



Data Privacy Policy

Overview:

This Data Privacy Notice is applicable to Pinnacle Medical Group Pte Ltd's subsidiary companies in Singapore including the subsidiary companies which may be established from time to time ("Pinnacle Family Clinic").

Your privacy is important to us at Pinnacle Family Clinic. We are committed to handling your Personal Data under our control with care. This document serves to inform you of practices at Pinnacle Family Clinic on Personal Data management. The Data Privacy Notice documents the purposes for which Pinnacle Family Clinic collect, use and disclose your Personal Data. It supplements any other consents which you may have previously provided to Pinnacle Family Clinic on your Personal Data. From time to time, we may update/amend this Data Privacy Notice to be consistent with Pinnacle Family Clinic's internal practices and to stay abreast with future developments in the industry and/ or changes in legal and regulatory requirements without prior notice. All your interactions with Pinnacle Family Clinic shall be subject to the latest version of the Data Privacy Notice in force at the relevant time.

By continuing to communicate with Pinnacle Family Clinic or by continuing to use Pinnacle Family Clinic's services following the modifications, updates or amendments to this Data Privacy Notice, such action shall signify your acceptance of such modifications.

1. Personal Data

In this Data Privacy Notice, "Personal Data" refers to any data, whether true or not, about an individual who can be identified (a) from that data; or (b) from that data and other information to which Pinnacle Family Clinic have or are likely to have access, including data in our records as may be updated from time to time. For the context of this Data Privacy Notice, examples of such Personal Data you may provide, include (depending on the nature of your interaction with us) your name, NRIC, passport or other identification number, telephone number(s), mailing address, email address and any other information relating to any individuals which you have provided to Pinnacle Family Clinic in any forms you may have submitted, or via other forms of interaction with you.

2. Collection of Personal Data

In this Data Privacy Notice, "Personal Data" refers to any data, whether true or not, about an individual who can be identified (a) from that data; or (b) from that data and other information to which Pinnacle Family Clinic has or is likely to have access, including data in Pinnacle Family Clinic's records as may be updated from time to time.

2.1 Generally, Pinnacle Family Clinic collects Personal Data in the following ways:

- when you submit any form, including but not limited to customer inquiry forms or other forms relating to any of Pinnacle Family Clinic's services;
- when you enter into any agreement or provide other documentation or information in respect of your interactions with us, or when you use Pinnacle Family Clinic's services;
- when you interact with Pinnacle Family Clinic's staff, including customer service officers, for example, via telephone calls (which may be recorded), letters, fax, face-to-face meetings, social media platforms and emails;
- when you request to be contacted or request that you be included in an email or other mailing list;
- when you respond to Pinnacle Family Clinic's promotions, initiatives or to any request for additional Personal Data;

- when your images are captured via CCTV cameras while you are within Pinnacle Family Clinic's premises, or via photographs or videos taken by Pinnacle Family Clinic or its representatives when you attend Pinnacle Family Clinic's events
 - when you are contacted by, and respond to, Pinnacle Family Clinic's marketing representatives and customer service officers;
 - when Pinnacle Family Clinic seeks information about you and receives your Personal Data in connection with your relationship with Pinnacle Family Clinic, including for Pinnacle Family Clinic's products and services or job applications, for example, from business partners, public agencies, your ex-employer, referral intermediaries and the relevant authorities;
 - when you registered with Pinnacle Family Clinic as a patient and other related party; and/or
 - when you submit your Personal Data to Pinnacle Family Clinic for any other reasons.
- 2.2 When you browse Pinnacle Family Clinic's website, you generally do so anonymously but please see paragraph (6) below for information on cookies and other technologies which we have implemented on Pinnacle Family Clinic website(s).
- 2.3 If you provide any Personal Data relating to a third party (e.g. information of your spouse, children, parents, and/or employees), by submitting such information to Pinnacle Family Clinic, you represent that you have obtained the consent of the third party to provide Pinnacle Family Clinic with their Personal Data for the respective purposes.
- 2.4 You should ensure that all Personal Data submitted to us is complete, accurate, true and correct. Failure on your part to do so may result in Pinnacle Family Clinic's inability to provide you with the products and services you have requested, or delays in providing you with products and services you have requested, or processing your applications.

