



DATA PROTECTION POLICY FOR MEMBER

This Data Protection Policy (“Policy”) sets out the basis which **Adept Health Pte Ltd** (“ADEPT”, “we”, “us”, or “our”) may collect, use, disclose or otherwise process personal data of our Members in accordance with the Singapore Personal Data Protection Act (“PDPA”). This policy applies to personal data in our possession or under our control, including personal data in the possession of organisations which we have engaged to collect, use, disclose or process personal data for our purposes.

PERSONAL DATA

1. As used in this policy:
“Member” means an individual who (a) is under an insurer’s or company’s scheme managed by ADEPT, or (b) may, or has, entered into an agreement with us for the supply of any services by us or (c) uses our healthcare administration services; and
“personal data” means data, whether true or not, about a Member who can be identified:
(a) from that data; or (b) from that data and other information to which we have or are likely to have access.
2. Depending on the nature of your interaction with us, some examples of personal data which we may collect from you include your full name and contact information such as your address, email address or mobile number, etc.
3. Other terms used in this policy shall have the meanings given to them in the PDPA (where the context so permits).

COLLECTION, USE AND DISCLOSURE OF PERSONAL DATA

4. Generally as we are a data intermediary of your insurer or company we do not collect your personal data unless (a) it is provided to us voluntarily by you directly or via a third party who has been duly authorised by you to disclose your personal data to us (your “authorised representative” which could include your insurer or your company if they process your claims) after (i) you (or your authorised representative) have been notified of the purposes for which the data is collected, and (ii) you (or your authorised representative) have provided written consent to the collection and usage of your personal data for those purposes, or (b) collection and use of personal data without consent is permitted or required by the PDPA or other laws. We shall seek your consent before collecting any additional personal data and before using your personal data for a purpose which has not been notified to you (except where permitted or authorised by law).
5. We may collect and use your personal data for any or all of the following purposes:
 - (a) performing obligations in the course of or in connection with our provision of the goods and/or services requested by you;
 - (b) verifying your identity;
 - (c) responding to, handling, and processing queries, requests, applications, complaints, and feedback from you;
 - (d) managing your relationship with us;
 - (e) converting the personal data to anonymised data for the purposes of analytics and market research;
 - (f) sending you marketing information about our goods or services including notifying you of our marketing events, initiatives, promotions and rewards schemes;



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- (g) complying with any applicable laws, regulations, codes of practice, guidelines, or rules, or to assist in law enforcement and investigations conducted by any governmental and/or regulatory authority;
 - (h) any other purposes for which you have provided the information;
 - (i) transmitting to any unaffiliated third parties including our third party service providers and agents, and relevant governmental and/or regulatory authorities, whether in Singapore or abroad, for the aforementioned purposes; and
 - (j) any other incidental business purposes related to or in connection with the above.
6. We may disclose your personal data:
- (a) To our affiliated companies or any relevant parties involved in the processing of your claims (which could include your insurer or your company), where such disclosure is required for performing obligations in the course of or in connection with our provision of the goods or services requested by you; or
 - (b) to third party service providers, agents and other organisations we have engaged to perform any of the functions listed in clause 5 above for us; or
 - (c) To a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution or other sale or transfer of some or all of ADEPT's assets, whether as a going concern or as part of bankruptcy, liquidation or similar proceeding, in which personal data maintained by ADEPT is among the assets transferred.
7. The purposes listed in the above clauses may continue to apply even in situations where your relationship with us (for example, pursuant to a contract) has been terminated or altered in any way, for a reasonable period thereafter (including, where applicable, a period to enable us to enforce our rights under any contract with you).

