

Wren Laboratories Privacy Policy for Patients

Last updated on 25.01.2021

Wren Laboratories (**we, us and ours**) includes Wren Laboratories LLC, located in the United States, and Wren Laboratories (Europe) Ltd, located in the Isle of Man. This privacy policy will explain how Wren Laboratories processes patients' personal data (**your data**) to provide European practitioners or GP (**your physician**) with [NETest and PPQ/PRRedicTor](#) (**Tests or our services**).

Introduction

Wren Laboratories and your physician jointly control your data. We offer our services to practitioners in Europe through Wren's [European Practitioners portal](#) where they may register their medical licence and practices' details to place Tests orders on behalf of patients under their care (**you**).

In order to provide our services, your data will be processed by Wren Laboratories. Processing may include the collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction of your data.

The following sections will explain how we process your data and how we safeguard your rights under the applicable data protection laws, taking into account the additional requirements established by the European Union in the General Data Protection Regulation ([GDPR](#)).

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1. What data do we collect

Wren Laboratories may collect the following data relating to you:

- personal identification information: such as name, date of birth, contact details and bank details, as the case may be; and
- special categories of personal data:
 - a. health data: such as medical reports, diagnosis and treatment history;
 - b. genetic samples: such as blood samples;
 - c. genetic data: such as information extracted from your genetic samples; and

d. health data: such as information about your health condition and treatment provided by your physician or by your Tests' results.

2. How do we collect your data

Your physician directly provides Wren Laboratories with most of the data we collect, via a Wren Laboratories' registered account, secured by a unique user name and password.

We may collect data directly from you when:

- You voluntarily get in contact with us; and/or
- You use or view our website via your browser's cookies. Please access our Cookies Policy for further details.

3. How do we use your data

Wren Laboratories collects your data so that it can:

- For Tests purpose:
 - a. process Tests orders submitted by your physician;
 - b. process your genetic sample, in order to extract relevant information;
 - c. analyse your genetic information by running the Tests and verifying the results;
 - d. provide your physician with Tests' results;
 - e. store Tests' results for comparison with your past and future information, including previous Tests' results; and
 - f. run further tests and analysis to improve our processes and the services we provide;
- For scientific research purposes:
 - a. conduct or assist in scientific research; and/or
 - b. statistical purposes.

4. Lawful basis for processing your data

We will request your *consent* to process your data, on the terms set out in this Privacy Policy, by asking you to sign a Consent Form and to read its terms carefully. These documents will be made available to you by your physician, who will file them for future disclosure to Wren Laboratories or the relevant data protection supervisory authority, upon request.

In the absence of a signed Consent Form, we may still process your data under one of the following lawful bases:

- *Necessary for the performance of a contract for health care and medical diagnosis:* Processing your data may be necessary for the purpose of your health care and/or medical diagnosis pursuant to contract with your physician, who are subject to an obligation of secrecy.
- *Legitimate purposes for scientific research purposes:* We may further process your data for our or a third party's legitimate purposes, as it may be necessary for scientific research purposes.

- We may also process your data to protect *vital interest of individuals*; to perform of a public task carried out in the public interest; or to comply with a legal obligation, as the case may be.

On the table below we explain in which situations Wren Laboratories may process your data and, on each case, the corresponding lawful basis we will be relying on in order to do so.

Wren Laboratories' purpose for processing	Lawful basis for processing (Article 6 of the GDPR)	Conditions for processing Special Categories of data (Article 9 of the GDPR) [Processing is necessary for/to]
Tests and Scientific Research	Freely given Consent.	One or more specified purposes the data subject has given explicit consent to the processing of those personal data for.
Tests	Performance of a contract.	Medical diagnosis, provision of health or treatment, pursuant to contract with a health professional.
	To protect a vital interest.	Protect the vital interests of the data subject or of another natural person where the data subject is physically or legally incapable of giving consent.
	Performance of a public task carried out in the public interest.	Public interest in the area of public health.
	Compliance with a legal obligation.	Legal claims or whenever courts are acting in their judicial capacity.
Scientific Research	Performance of a public task carried out in the public interest.	Reasons of substantial public interest in the area of public health.
	Legitimate interest pursued by Wren Laboratories, your physician and/or a third party.	Scientific research and statistical purposes.

In any case, considering we are processing special categories of data, additional safeguards for your personal rights and freedoms will be set in place. Limited data will be collected and only strictly necessary data will be processed, considering the purposes it is being processed for.

5. Whom do we share your data with

The processing of your data will involve sharing it within our organisation and with our partner companies, such as health care providers; partner laboratories; post services; website processor; and payment processor, as the case may be. Personal data shared with partner companies will always be processed under Wren Laboratories instructions and will be limited and redacted, where appropriate, considering the purposes it is being processed for. Our partner companies will delete your data as soon as their respective processing purposes are achieved. We work with companies under GDPR compliant processing contracts setting out high standards for their security systems to protect your data from unlawful disclosure.

