

HC Surgical Specialists Limited

Personal Data Protection Policy

Our assurance to protecting your personal data

HC Surgical Specialists Limited and its subsidiaries (“HCSS Group”) takes its responsibility to protect personal data seriously. Your privacy is important and we are committed to complying with the applicable law, including the Singapore Personal Data Protection Act (the “PDPA”).

Section 1: Introduction

1. The purpose of this document (“Personal Data Protection Policy”, or “PDPP”) is to inform you of how HCSS Group collects, uses and discloses your personal data, and to let you know your rights in respect to your personal data.
2. You may have seen or been referred to shorter summaries of this PDPP which were formatted to provide an overview of the key and relevant points of the PDPP – “Personal Data Protection”.
3. Please note that though we make an effort to provide reasonably adequate information concerning our policies as it pertains to personal data, this PDPP is not an exhaustive list of all the situations or scenarios concerning personal data. Feel free to approach our Data Protection Officer (see **Section 8: Contacting Us – Withdrawal of Consent, Access and Correction of your Personal Data** below) if you need clarification about any specific situation.
4. The PDPP applies and forms part of the terms and conditions governing your transactions and agreements with us, whenever your personal data is handled by us. The PDPP supplements but does not supersede or replace any other consents you may have previously provided to any centre in HCSS Group in respect of your personal data.
5. We bring it to your attention and make it part of your transactions and agreements with us, in addition to making it available in our website, by:
 - a. Providing the Personal Data Protection Form upon the first admission as patient
 - b. Making the PDPP available upon request
6. The PDPP, having been brought to your attention, becomes binding by your taking of any of the following actions:
 - a. Proceeding with your transactions and agreements with us
 - b. Submitting information to us via forms or other data collection means or processes (whether through the patient registration form or undergoing medical treatment)
 - c. Attending at our premises for visits

- d. Calling or sending messages to us
- e. Transacting with us, or undergoing any treatment with us; and
- f. Other means

Who will comply with this PDPP

7. We ask and require that each of the following parties / persons to abide by this PDPP:
- a. Each and every centre under HCSS Group
 - b. All HCSS Group employees, including any healthcare professional (doctors, nurses, etc)
 - c. Third parties (including third party partners, service providers, or affiliates) whom we work with and who have agreed to abide by this PDPP
8. Every centre under HCSS Group are subject to the PDPA. More information about the PDPA can be found at the website of the Personal Data Protection Commission (“PDPC”) at www.pdpc.gov.sg

Section 2: Your Personal Data

What kind of data will this PDPP apply to

9. This PDPP applies to “personal data”, which in this PDPP and in line with the PDPA, refers to any data, whether true or not, about an individual (i.e. the data subject) 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 to , including data in our records as may be updated from time to time.
10. The exact type of personal data that may apply in your case will vary depending on how you have interacted with us. Examples of such personal data you may provide to us including your name, NRIC, passport or other identification number, identification photo in your NRIC or passport, telephone number(s), mailing address, email address and any other information relating to any individuals which you have provided us in any forms you may have submitted to us (patient registration form), or via other forms of interaction with you.
11. In some situations, personal data may include tissue specimen, organic materials provided by a data subject as a patient, but only where such materials are linked with data that can lead to the identification of the data subject.

What is not personal data

12. Personal data does not include data about a data subject which has been anonymised. Anonymisation is the process of removing identifying information such that the remaining data does not identify any particular individual.

13. HCSS Group practices and undertakes reasonable safeguards to anonymise personal data in appropriate situations, balancing both the need to rely on and use sufficiently accurate and complete personal data to protect life and health, and avoid mistakes, injury or accidents.

Section 3: Consent

14. By applying this PDPP, you:

- a. Consent to the centre in HCSS Group and the relevant persons (See “Who will comply with this PDPP” above) handling your personal data in ways which enable us to provide you with the relevant services or to facilitate our interactions with you
- b. Enable the exercising of your rights under the PDPA in an operative and applicable framework, including securing the right to access your personal data, withdraw (or manage) your consents and preferences as to your personal data.

Withholding / Withdrawing Consent

15. You are entitled under applicable law to withhold / withdraw consent to the collection, use or disclosure of personal data, and HCSS Group will respect your choices in this regard. You may withhold consent at any juncture that you are asked for consent, and you may also apply the process / method to withdraw consent as stated in this PDPP (see **Section 8: Contacting Us – Withdrawal of Consent, Access and Correction of your Personal Data** below)

16. However, as recognised by and provided for under the PDPA, it may be that any choice you make to withhold or withdraw consent may impact our ability to proceed with your transactions or interactions with us, in particular:

- a. In some cases, it may also become unsafe or unlawful for us to provide (or continue to provide) medical treatment without the ability to collect, use or disclose personal data
- b. It may not be possible, without undue risk, cost or liability to HCSS Group, to proceed with a particular transaction or interaction with you, and we may be left with no choice but to cease or refrain from the same

17. HCSS Group will take the approach that best safeguards us, you and others from risks, and we may well have no choice but to decline to proceed with the transaction or interaction in question to avoid causing harm or exposing us, you or others to risk.

