SIDDHAM PATHOLOGY LABORATORY DIAGNOSTICS - SPL DIAGNOSTICS., HAVING ITS OFFICE AT SHOP NO. 03 NEW TAJ MARKET, OPPOSITE HAMIDIA HOSPITAL, ROYAL MARKET BHOPAL 462001 IS COMMITTED TO ENSURING THE PRIVACY AND CONFIDENTIALITY OF YOUR PERSONAL INFORMATION.

IN THIS PRIVACY POLICY , SIDDHAM PATHOLOGY LABORATORY DIAGNOSTICS - SPL DIAGNOSTICS. IS VARIOUSLY REFERRED TO AS "SPL DIAGNOSTICS"/ "COMPANY"/ "US"/ "OUR" AND "WE".

THIS PRIVACY POLICY IS AN ELECTRONIC RECORD IN THE FORM OF AN ELECTRONIC CONTRACT FORMED UNDER THE PROVISIONS OF THE INFORMATION TECHNOLOGY ACT, 2000 AND THE RULES AND REGULATIONS MADE THEREUNDER AND THE AMENDED PROVISIONS PERTAINING TO ELECTRONIC DOCUMENTS / RECORDS IN VARIOUS STATUTES AS AMENDED BY THE INFORMATION TECHNOLOGY ACT, 2000. THIS PRIVACY POLICY DOES NOT REQUIRE ANY PHYSICAL, ELECTRONIC OR DIGITAL SIGNATURE.

THIS PRIVACY POLICY IS A LEGALLY BINDING DOCUMENT BETWEEN YOU AND SPL DIAGNOSTICS (BOTH TERMS DEFINED BELOW). THE TERMS OF THIS PRIVACY POLICY WILL BE EFFECTIVE UPON YOUR ACCEPTANCE OF THE SAME (DIRECTLY OR INDIRECTLY IN ELECTRONIC FORM, BY CLICKING ON THE "I ACCEPT TAB" AND/OR BY ATTENDING ANY OF SPL DIAGNOSTICS PATHOLOGY LABS/COLLECTION CENTRES AS WALK-IN PATIENTS AND/OR BY VOLUNTARY USE OF THE **APP/ WEBSITE (DEFINED HEREINBELOW)** OR BY OTHER MEANS.

THIS DOCUMENT IS PUBLISHED AND SHALL BE CONSTRUED IN ACCORDANCE WITH THE PROVISIONS OF THE INFORMATION TECHNOLOGY (REASONABLE SECURITY PRACTICES AND PROCEDURES AND SENSITIVE PERSONAL DATA OF INFORMATION) RULES, 2011 UNDER INFORMATION TECHNOLOGY ACT, 2000 AND THE DIGITAL PERSONAL DATA PROTECTION ACT, 2023 AND THE ALLIED RULES FRAMED THEREUNDER.

INTRODUCTION:

- The domain name https://spldiagnostics.in/ including the Client/Patient/Customer Portal at spldiagnostics.in (hereinafter referred to as **"Website"**), the mobile application 'SPL Diagnostics Application' (hereinafter referred to as **"App"**) and the services, (if any) provided by SPL Diagnostics on other third party digital platforms including but not limited to WhatsApp (hereinafter referred to as **"Digital Platforms "**) are owned and / or operated by SPL Diagnostics (hereinafter referred to as **"SPL Diagnostics**").

- SPL Diagnostics is committed to the protection of your privacy and your personal information in accordance with applicable law.

- This privacy policy (**'Privacy Policy'**) is intended to clearly describe the practices of SPL Diagnostics pertaining to collection, usage, disclosure, holding, storage or otherwise handling of your personal information when you attend any of SPL Diagnostics pathology labs/collection centres as walk-in patients and/or visit/use the App/Website can be accessed at https://spldiagnostics.com/privacy-policy.

- SPL Diagnostics protects the personal information of walk-in patients/visitors attending any of SPL Diagnostics pathology labs/collection centres and/or voluntary users of the App / Website including but not limited to SPL Diagnostics Laboratories (as set forth under the "**Terms of Use**" located as the https://spldiagnostics.com/terms-and-conditions, the network of pharmacies, doctors / health care service providers/professionals/hospitals registered with SPL Diagnostics ("**Registered/Network**" "**Partners**"), the visitors of the App / Website and the users that avail services provided by SPL Diagnostics on Digital Platforms (jointly and severally referred to as **"you"** / "**your**"/ **"User(s)"** in this Privacy Policy). For purposes of this Privacy Policy, it is clarified that any reference to "you"/ "your"/ "Users(s)" would include walk-in patients/visitors attending any of SPL Diagnostics pathology labs/collection centres, users/visitors of the App/Website and the users that avail services provided by SPL Diagnostics on Digital Platforms.

