



DATA PROTECTION POLICY

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 the individual 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. Personal data means 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 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. We generally collect personal data that (a) you knowingly and voluntarily provide in the course of or in connection with us, or via a third party who has been duly authorised by you to disclose your personal data to us (your “authorised representative”, 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;
 - (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;



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- (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, where such disclosure is required for performing obligations in the course of or in connection or 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.
- 9. Upon receipt of your 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 **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

- 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.



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13. We will respond to your access request within **30 days** after receiving your request. We will generally provide reason (except where we are not required to do so under the PDPA), if we are unable to fulfil the access request.
14. We will not provide information under the access requirement for:-
 - (a) opinion data kept solely for an evaluative purpose;
 - (b) any examination, examination scripts and, prior to the release of examination results, examination results;
 - (c) the personal data of the beneficiaries of a private trust kept solely for the purpose of administering the trust;
 - (d) personal data kept by an arbitral institution or a mediation centre solely for the purposes of arbitration or mediation proceedings administered by the arbitral institution or mediation centre;
 - (e) documents related to a prosecution if all proceedings related to the prosecution have not been completed;
 - (f) personal data subject to legal privilege;
 - (g) personal data which, if disclosed, would reveal confidential commercial information that could, in the opinion of a reasonable person, harm the competitive position of the organisation;
 - (h) personal data collected, used or disclosed without consent pursuant to the exemptions in the PDPA, for the purposes of an investigation if the investigation and associated proceedings and appeals have not been completed;
 - (i) the personal data was collected or created by a mediator or arbitrator in the conduct of a mediation or arbitration for which he was appointed to act —
 - under a collective agreement under the Industrial Relations Act (Cap. 136) or by agreement between the parties to the mediation or arbitration;
 - under any written law; or
 - by a court, arbitral institution or mediation centre.
 - (j) any request:-
 - That would unreasonably interfere with the operations of the organisation because of the repetitious or systematic nature of the requests;
 - If the burden or expense of providing access would be unreasonable to the organisation or disproportionate to the individual's interests;
 - For information that does not exist or cannot be found;
 - For information that is trivial; and
 - That is otherwise frivolous or vexatious.
 - (k) personal data or other information shall not be provided to an individual if the provision of that personal data or information could reasonably be expected to:
 - Threaten the safety or physical or mental health of an individual other than the individual who made the request;
 - Cause immediate or grave harm to the safety or to the physical or mental health of the individual who made the request;
 - Reveal personal data about another individual;
 - Reveal the identity of an individual who has provided personal data about another individual and the individual providing the personal data does not consent to the disclosure of his/her identity; or is contrary to national interest.



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- (l) If personal data has been disclosed to a prescribed law enforcement agency without the consent of the individual or pursuant to the exemptions in the PDPA, we shall not be required to inform the individual of such disclosure.

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CORRECTION OF PERSONAL DATA

15. If you wish to make a correction request to correct or update any of your personal data which we hold, you may submit your request via email to our Data Protection Officer at the contact details provided below.
16. We will respond to your correction request as soon as reasonably possible. Should we not be able to correct the correction request within **10 days** after receiving your request, we will inform you in writing via email of the time by which we will be able to fulfil your correction request. If we are unable 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).
17. Correction request will not be approved in respect of:
- (a) opinion data kept solely for an evaluative purpose;
 - (b) any examination conducted by an education institution, examination scripts and, prior to the release of examination results, examination results;
 - (c) the personal data of the beneficiaries of a private trust kept solely for the purpose of administering the trust;
 - (d) personal data kept by an arbitral institution or a mediation centre solely for the purposes of arbitration or mediation proceedings administered by the arbitral institution or mediation centre; or
 - (e) a document related to a prosecution if all proceedings related to the prosecution have not been completed.

PROTECTION OF PERSONAL DATA

18. 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.
19. 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

20. 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 us through email to our DPO or your authorised representative .



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RETENTION OF PERSONAL DATA

21. We may retain your personal data for as long as it is necessary to fulfil the purposes for which they were collected, or as required or permitted by applicable laws.
22. 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

23. 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

24. 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

25. 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.
26. 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.

ACKNOWLEDGEMENT AND CONSENT

27. You acknowledge that you have read and understood the above Data Protection Policy, and consent to the collection, use and disclosure of my personal data by us for the purposes set out in the policy. If you choose not to provide us with the personal data described in this Policy or withdraw the consent for usage and/or disclosure of the personal data described in this Policy at any time, you understand that we may not be able to fulfil our contractual duties towards you or facilitate your request or provide the service to you