

# SingHealth Data Protection Policy

## Our Promise to Protect Your Personal Data

As leaders in healthcare, each SingHealth Institution<sup>1</sup> (collectively, “SingHealth”, “we”, “us”, “our” or similar expression) takes its responsibility to protect personal data seriously. Your privacy is important to SingHealth and we are committed to complying with applicable law, including the Singapore Personal Data Protection Act (No. 26 of 2012) (the “PDPA”).

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## Section 1: Introduction – About this DPP

1. The purpose of this document (“Data Protection Policy”, or “DPP”) is to inform you of how SingHealth collects, uses, discloses, processes or otherwise handles (“Handles”<sup>2</sup>) your personal data, and to let you know how you can exercise your rights in respect of your personal data.

### This is the full DPP

2. You may have seen or been referred to shorter summaries of this DPP which were formatted and edited to meet specific purposes, formats or to provide an easy-at-a-glance look at the key or relevant points of the DPP. This is the full DPP and is the authoritative statement of our policy on the handling of personal data.
3. The portion of the DPP that applies to your personal data will depend on the nature of your transactions, agreements or interactions with us.
4. Please note that though we make an effort, as per legal requirements, to provide reasonably adequate information concerning our policies as it pertains to personal data, this DPP is not an exhaustive list of all the situations or scenarios concerning personal data. Feel free to approach your SingHealth Institution’s Data Protection Officer (see **Contacting Us – Withdrawal of Consent, Access and Correction of your Personal Data** below) if you need clarification about any specific situation.

### We update the DPP from time to time - this version of the DPP was last updated as at 12 September 2023.

5. We update the DPP from time to time to ensure that our standards and practices remain relevant, are up to date, comply with applicable laws and guidelines, and remain applicable to industry trends. The latest version of the DPP supersedes and replaces the earlier versions.
6. The public website at <http://www.singhealth.com.sg/pdpa> contains the latest links and most updated editions of the DPP or resources.
7. We encourage and ask all individuals who interact with SingHealth, including any person to whom personal data relates (each a “data subject”) to check back to the publicly posted / circulated copies of the DPP.

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<sup>1</sup> Namely, SingHealth Services Pte Ltd (“Corp Office”) and its applicable related corporations, affiliates, subsidiaries and their respective charities and funds, including, Singapore General Hospital Pte Ltd (“SGH”), KK Women’s and Children’s Hospital Pte. Ltd (“KKH”), Bright Vision Hospital (“BVH”), National Cancer Centre of Singapore Pte Ltd (“NCCS”), National Dental Centre of Singapore Pte Ltd (“NDCS”), National Heart Centre of Singapore Pte Ltd (“NHCS”), National Neuroscience Institute of Singapore Pte Ltd (“NNI”), Singapore National Eye Centre Pte Ltd (“SNEC”), Singapore Eye Research Institute (“SERI”), SingHealth Polyclinics (“SHP”), Sengkang General Hospital (“SKH”), SingHealth Community Hospitals (“SCH”), SingHealth Fund (“SHF”), Changi General Hospital (“CGH”).

<sup>2</sup> And related expressions “Handle”, “Handled”, “Handling”

### **How this DPP becomes a part of your journey with us**

8. The DPP is an integral part of your journey with us. It applies to and forms part of the terms and conditions governing your transactions, agreements or interactions with us, whenever your personal data is Handled by us.
9. We bring it to your attention and make it a part of or complementary to your transactions, agreements or interactions with us, in addition to the website and making the copies of this DPP available as mentioned above, by:
  - a. making the DPP available or issuing / providing the DPP to you (or your authorised representatives) upon their first admission as patient following the publication of the DPP;
  - b. making the DPP available upon request;
  - c. including a reference to the DPP in applicable documents / recordings or other media including, generally for all data subjects, agreements, documents, and various forms (e.g. consent forms, data collection forms, feedback forms, application forms, questionnaires, surveys, and any other forms etc.) which may be given to you in the course of your interaction with us.
10. The DPP, having been brought to your attention, becomes binding by your taking any of the following steps:
  - a. proceeding with your transactions, agreements or interactions with us;
  - b. submitting information to us via forms or other data collection means or processes (whether through a form, an interview, undergoing examinations or by other means);
  - c. signing up / applying for medical treatment;
  - d. attending at our premises for visits;
  - e. interacting with our websites, electronic forms;
  - f. calling or sending messages to us;
  - g. transacting with us, or undergoing any treatment or process with us; and
  - h. other means.

### **Your other / specific agreements**

11. This DPP supplements but does not supersede nor replace any other consents you may have previously or specifically provided to any SingHealth Institution in respect of your personal data, and your consents here are in addition to any consents by you or rights given at law to any of the SingHealth Institution to Handle your personal data.

