

Privacy Notice

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1. Welcome

Welcome to our privacy notice (“Privacy Notice”). At Collinson Assistance Services Limited (“we, us, our,”), we respect and commit to protecting your Personal Information. Our Privacy Notice, together with our [Terms and Conditions](#), will explain how we collect, use, store, share and look after your information:

- a) When you visit or use our website to register and book for Covid-19 Testing, or
- b) If you use any of our products, services and or applications (together “services”).

For ease, we have divided our Privacy Notice into sections.

If you are a resident of California, we must comply with the Californian Consumer Privacy Act (“CCPA”). Please click here for the [CCPA notice](#).

2. About Us

Collinson Assistance Services Limited is a company registered in the US Collinson Assistance Services, Inc. – 5217 Tennyson Parkway, Suite 100, Plano Texas 75024

3. Contact Details

The Collinson Group has appointed a Group Data Protection Officer (“DPO”). If you would like to contact the DPO or the Data Protection Team please contact us by email at privacycovid@collinsongroup.com.

4. Our Scope

The website is intended solely for individuals within the United States. Individuals outside of the United States should not use the website or provide any Personal Information to us. By using the website or providing us with information, you acknowledge and agree that your Personal Information may be transferred to, processed and/or maintained outside of your state, province or country, and where laws regarding processing of Personal Information may be less stringent than the laws in your location. By providing your information or using the website, you acknowledge such transfer, processing and maintenance. Any defined terms in the [Terms and conditions – add link] have the same meaning when used in this Privacy Notice.

5. Personal Information we collect about you.

If you have any pre-existing medical conditions or concerns such as vulnerabilities, you can discuss this with the nurse at your testing location. The nurse will only use the information you share to provide direct care and will always remain confidential. If the nurse needs your medical consent to care for you, they will get this from you at the time.

We will collect your **Personal Information** from:

- You e.g. when you reach out to us, either online or via email, mobile, phone or post, or in person and you provide us with your details for a Covid-19 test.
- your devices e.g. when you visit or use our Website.
- Cookies we use on our websites to keep our site safe, offer you personalized experiences.
- From testing location

Different testing types will need slightly different details. Your Personal Information we may collect is outlined in the table below.

Purpose	Type of Personal Information
Data collected to register and take the test	Name, email address, telephone number, mobile number, address
	your customer username or number, password, Sample number,
	Photo ID: Driver's License or Passport
	Payment method used, credit and debit card, bank details
	Any Personal Information you provide us when you contact us. We also record your calls with us. We collect and store all copies of emails sent.
	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)

	<p>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> <p>information if you connect a wearable device to one of our Products or Services.</p> <p>Biometric Data. such as a face scan, for the purposes of verifying your identity.</p> <p>Sample taken date Sample type Result date Name of laboratory</p> <p>Device details: Traffic information, IP address, time of access, date of access, location, web pages visited, device identifiers.</p> <p>Website use data. Please see our cookie policy.</p>
Assistance Information (contacting Customer Services)	Name, gender, contact information, billing address, delivery address and any further information you volunteer to provide to us.
Your communications with us	Any Personal Information you provide us when you contact us. We also record your calls with us. We collect and store all copies of emails sent. If you make a request with regard to the handling of your Personal Information, we may retain information regarding the request and any actions we take or correspondence we provide in response to such request.
Surveys	If you respond to any surveys that we might request, which are completely voluntary, we will process your responses.
Passengers Information	<ul style="list-style-type: none"> • First Name • Last Name • Email • Confirm Email • Phone • Date of Birth • Gender • Race • Ethnicity • Passport Number • Passport Issuing Country • Address • Address line 2 • City • County • State • Zip • Country
Marketing and Advertising Purpose	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.

If the parent or guardian has granted consent, we will undertake a Covid-19 testing on your child.

We will not knowingly collect Personal Information from Site or Apps users that are under 18 years of age. We are relying on your representations in the Terms that you are 18 years of age or older. You should not use the Apps or our Site or its Services, including purchasing Products, if you are not 18 years of age or older. If you believe we might have information from or about an individual under 18 years of age, please contact us at

6. How we use your Personal Information

We will use your **Personal Information** for the following purposes:

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 information 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 fulfill any legal obligations and legal requirements, for example regulatory reporting to health agencies, or retaining certain tax and accounting records for financial reporting.