18. At the same time, it should be noted that your withholding / withdrawal of consent will not prevent us from exercising our legal rights (including any remedies, or undertaking any steps as we may be entitled to at law).

Section 4: Collection Of Personal Data

How we collect personal data

19. Generally, we may collect personal data in the following ways:

- a. When you submit any form, including but not limited to patient registration forms, hospital admission and medical consent forms
- b. When you undergo a procedure where tissue specimens, organic materials are provided as a patient, such that this is linked with other data that you can be identified
- c. When you interact with our staff, including nurses, doctors via telephone calls, letters, fax, face-to-face meetings and email
- d. When we receive your personal data from referral parties, your employer or other third party agencies (eg. your bank, your insurers etc)
- e. When you make payment or provide details to facilitate payment, or administer the application of Medisave
- f. When we seek information from third parties from you in connection with your relationship with us, including from next-of-kin and caregivers
- g. When you submit your personal data to us for any other reasons

20. If you provide us with any personal data relating to a third party (eg. information of your next-of-kin, spouse, children, parents, and/or employees), by submitting such information to us, we rely on you and will assume that you are representing to us that you have obtained the consent from the third party to provide us with their personal data for the respective purpose for which we are collecting this personal data.

21. We also rely on you and will assume that you have ensured that all personal data submitted to us is complete, accurate, true and correct.

22. If you fail to provide us with complete and accurate information, we may, in some situations, be prevented from providing a patient with medical treatment (or may be impaired in doing so, resulting in risks to that patient) or cause harm to a data subject.

How much personal data we collect

23. HCSS Group endeavours to limit the collection of personal data to what is reasonable or necessary for the transaction or interaction with us.

24. However, it should be noted that in the case of medical / health information, the extensiveness and completeness of information that is collected can mean the difference between saving a life, or preventing the loss of life, and can make a crucial difference between a full and proper diagnosis with appropriate treatment and incomplete or inadequate treatment.

25. Further, the relevance of information may not be immediately apparent at first and personal data may be collected as a matter of precaution to ensure that you are adequately treated for illness.

26. If you withhold information, we may have no choice but to decline to proceed with the transaction or interaction in question to avoid causing harm or exposing us, you or others to risk.

Section 5: Purposes For Your Personal Data And To Whom We Disclose It To

27. Generally, all our centres handle your personal data for the purposes set out in this section. Any one or more of the listed purposes may apply to your personal data, depending on the actual situation. The following does not purport to be an exhaustive listing, although an effort is made to set out as many salient purposes as may be applicable.

28. In the sub-sections that follow, we set out some of the Purposes which apply to collection or use of personal data in certain scenarios and also identify some of the relevant recipients in the disclosure of personal data. We would also highlight that while a party may be listed as a recipient or source of personal data in these sections, that same party may also be a recipient or source (albeit not listed or mentioned expressly) in other scenarios.

29. We may handle your personal data, particularly if you are a patient, to provide medical treatment. The personal data may be disclosed / shared with healthcare professionals (such as doctors, nurses, technicians who are assisting on or providing medical treatment / services), other medical facilities (including labs, pharmacies, care providers such as next-of-kin), and healthcare providers. In each case the disclosure or sharing of such personal data is solely to such persons or entities which are involved in the care of the patient.

30. The purposes for which such personal data is handled includes:

- a. Admitting the patient to establish patient records and to commence treatment and care of the patient
- b. Managing your relationship with us, and providing medical treatment, services and advice, including and without limitation to the management of your appointments, registration, advising you of alternate treatment options, sending notifications to you, communicating patient care issues
- c. Ensuring appropriate delivery of core patient care services including delivering results of tests and other medical updates (including via SMS)
- d. Ensuring proper and complete diagnosis and appropriate treatment including and without limitation to identifying health / treatment risks (e.g. collecting, identifying and communicating conditions, allergies, potentially adverse reactions etc.) and monitoring appropriateness of medication usage and specimen testing
- e. Referring / collaboration with other institutions, healthcare professionals, caregivers, persons, organisations for procedures, additional support on treatment, the procurement or provision of follow up care as part of integrated / seamless / holistic care arrangements. In such instances, reasonable safeguards will be taken to ensure the confidentiality of your personal data records
- f. All other purposes reasonably related to the patient's treatment and care

31. We may also handle personal data (such as telephone number and email address) to contact you to remind you of appointments at a centre in HCSS Group.

To minimise or eliminate errors which can cause harm and to safeguard the health, safety or well being of individuals

32. HCSS Group believes that the making of decisions and taking of steps in relation to the healthcare of a patient involves great care and should be made on the basis of complete and accurate information. Should a situation develop where the lack of information about an individual or the lack of completeness of a particular record could result in the creation or rise in risk to the health, safety or well being (e.g. through errors, or inability to validate information etc.), it is essential for our staff to be able to take steps to minimize or eliminate such risks and any personal data may be collected, used or disclosed by us for this purpose.