### **Who will comply with this DPP**

12. We ask and require that each of the following parties / persons to abide by this DPP:
  - a. Each and every SingHealth Institution;
  - b. all SingHealth employees, including any healthcare professional (doctors, nurses, etc);
  - c. all volunteers and trainees (including students undergoing healthcare training such as trainee doctors and nurses);
  - d. third parties (including third party partners, service providers, or affiliates) whom we work with and who have agreed to abide by this DPP.

### **About the PDPA**

13. SingHealth Institutions are subject to the PDPA, as well as specific legislation or regulations concerning relevant aspects of healthcare, and your transactions, agreements or interactions with

us. More information about the PDPA can be found at the website of the Personal Data Protection Commission (“PDPC”) at [www.pdpc.gov.sg](http://www.pdpc.gov.sg)

### **Other Legislation**

14. The PDPA is a baseline law that ensures a common standard of protection for individuals’ personal data across organisations in Singapore.
15. For the healthcare sector, existing laws such as Human Organ Transplant Act (HOTA), Termination of Pregnancy Act, the Infectious Diseases Act, etc will continue to apply concurrently with the PDPA. SingHealth Institutions will need to ensure that they comply with current sectoral laws and regulations as well as the PDPA.
16. Where there are inconsistencies between the PDPA and existing sectoral laws and regulations in respect of the collection, use or disclosure of personal data, the provisions of the other written laws shall prevail. For example, the requirements under the Private Hospitals and Medical Clinics Act (or successor / replacing Acts), the Singapore Medical Council Ethical Code and Ethical Guidelines (ECEG), the Human Organ Transplant Act, the Infectious Diseases Act, or Human Biomedical Research Act 2015 (“**HBRA**”), etc, in respect of Handling of information will prevail over the PDPA, while for the donation of a deceased person’s organs, consent must be obtained from the next-of-kin (i.e. the “Authorised Persons” in the Schedule to The Medical (Therapy, Education and Research) Act (MTERA)) before harvesting the organ.

## **Section 2: Your personal data**

### **What kind of data will this DPP apply to**

17. This DPP applies to “personal data”, which, in this DPP 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.
18. The exact type of personal data that may apply in your case will vary depending on the how you have interacted with us. Examples of such personal data you may provide to us 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 us in any forms you may have submitted to us (including in the form of biometric data), or via other forms of interaction with you.
19. NRIC, passport and other state issued numbers (national identification numbers, or “**NIN**”) are requested for and Handled in accordance with applicable PDPA guidelines. Handling of NIN is necessary where the establishment of identity to a high degree of fidelity is needed – this is particularly so for healthcare related purposes given the need for safety, security, prevent of risk of fraud, and accuracy.
20. In some situations, personal data may include tissue specimen, organic materials provided by a data subject (whether as a patient, donor, research participant, or volunteer etc.), but only where such materials are linked with data that can lead to the identification of the data subject. Where human biomedical research is concerned, SingHealth complies with its obligations under the HBRA, which is a separate law and regulation.

### **What is not personal data**

21. 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. Techniques can include pseudonymisation<sup>3</sup>, aggregation, replacement, data reduction<sup>4</sup>, data suppression<sup>5</sup>, data shuffling<sup>6</sup>, or masking<sup>7</sup>.

22. SingHealth 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**

#### **What this DPP enables you and us to do**

23. By applying this DPP, you:
  - a. consent to the relevant SingHealth Institution(s) and the relevant person(s) (see “**Who will comply with this DPP**” above) Handling your personal data in ways which enable us to serve you, provide you with the relevant services, attend to the relevant transaction, or to facilitate our interactions with you;
  - b. enable the exercise 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.
24. Your consent may not be necessary or required in some situations as there may be applicable law or regulation which renders this unnecessary, or where certain permissions or rights or duties have been accorded to the SingHealth Institution which enable / require us to Handle the personal data. Where such law or regulation applies, we will act in accordance with those other laws and regulations.

#### **Withholding / Withdrawing Consent**

25. You are entitled under applicable law to withhold / withdraw consent to the collection, use or disclosure of personal data, and SingHealth 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 DPP (see **Contacting Us – Withdrawal of Consent, Access and Correction of your Personal Data** below).
26. However, as is 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, agreements or interactions with us, and 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 SingHealth, to proceed with a particular transaction, agreement or interaction with you, and we may be left with no choice but to cease or refrain from the same.

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<sup>3</sup> Replacing identifiers with other references. For example, replacing an individual's name with a tag or reference number.

<sup>4</sup> Removing values that are not required for the purpose. For example, removing 'Ethnicity' from a data set of individuals' attributes.

<sup>5</sup> Banning or hiding the value within a given range. For example, replacing age '43' with the range '40-50'.

<sup>6</sup> Mixing up or replacing values with those of the same type so that the information looks similar but is unrelated to the actual details. For example, the surnames in a customer database could be sanitised by replacing them with those drawn from another database.

