

CALIFORNIA CONSUMER PRIVACY ACT

1. Welcome

This notice only applies to individuals (“you”) who reside in the State of California. This Notice shall comply with the California Customer Privacy Act 2018 (“CCPA”) and other California privacy laws.

The CCPA requires us to provide California residents certain information. An extended overview of how we process your personal information can be found on in our [Privacy Notice](#), this separate notice ensures we meet the CCPA’s requirements. This notice contains the following four sections:

- We Do Not Sell Your Personal Information
- Your CCPA Rights
- The CCPA Categories of Personal Information We Collect and the Sources
- The CCPA Categories of Personal Information We Share for a “Business Purpose”

2. WE DO Not Sell Your Personal Information in a monetary capacity

The CCPA requires us to disclose whether we sell your personal information. We do not sell your personal information in a monetary capacity. As explained in Section 4 below, however, we do use data collected from this site to improve and analyze its functionality and to tailor products, services, ads, and offers to your interests. Occasionally, we do this with help from third parties with whom we share your information and/or by using cookies and tracking technologies.

Your CCPA Rights

Under the CCPA, California residents also have rights relating to disclosure and access and deletion of their personal information. These rights are not absolute and are subject to certain exceptions. For instance, we cannot disclose or permit access to specific pieces of personal information if the disclosure or access would present a certain level of risk to the security of the personal information, your account with us or security of the business’s systems of networks.

If you make a request to exercise a consumer right, such as to obtain a data export or delete your data, we will respond within a reasonable timeframe. At a minimum we will acknowledge your request no later than 10 days after it is made and will fulfil it within forty-five (45) days of its receipt. If we require more time (up to 45 additional days or 90 total days after we receive the request), we will inform you of the reason and extension period in writing.

If we cannot comply with a request, we will explain the reasons.

We do not charge a fee to process or respond to your request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

1. Your Right to Request for Information

You have the right to request that we disclosed to you, for the 12-month period preceding the date of your request

1. The categories of personal information we have collected about you
2. The categories of sources from which personal data is collected.
3. The business or commercial purpose for which the information was collected,
4. The categories of third parties with whom we have shared personal information, and
5. The specific pieces of personal information we hold about you. Please note that we are only required to fulfil Discloser and Access request from a consumer twice per every 12 months. You can submit such a request by sending an email to (the controller) or calling Customer service (controller).

Please note we may require you to provide identifying information to verify your identity.

2. Your Right to Opt-out of Sales

Under California Laws, California consumers have the right to opt-out of having their personal information sold. For purposes of California Laws, the definition of “sale” includes sharing Personal Information with a third party in exchange for anything of value (money or otherwise).

3. Changes to Our Privacy Notice

We reserve the right to amend this privacy notice at our discretion and at any time. When we make changes to this privacy notice, we will notify you by email or through a notice on our website homepage.

4. Non-discrimination for exercising your CCPA Rights

California residents have a right not to be discriminated against do the exercise of their Rights. The CCPA prohibits businesses from discriminating against you for exercising your rights under the law. Such discrimination may include denying services, charging different prices or rates for services, providing a different level or quality of services, or suggesting that you will receive a different level or quality of goods or services as a result of exercising your rights.

5. Your Right to Delete Personal Information

You have the right to request that we delete the personal information we have collected or maintained in connection with your use of our service, subject to certain exceptions as provided for under California Laws. We will take reasonable measures to delete your personal information from our records unless an exception applies. For example, we will keep certain records (e.g. Personal Information relating to payments or customer service matters) where we need and have rights to, such as for legal or accounting purposes. We also keep information in order to exercise, defend or establish our rights. While fulfilling a valid deletion request, we will also endeavour to direct our service providers to delete your personal information from their records. You can submit such a request by sending an email to privacycovid@collinsongroup.com

Reasons why we may deny a deletion request:

1. Complete the transaction for which we collected the personal information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you.
2. Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
3. Debug products to identify and repair errors that impair existing intended functionality.
4. Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
5. Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 seq.).
6. Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent.
7. Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
8. Comply with a legal obligation.
9. Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

3. The CCPA Categories of Personal Information we Collect and the Sources

Our Privacy Notice describes the information we collect and its sources. This notice organises that information around the personal information categories set forth in the CCPA.

