

## NATIONAL HEALTHCARE GROUP PERSONAL DATA PROTECTION POLICY

### SECTION 1 – INTRODUCTION

1. National Healthcare Group Pte Ltd (NHG) and its subsidiaries, associated companies, corporations, joint ventures, partners and any entity directly or indirectly controlling or controlled by or under common control with NHG such as Tan Tock Seng Hospital, Institute of Mental Health, Khoo Teck Puat Hospital, Yishun Community Hospital, Woodlands Health Campus, NHG Polyclinics, National Skin Centre, NHG Pharmacy, NHG Diagnostics and Geriatric Education & Research Institute (each an “Institution”), shall be collectively referred to as “NHG”, “we”, “us” or “our” in this Personal Data Protection Policy (“Policy”).
2. NHG value the privacy of every individual and are committed to protect the personal data we collect in accordance with the principles set out in this Policy.
3. In accordance with the Personal Data Protection Act 2012 (“PDPA”), this Policy describes how we may collect, use, disclose and manage your personal data. For general information on Personal Data Protection, please visit the Personal Data Protection Commission (“PDPC”) website (<https://www.pdpc.gov.sg>).
4. There are other statutory and regulatory requirements which NHG is required to comply with in the course of your interactions with us, such as under the Healthcare Services Act 2020 (“HCSA”), Human Organ Transplant Act 1967, and Infectious Diseases Act 1976 (“IDA”), among others. The provisions stated in the other written laws will prevail to the extent that they are inconsistent with the PDPA.
5. Unless otherwise stated, any undefined terms used in this document, such as “individual”, “personal data” and “process”, should be understood to take on the definition or interpretation under the PDPA or the PDPC’s Advisory Guidelines.
6. We may update this Policy from time to time to ensure that our standards and practices remain relevant and comply with applicable laws and guidelines. The latest version of this Policy will supersede earlier versions and will apply to personal data provided to us previously. We encourage you to review this page periodically to keep up to date with any changes to this Policy.

## **SECTION 2 – WHAT TYPES OF PERSONAL DATA DO WE COLLECT?**

7. This policy applies to all individuals who have interacted with us. The exact type of personal data that may apply in your case may vary depending on how you have interacted with us.
8. Depending on the nature of your interaction with us, the personal data collected by us may include your full name, national identification number, passport details, photograph, video, audio recording, contact number, personal email address, thumbprint, DNA profile, as well as personal information of any individual which you have provided to us. You may wish to note that certain or all the provisions of PDPA may not apply to business contact information, anonymised information, personal data about an individual that is contained in a record that has been in existence for at least 100 years, or personal data about an individual who has been deceased for more than 10 years.
9. The PDPA recognises that a balance needs to be maintained between the need for organisation to protect personal data and the need to collect, use or disclose personal data. Hence, in meeting its obligations under the PDPA, NHG considers what a reasonable person would consider appropriate in the circumstances when we undertake any action that is subject to data protection.

## **SECTION 3 – CONSENT, PURPOSES FOR COLLECTION, USE OR DISCLOSURE OF YOUR PERSONAL DATA**

10. This Policy generally applies to all individuals whose personal data is in our possession or under our control, including personal data in the possession of organisations which we have engaged to process personal data on our behalf and for our purposes.
11. By providing us with your personal data, 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.
12. Consent for the collection, use or disclosure of your personal data can be provided either in the form of expressed consent or deemed consent. When you voluntarily provide us your personal data after having been notified of the purpose, you are deemed to consent to our collection, use or disclosure of your personal data. If you have consented to our disclosure of your personal data to another organisation<sup>1</sup> for a particular purpose, or where such disclosure is required in the course of or in connection with our provision of goods and/or

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<sup>1</sup> Another organisation may include our vendors, partners, collaborators, other healthcare institutions, government agencies, institutes of higher learning / medical schools and volunteer organisations.

services requested by you, they will use your personal data only for the purposes you have consented to, or to perform any of the functions relating to the particular purpose.

13. If you provide us with personal data of other individuals, you warrant that you have informed the individuals of the purpose(s) for which we are collecting their personal data and that they have consented to your disclosure of their personal data to us for those purpose(s).
14. NHG, being part of the public healthcare system, operates under a “deemed consent” framework for collection, use and disclosure of patient data for the purposes of providing medical treatment and care of our medical treatment. NHG, as well as other public healthcare institutions are also training grounds for medical and healthcare professionals, and are key nodes for recruiting patients into various programmes that will benefit the individual patients themselves or advance medical knowledge for future care. If you are a patient seeking care at NHG, you agree that we may use your data for training and other purposes. We may also collect and use your personal data for purposes such as contact tracing, volunteering activities, event registration, business improvement and conducting patient user experience survey, among others. Please refer to NHG’s Personal Data Protection Notification available at <https://www.nhghealth.com.sg/personal-data-protection-notification>.
15. On the provision and sharing of information, you may also refer to the patient’s responsibilities that is stated in the patient charters, available on our Institutions’ websites.
16. In addition, we run programmes that help you stay well and healthy, and you will be informed how these programmes benefit you, what our screening tests, assessments or treatments entail, and any other information deemed relevant and significantly by our care professionals in facilitating your decision to participate in our programmes. If you have consented to participate in various programmes as a Client, you agree that we may use your data for training and other purposes stated in the NHG Client Charter, which is available on our Institutions’ websites (refer to Annex A below).
17. Please note that your consent may not be obtained in some circumstances as provided in the “First Schedule – Collection, Use and Disclosure of Personal Data without Consent” and “Second Schedule – Additional bases for Collection, Use and Disclosure of Personal Data without Consent” of the PDPA, or there may be other legislation such as the IDA which renders this unnecessary. Where the disclosure is restricted by such legislation, the obligation under such other laws will prevail. Additionally, we may use your personal data that has been disclosed to us by a public agency, and will ensure that such use is