<sup>7</sup> Removing certain details while preserving the look and feel of the data. For example, representing a full string of numbers on a credit card as 4346 XXXX XXXX 5379 instead of '4346 6454 0020 5379'.

27. SingHealth 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, agreement or interaction in question to avoid causing harm or exposing us, you or others to risk.
28. 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**

29. Generally, depending on the situation, we may collect personal data in the following ways:
  - a. when you submit any form, including but not limited to hospital admission and medical consent forms;
  - b. when you undergo a procedure / process where tissue specimens, organic materials are provided (whether as a patient, donor, research participant, or volunteer etc.), such that this is linked with other data in any way such that you can be identified;
  - c. when, as a patient, you are examined by our staff or medical equipment, or when you are subject to or participate in a medical examination, including but not limited to various forms of screening (which may include the taking of biological samples or matter), or when, as a patient you are engaged in medical procedures (which may result in notes, or records being made);
  - d. where medical monitoring devices and equipment are supplied to you as part of treatment / diagnostics, when we receive personal data from those devices as part of the device or equipment's operation;
  - e. when you interact with our staff, including customer service officers, nurses, doctors, residents, allied health service professionals, and other representatives etc. via telephone calls (which may be recorded), letters, fax, face-to-face meetings and email;
  - f. when your images and/or audio are captured by our CCTV cameras while you are within our premises, or by audio, photographs or videos taken by us or our representatives when you attend events hosted by us;
  - g. when you present yourself and/or submit non-medical documents at our polyclinics at the front counter or service stations in which event we will take a photo or image capture of the same for display and retrieval at front counters, pharmacy counters and consultation rooms;
  - h. when you attend SingHealth's events (e.g. public forums and corporate events) and your voice and image data is captured on our audio and video recordings;
  - i. when you use our services provided through online and other technology platforms, such as kiosks, websites and apps, including through the use of any online platforms / technologies or tools (e.g., eAppointment, mAppointment, web portals, medical devices, security tokens, biometric technologies);
  - j. when you request that we contact you, be included in an email or other mailing list; or when you respond to our request for additional personal data, our promotions and other initiatives;
  - k. when you are contacted by, and respond to, our customer service officers, nurses, doctors, agents and other service providers;
  - l. when we receive your personal data from referral parties (which include other non-Singhealth healthcare organisations, or through referrals between SingHealth Institutions), public agencies (including other government agencies, third party organisations, other professionals with whom you have interacted, such as medical social workers), your representatives (or third parties engaged by you or acting for you, including concierges, assistants, or, in the case of foreign assisted VIP patients, embassy / consulate staff or equivalent), your employer and other third parties;

- m. when we receive personal data from relevant registries such as the registry of National Organ Transplant Unit in respect of organ donors in compliance with applicable including HOTA;
- n. when you make payment or provide details to facilitate payment, or secure or administer the application of funding / benefits / subsidies;
- o. when we seek information from third parties about you in connection with your relationship with us, including from next-of-kin and caregivers;
- p. when you provide any information to our retail malls/retail pharmacy through your participation in market surveys, lucky draws, contests, item reservation, and when you fill up device warranty cards;
- q. when you browse any SingHealth website (you generally do so anonymously but please see the section below on cookies), and you provide such information or login with your account credentials;
- r. from publicly available sources including public social media or information you make available to the public; and
- s. when you submit your personal data to us for any other reasons.

**Collection of personal data about you from third parties, & collection of data about third parties from you**

30. We may also collect personal data about you from third parties such as:
- a. your representatives / intermediaries / agents or your next-of-kin who may either be doing so on your behalf, or in connection with their own transactions, agreements or interactions with us (in which event we will endeavour to collect only such personal data as may be relevant);
  - b. your employers; and
  - c. your service providers (e.g. your insurers, your bank, etc.).
31. If you provide us with any Personal Data relating to a third party (e.g. 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.

**Accuracy of personal data we collect from you**

32. 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.

**Risks of relying on data we collect from you that is without consent or which is inaccurate**

33. If consents are not procured or 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.
34. SingHealth 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, agreement or interaction in question to avoid causing harm or exposing us, you or others to risk.

**How much personal data we collect**

35. SingHealth will endeavour to limit the collection of personal data to what is reasonable or necessary for such applicable purposes as described in this DPP.

36. 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.
37. 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 or a data subject is adequately protected from or treated for illness.
38. It may also be good medical practice to collect information about a patient or even next-of-kin (e.g. in the case of congenital disorders, allergies, predispositions to certain risks etc), spouse, children, parents, and/or employees.

#### **Withholding information**

39. If you withhold information, this can have the same effect as when you withdraw consent (see “**Withholding / Withdrawing Consent**” above), and as stated in the “**Risks of relying on data we collect from you that is without consent or which is inaccurate**” section above, we may well have no choice but to decline to proceed with the transaction, agreement or interaction in question to avoid causing harm or exposing us, you or others to risk.