CCPA Categories	Type of Personal Data	Sources
Category A – Identifiers <i>includes personal information such as real name, alias, postal address, unique</i>	Email address, telephone number, mobile number, Passport number, membership numbers, login details,	You e.g. when you register your interest or sign up to use

<p><i>personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver's license number, passport number, or other similar identifiers.</i></p>	<p>security answer, IP address, device identifiers,</p>	<p>our services or provide us with your marketing preference. our clients or prospective clients send us your Personal Data to allow us to give you access to our services or communicate with you. Companies within the Collinson Group assisting us with services we offer you</p>
<p>Category B - Personal information described in Cal. Civ. Code §1798.80(e) <i>This category includes personal information such as name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information.</i></p>	<ul style="list-style-type: none"> • First Name • Last Name • Email • Confirm Email • Phone • Date of Birth • Passport Number • Passport Issuing Country • Address • Address line 2 • City • County • State • Zip • Country 	<p>You e.g. when you register your interest or sign up to use our services</p>
<p>Category C - Characteristics of protected classifications under California or Federal law (“Characteristics of Protected Classifications”) <i>Race, colour, ancestry, national origin, citizenship, religion or creed, marital</i></p>	<p>Medical condition, physical or mental disability, Medical data that directly relate or may prevent you from undertaking the Covid-19 testing. Test method (e.g. PCR) Test result (i.e. COVID-19 +ve/-ve) Genetic data (genetic swabs)</p> <p>Test information or any other information we might receive from you, a medical practitioner, your insurance company, or Accredited Laboratory.</p> <ul style="list-style-type: none"> • Race • Ethnicity 	<p>For e.g. when you register your interest or sign up to use our services</p>

<p><i>status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).</i></p>	<ul style="list-style-type: none"> Gender 	
<p>Category D - Commercial Information</p>	<p>Services, you access and purchase, Information about your membership with us, Your marketing preferences and responses to our direct marketing, e.g. when and if you have open, read and deleted our marketing emails, links clicked in marketing emails. your contact details when you communicate with us, sign up for promotional material, participate in special promotions, or connect with us through social media.</p>	<p>You e.g. when you register your interest or sign up to use our services or provide us with your marketing preference. our clients or prospective clients send us your Personal Data to allow us to give you access to our services or communicate with you.</p> <p>Companies within the Collinson Group assisting us with services we offer you. Resellers and B2B Customers (e.g. if you are an employee, your employer may provide us with certain necessary personal information for purposes of providing you with a Test. If you purchase through a reseller channel, that reseller may provide your order and shipping details to allow us to fulfil your order)</p>
<p>Category F - Internet or Other Electronic Network Activity Information</p>	<p>Browsing history, search history, information on a your interaction with our website, application, or advertisement.</p> <p>Please see our cookie policy.</p>	<p>Your devices e.g. when you connect to our Website, use our Website.</p> <p>Through cookies we use on our Websites to secure our</p>

		Website, offer you personalized experiences.
Category G - Geolocation Data		
Physical location or movements.		

Personal information does not include:

- Publicly available information from government records.
- De-identified or aggregated consumer information.
- Information excluded from the CCPA's scope, like:
 - health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data;
 - personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FRCA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver's Privacy Protection Act of 1994.

4. How we use your Personal Data

The table outlines the lawful basis we can rely on to process your Personal Data.

What we use your information for
Confirming the appointment to the test site
To ensure that content from our Site and Apps is presented in an effective manner for you and your device.
Performing a security and ID verification at the test site
Performing your test
To receive, store and analyze your Samples at Accredited Laboratories.
To process payment for the test
Receiving and processing your test

