

NOVO GENOMICS MEDICAL COMPANY

PRIVACY POLICY

How we collect, use, process, store, protect, disclose and retain Personal Data

Effective Date: 22 September 2026

Last Updated: 22 September 2026

Kingdom of Saudi Arabia — Personal Data Protection Law (PDPL)

Novo Genomics - CR1010772277

Riyadh, kingdom of Saudi Arabia

شركة العلوم الحيوية الطبية - س.ج. ١٠١٠٧٧٢٢٧٧

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Introduction

Novo Genomics Medical Company (“Novo Genomics”, “Novo”, “we”, “us”, or “our”) is committed to protecting the privacy and confidentiality of Personal Data entrusted to us.

This Privacy Policy explains how Novo Genomics collects, uses, processes, stores, protects, discloses, and retains Personal Data when you visit or use our website, submit an inquiry, book an appointment, request a service, communicate with us, or otherwise interact with our digital services.

This Policy is intended to comply with the applicable laws and regulations of the Kingdom of Saudi Arabia, including the **Personal Data Protection Law (PDPL)** and its Implementing Regulations.

By using our website or providing Personal Data to us, you acknowledge that you have read and understood this Privacy Policy.

1. Data Controller

The Data Controller responsible for the processing of your Personal Data is:

Novo Genomics Medical Company

Website: <https://novogenomics.sa/>

Email: info@novogenomics.sa

Telephone: 9200 32687

Address: 7045 Prince Muhammad Ibn Saad Ibn Abdulaziz Road, Al Malqa 13524, Riyadh, Kingdom of Saudi Arabia.

For privacy-related requests, complaints, or inquiries, please contact us using the contact information above or the dedicated privacy contact identified in this Policy.

2. Scope of This Policy

This Privacy Policy applies to Personal Data collected through:

- The Novo Genomics website.
- Online appointment and booking forms.
- Contact and inquiry forms.
- Requests for laboratory and genetic testing services.

- Communications with our customer service team.
- Telephone, email, WhatsApp, or other communication channels where applicable.
- Website cookies and similar technologies.
- Other digital services operated by or on behalf of Novo Genomics that reference this Privacy Policy.

This Policy does not necessarily apply to third-party websites, platforms, or services that may be linked to our website.

3. What Is Personal Data?

For the purposes of this Policy, “Personal Data” means any data that identifies an individual directly or indirectly, or makes the individual identifiable.

This may include, for example:

- Name.
- Mobile number.
- Email address.
- Identification information.
- Appointment information.
- Service requests.
- Communication records.
- Technical information.
- Online identifiers.
- Health-related information.
- Genetic information, where applicable.

The Saudi Personal Data Protection Law defines Personal Data broadly to include information that can identify an individual directly or indirectly.

4. Personal Data We May Collect

The type of information we collect depends on how you interact with Novo Genomics.

4.1 Information You Provide Directly

When you use our website or request our services, we may collect:

- First name.
- Family name.
- Mobile number.
- Email address.
- Appointment date.
- Requested service.
- Service type.
- Inquiry details.
- Information included in communications with us.

Our current online appointment form requests information including first name, family name, phone number, email address, selected service, service type, and appointment date.

4.2 Health and Medical Information

Depending on the service requested, we may process information relating to:

- Health conditions.
- Medical history.
- Clinical information.
- Diagnostic information.
- Laboratory information.
- Test requests.
- Test results.
- Pregnancy-related information.
- Other information necessary to provide healthcare or laboratory services.

Such information will only be collected and processed where necessary and on an appropriate lawful basis.

4.3 Genetic and Genomic Information

Where you request or receive genetic, genomic, molecular, or related laboratory services, we may process information such as:

- Genetic test information.
- Genomic information.
- Laboratory test information.
- Sample-related information.
- Genetic test results.
- Clinical interpretation information.
- Information necessary to provide or interpret the requested service.

Genetic and health information may constitute Sensitive Personal Data and may therefore be subject to additional legal and organizational safeguards.