#### **Section 5: Why we Handle Your Personal Data (i.e. the “Purposes”) & to Whom We Disclose It to**

40. **Generally**, a SingHealth Institution Handles 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.
41. 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.

#### **To treat patients or provide medical services**

42. We may Handle your personal data, particularly if you are a patient, to provide medical and other allied health treatments, such as physiotherapy, speech and dietetics treatments and therapies.
43. The personal data may be disclosed / shared with healthcare professionals (such as doctors, physicians, residents, nurses, allied health professionals, technicians, students / trainees who are assisting on or providing medical treatment / services), other medical institutions / facilities (including labs, pharmacies, counsellors, care providers such as next-of-kin, service providers etc.), 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.
44. The purposes for which such personal data is Handled includes:
  - a. admitting the patients, and the onboarding of information on relevant data subjects necessary 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,

- c. counselling, advising you of alternative treatment options, sending notifications to you, communicating patient care issues, securing instructions on treatment choices;
  - c. contacting family members / next-of-kin / representatives for purposes of providing patient location (e.g. when visiting), medical updates, and seeking consent from them in emergency/incapacity situations;
  - d. ensuring appropriate delivery of core patient care services including delivering results of tests and other medical updates (including via SMS), facilitating set-up, rental, registration (including with equipment / device or relevant service providers) and/or configuration of healthcare services equipment, ordering and/or making of customised splints/ surgical wafers;
  - e. ensuring proper and complete diagnosis and appropriate treatment including and without limitation to identifying health / treatment risks (e.g. collecting, identifying and communicating vulnerabilities, conditions, allergies, potentially adverse reactions, adverse events, device failures / issues, etc.) and monitoring appropriateness of medication usage, specimen testing and reporting recording patient infection data;
  - f. prescribing and dispensing appropriate medication whether through SingHealth pharmacies or other channels;
  - g. ensuring a patient's health and safety (including, for example, advising you of a product or drug recall);
  - h. administering compulsory / legally mandatory medical procedures (e.g. newborn vaccinations);
  - i. verifying patient identity, preventing impersonation / fraud, and documenting accurate information for e.g. newborn or birth registration, certification of reportable diseases, certification of death;
  - j. internal auditing, managing medical records, including facilitating patient merge processing and answering requests for medical records (including compilation of centralised medical records for quick reference by various internal departments for medical purposes), producing medical reports and associated administrative documents;
  - k. managing patient access by visitors or visitation rights;
  - l. co-ordinating healthcare services provided by other healthcare providers;
  - m. referring / collaboration with/ transferring patients to other institutions, healthcare professionals, caregivers, persons, organisations for procedures, additional support on treatment, specialist assistance, the procurement or provision of follow up care or as part of integrated / seamless / holistic care arrangements;
  - n. conduct medical reviews to better address your medical risks and improve patient care (e.g., via medical board meetings such tumour board meetings etc);
  - o. coordinate and facilitate follow-up home visits post-discharge;
  - p. monitor and facilitate the post-discharge and/or post treatment transition of patients' care to partners (including community partners, allied health professionals, step-down care, home care and the like);
  - q. supporting, organising, co-ordinating, facilitating or executing regional health programs;
  - r. working with funeral directors, casket companies, morticians, or other like persons as may be necessary to discharge duties with respect to a deceased individual; and
  - s. all other purposes reasonably related to the aforesaid.
45. We may also Handle personal data (such as telephone number and email address) to contact you and/or your representatives to remind you of appointments at the SingHealth Institution. Telephone calls may also be made as part patient care and follow up (including but not limited phone triage, or consultation).

**For emergency prevention of injury or death**

46. We may also disclose personal data in emergency situations affecting (or causing serious threats to) the health, life, safety of any individual (e.g. to notify appropriate authorities where we believe



a person has been the victim of abuse, neglect or domestic violence). Such disclosures will be made to such persons as may be necessary to address or respond to the situation.

