

# PERSONAL DATA PROTECTION POLICY

#### **SECTION 1 - PERSONAL DATA**

- Personal data refers to any data that related to an identifiable individual. This may
  include your full name, identification number, passport, date of birth, contact number,
  email address, financial details, medical history, allergy information, image on our
  CCTV and in photographs, as well as name and residential address of any individual
  which you have provided us.
- 2. The PDPA does not apply to:
  - (a) business contact information, defined as an individual's name, position name or title, business telephone number, business address, business electronic mail address, business fax number and any other similar information not provided solely for the individual's personal purposes;
  - (b) personal data that is anonymized, i.e. identifying information is removed such that the remaining data does not identify any particular individual. The PDPC will consider the data anonymized only if the possibility if reidentification is trivial;
  - (c) personal data of a deceased individual who has been dead for more than 10 years; and
  - (d) personal data that is falsified with the intent to commit fraudulent.
- 3. The PDPA recognize that a balance needs to be struck between the needs to protect personal data and the need of organizations to collect, use or disclose personal data. Hence, in meeting those obligations, PDPA considers what a reasonable person would consider appropriate in the circumstances when they undertake any action that is subject to data protection.

# SECTION 2 - CONSENT, PURPOSES FOR COLLECTION, USE OR DISCLOSURE OF YOUR PERSONAL DATA

- 4. By applying this policy, you consent to our collection, use and disclosure of your personal data for the purposes that a reasonable person would consider appropriate in the circumstances.
- 5. Consent of collection, use or disclosure of your personal data can be provided either in the form of expressed consent or deemed consent. Your provision of personal data to us is voluntary and you are deemed to consent to our collection, use or disclosure of your personal data under which it was collected. If you have consented to our



- disclosure of your personal data to other organization for a particular purpose, they will use your personal data only for the purposes you have consented to.
- 6. If you provide the personal data belonging to others, you warrant that you have informed the individuals of the purposes for which we are collecting their personal data and that they have consented to your disclosure of their personal data to us for those purposes.
- 7. When using your personal data to contact you for the purposes under which you have consented, we may contact you via postal mail, electronic mail, SMS, telephone, fax or any other means.
- 8. We collect, use and disclose personal data for the following purposes:

#### Healthcare Services

- To make informed decisions and provide you the best possible care
- Providing outpatient medical treatment and services, healthcare and allied healthcare services
- Management and coordination of your care including follow-ups, step-down care and other continuity of care issues

#### Administration

- Booking appointments, admissions and discharge
- Processing and collecting payment for treatments and services
- Insurance claims, claims reimbursement and claims for subsidies
- Medical records, financial records and other business records
- Addressing claims, disputes or feedback
- Complying with our legal obligations and requirements

# **Business Operations**

- Premises security measures
- Enhancing and improving quality of patient care
- Business research, planning, statistical analysis and policy development
- Financial records, regulatory records, management records, risk management, record keeping and internal and external audit

#### Public Health Purposes

 Safeguarding public health and safety and preventing or lessening the threat to your health and safety or the health and safety of others.



# CCTV, Video Recording and Photography

 CCTV may be in operation in and around our premises as necessary in the interest of security.

#### SECTION 3 - TRANSFER OF YOUR PERSONAL DATA OUT OF SINGAPORE

9. If we transfer your personal data to a country outside of Singapore, we will ensure that the organization or country provides a standard of protection to the personal data that is comparable to that provided under Singapore's PDPA.

## **SECTION 4 - PROTECTION OF YOUR PERSONAL DATA**

- 10. We will practice strong data protection as part of our IT Policies and Procedures and in fulfilment of the obligations under various legislation requirements such as Private Hospitals and Medical Clinic Act (PHMCA), Infectious Disease Act (IDA) ETC.
- 11. While we take reasonable efforts to protect your personal data held by us, we cannot be held responsible for unauthorized and unintended access that is beyond our control.

## **SECTION 5 - RETENTION OF YOUR PERSONAL DATA**

- 12. We will review your personal data held by us on a regular basis to determine if such personal data is still needed. Your personal data will not be retained longer than needed for the purpose under which it was collected, unless there are business, industry and/or legal requirements for the retention of such. Your personal data will also not be kept for "just in case" it may be needed for other purposes that you have not been notified.
- 13. We may anonymize your personal data on record as an organization is considered to have ceased retention of personal data when it no longer has the means to associate the personal data with particular individuals. The anonymizing of data could be found under the section on Anonymization in the Advisory Guidelines on Selected Topics in the PDPA website.

#### SECTION 6 - ACCURACY OF PERSONAL DATA

14. It is the obligation of the individual to ensure that all personal data submitted to us is true, accurate and complete. We generally rely on personal data provided by you (or you authorised representative). In order to ensure that your personal data is current, complete and accurate, please update us if there are changes to your personal data by



informing our Data Protection Officer in writing or via email at the contact details provided below.

# SECTION 7 - WITHDRAWAL OF CONSENT, ACCESS AND CORRECTION OF YOUR PERSONAL DATA

- 15. The consent that you provide for the collection, use and disclosure of your personal data will remain valid until such time it is being withdrawn by you in writing. If you wish to withdraw your consent to the use of your personal data, correct or obtain access to your personal data held by us, please submit your request in writing or via email to our Data Protection Officer at the contact details provided below.
- 16. Upon receipt of your written request to withdraw your consent, 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 ten (10) business days of receiving it.
- 17. We will not be able to provide access to data which are opinion data kept solely for evaluation purpose such as opinion of suitability, eligibility, qualification of individuals for employment, promotion or continuance in employment.
- 18. 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.

### SECTION 8 – ACCESS TO AND CORRECTION OF PERSONLA DATA

- 19. 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 in writing or via email to our Data Protection Officer at the contact details provided below.
- 20. Please note that a reasonable fee may be charged for an access request. If so, we will inform you of the fee before processing your request.
- 21. We will respond to your request as soon as reasonably possible. In general, our response will be within fourteen (14) business days. Should we not be able to respond to your request within fourteen (14) days after receiving your request, we will inform



you in writing within fourteen (14) days of the time by which we will be able to respond to your request. If we are unable to provide you with any personal data or to make a correction requested by you, we shall generally inform you of the reasons why we are unable to do so (except where we are not required to do so under the PDPA).

## **SECTION 9 - CONTACT US**

22. If you wish to withdraw any consent you have given us at any time, or if you wish to obtain access or make corrections to your personal data held by us, or if you do not accept any amendment to this Policy, please contact:

Quantum Medical Imaging

Address: 12 Kallang Avenue, Aperia Mall,

#02-05/06 Singapore 339511

Tel: 6283 1085

Email: info@quantummed.sg