To share your information with physicians, prescription service providers, or pharmacies where we have legal basis to do so.
Provide access to Covid-19 Test results and, in some instances, relevant treatment options.
Respond to any enquiries from you regarding our service
Where we share your personal data with regulators and governmental agencies.
To provide you with information about goods and services which we believe may be of interest to you from us or trusted third parties.
To provide marketing, including targeted marketing on third party sites such as social media websites.
To provide you with access to our website and or our mobile app.
To help develop and improve our products, services and the way in which we communicate with you, and to carry out internal research and development that allows us to better serve our customers.
To receive feedback from you to help us improve on our product services
To provide customer support services
To detect, investigate and prevent activities that may violate our policies or agreements or be illegal, including by sharing information with law enforcement.
To retain certain records about the handling of any Samples you send us for regulatory purposes.
To fulfil any legal obligations and legal requirements, for example regulatory reporting to health agencies, or retaining certain tax and accounting records for financial reporting.

5. The CCPA Categories of Personal Information we Share for Business Purposes

We may share your Personal Information with the following types of companies for the reasons explained in section 5.

Also, to help us deliver our services and provide the Covid test administration, we may share Personal Information with our medical practitioners who provide you with results of your Covid-19 test and analyse data from the Biotech laboratory. They will be under a duty of confidentiality and will handle your information securely.

Companies we will share your Personal Information with include:

- Our lab service providers.
- Pharmacies
- Public health agencies
- Healthcare providers, such as contracted or other medical practitioners for purposes of review, quality assurance, prescribing of tests, review of results and other purposes.
- Our providers who host our websites or platform.
- IT service providers, data disposal service providers and data storage service providers.
- Marketing affiliates and vendors

- Analytics Vendors
- Tax agencies
- Companies within the Collinson Group acting as our processor, to help us provide our services to you e.g., our customer service function to handle your enquiries.
- Our payment service providers.
- Airline Carriers you are travelling with or the Airport where you have taken your test, for marketing purposes, where we have your consent. We may also share aggregated data or anonymised data for analytics or research purposes. No medical data identifying an individual will be shared. Please read the respective Airport and Airline Carrier's Privacy Notice for information about how they will process your Personal Information.
- Companies within the Collinson Group to offer you services or products, where we have your consent.
- Other third parties outside the Collinson Group to offer you services or products, where we have your consent.

We take all steps reasonably necessary to ensure that your Personal Information is treated securely and in accordance with this Privacy Notice by imposing obligations of security and confidentiality on such service providers.

If you send offensive or objectionable content or otherwise engage in any disruptive behavior on the Site, we can use your Personal Information to stop such behavior and pursue our legitimate interest to prevent such behavior on our Site. This may involve informing relevant third parties, such as law enforcement agencies, about the content and your behavior.

We may share your Personal Information with courts, law enforcement, and governmental authorities and other third parties if required by law, subpoena, a directive from a regulatory authority or as otherwise necessary to comply with legal requirements or to protect our rights or property or those of third parties. We may also share your Personal Information with Fraud prevention agencies, payment service providers, banks, financial institutions and similar third parties for checking your identity, to help protect you and us from fraud, to combat money laundering, protect our Website from illegal use, monitor your behavior on our Website.

The Collinson Group may transfer all your Personal Information to a third party if the operator of the Website changes, or if there is a sale of all or any part of its business or its assets or if we go out of business, enter bankruptcy, or go through some other change of control. In the event of any of these transfers occurring, the party who acquires the Personal Information will assume the rights and obligations described in this Privacy Notice and we will notify you and other users of any transfer to a different legal entity.

If we have links to other sites promoting our partners and clients, please read their Privacy Notices on their website to see how they use your Personal Information. Our Privacy Notice will not cover their use of your Personal Information.

6. Contact Details

We are [insert company name], part of a group of companies (the “Collinson Group”) owned by Collinson Group Limited. Our Company details are [5217 Tennyson Parkway, Suite 100, Plano Texas 75024] [Tax ID number: 803989209]

The Collinson Group has appointed a Group Data Protection Officer (“DPO”). If you have any questions about this Privacy Notice or would like to know how we handle your Personal Data, please contact the DPO or the Data Protection Team, by email at privacycovid@collinsongroup.com

7. Updates to the Privacy Notice

We keep our Privacy Notice under regular review, and we will make new versions available on our Privacy Notice page on our website. This Privacy Notice was last updated on May 24, 2021.