#### **For healthcare operations**

47. We may Handle your personal data in order to execute healthcare operations. In brief, this relates to planning, execution, administration and implementation of functions or things which are necessary to run the relevant SingHealth Institution. Your personal data may also be used to respond to the service needs of patients as well as other data subjects.
48. Purposes under this heading include:
  - a. acknowledging, responding to, processing and handling your complaints, queries, requests, feedback (including patient experience interviews or surveys, and including for purposes of improving services, or recognising service achievements, which, in each case, participation would include us reaching out to you and/or responding to your feedback) and suggestions;
  - b. managing the administrative and business operations of the SingHealth Institution, including file management, tracing of old reports, old films and old clinical notes for review and audit studying and improving efficiency, standards and quality of the SingHealth Institutions' services and operations;
  - c. complying with internal policies and procedures, including recording and managing room utilisation;
  - d. personalising your experience at the SingHealth Institution's touchpoints;
  - e. patient location tracking so as to better monitor, contact and safeguard patients and security of the facilities;
  - f. right siting patients to ensure that the correct and most appropriate level / type of healthcare services are applied and making appropriate referrals or directions accordingly or to transfer patients accordingly;
  - g. matching any personal data held which relates to you for any of the Purposes;
  - h. recording telephone call conversations (including overseas calls) to mediate complaints against staff and train call centre assistants;
  - i. requesting feedback or participation in surveys;
  - j. processing and billing for medical services delivered and collecting payment on debts;
  - k. conducting clinical quality update and morbidity and mortality review;
  - l. handling potential legal claims, manage litigation cases and review legal cases;
  - m. analysis for statistical, profiling or other purposes for us to conduct category analysis, financial analysis, investigate service lapses, and to review, develop and improve the quality of our products and services;
  - n. quality improvement projects and/or data analytics for service enhancement and improvement, including workload management, efficiency requirements, process re-engineering or management / introduction of new processes or technologies to enhance / supplement service delivery, and all associated interactions with service providers, regulatory bodies or related companies to facilitate or support such purposes;
  - o. To develop predictive tools so as to enhance treatment and diagnosis, and to manage risks;
  - p. to study workflows for efficiency and effectiveness including data capture and processing;
  - q. conduct reviews, reporting and examining case studies, incidents (including incident reporting and governance), issues encountered with a particular data subject so as to understand, minimize and avoid risks, service failures or hazards;
  - r. undertaking preventative measures to safeguard any individual, property or defend and maintain legal rights;
  - s. to clarify issues or matters which have arisen in connection with existing or potential disputes;
  - t. to clarify and resolve discrepancies or reconcile information and establish accurate records;
  - u. to carry out root cause analysis of issues for the compilation of reports to management and to address investigations;

- v. ensuring the safety of the SingHealth Institution's staff and operations;
  - w. data mining to track pharmaceutical drug transactions, usage patterns and drug movement;
  - x. to identify and establish ways to improve or deliver more appropriate products, services or developments to better address the needs of data subjects;
  - y. to combine, collate, compile, analyze, review or submit reports or recommendations to meet the Purposes listed above;
  - z. to ensure that staff, volunteers, students (including medical students, trainees or other staff) are properly trained to provide medical services or execute their functions in the context of healthcare operations generally;
  - aa. to meet organisational auditing, accreditation and compliance requirements concerning service standards;
  - bb. sending staff for occupational health reviews; and
  - cc. all other purposes reasonably related to the aforesaid.
49. For these purposes, disclosures may be made to SingHealth's staff who have a need to know, such as administrators, patient navigators, doctors, nurses, allied health professionals, executive / administrative staff, as well as persons who can assist SingHealth in undertaking these purposes such as analysts, consultants, advisors, educators, or other similar persons.
50. Disclosures for this purpose can also be to SingHealth Institutions' regulatory body (such as MOH) who monitor performance for public healthcare operational indicators, affiliated institutions, other SingHealth Institutions, community health centres or polyclinics, or to the SingHealth Institution's service providers. In the case of other SingHealth Institutions, the Handling of personal data will be under the framework of intra-group agreements / policies that ensure that the standards in this DPP are followed / applied.
51. Disclosures may also be to agents, debt collection agencies, contractors or third party service providers who provide operational services to the SingHealth Institution, such as courier services, telecommunications, information technology, payment, payroll, processing, training, market research, storage, archival, customer support investigation services or other services to the SingHealth Institution, or other vendors or other third party service providers in connection with services offered by the SingHealth Institution.
52. For some SingHealth Institutions, it may be necessary to disclose personal data records to a shared third party service provider or vendor, or via another SingHealth Institution, in order to obtain the services of that vendor. In such instances, reasonable safeguards will be taken to ensure the confidentiality of your personal data records.
53. In the case of third party entities, the SingHealth Institution will ensure that agreements in place with such third parties to hold them to the standards in this DPP.