- The User's use of Our Services by visiting/attending any of SPL Diagnostics Labs/collection centres and/or by accessing to App / Website and/or Digital Platforms is subject to this Privacy Policy and the Terms of Use. Any capitalized term used but not defined in this Privacy Policy shall have the meaning attributed to it in our Terms of Use.

- By browsing, visiting, accessing and / or using the services available at App / Website / Digital Platforms (or searching for any of the pages on the Website/App) or otherwise, you confirm that you are bound by this Privacy Policy (by the means provided on the Website or the App), or by using the Services (as defined in Terms of Use), or by otherwise giving us your information, you agree to the practices and policies outlined in this Privacy Policy and you hereby consent to our collection, use and sharing / disclsoure of your information as described in this Privacy Policy. We reserve the right to change, modify, add or delete portions of the terms of this Privacy Policy, at our sole discretion, at any time. If you do not agree with this Privacy Policy at any time, do not use any of the Services or give us any of your information. If you use the Services on behalf of someone else (such as your child) or an entity (such as your employer), you represent that you are authorised by such individual or entity to accept this Privacy Policy on such individual's or entity's behalf.

- By using the App / Website / Digital Platforms and / or by providing your information otherwise, you consent to the collection, use and disclsoure of the information you disclose on the App / Website / Digital Platforms in accordance with this Privacy Policy.

In certain exceptional circumstances, where it is not reasonable or practical for us to collect this information directly from you, responsible persons (for example, a spouse or partner, close family member, legal guardian, emergency contact or enduring medical power of attorney) can give consent for collection on your behalf.

WHY THIS PRIVACY POLICY?

This Privacy Policy is published in compliance with applicable laws and regulations.

This Privacy Policy states the following:

- The type of information collected from the Users, including sensitive personal data or information;
- The purpose, means and modes of usage of such information;
- How and to whom such information will be disclosed; and
- How the information collected is going to be protected?
- How your concerns or complaints concerning data protection / breach shall be resolved / addressed?

WHAT IS THE PERSONAL INFORMATION COLLECTED BY SPL DIAGNOSTICS?

- **Information Collection:**

The type of information we collect about you depends on who you are, our relationship with you and the nature of our interaction with you.

We obtain two types of information: A) **User Provided Information** viz., the information which you provide when you attend any of SPL Diagnostics Labs/collection centres and/or download and register the App or use the Website. Registration with us is optional. However, please keep in mind that you may not be able to use some of the features offered by the App unless you register with us. When you register with us and use the Website /App, you generally provide (i) certain Personal Information; (ii) Transaction related information, such as when you book a test, respond to any offers, or download or use applications from us; (iii) information you provide us when you contact us for help; (iv) credit card/payment information for booking a test on the network of our authorised payment gateways, B) **Automatically Collected Information**, including, but not limited to, the type of mobile device you use, the

mobile operating system, the type of mobile internet browser you use, (i) application may collect and use your precise information about the location of your mobile device.

For the purposes of this Privacy Policy, the term "***Personal Information***" shall mean any information that may be used to identify you including, but not limited to, (i) Your Name, Address, Mailing Address, Email ID, User Name, Password (ii) age, gender, date of birth and contact details (iii) correspondence address (iv) physical, physiological and mental health condition (v) sexual orientation (vi) Medical Records and History and / or health information relating to your lifestyle relevant to providing healthcare services (such as your medications, medical prescription, record of any past engagements with us, other diagnostic tests and treatments, family medical history, occupational history) (vii) other personal information collected in the form of clinical images and samples (viii) Biometric Information (the amount of information you choose to keep confidential is entirely up to your discretion; you may enter as much or as little information as you choose, except for the information which is mandatorily required).The information essentially required for conducting the test may be gathered at the time when the patient gets registered at any authorized centre of SPL Diagnostics.

When you attend any of our Labs/collection centres as walk-ins and/or use our Website / App, we collect and store your Personal Information. Our primary goal in doing so is to facilitate and deliver the Services, enable quality and detailed medical diagnosis, provide a safe, efficient, and customized experience to the Users. This allows us to provide services and features that most likely meet your needs, and to even customize our Website / App to make your experience safer and easier. Importantly, we only collect Personal Information about you that we consider necessary for achieving this purpose i.e. for ensuring quality medical diagnosis and also to provide easy/convenient user experience.

