time. Fortress Clinical Laboratory Ltd. will ensure active communication between the parties to demonstrate active consent. Consent cannot be inferred from non-response to a communication. The Controller (Fortress Clinical Laboratory Ltd.) must be able to demonstrate that consent was obtained for the processing operation. For sensitive data, explicit written consent must be obtained from data subjects unless an alternative legitimate basis for processing exists.

2. Disclosure of Data

Fortress Clinical Laboratory Ltd. will ensure that personal data is not disclosed to unauthorised third parties which includes family members, friends, government bodies, and in certain circumstances, the Police. All Employees/ Staff should exercise caution when asked to disclose personal data held on another individual to a third party. It is important to bear in mind whether or not disclosure of the information is relevant to and necessary for, the conduct of Fortress Clinical Laboratory Ltd. business. All requests to provide data for one of these reasons must be supported by appropriate paperwork and all such disclosures must be specifically authorised by the Data Protection Officer / GDPR Owner.

3. Retention and Disposal of Data

Fortress Clinical Laboratory Ltd. shall not keep personal data in a form that permits the identification of data subjects for a longer period than is necessary, in relation to the purpose(s) for which the data was originally collected. Fortress Clinical Laboratory Ltd. may store data for longer periods if the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes, subject to the implementation of appropriate technical and organisational measures to safeguard the rights and freedoms of the data subject.

4. Data Transfers

All exports of data from within the European Economic Area (EEA) to non-European Economic Area countries (referred to in the GDPR as 'third countries') are unlawful unless there is an appropriate "level of protection for the fundamental rights of the data subjects".

5. Information Asset Register/Data Inventory

Fortress Clinical Laboratory Ltd. has established a data inventory and data flow process as part of its approach to address risks and opportunities throughout its GDPR compliance project. Fortress Clinical Laboratory Ltd. data inventory and data flow determine:

- business processes that use personal data;
- source of personal data;
- volume of data subjects;
- description of each item of personal data;
- processing activity;
- maintains the inventory of data categories of personal data processed;
- documents the purpose(s) for which each category of personal data is used;
- recipients, and potential recipients, of the personal data;
- the role of the Fortress Clinical Laboratory throughout the data flow;
- key systems and repositories;
- any data transfers; and
- all retention and disposal requirements.





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5. Information Asset Register/Data Inventory

Fortress Clinical Laboratory Ltd. are aware of any risks associated with the processing of particular types of personal data. Fortress Clinical Laboratory Ltd. assesses the level of risk to individuals associated with the processing of their personal data. Data protection impact assessments are carried out in relation to the processing of personal data by Fortress Clinical Laboratory Ltd. and in relation to processing undertaken by other organisations on behalf of Fortress Clinical Laboratory Ltd. Fortress Clinical Laboratory Ltd. shall manage any risks identified by the risk assessment to reduce the likelihood of a non-conformance with this policy. Fortress Clinical Laboratory Ltd. shall, prior to processing, carry out a DPIA of the impact of the envisaged processing operations on the protection of personal data. Where, as a result of a DPIA it is clear that Fortress Clinical Laboratory Ltd. is about to commence processing of personal data that could cause damage and/or distress to the data subjects, the decision as to whether or not Fortress Clinical Laboratory Ltd. may proceed must be escalated for review to the GDPR Owner.

The GDPR Owner shall, if there are significant concerns, either as to the potential damage or distress, or the quantity of data concerned, escalate the matter to the supervisory authority. Appropriate controls will be selected and applied to reduce the level of risk associated with processing individual data to an acceptable level, by reference to Fortress Clinical Laboratory Ltd. documented risk acceptance criteria and the requirements of the GDPR.

6. What kind of data is collected?

Our company collects the following set of data and information:

- Personal identification information (name, physical address, email address, phone number...)
- Video and Imagery uploaded in relation to specific data inputs such as forms, both internally and externally to the website and/or digital services

7. How is the data collected?

You provide our company with most of the data we collect, we collect data and process personal data and information when:

- You register online or place an order for any of our products or services
- Use our website or digital services when cookies are set on your device

8. How will we use your data?

Our company collects your data so that we can:

- Process your order, manage your account
- Send you emails with special offers on products and services

When our company processes your order it may send your data to credit and banking agencies to prevent fraudulent purchases that can include third-party payment processors.

9. How is the data stored?

Our company securely stores your data in the United Kingdom. Our company will keep your name, physical address, email address, and phone number for 3 years after a period of inactivity. Once this period has expired, we will delete your data by running scheduled automation that identifies 3 years from your last active date:

- Device model (anonymous)
- Device's language (anonymous)
- Geolocalisation if provided
- Country (deducted from geolocalisation)
- City (deducted from geolocalisation)





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10. Third-Party Data Processors

- Google
- MailChimp
- Paperform

11. Marketing

Our company would like to send you information about our products and services that we think you might like. If you have agreed to receive marketing emails or communication you may always opt out at a later date. You have the right at any time to stop our company from contacting you for marketing purposes or giving data to other partners working with our company. If you no longer want to be contacted for marketing purposes, you can contact us at: marketing@fortressclinical.com

12. Data Protection Rights

Our company would like to make sure you are fully aware of all your data protection rights. Every user has, if applicable, the right to:

- The right to access: you have the right to request our company for copies of your personal data.
- The right to rectification: you have the right to request that our company correct any information you believe is inaccurate or mistaken. You also have the right to request our company to complete information you believe is incomplete.
- The right to erasure: you have the right to request that our company erase your personal data under certain conditions.
- The right to restrict processing: you have the right to request that our company restrict the processing of your personal data under certain conditions.
- The right to object to processing: you have the right to object to our company's processing of personal data under certain conditions.
- The right to data portability: you have the right to request that our company transfer the data we have collected to another organization or directly to you under certain conditions.