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

54. SingHealth 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 (whether a patient, next-of-kin, or other person) 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 an individual (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.
55. In such cases, collection, use or disclosure 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**

56. SingHealth Institutions are progressive and continually exploring ways to advance the seamless and efficient delivery of healthcare services, and information technology (“IT”) tools and platforms are central to this drive.
57. For this purpose, SingHealth Institutions may Handle personal data using IT platforms and tools promulgated by MOH, MOHH or other like body including, but not limited to the National Electronic Health Records (“NEHR”) system. SingHealth Institutions apply and require the application of reasonable and defensible security and access controls in the use of such systems, such that organisations other than the SingHealth Institution treating or transacting with you have only such access as is on a need to know basis for purposes and in a manner consistent with this DPP and/or where (and to the extent) necessary to meet your needs.
58. SingHealth Institutions also work with partners such as Integrated Health Information Systems (“IHIS”) who run IT services within the SingHealth Institution. For the purposes of meeting your needs, such IT services include establishing the scope and requirements of projects, testing systems / applications, fulfilling IT support and service requests, and managing changes and configurations in IT infrastructure. Personal data is shared with IHIS under appropriate agreements which ensure that IHIS only accesses or Handles personal data as our data intermediary on a need to know basis for the purposes and in a manner consistent with this DPP.
59. SingHealth Institutions may also, as part of the efforts to increase security and efficiency around healthcare operations or the handling of any information including personal data, make use of third party IT platforms and services. Where so, SingHealth Institutions will ensure that such engagements are made with appropriate legal, operational, technological and security controls.

### **To comply with applicable law / regulations**

60. As healthcare providers, SingHealth Institutions and/or its staff are subject to and regulated by various statutes and regulations such as the Private Hospitals and Medical Clinics Act, Medical Registration Act, Singapore Medical Council Guidelines etc. Additionally, special legislation may apply to certain healthcare scenarios, e.g. National Registry of Diseases Act, Infectious Diseases Act, Human Organ Transplant Act, Termination of Pregnancy Act, etc. Such legislation (collectively, “**Medical Laws**”) may override / apply in place of the provisions / standards set by the PDPA in respect of the subject matter of such legislation. We may owe duties under such Medical Laws to Handle your personal data in certain ways, including making disclosures to appropriate government agencies, ministries, statutory bodies, or third parties in each case in accordance with and within the scope of our legal duties.
61. Other compliance obligations may include where health information is to be collected, used, disclosed or process to meet requirements under other ministries including the Ministry of Home Affairs, Ministry of Community, Youth & Sports (MCYS), the Immigration Checkpoint Authority, the Singapore Police Force, the Singapore Medical Council (or other vocational regulatory bodies), or to comply with court orders.
62. In addition, SingHealth may be required to collect, use or disclose personal data for the purposes of facilitating business asset transactions (which may extend to any merger, acquisition or asset sale); and in order to comply with any applicable rules, laws and regulations, codes of practice or guidelines or to assist in law enforcement and investigations by relevant authorities.
63. Examples of such purposes include:

- a. notifying and registering with various registries including processing, registration and notification of births or death, and reports to disease registries;
  - b. facilitating reporting of infectious diseases and contact tracing if you are exposed to a certain infectious disease e.g. chickenpox or identifying and reporting an outbreak or cluster of infection;
  - c. reporting relevant suspected adverse drug reactions experienced by patients to HSA;
  - d. preventing, detecting and investigating crime, and making the necessary reports to the investigative or appropriate authorities (e.g. where we suspect cases of abuse, or the information is required to assist in investigations or proceedings.);
  - e. complying with court orders, directives, or applicable requests from appropriate authorities;
  - f. working with and releasing personal data to a coroner or medical examiner so as to identify a deceased person, determine the cause of death, assist in the coroner or examiner's investigations / verdicts; and
  - g. all other purposes reasonably related to the aforesaid.
64. To comply with any directions, laws, rules, guidelines, regulations or schemes issued or administered, SingHealth may disclose the relevant personal data to government regulators, government ministries, registries for diseases and illnesses, statutory boards or authorities and/or law enforcement agencies, whether local or overseas, including but not limited to:
- a. Thalassemia Registry;
  - b. Birth Defects Registry;
  - c. Registry of Births and Deaths;
  - d. National Immunisation Registry;
  - e. National Registry of Disease;
  - f. Ministry of Health;
  - g. Health Sciences Authority;
  - h. Immigration and Checkpoints Authority of Singapore;
  - i. Ministry of Manpower; and
  - j. Ministry of Social and Family Development.

**To make payment and/or facilitate claims for reimbursement / grants or subsidies / upgrades or downgrades of appropriate class / treatments etc.**

65. We may Handle your personal data to bill and receive payment for services that we or others provide to you.
66. The purposes connected with such Handling of the personal data include:
- a. authorising payment instructions;
  - b. payment administration with financial institutions such as your banks / payment service providers;
  - c. liaising with government agencies, statutory bodies (e.g. CPF in respect Medisave / Medishield related transactions), organisations handling and/or administering the provision of subsidies, grants, endowments, or other funds relevant to the payment for the medical services to address;
  - d. liaising with financial institutions (including banks, credit card service providers) or other payment service providers to facilitate and administer payments, payments instructions, clearing or settling payment transactions;
  - e. assessing means testing / eligibility criteria for funding, financial assistance, grants, endowments/ILTC services or other funds;
  - f. arranging / administering applications for funding, financial assistance, grants, endowments/ILTC services or other funds;
  - g. providing or assisting in the provision of financial counselling for medical payments;
  - h. procuring custodial services for payments;