- **Voluntary:**

By voluntarily providing/sharing your Personal Information to SPL Diagnostics -in person/telephone/e-mail and/or by accepting or consenting to the terms of use of SPL Diagnostics over the in-App/Website; , you shall be deemed to have affirmed your consent to this Privacy Policy and accordingly, consented to the collection and processing of your Personal Information by SPL Diagnostics for the purpose(s) as set forth herein, as per applicable laws.

Should you, at any time, wish to withdraw your consent for collection or processing of your personal information at any time, please notify our Grievance/privacy Officer using the contact details below. Basis your request, SPL Diagnostics shall within reasonable time proceed to comply with your request. Withdrawing your consent may affect your ability to access the Services of SPL Diagnostics.

You hereby also give your consent to SPL Diagnostics to store the User Information on SPL Diagnostics servers, as per applicable laws.

You hereby give your consent to SPL Diagnostics to share with third parties (to the extent permitted by applicable laws), the User Information on the SPL Diagnostics Website/ App / Digital Platforms or stored on the SPL Diagnostics servers.

- **Accuracy:**

You are responsible for maintaining the accuracy of the information you submit on the Website, App and/or Digital Platforms, such as your contact information provided as part of account registration. If your Personal Information changes

or if you have inadvertently submitted information without reading the Privacy Policy, you may correct or delete inaccuracies, or amend information, or delete such information by making the change wherever possible on the Website/App or by contacting us through email. You can send an email to ***connect@SPL.in*** to inquire whether the Company is in possession of your personal data and if you do not want the Company to be in possession of such data you may require the Company to delete and destroy all such information. We will make good faith efforts to make requested changes in our then active databases as soon as reasonably practicable. If you provide any information that is untrue, inaccurate, out of date or incomplete (or becomes untrue, inaccurate, out of date or incomplete), or the Company has reasonable grounds to suspect that the information provided by you is untrue, inaccurate, out of date or incomplete, the Company may, at its sole discretion, discontinue the provision of its services you.

If the User avails any third party services through the Website / App / Digital Platforms, providing inaccurate or incomplete information, may lead to such third parties being unable to provide its services to the User. The Company accepts no liability whatsoever for the inability of such third parties to provide its services to the End-User and for any loss, injury or damage or inconvenience suffered by the User Information arising therefrom on account of inaccuracy of the information shared by the User with the Company at the time of subscribing to such third party services.

- **Collection for lawful purpose:**

The Company confirms that the collection of User Information is for a lawful purpose and is connected to and necessary for the functions and activities of the Company.

HOW IS THE INFORMATION COLLECTED GOING TO BE USED?

- **General:**

The Personal Information you provide is necessary for such purposes including allowing you to set up a user account and profile and also to provide effective Services.

You agree that we may use your Personal Information to facilitate the Services you request, to resolve disputes, troubleshoot concerns and help promote safe services. You agree that we may use your Personal Information and other information we obtain on the Website / App or at the time of patient registration to enable detailed examination of the medical tests conducted, inform you about online and offline offers, products, services, password retrieval and updates; customize your experience; enforce Terms of Use; and as otherwise described to you at the time of collection.

If you do not wish to receive certain communications, we encourage you to unsubscribe / opt out of the receipt of certain communications in your profile or contact our grievance officer.

- **Commercial:**

We may also draw upon your Personal Information for commercial purposes and in an aggregated or non-personally identifiable form for research, studies, analysis, development of new products/services, for maintaining existing data, advertising including advertising by third parties, statistical analysis and business intelligence purposes, for sale or transfer of such research, statistical or intelligence data in an aggregated or non-personally identifiable form to third parties and affiliates.

- **Additional Use:**

The Company also reserves the right to use the User Information provided by or about the User for the following purposes:

- For the purpose of providing the Services to the User;
- Contacting Users for offering new products, features or services;
- Contacting Users for taking service feedback; Customize your experience by occasionally asking you to provide your feedback through online surveys. These surveys may ask you for contact information and demographic information (like zip code, age, gender, etc.).
- For commercial purposes and in a non-personally identifiable form for research, statistical analysis and business intelligence purposes;
- For the purpose of contacting the User to complete any transaction if the User do not complete a transaction after having provided the Company with the User Information in the course of completing such steps that are designed for completion of the transaction;
- Analyzing software usage patterns for improving product design and utility;
- Analyzing anonymized practice information for commercial use;
- Monitoring and improving the content and usage of the Company;
- Customizing the advertising and content you see;
- Improvement of products and Services;
- For providing any third party services; and
- Any other purpose for which the information was collected.