4.4 Technical Information

When you visit our website, certain technical information may be collected automatically, including:

- IP address.
- Browser type.
- Device type.
- Operating system.
- Website pages visited.
- Date and time of access.
- Referring website.
- Technical logs.
- Website performance information.

5. How We Collect Personal Data

We may collect Personal Data through:

Direct collection

When you:

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- Submit an appointment request.
- Contact us.
- Request information.
- Request a laboratory or genetic service.
- Communicate with our staff.
- Submit information through website forms.

Automatic collection

Certain technical information may be collected automatically when you access or use our website through cookies, logs, analytics tools, and similar technologies.

Third parties

Where permitted by law, Personal Data may also be received from authorized third parties, healthcare providers, business partners, or service providers when necessary to provide the requested service.

We aim to collect Personal Data through clear, appropriate, and secure methods and to limit collection to what is necessary for the relevant purpose. The PDPL requires Personal Data to be appropriate and limited to the minimum necessary for the purpose of collection.

6. Purposes of Processing

Novo Genomics may process Personal Data for the following purposes:

Healthcare and Laboratory Services

- Providing requested laboratory and genetic testing services.
- Processing and managing test requests.
- Managing appointments.
- Processing laboratory samples.
- Providing test results.
- Supporting clinical or laboratory interpretation.
- Communicating with patients and customers regarding requested services.

Customer Service

- Responding to inquiries.

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- Providing customer support.
- Managing complaints and requests.
- Confirming appointments.
- Providing service-related updates.

Website Operations

- Operating and maintaining the website.
- Improving website functionality.
- Monitoring website performance.
- Maintaining website security.
- Detecting and preventing unauthorized activities.

Business Operations

- Managing customer relationships.
- Maintaining business records.
- Performing administrative activities.
- Managing payments and transactions where applicable.
- Improving our products and services.
- Supporting quality management and operational processes.

Legal and Regulatory Compliance

We may process Personal Data when necessary to:

- Comply with applicable laws and regulations.
- Respond to lawful requests from competent authorities.
- Meet healthcare, laboratory, regulatory, or professional requirements.
- Establish, exercise, or defend legal claims.
- Protect the rights, safety, and security of individuals and our organization.

7. Legal Basis for Processing

Novo Genomics will process Personal Data only where there is an appropriate legal basis under applicable law.

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Depending on the circumstances, the legal basis may include:

- Consent.
- Performance of a contract or provision of a requested service.
- Compliance with a legal or regulatory obligation.
- Protection of an individual's vital interests where applicable.
- Other lawful grounds permitted under the PDPL and its Implementing Regulations.

Where processing requires consent, we will seek consent in an appropriate manner and will explain the purpose of the processing.

The PDPL requires lawful processing and provides requirements concerning consent and the purposes for which Personal Data is collected and processed.

8. Sensitive Personal Data

Some services provided by Novo Genomics may involve Sensitive Personal Data, including health-related and genetic information.

Sensitive Personal Data will be processed only where permitted under applicable law and where the required safeguards and legal conditions are satisfied.

We will apply appropriate technical, organizational, and administrative measures to protect Sensitive Personal Data against unauthorized access, use, disclosure, alteration, loss, or destruction.

Sensitive information will not be processed for unrelated purposes unless permitted by applicable law.

9. Data Minimization

Novo Genomics seeks to collect only the Personal Data that is reasonably necessary for the relevant purpose.

We will not intentionally request information that is unnecessary for the service or purpose for which it is collected.

Where Personal Data is no longer necessary for the purpose for which it was collected, we will take appropriate action in accordance with applicable legal and regulatory requirements.

The PDPL requires data collection to be limited to the minimum necessary and requires Personal Data that is no longer necessary for its collection purpose to be addressed appropriately.

10. Data Accuracy

We take reasonable measures to ensure that Personal Data processed by us is:

- Accurate.
- Complete where necessary.
- Relevant.
- Up to date where required.

You may contact us if you believe that Personal Data we hold about you is inaccurate or incomplete.

11. Disclosure of Personal Data

Novo Genomics may disclose Personal Data only where permitted or required by applicable law, or where disclosure is necessary to provide a requested service.