- i. filing reports, consolidating or collating information to government agencies / statutory bodies, organisations handling / administering the provision of subsidies, grants, endowments, foundations, funds, donor-financed work organisations, charities, voluntary welfare organisations (“VWO”), or other funds relevant to the payment for the medical services to address take up / utilisation of the same; and
  - j. all other purposes reasonably related to the aforesaid.
67. Disclosures for these purposes include submission of personal data to health insurers, or another party that pays for some or all of your healthcare (payor) including for the purposes of verifying their payment for your invoice. To process such payments, we may also disclose personal data (e.g. when addressing whether a certain prescribed treatment would be covered under a particular plan etc). For certain services, your permission may be requested to release health information to obtain payment.

## **Section 6: Specific Data Subjects**

68. The following section of the DPP addresses the application of the DPP and details concerning the Handling of personal data in respect of specific classes / types of data subjects.

### **For general practitioners, healthcare professionals, students (including student radiographer), trainee doctors and nurses, resident, house officer, medical officer, or a person on clinical attachment with SingHealth Institution**

69. We will Handle your personal data to:
- a. facilitate / address accreditation applications or to assist in training purposes when you provide documents or information in connection with the same;
  - b. generally, sending invitations to you and facilitating in respect of General Practitioner forums;
  - c. generally, sending invitations to you and facilitating and mission trips / exchanges or international collaborations ;
  - d. verifying your identity for teaching of student radiographers;
  - e. maintaining student and safety records;
  - f. assessing and interviewing students on attachment for employment;
  - g. submitting student progress reports to polytechnic registrar or lecturer;
  - h. facilitating contact during work and emergency;
  - i. processing the application for access cards, tracing and ensuring accountability for cards;
  - j. fulfilling job description requirements, including medical students’ research appointments in different local or international healthcare/education/research institutions/bodies, and proof of Hepatitis B immunization prior to contact with patients;
  - k. inviting, facilitating and assisting in continuing professional education / development; and
  - l. all other purposes reasonably related to the aforesaid.

### **For sureties of trainee doctors and nurses:**

70. We will Handle your personal data to:
- a. process documents and applications in connection with the provision of the surety bond by you in respect of the trainee doctor or nurse (as may be applicable); and
  - b. all other purposes reasonably related to the aforesaid.

### **For shoppers at our retail malls/ retail pharmacies**

71. We may sometimes collect your information when you participate in our market surveys, lucky draws, contests, free sample giveaways, when you reserve items with us or fill in device warranty cards. We may use your personal data to:

- a. build our customer database;
- b. offer you rewards and customer loyalty benefits;
- c. contact you regarding the availability of your desired purchase items; and
- d. all other purposes reasonably related to the aforesaid.

#### **For our donors and sponsors**

72. SingHealth works with various donors and sponsors, and we Handle personal data for the following purposes:

- a. referring our donors/ prospective donors to our Philanthropy departments;
- b. outreach and soliciting donations;
- c. tracking sponsorship;
- d. processing tax deductions for eligible donations by donors;
- e. where donations are processed for causes / uses in conjunction / in collaboration with third parties (e.g. Duke-NUS, or other third party organisations), the personal data may be disclosed to such third parties for the purposes or processing the donors' instructions and in accordance with the purposes of this paragraph 72 (where relevant);
- f. inviting donors to our fundraising events or visits;
- g. filing mandatory financial reports with police licensing unit for donations received by our institutions;
- h. donor stewardship, including sending of thank you letters and collaterals such as annual review and donation forms;
- i. featuring the donor (in accordance with the law) in collaterals or mass media; and
- j. all other purposes reasonably related to the aforesaid.

73. Recipients include government authorities such as IRAS, fund managers, VWOs, publicity / outreach organisations including those that facilitate or work with media outlets.

#### **For organ donors & organ donees**

74. SingHealth supports and promotes organ donation processes which may help save lives and address emergency situations. For such purposes, specific protocols and consents are in place, including where in line with other legislation. Do note that we may, as part of processes to identify / pre-screen candidates for donation, or to facilitate or administer the identification of donees, we may, subject to compliance with applicable law, collect information from the National Organ Transplant Unit or other lawful sources, also pre-screen information to facilitate outreach to a possible donor / donee as part of the preparatory process to evaluate information so as to commence the consent managements options given to such an individual under applicable. We do so with full respect to your information and your choice / autonomy in these decisions.