Information that does not personally identify the Users as an individual, is collected by the Company from Users, stored in a non-personally identifiable aggregated form (such as, patterns of utilization described above) and is exclusively owned by the Company.

You hereby consent to the abovementioned use of the Personal Information and User Information by the Company.

- **Third Party Site:**

This Privacy Policy applies to services that are owned and operated by the Company. The Company does not exercise control over the sites / digital platforms displayed as search results or links from within its services. These other sites / digital platforms may place their own cookies or other files on the Users' computer, collect data or solicit Personal Information from the Users, for which the Company is not responsible or liable. Accordingly, the Company does not make any representations concerning the privacy practices or policies of such third parties or terms of use of such websites/ digital platforms, nor does the Company guarantee the accuracy, integrity, or quality of the information, data, text, software, sound, photographs, graphics, videos, messages or other materials available on such websites / digital platforms. The inclusion or exclusion does not imply any endorsement by the Company of the website/ digital platform, the website's / digital platform provider, or the information on the website/ digital platforms. If you decide to visit a third party website / digital platform linked to the Website / App / Digital Platforms, you do this entirely at your own risk. The Company encourages the User to read the privacy policies of that website.

HOW AND TO WHOM IS THE INFORMATION SHARED AND DISCLOSED?

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- SPL Diagnostics will share the User's Information to the extent necessary for providing the Services.
- SPL Diagnostics may share User Information in an aggregated non-personally identifiable manner with its partners and third parties for the purposes set out above. SPL Diagnostics maintains a strict 'No-Spam' policy, which means that the SPL Diagnostics does not intend to sell, rent or otherwise share your Personal Information to a third party without your consent, except to provide products or Services under the Terms of Use or this Privacy Policy, or under the following circumstances:

- to provide the Personal Information to physicians and other authorized health care service providers who need to access your laboratory reports for your proper diagnosis.
- to insurance companies, hospitals, physicians or third parties with our billing department for payment purpose.
- to support our healthcare operations, such as performing quality checks on your testing, for teaching purposes, or for developing normal reference ranges for the tests we perform.
- to respond to summons, court orders, or legal process, or to establish or exercise our legal rights or defend against legal claims.
- to health department or any other Government body as and when required by them for collecting or processing health information of the state/country.

- to other laboratories/medical institutions for research and development purposes from time to time, to reveal general statistical information about our Website/App and visitors, such as number of visitors, number and type of services purchased, etc.
- to transfer/disclose Personal Information about you to trusted partners/Network Partners, may or may not be for gain, to promote certain products/services for commercial purposes, without any prior notice to you.

(iii) Further, you agree that we may share your Personal Information for the following categories of activities from time-to-time:

Advertisements

- When you enter Personal Information on any forum of an advertiser, such information is simultaneously collected by Website/App and the advertiser. The Personal Information is used by Website/App in accordance with the terms of this Privacy Policy and is used by the advertiser as per the advertiser's prevalent privacy policies. Because we do not control the privacy practices of these advertisers, you should evaluate their practices before deciding to provide the said information.
- Website/App may also aggregate (gather up data across all accounts) Personal Information and disclose such information in a non-personally identifiable manner to advertisers and other third parties for other marketing and promotional purposes.

Posting to public areas of the Website/App

- Please remember that if you post any of your Personal Information in public areas of the Website/App such as in online forums or chat rooms, or on the Website/App's searchable database, such information may be collected and used by others over whom we have no control. We are not responsible for the use of information by third parties based on information you post or otherwise make available in public areas of the Website/App.

(iv) To the extent necessary to provide Users with the services, SPL Diagnostics may provide their Personal Information to third party contractors who work on behalf of or with SPL Diagnostics to provide Users with such services, to help SPL Diagnostics communicate with Users or to maintain the Website/App/Digital Platforms. Generally these contractors do not have any independent right to share this information, however certain contractors who provide services on the Website/App/Digital Platforms, including the providers of online communications services, will have the limited rights to use and disclose the Personal Information collected in connection with the provision of these services in accordance with their own privacy policies.

HOW IS THE USER INFORMATION PROTECTED?

- SPL Diagnostics has implemented ISO Standard security policies, rules and technical measures to protect the personal data that it has under its control from unauthorised access, improper use or disclosure, unauthorised modification and unlawful destruction or accidental loss. However, for any data loss or theft due to unauthorized access to the User's electronic devices through which the User avails the services including the Services listed in the Terms of Use, SPL Diagnostics shall not be held liable for any loss whatsoever incurred by the User.