Depending on the circumstances, Personal Data may be disclosed to:

- Authorized healthcare professionals.
- Authorized laboratory personnel.
- Service providers processing information on our behalf.
- Technology and IT service providers.
- Hosting and infrastructure providers.
- Authorized business partners.
- Payment service providers, where applicable.
- Professional advisors.
- Government authorities and regulatory bodies where legally required.
- Other parties where disclosure is legally permitted and necessary for the stated purpose.

We seek to limit disclosures to the minimum information necessary for the relevant purpose.

The PDPL requires disclosures to be connected to a specific purpose and to take appropriate measures to protect the privacy of the Data Subject.

12. Data Processors and Third-Party Service Providers

Novo Genomics may use third-party service providers to support our operations, including:

- Website hosting.
- Website development and maintenance.
- IT infrastructure.
- Cybersecurity.
- Email and communication services.
- Appointment systems.
- Analytics.
- Customer support.
- Payment processing.
- Laboratory and operational systems.

Where a third party processes Personal Data on our behalf, we will take appropriate measures to ensure that such processing is governed by applicable contractual, organizational, and security requirements.

13. International Data Transfers

Some technology, hosting, cloud, analytics, communication, or other service providers may process Personal Data outside the Kingdom of Saudi Arabia.

Where Personal Data is transferred, disclosed, or processed outside the Kingdom, Novo Genomics will comply with the applicable requirements governing international transfers of Personal Data under Saudi law.

Such transfers will be subject to appropriate safeguards and legal requirements.

14. Data Storage

Personal Data may be stored using Novo Genomics systems or authorized third-party systems used to provide our services.

We implement appropriate technical and organizational measures designed to protect Personal Data during storage and transmission.

These measures may include:

- Access controls.
- Authentication mechanisms.
- Authorization management.

- Encryption where appropriate.
- Backup and recovery controls.
- Security monitoring.
- System logging.
- Administrative controls.
- Confidentiality obligations.
- Security procedures.

15. Data Retention

Novo Genomics retains Personal Data only for as long as necessary to fulfill the purposes for which it was collected, unless a longer retention period is required or permitted by applicable laws, regulations, healthcare requirements, laboratory requirements, contractual obligations, or legitimate legal purposes.

Retention periods may therefore vary depending on:

- The type of Personal Data.
- The purpose for which it was collected.
- The type of service provided.
- Applicable healthcare or laboratory requirements.
- Legal and regulatory obligations.
- Dispute resolution requirements.

When Personal Data is no longer required, we will take appropriate measures to securely delete, destroy, anonymize, or otherwise dispose of it in accordance with applicable requirements.

16. Information Security

Novo Genomics takes the security of Personal Data seriously.

We maintain appropriate administrative, technical, and organizational safeguards designed to protect Personal Data against:

- Unauthorized access.
- Unauthorized disclosure.
- Accidental loss.

- Destruction.
- Alteration.
- Misuse.
- Unlawful processing.

Access to Personal Data is restricted to authorized individuals who require access for legitimate business, healthcare, laboratory, or operational purposes.

Despite our security measures, no electronic system or method of transmission over the internet can be guaranteed to be completely secure.

17. Cookies and Similar Technologies

Our website may use cookies and similar technologies.

These technologies may be used for:

- Essential website functionality.
- Security.
- Website performance.
- Analytics.
- Understanding website usage.
- Improving user experience.
- Measuring marketing or website performance where applicable.

Our website currently uses Google Tag Manager technology.

Where applicable, non-essential cookies or tracking technologies will be managed in accordance with applicable consent and privacy requirements.

You may also control cookies through your browser settings. Disabling certain cookies may affect some website functionality.

For more information, please refer to our **Cookie Policy**.

18. Marketing Communications

Where permitted by applicable law, Novo Genomics may use Personal Data to communicate with customers regarding services, updates, educational information, or promotional communications.

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Where consent is required for direct marketing, we will obtain the required consent.

You may opt out of marketing communications by:

- Using the unsubscribe option included in the communication, where available; or
- Contacting us through the details provided in this Privacy Policy.