3. Purposes for the Collection, Use, Process and Disclosure of Your Personal Data

- 3.1 Generally, Pinnacle Family Clinic collects, uses and discloses your Personal Data for the following purposes:

3.1.1 If you are a prospective, current or former patient or customer of Pinnacle Family Clinic:

- providing customer service and support (including but not limited to customer relationship management, processing your admissions, processing and settlement of bills, facilitating, arranging and providing reminders of your appointments, medical examinations, screenings or check-ups, applying for visas on your behalf, contacting you regarding medical reports and results, providing follow-up calls, providing you with administrative support, and administering insurance coverage and processing insurance claims);
- administering and processing your requests including creating and maintaining profiles of Pinnacle Family Clinic's customers in Pinnacle Family Clinics system database for administrative purposes (including tracking your attendance at various Pinnacle Family Clinic facilities and/or events);
- personalising your experience at Pinnacle Family Clinic's various touchpoints and conducting market research, understanding and analysing customer behaviour, location, preferences and demographics in order to improve Pinnacle Family Clinic's service offerings;
- administering medical care (including keeping patient case and procedure records, providing medication, ordering medical tests, reports and biological samples; liaising with third party specialist doctors, clinics, hospitals and/or medical institutions in relation to your medical care (including by providing them with access to your medical records);

- if you use Pinnacle Family Clinic's mobile applications or online registration and payments systems, displaying your medical data, sending you health-related notifications, and facilitating the provision of Pinnacle Family Clinic services to you;
- if you use Pinnacle Family Clinic's telemedicine services
- administering debt recovery and debt management;
- disclosing of your Personal Data whenever and to whomever the law or a court order may require;
- disclosing of your Personal Data to Pinnacle Family Clinic's suppliers/vendors if it is required by the law and/or authorities that the end-user consuming the medicine/drug/equipment must be recorded or if it is required for them to carry out their duties;
- enabling a response to a request for Personal Data which may include your Personal Data, in compliance with the Personal Data Protection Act 2012 and its regulations; and/or
- any other purposes which are reasonably related to the aforesaid.

3.1.2 If you are a nominated caregiver or next-of-kin of a patient or customer of Pinnacle Family Clinic:

- informing you of the patient's medical status and whereabouts;
- the disclosing of your Personal Data whenever and to whomever the law or a court order may require; and/or
- any other purposes which are reasonably related to the aforesaid.

3.2 Furthermore, where permitted under Personal Data Protection Act 2012, Pinnacle Family Clinic may also collect, use and disclose your Personal Data for the following "Additional Purposes":

- taking or filming photographs and videos for corporate publicity or marketing purposes, and featuring your photographs and/or testimonials in Pinnacle Family Clinic's articles and publicity materials;
- providing or marketing services and benefits to you, including promotions, service upgrades, loyalty, reward and/or membership programmes and sending of healthcare-related updates, event invitations, newsletters and marketing and promotional information to you;
- organising roadshows, tours, campaigns (including health check or vaccination campaigns) and promotional or events and administering contests and competitions;
- matching your Personal Data with other data collected for other purposes and from other sources (including third parties) in connection with the provision or offering of services;
- sending you details of services, clinic updates, health-related information and rewards, either to Pinnacle Family Clinic's customers generally, or which have been identified may be of interest to you;
- conducting market research, aggregating and analysing customer profiles and data to determine health-related patterns and trends, understanding and analysing customer behaviour, location, preferences and demographics for Pinnacle Family Clinic to offer you other products and services as well as special offers and marketing programmes which may be relevant to your preferences and profile; and/or
- any other purposes which are reasonably related to the aforesaid.