consistent with the purpose(s) as authorised by the public agency. This includes, but is not limited to, the implementation of the government's Healthier SG initiative, in our role as regional health manager. For more information on Healthier SG, please visit <https://www.healthiersg.gov.sg/>.

18. 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.

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

19. We practise strong data protection as part of our IT Policies and Procedures and in fulfilment of the obligations under various legislation requirements such as the HCSA, IDA and PDPA.
20. We take reasonable efforts to protect your data in our possession or under our control - whether it is hosted in our healthcare cloud environment, at rest or in motion, or whether it is managed by us or by a third party.
21. Notwithstanding the above, there could be circumstances or inherent risk of unauthorised, wrongful, illegal or unintended access by third parties that is beyond our control. You hereby acknowledge and agree to accept the risk of such wrongful, illegal or unauthorised access and agree that NHG shall not be liable for any loss or damage howsoever arising from such wrongful, illegal or unauthorised access.

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

22. 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 for which it was collected, unless there are business, industry and/or legal requirements for its retention.
23. We may anonymise your personal data held by us that is not required for any business or legal purposes. In so doing, we remove any means that can associate the personal data with particular individuals.
24. We may retain your personal data for as long as it is necessary to fulfil the purposes for which it was collected, or as required or permitted under applicable laws. With regard to medical data, we will retain medical records in accordance with guidelines prescribed by the Ministry of Health (MOH).

## **SECTION 6 – TRANSFER OF YOUR PERSONAL DATA OUT OF SINGAPORE**

25. If we transfer your personal data to a country outside of Singapore, we will ensure that the organisation processing such data provides a standard of protection to the personal data that is comparable to that under the PDPA.

## **SECTION 7 – ACCURACY OF PERSONAL DATA**

26. It is your responsibility to ensure that all personal data submitted to us is true, accurate and complete. In order to ensure that your personal data is current, complete and accurate, please update us if there are changes to your personal data.

## **SECTION 8 – ACCESS AND CORRECTION OF YOUR PERSONAL DATA**

27. We may charge you a fee should you request us to furnish you with a copy of your personal data held by us, or for information about the ways in which the data may have been used or disclosed in the past one year.
28. We will not be able to provide access to data which are opinion data kept solely for evaluation purposes such as opinion of suitability, eligibility, qualification of individuals for employment, promotion or continuance in employment.
29. Upon your request, we will correct your personal data as soon as practicable unless we have reasonable ground to believe that a correction is not required. For correction of your personal data, you may email to our Data Protection Officer at [nhggroup.dpoffice@nhghealth.com.sg](mailto:nhggroup.dpoffice@nhghealth.com.sg).

## **SECTION 9 – WITHDRAWAL OF CONSENT**

30. If you wish to withdraw your consent to the collection, use and disclosure of your personal data with us, please note that it will impact our ability to communicate effectively with you and may also become unsafe for us to provide medical treatment to you without the ability to access your data. We will be unable to provide or continue to provide care without the ability to collect, use and/or disclose your personal data, and we may have to refer you to other care providers.

## **SECTION 10 – CONTACTING US**

31. If you wish to seek any clarification regarding this Policy, please contact our Data Protection Officer below. We will respond to your request as soon as reasonably possible.

**The Data Protection Officer**

3 Fusionopolis Link

#04-00 Nexus@one-north

Singapore 138543

Email: [nhggroup.dpoffice@nhghealth.com.sg](mailto:nhggroup.dpoffice@nhghealth.com.sg)

**ANNEX A**

**NHG Client Charters**

<b>Institution</b>	<b>NHG Client Charter</b>
Tan Tock Seng Hospital (TTSH)	<a href="https://www.ttsh.com.sg/Pages/NHG-Client-Charter.aspx">https://www.ttsh.com.sg/Pages/NHG-Client-Charter.aspx</a>
Institute of Mental Health (IMH)	<a href="https://imh.com.sg/Pages/NHG-Client-Charter.aspx">https://imh.com.sg/Pages/NHG-Client-Charter.aspx</a>
Khoo Teck Puat Hospital (KTPH)	<a href="https://www.ktph.com.sg/nhg-client-charter">https://www.ktph.com.sg/nhg-client-charter</a>
Yishun Community Hospital (YCH)	<a href="https://www.ktph.com.sg/nhg-client-charter">https://www.ktph.com.sg/nhg-client-charter</a>
National Healthcare Group Polyclinics (NHGP)	<a href="https://www.nhgp.com.sg/Pages/client-charter.aspx">https://www.nhgp.com.sg/Pages/client-charter.aspx</a>