Opting out of marketing communications will not necessarily stop essential service-related communications, such as appointment confirmations, service updates, or important notices.

19. Your Rights

Subject to the conditions and exceptions provided under applicable law, you may have rights regarding your Personal Data, including:

Right to be informed

You have the right to know how your Personal Data is collected and processed.

Right to access

You may request access to your Personal Data held by Novo Genomics, subject to applicable requirements.

Right to obtain a copy

You may request a copy of your Personal Data in an appropriate and readable format where applicable.

Right to correction

You may request correction, completion, or updating of inaccurate or incomplete Personal Data.

Right to destruction

You may request destruction of your Personal Data where the applicable legal requirements and exceptions permit.

Right to withdraw consent

Where processing is based on consent, you may request withdrawal of your consent, subject to applicable legal requirements and consequences.

These rights are subject to the conditions, exceptions, and procedures established under the PDPL and its Implementing Regulations.

20. How to Exercise Your Rights

To submit a Personal Data request, complaint, or privacy inquiry, please contact:

Novo Genomics Medical Company

Email: info@novogenomics.sa

Telephone: 9200 32687

Address: 7045 Prince Muhammad Ibn Saad Ibn Abdulaziz Road, Al Malqa 13524, Riyadh, Saudi Arabia.

Please include:

- Your full name.
- Contact information.
- Description of your request.
- Any information necessary to identify the relevant data or interaction.

For security purposes, we may request reasonable information to verify your identity before processing certain requests.

Requests will be handled in accordance with applicable laws and regulations.

21. Children and Minors

Certain Novo Genomics services may involve children or minors, including prenatal or pediatric-related services.

Where Personal Data relates to a minor, Novo Genomics will process the information in accordance with applicable legal requirements and any required parental or legal representative authorization.

We do not intentionally collect Personal Data from children for unrelated purposes.

22. Third-Party Links

Our website may contain links to third-party websites, applications, or services.

These third parties operate independently from Novo Genomics and may have their own privacy policies and terms.

Novo Genomics is not responsible for the privacy practices, security, content, or processing activities of third-party websites or services.

We recommend reviewing the applicable privacy policy before providing Personal Data to any third party.

23. Medical and Health Information Disclaimer

Information presented on the Novo Genomics website is provided for general informational purposes and should not be interpreted as a substitute for professional medical advice, diagnosis, or treatment.

The availability of information on the website does not establish a doctor-patient relationship.

Specific medical decisions should be made in consultation with an appropriately qualified healthcare professional.

Where a genetic or laboratory test is requested, the appropriate healthcare professional may determine whether additional clinical assessment, referral, or testing is required.

24. Changes to This Privacy Policy

Novo Genomics may update this Privacy Policy from time to time to reflect:

- Changes in applicable laws and regulations.
- Changes to our services.
- Changes to our website.
- Changes to our information systems.
- Changes in how Personal Data is processed.
- Changes to our privacy and security practices.

When we make material changes, we will update the “Last Updated” date and provide any additional notice required by applicable law.

You are encouraged to review this Privacy Policy periodically.

25. Contact Us

If you have questions, concerns, complaints, or requests regarding this Privacy Policy or the processing of your Personal Data, please contact us:

Novo Genomics Medical Company

Email: info@novogenomics.sa

Telephone: 9200 32687

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Address: 7045 Prince Muhammad Ibn Saad Ibn Abdulaziz Road, Al Malqa 13524, Riyadh, Saudi Arabia.

Website: <https://novogenomics.sa/>

Privacy Notice for Online Forms

Before submitting Personal Data through our website forms, please review this Privacy Policy.

By submitting the form, you acknowledge that:

- Your Personal Data will be collected for the purpose stated in the relevant form.
- Required information must be provided to process your request.
- Optional information, where identified as optional, may be declined.
- Your Personal Data may be processed by authorized Novo Genomics personnel and service providers where necessary.
- Your Personal Data will be handled in accordance with this Privacy Policy and applicable Saudi laws and regulations.

Where consent is legally required, a separate consent mechanism will be provided.

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