

# PERSONAL DATA PROTECTION NOTICE

This Personal Data Protection Notice ("Notice") describes how Health Management International Ltd (the "Company") and/or its subsidiaries (the "Group") use your Personal Data. The Group respect the privacy of individuals with regards to Personal Data (hereinafter defined) and are committed to protecting the privacy of our stakeholders ("Stakeholders"). This notice is formulated in accordance with the Personal Data Protection Act 2012 ("PDPA") and/or its regulations ("Act") which describes how your Personal Data is collected, processed and used and your choices with respect to your Personal Data.

## **DESCRIPTION OF PERSONAL DATA**

- 1. Personal Data means personal information about you, from which you are identifiable, including but not limited to your name, identification card number, passport number, address, telephone number, email address, date of birth, credit card details, race, nationality, sensitive data such as medical information, any information about you which you have provided to the Group in our registration or application forms and/or any information about you that has been or may be collected, stored, used and processed by the Group from time to time.
- 2. The provision of Personal Data is mandatory if you intend to seek healthcare and other services in the Group. If you do not provide your Personal Data, the Group is unable to register your information and thus unable to render the healthcare and other services to you.

#### SOURCES OF PERSONAL DATA COLLECTED

3. In addition to the Personal Data you may provide to the Group directly, the Group may also collect your Personal Data from a variety of sources, including but not limited to information you may furnish when you register with the Group as patient, employees, business associates and other related parties with the Group, from the Group agents or other third party referring agents, when you interact and communicate with our staff at exhibitions, events, roadshows or otherwise, from companies within the Group or by using the Website (hereinafter defined). The Group includes the Company, its subsidiaries, affiliated company and/or associate companies.

#### PURPOSES OF WHY PERSONAL DATA IS COLLECTED

4. The Company is a healthcare company delivering quality healthcare and healthcare education services in the region through 2 hospitals, 21 patient representative offices and 2 healthcare training institutions in Singapore, Malaysia, Indonesia, Myanmar and Cambodia (other "Countries"). The Group may use and process your Personal Data for the purposes relating to the healthcare business and activities of the Group which shall include, but not limited to:-

- a. The release and receipt of Personal Data to or by the Group and/or its representative with whom the Group has a relationship in accordance with the applicable Legislative Acts and/or its regulations pertaining to medical or other healthcare related information that are performed at the direction of a medical or other healthcare providers attending to you (including consenting to the healthcare professionals having access, inspecting and making relevant copies of the Personal Data). This release and receipt also includes disclosure of Personal Data to the Stakeholder's employer/insurer or to any other companies issuing guarantees for payment of costs for the healthcare services rendered/to be rendered to a Stakeholder;
- b. The disclosure of your Personal Data whenever and to whomever the law or a court order may require.
- c. The disclosure of your Personal Data to the suppliers, vendors and/or agents of the Group if it is required for them to carry out their duties;
- d. The disclosure and/or publication of information relating to the debt in such as manner and to such extent as the Group shall from time to time consider necessary, without further notification or concurrence by the Stakeholder and/or the guarantor to any parties including credit reporting agencies/ credit data management company operating in Singapore and other Countries, the auditors, solicitors and other professional advisors of the Group, any third party if required by law, regulation or by-law, subpoena, court order or other legal process;
- e. To enable the Group to respond to the request for Personal Data which may include your Personal Data and sensitive information of the Stakeholders in accordance to the Group's internal policy and practices which shall be in compliance with the Act;
- f. To collect your Personal Data to enable the Group to conduct any survey on the performance of the Group's services.

You hereby agree and consent for the Group and the Company to use and process your Personal Data in the manner as identified above and in this Notice.

- 5. The Group may also use and process your Personal Data for other purposes such as to send you updates and news on their latest products, services and promotions including the latest Group projects and developments and to inform you about events, exhibitions or roadshows which may be of interest to you, by way of social media, post, telephone calls, short message service (SMS) and/or by email.
- 6. If you do not consent to the Group or the Company processing your Personal Data for the purposes listed in Section 4 & 5, please notify the Group or the Company using the contact details stated in Section 15 below.

#### TRANSFER OF PERSONAL DATA

7. Your Personal Data may be transferred to, stored, used and processed in a jurisdiction other than Singapore, which is to companies under the Group which are located outside of Singapore. You understand and consent to the transfer of your Personal Data out of Singapore as described herein.