- The Company implements reasonable security practices and procedures and has a comprehensive documented information security programme and information security policies that contain managerial, technical, operational and physical security control measures that are commensurate with respect to the information being collected and the nature of the Company's business. The reasonable security practices and procedures implemented by the Company include but are not limited to: encrypting data when it is on the move using industry standard practices, keeping all the data within private cloud, regularly changing production keys and password, secure and very limited access to all production servers, performing regular security updates on our servers and more.

- The Company takes your right to privacy very seriously and other than as specifically stated in this Privacy Policy, will only disclose your Personal Information in the event it is required to do so by law, rule, regulation, law enforcement agency, governmental official, legal authority or similar requirements or when the Company, in its sole discretion, deems it necessary in order to protect its rights or the rights of others, to prevent harm to persons or property, to fight fraud and credit risk, or to enforce or apply the Terms of Use.

- Your Personal Information is maintained by the Company in electronic form on its equipment viz., a third party Cloud Services provider, and on the equipment of its employees. Such information may also be converted to physical form from time to time. The Company takes all necessary precautions to protect your Personal Information both online and off-line, and implements reasonable security practices and measures including certain managerial, technical, operational and physical security control measures that are commensurate with respect to the information being collected and the nature of the Company's business.

- It is important for you to protect against unauthorized access to your password, your computer and your mobile phone. The Company does not undertake any liability for any un-authorised use of your login to SPL Diagnostics including Account and password. If you suspect any unauthorized use of your login to SPL Diagnostics including Account, you must immediately notify the Company by sending an email to ***connect@SPL.in***. You shall be liable to indemnify the Company due to any loss suffered by it due to such unauthorized use of your login to SPL Diagnostics including Account and password.

- The Company makes all User information accessible to its employees, agents or partners and third parties only on a need-to-know basis, and binds all such employees to strict confidentiality obligations.

- Notwithstanding the above, the Company is not responsible for the confidentiality, security or distribution of your Personal Information by our partners and third parties outside the scope of our agreement with such partners and third parties. Further, the Company shall not be responsible for any breach of security or for any actions of any third parties or events that are beyond the reasonable control of the Company including, acts of government, computer hacking,

unauthorised access to computer data and storage device, computer crashes, breach of security and encryption, poor quality of Internet service or telephone service of the User etc.

HOW CAN YOU CONSENT TO THIS POLICY?

- **Consent**

You acknowledge that this Privacy Policy is a part of the Terms of Use or other agreements with SPL Diagnostics, whichever applicable and you unconditionally agree that becoming a User of the Website/App/Digital Platforms signifies your assent to this Privacy Policy and the use of the information including its disclosure in the manner provided above. Your visit to the Website, App and/or Digital Platforms and use of the products and Services of SPL Diagnostics is subject to this Privacy Policy and the Terms of Use.

- **Address for Privacy Questions and Grievance Officer:**

Should you have questions about this Privacy Policy or SPL Diagnostics information collection, use and disclosure practices, you may contact us at the address: ***spldiagnosticsbpl@gmail.com*** SPL Diagnostics will use reasonable efforts to respond promptly to any requests, questions or concerns, which you may have regarding our use of your Personal Information. If you have any grievance with respect to our use of your information, you may communicate such grievance to the grievance officer as mentioned under: [***Name: Dr Abhishek Jain, Designation: OWNER Email: jabhishek14@gmail.com***

USER DISCRETION AND OPT OUT

The User agrees and acknowledges that it is providing Information out of its own free will. The User has an option not to provide or permit SPL Diagnostics to collect its User Information which includes its Personal Information or later on withdraw its consent with respect to such User Information so provided herein by sending an email to the grievance officer or such other electronic address of SPL Diagnostics as may be notified to the User. In such case, the User should neither visit any other website/app nor use any services provided by the SPL Diagnostics or its related entities nor shall contact any of the SPL Diagnostics related entities. Further, SPL Diagnostics may deny the User's access from using certain services offered on Website / App.

The User can add or update its User Information on regular basis.

CHANGES TO THIS PRIVACY POLICY

SPL Diagnostics reserves the right to update, change or modify this Privacy Policy at any time. Any update, change or modification in the Privacy Policy shall come to effect from the date of such update, change or modification. However, it is the responsibility of the User to regularly check the Privacy Policy to ensure that the User agrees with it and the continued use of the Website / App / Digital Platforms by the User will be deemed to be the acceptance by the User of any changes/modification that SPL Diagnostics make in the Privacy Policy.

GOVERNING LAW AND JURISDICTION

The governing law, jurisdiction and related matters with regards this Privacy Policy shall be in accordance with the 'Terms of Use'