If you have any request regarding this matter we have a month to answer you. If you want to exercise any of these rights please contact us by using the following contact details: marketing@fortressclinical.com

13. Privacy Policies of Other Websites or Third-Party?

Our company's website might contain links to other websites, our privacy policy applies only to our website and/or digital services and services so if you click on another website you must read their privacy policy.

14. Changes to our Privacy Policy

Our company keeps its privacy policy under regular review and places any updates on this web page, this privacy policy was last updated on 25/07/2024.

15. Contacting Us

If you have any questions or demands about our privacy policy, the data we hold on you, or you would like to exercise one of your data protection rights, please contact us at: marketing@fortressclinical.com

16. Contacting the Appropriate Authority

If you have any complaints or concerns regarding how your data is managed you can contact the appropriate authority at Information Commissions Office: NI@ico.org.uk





Privacy Policy under other regulations than GDPR

Our company is committed to protecting individual privacy and securing the personal information made available to us when you visit. This privacy policy describes what information is made available to our company and how that information is used and retained and provides information on:

- Information we receive (when you provide it, visit our website, receive email...)
- How this information is used
- Sharing of this information
- Data retention
- Third-party tools and sites
- Children and privacy security

If you have any questions or suggestions for its improvement, please let us know at marketing@fortressclinical.com

1. Information You Give Us

You do not have to provide our company with any personal information or create a user account to access information on our website and/or digital services. However, for some services, we may need personal information from you such as:

- Personal identification information (name, physical address, email address, phone number...)
- Information that is collated in relation to your job role.
- Personal videos that are submitted from forms in relation to the users' business needs

Also when you visit our website the following information is automatically received and stored by servers:

- IP address
- Location

2. Third-Party Websites

Our company's website and/or digital services might contain links to other websites, our privacy policy applies only to our website so if you click on another website you must read their privacy policy. How information is used:

- If you choose to provide us with information we may use that information to contact you, respond to your message or provide information or services you requested.
- We use the data you provide and automatically generated data for statistical analysis to assess what information is of interest to users and system performance. This allows us to make general improvements to our site.
- We may also use your information to detect, prevent and respond to security issues and harmful activities on our website and/or digital services.

3. Sharing of this Information

Information you choose to share with our company may be treated as public information. Our company uses a third-party analytics provider (such as Google Analytics) to analyse data from cookies. The third-party analytics provider does not receive personally identifiable information through these cookies. We have also limited the provider's ability to see your full IP address. Within our company, we restrict access to personally identifiable information to employees, contractors and vendors subject to non-disclosure requirements who require access to this information to perform their official duties and exercise controls to limit what data they can view based on the specific needs of their position. We do not use or share your information for commercial purposes and except as described above, we do not exchange or otherwise disclose this information.





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4. Link to External Websites and Third-Party

Our website may link to other websites created and maintained by other private and/or public organizations and individuals. When you follow a link to an external site you are leaving our website and are subject to the external site's privacy and security policies. Our company does not control or guarantee the accuracy, relevance, timeliness or completeness of information contained on an external site.

5. Security

Our company takes reasonable precautions to protect our site and information. For example, we restrict access to personally identifiable information to employees, contractors and vendors subject to non-disclosure requirements. Our company also uses commonly used practices and technical controls to protect the information in our possession or control. These practices and controls include but are not limited to, encrypting the transfer of personal information over the internet, using firewalls and intrusion detection systems and maintaining strict technical controls and procedures to ensure data integrity. We periodically review our processes and systems to verify compliance with industry best practices and to ensure the highest level of security for our website.

6. Updates do this Privacy Policy

Our company will revise or update this policy from time to time, if we make significant changes to how we handle personal information we will post changes to the policy on our site and change the date at the end. Updated on: 25/07/2024

7. Cookies

We can use different type of cookie or tracking technologies while you are visiting our website and/or digital services:

- Strictly necessary cookies: These types of cookies enable you to access and browse websites and use their features. Without these cookies, services like billing or shopping baskets cannot work properly.
- Performance cookies: these cookies collect information and data about how you use our websites and/or digital services. The data collected can be used to optimize our websites and/or digital services. These cookies are used to know where our visitors and users are coming from. These cookies do not collect information that identifies you personally.
- Functionality cookies: these cookies allow our website or digital services to remember your choices. They can be used to memorize your localisation or your preferences such as language settings or font size

6. How to Manage Cookies

You can set your browser not to accept cookies and the above website and/or digital service tell you how to remove cookies from your browser. However, some of our websites and/or digital services might not work properly without the use of cookies.

For mobile devices, if you don't want to receive targeted advertising based on your centre of interest coming from a mobile application, please check the parameters of the operating system of your mobile device and follow these instructions: 1) iOS Users: to enable "Limited Ad Tracking" follow the instructions given by Apple. 2) Android Users: to enable the option "deactivate ad personalisation", follow the instructions given by Google on Google Play. 3) You might want to download the DAA mobile App Choices application to control behavioural advertising online.