#### **DISCLOSURE TO THIRD PARTIES**

- 8. Your Personal Data may be transferred, accessed or disclosed to third parties for the purposes of processing your registration or for providing you with healthcare and related services under the Group. Further, the Company may engage other companies, service providers or individuals to perform functions on the Company's behalf, and consequently may provide access or disclose to your Personal Data to such service providers or third parties. Such third parties include but not limited to the following:
  - a. To local authorities, such as Ministry of Manpower, Ministry of Health, Ministry of Education, Singapore Council for Private Education, Singapore Workforce Development Agency and/or any other government authorities/agencies in order to comply with statutory and governmental requirements;
  - b. Our information technology service providers, suppliers or vendors that render services to the Group;
  - c. To our vendors or suppliers of which the Group outsources its services, if any;
  - d. Healthcare professionals such as registered medical practitioners, registered dental practitioners, registered nurses, registered medical assistants, technologies, allied health staff, paramedical staff or other healthcare staff engaged or referred to for the provision of healthcare services in accordance with the Medical Acts:
  - e. Our professional advisers such as external auditors, legal advisors and/or financial advisors or any other third party required by law, regulation or by-law, subpoena, court order or other legal process;
  - f. Insurance companies, third party insurers, employers of patients, guarantors and/or credit reporting agencies/credit data management company operating in Singapore and other Countries;
  - g. Regulatory and governmental authorities in order to comply with statutory and government requirements.
- 9. Your Personal Data may also be shared in connection with a corporate transaction, such as merger, consolidation, or in the unlikely event of winding-up.

## LINKS TO THIRD-PARTY WEBSITES AND SOCIAL MEDIA SITES

10. The Groups' Websites and social media sites (e.g. Facebook, Twitter, etc.) may contain links to third parties' websites. Please note that the Group is not responsible for the collection, use, maintenance, sharing or disclosure of data and information by such third parties. If you provide information directly to such sites, the privacy policy and terms of service on those sites are applicable and the Group is not responsible for the information processing practices or privacy policies of such sites.

#### INCOMPETENT STAKEHOLDERS

11. In order to provide healthcare or related services, the Group knowingly collects Personal Data from Incompetent Stakeholders. Incompetent Stakeholders include patients who are medically certified to be mentally incompetent or who is legally incompetent or he/she is a minor who has not attained the age of 18 years old. In the event that such Personal Data is provided to the Group, you, as legal guardian hereby consent to the processing of the Incompetent Stakeholder's Personal Data and personally accept and agree to be bound by this Notice and take responsibility for his or her actions.

## **CHANGES TO NOTICE**

12. We reserve the right to amend this Notice from time to time without prior notice. We advise that you check this Notice on our Website on a regular basis.

#### PREVAILING NOTICE

13. In the event of any conflict in the notices between the English and any other language versions, the English version shall prevail. The Group shall have the right to modify, update or amend the terms of this Notice at any time by placing the updated Notice on the Company website ("Website") at the following link: <a href="http://hmi.com.sg/">http://hmi.com.sg/</a>. By continuing to communicate with the Group and the Company or by continuing to use the Group's healthcare and related services subsequent modifications, updates or amendments to this Notice, such actions shall signify your acceptance of such modifications, updates or amendments.

### **ACCURACY OF PERSONAL DATA**

14. You are responsible for informing us about changes to your Personal Data and for ensuring that such information is accurate and current. You may do so by submitting the information to the respective Group's representatives or in writing (letter or email).

#### **ACCESS & CORRECTION REQUESTS AND INQUIRIES**

15. Subject to any exceptions under applicable laws, you may request for access to and/or request correction of your Personal Data, lodge a complaint, request to limit the processing of your Personal Data in relation to Section 4 & 5 above and/or make any inquiries regarding your Personal Data by contacting:-

## **Health Management International Ltd**

167 Jalan Bukit Merah Connection ONE Tower 5 #05-10

Singapore 150167

Telephone: (65) 6253 3818

Email : dataprotection@hmi.com.sg

16. In respect of your right to access and/or correct your Personal Data, the Group has the right to refuse your requests to access and/or make any correction to your Personal Data for the reasons permitted under law.

#### CONSENT

- 17. The Group seeks to use your Personal Data only for the purposes of legitimate interests and with your consent.
- 18. The Group will not use your Personal Data for a purpose that has not previously been specified, unless we have previously obtained your consent or unless such purpose is required by law.
- 19. If you have previously opted in receiving commercial communications from the Group while also becoming a member of our membership clubs under the Group, should your membership to such scheme comes to an end for whatever reason, we will not take in as an implication for an automatic request to unsubscribe, and we will assume that we continue to have your consent, unless you specifically unsubscribe.
- 20. Subsequent with this Notice, if you do not consent to the Group processing your Personal Data, you may withdraw your consent to our collection, use or disclosure of your Personal Data by contacting us as provided in Section 15 of this Notice.
- 21. Accordingly, we believe that you consent to and agree with the terms above with respect to the processing of your Personal Data. If we have not received any response from you regarding the above, we reserve the right to assume that you agree with the above.