3.3 If you have provided us with your Singapore telephone number(s)and/or email address(es) (collectively "contact details") and have indicated that you consent to receiving marketing or promotional information via your contact details, then from time to time, Pinnacle Family Clinic may contact you using such contact details(including via voice calls, text, fax, email or other means) with information about Pinnacle Family Clinic's products and services.



- 3.4 In relation to particular services or in your interactions with Pinnacle Family Clinic, you may also have been specifically notified of other purposes for which Pinnacle Family Clinic collects, uses or discloses your Personal Data. If so, Pinnacle Family Clinic will collect, use and disclose your Personal Data for these additional purposes as well, unless you have been specifically notified otherwise.
- 3.5 You have a choice to withdraw your consent for receiving marketing or promotional materials/communication. You may contact us using the contact details found in paragraph (8) below.
- 3.6 Please be aware that once Pinnacle Family Clinic receives written notification that you wish to withdraw your consent for marketing or promotional materials/communication, it may take up to 21 calendar days for your withdrawal to be reflected in Pinnacle Family Clinic's systems. Therefore, you may still receive marketing or promotional materials/communication during this period of time.
- 3.7 Please note that even if you withdraw your consent for the receipt of marketing or promotional materials, you may still be contacted for other purposes in relation to the services that you have requested or purchased from Pinnacle Family Clinic.

4. Disclosure of Personal Data

- 4.1 Pinnacle Family Clinic will take reasonable steps to protect your Personal Data against unauthorised disclosure. Subject to the provisions of any applicable law, your Personal Data may be disclosed, for the purposes listed above (where applicable), to the following entities or parties, whether they are located overseas or in Singapore:
 - amongst Pinnacle Medical Group and affiliates (including their staff and medical /dental/ traditional and complementary medicine practitioners, registered nurses or other healthcare staff engaged or referred to for the provision of healthcare services) in accordance with applicable law;
 - third party medical/dental practitioners, clinics, hospitals and/or medical institutions;
 - companies providing services relating to insurance to Pinnacle Family Clinic;
 - agents, contractors, sub-contractors or third party service providers who provide operational services to Pinnacle Family Clinic, such as courier services, telecommunications, information technology, payment, printing, billing, debt recovery, processing, technical services, transportation, training, market research, call centre, security, third party administrator or other services to Pinnacle Family Clinic;
 - vendors or third party service providers and marketing and business partners of Pinnacle Family Clinic in connection with marketing promotions, products and services;
 - Pinnacle Family Clinic's corporate clients;
 - any business partner, investor, assignee or transferee (actual or prospective) to facilitate business asset transactions (which may extend to any merger, acquisition or asset sale);
 - external banks, credit card companies, other financial institutions and their respective service providers;
 - Pinnacle Family Clinic's professional advisers such as consultants, auditors and lawyers;
 - third party insurers, employers of patients, guarantors and/or credit reporting agencies/credit data management company;
 - relevant government ministries, regulators, statutory boards or authorities or law enforcement agencies to comply with any laws, rules, guidelines and regulations or schemes imposed by any governmental authority (including the Ministry of Health);
 - in connection with a corporate transaction, such as merger, consolidation, or in the unlikely event of winding up; and/or
 - any other party to whom you authorise us to disclose your Personal Data.

4.2 As far as permitted by the laws of Singapore, Pinnacle Family Clinic will not be responsible for any unauthorised use of your Personal Data by third parties which are wholly attributable to factors beyond the control of Pinnacle Family Clinic.

5. **Retention of Personal Data**

- 5.1 Pinnacle Family Clinic retains such Personal Data as may be required for business or legal purposes, and such purposes do vary according to the circumstances.
- 5.2 Whilst Pinnacle Family Clinic will securely dispose of or anonymise Personal Data which it can reasonably determine is no longer needed and does not generally hold on to Personal Data “just in case”, it is in the interests of any caregiver or person 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.
- 5.3 With respect to the medical records of patients, unless specific contrary instructions from the patient are received, Pinnacle Family Clinic may (but is not obliged to) retain such medical records for as long as Pinnacle Family Clinic may be potentially consulted for further follow up by (or on behalf of) 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. In addition, Pinnacle Family Clinic will retain Personal Data relating to claims for a period deemed necessary due to regulatory requirements.

