# Privacy

Version 1.0 · Updated 13 Nov 2026

## In short

· SANTE SALUD BARCELONA BRAND, S.L. is the controller of your data.

· We use your health data to run your blood test and explain it to you. For any other use we ask your permission, except for what the law obliges us to keep or disclose.

· We do not sell your data or use it for advertising.

· You can download and delete your data from the app, and ask us to show or correct it.

This summary does not replace the full text.

## 01 · Data controller

Who decides how your data is processed.

Company name: SANTE SALUD BARCELONA BRAND, S.L.

Tax ID (NIF): B56142987

Registered office: Avenida Diagonal 384, 08037 Barcelona

Laboratory: Av. Diagonal 380, 08037 Barcelona

Privacy contact: contact@santeclinics.com

This policy applies to santelabs.com, the member account at app.santelabs.com, the Santé Labs apps for iOS and Android, once they are available, and the care you receive at the laboratory.

We wrote it in line with Regulation (EU) 2016/679 (GDPR), Spanish Organic Law 3/2018 (LOPDGDD), Spanish Law 41/2002 on patient autonomy and Catalan Law 21/2000 on health information and clinical records.

## 02 · What data we process

The data depends on what you do with us.

· Identification and contact

· Health data

· Payments

· Usage and technical data

· Other people's data

**Identification and contact**

First and last name, email, mobile phone, language, date of birth, sex at birth and the type, number and country of your identity document (DNI, NIE or passport), which the laboratory needs to identify you without error. Also your billing address and tax ID for invoices, the visit address if you book a home blood draw once that service is available, your profile photo if you add one, and how you sign in: a one-time code by email, your Apple or Google account or, if you have set them up, a password or a passkey.

**Health data**

The answers to the initial questionnaire and in your health history (your goals, diagnoses and personal and family history, medication and supplements, height and weight, and habits such as

diet, activity, sleep, stress, smoking and alcohol), your appointments and samples, results and reports, your action plan, the files you upload, your conversations with Santé AI, messages with the team, and data from the watches and health apps you choose to connect (for example steps, heart rate, sleep or weight). The questionnaire also asks about your ethnic origin, because it helps to interpret some values: answering is voluntary and you can skip the question.

**Payments**

What you buy, the amount, the date, the payment status, your invoices, refunds and credit. Your full card details are handled by the payment provider: we neither receive nor store them.

**Usage and technical data**

IP address, device and browser type, app version, access and error logs, and information from the cookies described in the Cookie Policy, according to your settings.

**Other people's data**

If you gift a plan, you give us the name and email of the recipient, your message, the sending date and the name you sign with, as well as your own email for the receipt. If a member invites you, we receive the code you arrive with, and that person sees your name or your partly hidden email and the status of the invitation in their account. We use that data only to deliver the gift or manage the invitation.

**Where it comes from**

From you, when you fill in a form, use the app or visit the laboratory; from the devices and accounts you connect; and from anyone who gives you a gift. In contact forms we ask you not to write health data. Data marked as required is needed for the contract or required by healthcare law: without it we cannot provide the service.

## 03 · Legal basis

Each purpose has its legal basis.

Performance of the contract: Creating your account, charging you, booking your appointment, running your blood test and delivering your results and your plan (art. 6.1.b GDPR)

Health data and ethnic origin: Your explicit consent, given when you join, and the provision of healthcare by professionals bound by secrecy (arts. 9.2.a and 9.2.h GDPR)

Legal obligation: Keeping your clinical record and invoices, and answering the authorities (art. 6.1.c GDPR)

Consent: Santé AI with your data, wearables, news and offers by email or notifications, the other optional permissions you see under Consents; you can withdraw it at any time (arts. 6.1.a and 7.3 GDPR)

Legitimate interest: Protecting the service, preventing fraud, fixing technical errors and delivering a gift or recording an invitation (art. 6.1.f GDPR)

Withdrawing consent does not affect what was done while it was given. Processing your health data is necessary to provide the service: if you withdraw that consent entirely, we cannot go on analysing your samples or showing you new results.

We do not take decisions based solely on automated processing that have legal effects on you or similarly significantly affect you. A doctor decides on the request for your blood test and a professional validates your results.

We only send you marketing emails if you have asked for them, and every message lets you unsubscribe (arts. 21 and 22.1 LSSI-CE). Notices about your account, your appointments, your results and your subscription are part of the service.

## 04 · Santé AI

What it is and how it uses your data.

Santé AI is the account's assistant, in the accounts where it is available. It is an artificial intelligence system, not a person. Its name and the “Santé AI” label on every answer say so, so that you always know you are talking to an AI (art. 50 of Regulation (EU) 2024/1689 on artificial intelligence).

Its answers are educational: they do not diagnose or prescribe, and they do not handle emergencies. In an emergency, call 112.

It only uses your results, your health history and your action plan if you give it permission under Account > Consents. Without that permission it answers in general terms. If you withdraw it, it stops using them; what was already discussed stays in your conversation history.