When Wren Laboratories processes a Test order under your bank details, it may send the relevant data to, and also use the resulting information from, credit reference agencies to prevent fraudulent purchases.

To run the Test we may transfer your data to our partner laboratories in the UK, to our server in the Isle of Man and to our CLIA-certified laboratory in the USA. We will not share your data

outside the European Economic Area (**EEA**) unless such transfer is compliant with applicable data protection law.

Wren Laboratories may transfer your data internationally relaying on the following GDPR permissions:

From	To	Authorised by
EU	Isle of Man	European Commission's Adequacy decision
Isle of Man	USA	Privacy Shield Agreement/ European Commission's Standard data protection clauses
USA	EU	

6. How do we store your data

Wren Laboratories securely stores your data on our server in the Isle of Man. We secure information by using industry standard administrative, physical and technical safeguards. We encrypt information transmitted to us using Secure Sockets Layer (SSL) technology. All information are stored on controlled servers with restricted access, either directly managed by Wren Laboratories or by a service provider subject to a data processing agreement.

At Wren Laboratories, all access is limited to authorised personnel, based on job function and roles. Wren Laboratories access controls include multi-factor authentication and single sign-on, and follows a strict least-privileged authorization policy. Access to your special categories of personal data and your physician's account information is enforced through different policies and encryption keys. That means your information requires additional privileges to be accessed.

7. How long do we store your data for

Wren Laboratories will keep your data for a minimum period of 10 years after the Test results are provided to your physician. Processing for longer periods may be necessary for the provision of health care, medical diagnosis and/or treatment, as well as for scientific research purposes. Once this time period has expired, we may continue to store your data and we may process it for as long as necessary for scientific research purposes.

In any case, considering we are processing special categories of data, additional safeguards for your personal data rights and freedoms will be set in place and only limited data will be processed, strictly necessary for the purposes it is being collected.

8. Your data protection rights

Wren Laboratories and your physician jointly control your data and as controllers we share the main responsibilities under the data protection laws. Therefore, Wren Laboratories would like to make sure you are fully aware of your data protection rights.

Every individual whose data we process is entitled to the following:

- right to access: you have the right to request Wren Laboratories for copies of your data. We may charge you a small fee for this service;

- right to rectification: You have the right to request that Wren Laboratories correct any information you believe is inaccurate. You also have the right to request Wren Laboratories to complete the information you believe is incomplete;
- right to erasure: you have the right to request that Wren Laboratories erase your data, under certain conditions;
- right to restrict processing: you have the right to request that Wren Laboratories restrict the processing of your data, under certain conditions;
- right to object to processing: you have the right to object to Wren Laboratories' processing your data, under certain conditions; and
- right to data portability: you have the right to request that Wren Laboratories transfer the data that we have collected to another organization, or directly to you, under certain conditions.

The above mentioned rights to data portability, to object, to restrict processing and to erasure will not be applicable when the processing is not based on your consent as a lawful basis and the fulfilment of the respective purposes requires it.

If you make a request to exercise any of your rights, we have one month to respond to you. Under exceptional circumstances, this period may be extended.

9. Automated decision-making

Our services are provided using the current state of the art gene-related research and technology available at the time of providing them. Tests will involve automated decision-making in regards to mapping gene extracted information and will be subject to our further analysis and interpretation.

10. Changes to our privacy policy

Wren Laboratories keeps its privacy policy under regular review and places any updates on this web page.

11. How to contact us

If you have any questions about Wren Laboratories' privacy policy, the data we hold on you, or you would like to exercise one of your data protection rights, please do not hesitate to contact us.

Data Protection Officer: Simona Deifta
Email: eu-privacy@wrenlaboratories.com
Call us: +49 (0)89 919294900
Or write to us at: activeMind.legal Rechtsanwaltsgesellschaft m. b. H
Potsdamer Str. 3
80802 Munich
Germany



How to contact the appropriate authority

Wren Laboratories (Europe) Ltd and Wren Laboratories LLC are both registered in Europe as a data controller, under the data protection regulatory authority in the United Kingdom, the Information Commissioner's Office (**ICO**).

Should you wish to report a complaint or if you feel that Wren Laboratories has not addressed your concern in a satisfactory manner, you may contact the ICO in one of the following channels.

Helpline: 0303 123 1113

Complaint website: <https://ico.org.uk/make-a-complaint/>.

Address: Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

Telephone: 0303 123 1113

Fax: 01625 524510

To visit ICO's website click [here](#).

To access GDPR act click [here](#).