Other use

- a) We may also keep and use your Personal Information to comply with our legal obligations, resolve disputes, and enforce our agreements.
- b) We may access, use and preserve your Personal Information to comply with law, in anticipation of litigation, or to protect our rights or property or those of third parties, even if your Personal Information is subject to a deletion request from you. We may also provide information to law enforcement or authorities to protect the safety of you, other users of our services or others.
- c) *Sale, acquire, merger, or change of ownership.* If we merge with another company, or our equity securities or all or a part of our assets are sold to a third party, your **Personal Information** may be transferred to the buyer or successor entity. We will notify you and other users of any transfer to a different legal entity.

7. Marketing and your Personal Information

Marketing within the Collinson Group

We are part of the Collinson Group. If you consent to receive marketing from other companies within the Collinson Group, we will share your Personal Information with these companies so they can send you information about their products and services and any news that may be of interest to you. Each entity will be a separate Controller for the marketing they send to you and will handle your Personal Information, and any opt outs as set out in their Privacy Notice on their website.

Third Party Marketing

With your consent we may share your information with selected third parties and partners outside the Collinson Group for marketing purposes. If you consent, we will share your Personal Information with these partners and third parties. They will handle your Personal Information, and any opt outs as set out in their Privacy Notice on their website.

Marketing on behalf of Third Parties

With your consent we may send you updates and news about products and services on behalf of trusted third parties. When marketing on behalf of third parties all communications will come from us and we will not share your details with these carefully selected third parties for marketing purposes.

Opting out of Marketing

Where you consent to receive communication for marketing purposes, you have the right to opt-out. You can opt-out of receiving marketing communication from us at any time by following the opt-out links or options in any marketing messages sent to you or by contacting us any time at customerrelations@collinsongroup.com.

If you opt-out of marketing, you will stop receiving marketing from us within 8 days. Please note, this does not apply to service communication, market research or customer surveys or any other processing outside marketing.

If opting out of marketing by post, please expect 8 days for the marketing to stop.

Where you consent to receive marketing from our selected partners, third parties or companies within the Collinson Group we do not control the use of your Personal Information by these partners, third parties or Collinson companies. You should contact them directly to opt-out of receiving their marketing communications.

8. How we share your Personal Information

We may share your Personal Information with the following types of companies for the reasons explained in section 6.

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

Entities 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 traveling 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 anonymized data for analytics or research purposes, provided that no medical data identifying an individual will be shared in connection therewith. 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.

9. International Transfer and Storage of your Personal Information

We may transfer and store your information internationally where different data protection laws may apply. These transfers and storage may take place when:

- we use service provider companies located outside the US e.g. Accredited Laboratory;

Where we transfer and store your information to a service provider company outside the US, we will ensure they are subject to appropriate privacy and security protection and they are consistent with any agreement we have with you.

10. Security of your Personal Information

We use appropriate technical, organisational, and administrative security measures to protect any information we hold in our records from loss, misuse, and unauthorised access, disclosure, alteration and destruction. We have written procedures and policies regularly audited, and the audits are reviewed at a senior level.

11. Retention of your Personal Information

We will not keep your information for longer than we need to and will only use your information for the purposes outlined in this Privacy Notice.

We may keep your information if we have a legal obligation to do so or to establish, exercise or defend a legal claim. In most circumstances, this means we will not keep your information for more than 7 years after the end of your relationship with us.

Your swab samples will be securely discarded immediately after testing.

12. Your rights under Applicable Privacy and Data Protection Law

You have certain rights. To exercise your right or if you have any queries, please email Privacycovid@collinsongroup.com. Your request will be reviewed and responded to as quickly as possible.

1. **Cookies.** If you decide at any time that you no longer wish to accept cookies for any of the purposes described above, then you can instruct your browser, by changing its settings, to stop accepting cookies or to prompt you before accepting a cookie from the websites you visit. If you do not accept cookies, however, you may not be able to use all portions of the Site or all functionality of the Services. For more information on our use of Cookies, please see our [Cookie policy link]

2. **How We Respond to Do Not Track Signals.** Some web browsers transmit "do not track" signals to the websites and other online services with which your web browser communicates. There is currently no standard that governs what, if anything, websites should do when they receive these signals. We currently do not take action in response to these signals. If and when a standard is established, we may revise our policy on responding to these signals.

3. **HIPAA.** Collinson Assistance Services Limited is not a "covered entity" as defined in the federal medical record privacy statute known as the Health Insurance Portability and Accountability Act of 1996, as amended, and the regulations issued under that law ("HIPAA"). Additionally, with respect to the personal information we will obtain about you, we do not anticipate that Collinson Assistance Services Limited will ever be a "business associate" under HIPAA, since the companies we work with are not "covered entities" under HIPAA. Therefore, even though your personal information contains medical information that is the type of information commonly protected under HIPAA, it is not subject to any of the protections available to you under HIPAA. HIPAA is inapplicable to our relationship with you.

13. 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.**