Your conversations are saved in your account so you can pick them up again, and they are included in your data export. They are deleted with your account, when the grace period ends; if you want one deleted sooner or would rather talk to a person, write to us from Account > Help.

## 05 · How long

Retention periods, with the clinical record treated separately.

Clinical and laboratory record: 15 years from the discharge of each care process

Invoices and accounts: 6 years (Spanish Commercial Code, art. 30)

Account and non-clinical data: While you have an account; if you ask to delete it, it is erased or anonymised when the grace period we tell you about at that moment ends

News by email: Until you unsubscribe

Enquiries and forms: As long as needed to answer you and, afterwards, while a claim could still arise

Your clinical and laboratory record (results, reports and sample data, with the identity data needed to link it to you) is kept in a restricted archive for 15 years, even if you delete your account. Catalan Law 21/2000 (art. 12) requires, among other documents, reports of complementary examinations (such as blood test results) and informed consent forms to be kept for at least 15 years from the discharge of each care process, and other clinical documentation for at least five years. After that period it is erased or anonymised.

What we must keep by law, or what may be needed if a claim arises, is blocked and separated from normal use of the app for the legal periods (LOPDGDD, art. 32).

Cookies have their own periods, set out in the cookie policy.

Cookies: https://santelabs.com/en/legal/cookies

## 06 · Who we share it with

Processors and providers.

We do not sell your data or use it to show you advertising. It is only accessed by the laboratory staff and medical team who look after you, bound by professional secrecy, and by the providers we need to deliver the service, under a contract that obliges them to follow our instructions (art. 28 GDPR).

Hosting: Amazon Web Services (AWS): serves the website and the app

Payments: Stripe: charges by card and by the other methods you see when paying, and prevents

fraud; it is also a controller for its own processing

Usage analytics: Google Analytics 4 and PostHog: analytics is active by default, without a banner; you can disable it in Cookie settings. They receive page views and completed steps, never health data

Technical errors: Sentry: receives error and performance reports (for example, how long a screen takes to load) from which we first remove emails, phone numbers, document numbers, IP addresses and any health data

Notices: Providers that deliver email, SMS and app notifications

Sign-in: Apple or Google, only if you choose to sign in with your account there

The watches and health apps you connect (Apple Health, Health Connect, Oura or Whoop, depending on what is available in your account) send us the data you choose. With Apple Health and Health Connect the app only reads: it does not write data to those services.

Data may also go to other laboratories or healthcare professionals when needed to carry out a test you have asked for; to the doctor you choose as the recipient of a report; and to the authorities and the courts when the law requires it.

## 07 · International transfers

What happens if a provider is outside Europe.

We prefer providers that store data in the European Economic Area. Some of those above (Amazon Web Services, Stripe, Google, Sentry, PostHog and Apple) have their head office or parent company in the United States and may access data from there.

When that happens, the transfer relies on the adequacy decision for the EU-US Data Privacy Framework, if the provider has joined it, or on the European Commission's standard contractual clauses (arts. 45 and 46 GDPR). You can ask us for more information about these safeguards.

## 08 · Your rights

How to exercise them and where to complain.

You can ask for access to your data, its rectification, its erasure, the restriction of or objection to processing, and its portability, and you can withdraw any consent (arts. 7.3 and 15 to 22 GDPR). You can object at any time to processing that is based on our legitimate interest.

In the app, under Account, you can download your data and delete your account (Privacy and data) and change your consents (Consents). The export is ready within 30 days at most. You can also write to us at contact@santeclinics.com using the email address of your account.

We answer within one month at most; if the request is complex, the law allows that period to be extended by two more months, and we will let you know. We may ask you to verify your identity. Exercising your rights is free.

You also have the right to access your clinical record and obtain a copy (Spanish Law 41/2002, art. 18). Erasure does not extend to what the law obliges us to keep.

If you think we have not handled your data properly, you can complain to the Spanish Data Protection Agency (AEPD) at https://www.aepd.es. We would be grateful if you wrote to us first so we can try to resolve it.

## 09 · Security

How we protect your data.

We apply technical and organisational measures suited to the risk: encrypted connection, access limited to those who need it, a duty of confidentiality for all staff and sign-in with one-time codes or a passkey.

No system is infallible. If a security breach put your rights at risk, we would notify the supervisory authority (art. 33 GDPR) and, if the risk to you were high, we would also notify you without delay (art. 34 GDPR).

## 10 · Minors

Who the service is for.

The service is only for people aged 18 or over and we do not create accounts for minors. You can subscribe to our email updates from the age of 14, the age at which Spanish law allows consent (LOPDGDD, art. 7).

## 11 · Changes to this policy

How we tell you if this policy changes.

We update this policy when the service or the law changes. The current version and the date of its last update are always at the top of this page. If a change significantly affects how we use your data, we will tell you by email or in the app before applying it.