WITHDRAWING YOUR CONSENT

- 8. The consent that you provide for the collection, use and disclosure of your personal data will remain valid until such time it is withdrawn by you by informing your respective insurer or company.
- 9. Upon receipt of your written request to withdraw your consent from your insurer or company, we may require reasonable time (depending on the complexity of the request and its impact on our relationship with you) for your request to be processed and for us to notify you of the consequences of us acceding to the same, including any legal consequences which may affect your rights and liabilities to us. In general, we shall seek to process your request within **10 days** of receiving it.
- 10. Whilst we respect your decision to withdraw your consent, please note that depending on the nature and scope of your request, we may not be in a position to continue providing our goods or services to you and we shall, in such circumstances, notify you before completing the processing of your request. Should you decide to cancel your withdrawal of consent, please inform your insurer or company.
- 11. Please note that withdrawing consent does not affect our right to continue to collect, use and disclose personal data where such collection, use and disclose without consent is permitted or required under applicable laws. For the avoidance of doubt, such withdrawal of consent shall not require us to delete any personal data that has already been collected by us from our records. Such retention shall be subject to clauses 18 and 19 below.

ACCESS TO AND CORRECTION OF PERSONAL DATA



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12. If you wish to make (a) an access request for access to a copy of the personal data which we hold about you or information about the ways in which we use or disclose your personal data, or (b) a correction request to correct or update any of your personal data which we hold about you, you may submit your request to your insurer or company.
13. We will respond to your access request as soon as reasonably possible upon receipt of the request from your insurer or company. Should we not be able to respond to your access request within **30 days** after receiving your request, we will inform your insurer or company in writing via email on the time by which we will be able to respond to your request. If we are unable to provide you with any personal data requested by you through your insurer or company, we shall generally inform your insurer or company of the reasons why we are unable to do so (except where we are not required to do so under the PDPA).
14. As we are a data intermediary we do not have the rights to correct your data and therefore if you wish to make a correction request on your personal data kindly contact your insurer or company and after we received the correction request from your insurer or company then we will proceed with the request.

PROTECTION OF PERSONAL DATA

15. To safeguard your personal data from unauthorised access, collection, use, disclosure, copying, modification, disposal or similar risks, we have introduced appropriate administrative, physical and technical measures such as up-to-date antivirus and firewall protection, encryption and the use of privacy filters to secure all storage and transmission of personal data by us, and disclosing personal data both internally and to our authorised third party service providers and agents only on a need-to-know basis.
16. You should be aware, however, that no method of transmission over the Internet or method of electronic storage is completely secure. While security cannot be guaranteed, we strive to protect the security of your information and are constantly reviewing and enhancing our information security measures.

ACCURACY OF PERSONAL DATA

17. We generally rely on personal data provided by you (or your authorised representative). In order to ensure that your personal data is current, complete and accurate, please update your insurer or company if there are changes to your personal data.

RETENTION OF PERSONAL DATA

18. We may retain your personal data for **as long as you are under your insurer's or company's insurance scheme managed by ADEPT** to fulfil the purpose for which it was collected, or as required or permitted by applicable laws.
19. We will cease to retain your personal data, or remove the means by which the data can be associated with you, as soon as it is reasonable to assume that such retention no longer serves the purpose for which the personal data was collected, and is no longer necessary for legal or business purposes.

TRANSFERS OF PERSONAL DATA OUTSIDE OF SINGAPORE

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20. We generally do not transfer your personal data to countries outside of Singapore. However, if we do so, we will obtain your consent for the transfer to be made and we will take steps to ensure that your personal data continues to receive a standard of protection that is at least comparable to that provided under the PDPA.

DATA PROTECTION OFFICER

21. You may contact our Data Protection Officer if you have any enquiries or feedback on our personal data protection policies and procedures, or if you wish to make any request, through the following:
- Contact Person: **Data Protection Officer**
 - Email: **dpo@adepthealth.com.sg**

EFFECT OF POLICY AND CHANGES TO POLICY

22. This policy applies in conjunction with any other policy, contractual clauses and consent clauses that apply in relation to the collection, use and disclosure of your personal data by us.
23. We may revise this policy from time to time without any prior notice. Such updated policy will be available on our website at <http://www.adepthealth.com.sg>. You may determine if any such revision has taken place by referring to the date on which this policy was last updated. Your continued use of our services constitutes your acknowledgement and acceptance of such changes.