6. **Use of Cookies, Web Beacons, and Similar Technologies on the website**

- 6.1 When you visit or interact with Pinnacle Family Clinic's sites and services, Pinnacle Family Clinic or Pinnacle Family Clinic's authorized service providers may use cookies, web beacons, and other similar technologies for collecting and storing information to help provide you with a better, faster, and safer web experience.
- 6.2 The information collected by Pinnacle Family Clinic or Pinnacle Family Clinic's authorised service providers may recognise a visitor as a unique user and may collect information such as how a visitor arrives at Pinnacle Family Clinic's sites, what kind of browser a visitor is on, what operating system a visitor is using, a visitor's IP address and a visitor's click stream information and time stamp (for example, which pages they have viewed, the time the pages were accessed and the time spent per web page).
- 6.3 The use of cookies, web beacons and similar technologies by Pinnacle Family Clinic on the website(s) has different functions. They are either necessary for the functioning of Pinnacle Family Clinic's services, help in improvement of Pinnacle Family Clinic's performance, or serve to provide you with extra functionalities. They may also be used to deliver content that is more relevant to you and your interests, or to target advertising to you on or off Pinnacle Family Clinic's sites.
- 6.4 Pinnacle Family Clinic offers certain site features and services that are available only through the use of these technologies. You are always free to block, delete, or disable these technologies if your browser so permits. However, if you decline cookies or other similar technologies, you may not be able to take advantage of certain site features or services tools. For more information on how you can block, delete, or disable these technologies, please review your browser settings.

7. **Third-Party Sites**



Pinnacle Family Clinic's website(s) may contain links to other websites operated by third parties, including for example business partners of Pinnacle Family Clinic. Pinnacle Family Clinic will not be responsible for the data protection practices of websites operated by third parties that are linked to Pinnacle Family Clinic's website(s). You are encouraged to learn about the data protection practices of such third party websites. Some of these third party websites may be co-branded with Pinnacle Family Clinic's logo or trade mark, even though they are not operated or maintained by Pinnacle Family Clinic. Once you have left Pinnacle Family Clinic's website(s), you should check the applicable Data Privacy Notice/Policy of the third party website to determine how they will handle any information they collect from you.

8. Contacting Us – Withdrawal of Consent, Access and Correction of your Personal Data

8.1 If you:

- have any questions or feedback relating to your Personal Data or this Data Privacy Notice;
- would like to withdraw your consent to any use of your Personal Data as set out in this Data Privacy Notice;
- would like to obtain access and make corrections to your Personal Data records; or
- would like to lodge a complaint regarding the collection, use, process and disclosure of your Personal Data;

Please contact us as follows:

Call: +65 235 7868

Email: connect@pinnaclefamilyclinic.com.sg

Write to our Data Protection Officer at:

Data Protection Officer
Pinnacle Medical Group Pte Ltd
24 New Industrial Road
#03-02
Singapore 536210

8.2 Please note that it may take up to 21 calendar days for the requested changes under paragraph 8.1 above to be reflected in Pinnacle Family Clinic's systems.

8.3 Please note that if your Personal Data has been provided to us by a third party (e.g. a general practitioner or your employer), you should contact that organisation or individual to make such queries, complaints, and access and correction requests to Pinnacle Family Clinic on your behalf.

8.4 If you withdraw your consent to any or all use of your Personal Data, depending on the nature of your request, Pinnacle Family Clinic may not be in a position to continue to provide its products and services to you, or administer any contractual relationship in place, which in turn may also result in the termination of any agreements with Pinnacle Family Clinic, and your being in breach of your contractual obligations or undertakings. Pinnacle Family Clinic's legal rights and remedies in such event are expressly reserved.

9. Governing Law

This Data Privacy Notice shall be governed in all respects by the laws of Singapore.