33. In such cases, collection, use or disclosure of personal data will be made strictly to the extent necessary and to such persons as may be necessary to achieve the minimization or elimination of such risks.

To leverage the use of Information Technology tools and platforms as may be appropriate to provide services

34. HCSS Group may handle personal data using IT platforms and tools promulgated by MOH, CPF Board, but not limited to National Electronic Health Records (“NEHR”) system. HCSS Group applies access controls in the use of these systems, such that access is on a need to know basis for purposes in a manner consistent with this PDPP and to an extent necessary to meet your needs.

To comply with applicable law / regulations

35. HCSS Group may disclose personal data when complying with court orders, directives, laws, guidelines, or applicable requests from government regulators, government ministries, statutory boards or authorities within or outside of Singapore.

To make payment and/or facilitate claims for reimbursement

36. We may handle your personal data to process and receive payment for services that have been provided to you with your bank / payment service providers, or when liaising with government agencies, statutory bodies (e.g. CPF in respect of Medisave / Medishield related transactions).

37. Disclosures for these purposes include submission of personal data to health insurers for verification of their payment for your invoice. For certain services, your permission may be requested to release health information to obtain payment.

Section 6: Your Trusted Representatives

38. HCSS Group recognizes that the care of a patient may well involve or impact more than one individual, and the persons who must be kept informed, or who could have a say in such matters may well extend beyond the patient.
39. The PDPA places an emphasis on the rights of the data subject, and obligates HCSS Group to respect that data subject's wishes. HCSS Group seeks always to balance the need to respect the interests of the data subjects as required by law, with the rights of such persons connected to the data subject.
40. Where the patient is a minor (i.e. below 21 years old), we will make the reasonable assumption that both parents (whether married, separated or divorced) has full rights of access to the minor patient's personal data unless otherwise alerted with due proof of contrary authorisation / order, or where our staff take the view that such access could jeopardize the health, safety or well being of any person.
41. Every patient who is of majority age (i.e. above 21 years old) and with full legal and mental capacity, is entitled to exercise his / her legal rights to identify any persons who are to act as a Patient's Representative. In such instances, we will, unless otherwise instructed by the patient, or alerted with due proof of contrary authorisation / order, make the reasonable assumption that any immediate next-of-kin (i.e. parents and children) may be contacted in respect of emergencies or situations where contact is needed to preserve the health, safety or well being of the patient.
42. Should any patient of legal age of majority, with full legal and mental capacity, wish for any HCSS Group centre to instruct us to limit access to his / her personal data or include only certain named persons in the handling / administration of any personal data or matters concerning the individual's healthcare, we will respect these decisions, subject to appropriate verifications / processes to ensure that such instructions are properly given.

Notice to all persons identifying themselves as a Patient's representative

43. For this reason, notice is given to all individuals that even if they identify themselves as a Patient's representative, such identification may not match our latest records / instructions from the patient, or such records / instructions may limit access to the patient's personal data. In such cases, HCSS Group reserves the right to decline access, pursuant to our obligations under the PDPA.

Contacting persons in emergencies / safeguarding of health, safety and well being

44. Notwithstanding the above, HCSS Group has the right under the PDPA to contact such persons or execute such steps involving the handling of personal data as may be reasonably necessary to address emergencies or in situations where contact is needed to safeguard and preserve the health, safety or well being of the patient, or to comply with our legal obligations.

Section 7: Security, Retention And IT matters

Security

45. Each centre in HCSS Group will take reasonable efforts to protect personal data in our possession by making reasonable security arrangements to prevent unauthorised access, collection, use, disclosure, copying, modification, disposal or similar risks.

Retention

46. Each centre in HCSS Group retains personal data as may be required for business or legal purposes. Whilst each centre in HCSS Group will securely dispose of personal data which it can reasonably determine as no longer needed, it is in the interests of any healthcare professional treating the patient to be able to refer to a complete set of medical records to avoid risks to health and safety of the patient.

47. Medical records covers all clinical encounters and inpatient and outpatient records generated at the time of admission or outpatient attendance. With accordance to MOH 2015 Guidelines for the Retention Periods of Medical Records, it is advised that the retention period starts only after patients have turned inactive, or have passed away. This ensures that patients who require their medical records in the future will have access to them.

48. As such, with respect to the medical records of patients, unless specific contrary instructions from the patient are received, HCSS Group may retain medical records for as long as the centre may be potentially consulted for further follow up by the patient even where such consultation may not occur until after a substantial period of time or there is no current or present indication that the patient may well return for further consultation or follow up.

IT Matters

49. While we strive to protect your personal data, we cannot ensure the security of the information you transmit to us via the Internet, and we urge you to take every precaution to protect your personal data when you are on the Internet.

50. When you interact with us on our website, we automatically receive and record information on our server logs from your browser. We may employ cookies on our server. The cookies are readable only by us, and cookies cannot access, read or modify any other data on a computer.