#### **For volunteers and research volunteers**

75. SingHealth complies with the HBRA in all of its dealings with human biomedical research, in which separate policies apply and for which the PDPA (and this policy) does not cover. SingHealth Institutions engage and work with volunteers, if you are a volunteer, we Handle your personal data for the following purposes:

- a. assessing suitability of volunteer applicants;
- b. building a consolidated electronic volunteer database;
- c. managing relationships with you, including sending greeting cards and invitations;
- d. enrolling suitable subjects for research study;
- e. preparing and publishing testimonials or materials to publicise volunteer events and efforts, and encourage volunteerism;
- f. arranging for volunteer training;

- g. facilitating our various support programmes which you participate in;
  - h. all other purposes reasonably related to the aforesaid; and
  - i. as may be additionally indicated in any volunteer consent form / handbook.
76. We may disclose your personal to related organisations such as VWOs, charitable foundations or to beneficiaries.

**For visitors to a SingHealth Institutions/research facilities or a SingHealth Institution corporate event**

77. We welcome many visitors to SingHealth Institutions, whether this is a visit to see a patient, or if you are on SingHealth premises / campus for any specific transaction, event or other interaction with us. The personal data Handled in this regard are purposes such as :
- a. visitor screening and temperature taking;
  - b. creating a data log of your information for security monitoring and fire safety;
  - c. for contact tracing;
  - d. issuing you access cards and visitor pass;
  - e. arranging and planning logistics for corporate visits;
  - f. recording data of persons making lost and found reports, and tracing and accountability for such reports;
  - g. processing carpark and complimentary ticket applications;
  - h. verifying your identity and recording attendance;
  - i. providing / arranging for sufficient facilities;
  - j. recording motorists and vehicles using valet service for such service; and
  - k. all other purposes reasonably related to the aforesaid.
78. For visitors to the SingHealth Institutions visiting patients, meeting with healthcare professionals, or otherwise attending meetings with SingHealth staff as part of delivery of services, the recipients of such information include SingHealth Institutions operations, administrative offices, facilities and security, law enforcement, ward staff, nurses and other healthcare professionals. At the same time, we may also maintain a log or track your attendance at a SingHealth Institution's premises or event for subsequent reference including addressing event hosting reviews.

**For participants in a SingHealth Institution's events, courses, contests, and training workshops**

79. SingHealth Institutions also host, and arrange educational activities (for a more in-depth look at our Data Protection Policy section on Education please see section 9. In addition to the information in the other sections, we would apply the personal data Handled for the following purposes:
- a. managing registrations and sign-ups for events, courses and workshops;
  - b. confirming participation, including contacting and reminding participants that they have to attend the events which they have signed up;
  - c. processing payment, including mailing receipts to participants;
  - d. storing a database to inform participants of future events;
  - e. keeping track of actual attendance;
  - f. gathering feedback for programme improvement;
  - g. using photos for post-publicity events;
  - h. allowing vendors of various courses to provide ID and password to participants to access the course;
  - i. using recorded videos for debriefing in simulation training;
  - j. disclosing to respective councils for continuing professional education (CPD) credits;
  - k. accessing participants' pre-requisite for programmes;
  - l. applying for training employment passes with MOM;
  - m. administering training / skills development funding;

- n. facilitating HR's administration; and
  - o. all other purposes reasonably related to the aforesaid.
80. Recipients for this type of data include event organisers / vendors, vendors of course content, social media platforms, including Facebook.

**For participants in a community / regional health programmes**

81. SingHealth Institutions work with community partners to plan and execute community / regional health activities and programmes such as preventive health / health improvement programmes such as health community screenings, and other activities which may be conducted in co-ordination or together with third parties such as MOH or other community partners. In connection with this, we may Handle personal data for the following purposes:
- a. Organizing, facilitating and executing such activities and programmes;
  - b. Conducting surveys and fact gathering in preparation for such activities and programmes;
  - c. Publicising or reporting such activities (including events held);
  - d. Follow up engagement with participants including managing any follow up health related issues, or issues arising in connection with the participant's experience at the event;
  - e. Maintaining contact and further communication in relation to the activities or programmes;
  - f. Providing medical intervention, and assisting in induction as a patient in healthcare services offered by SingHealth Institutions or where such services are rendered by other parties which the participant is referred to or which the participant approaches following participation in such activities and programmes.
82. SingHealth Institutions may also receive referrals or induct patients as a result of work by community partners that plan and execute community / regional health activities and programmes. Where, other parts of this DPP as it relates to patients and other relevant purposes will apply.

**If you are a vendor which provides goods and services to and on behalf of the SingHealth Institutions**

83. This category of persons includes suppliers, trainers and interpreters, tenants of SingHealth's relevant retail mall, business contacts in the stakeholder's exercise.
84. We would apply the personal data Handled for the following Purposes:
- a. identifying vendors of equipment servicing;
  - b. tracking data subjects in various situations e.g. in outbreak of infectious disease;
  - c. facilitating liaison amongst SingHealth staff, vendors, vendors' sub-contractors, homecare patient and next-of-kin for the installation, commissioning, repair and maintenance of medical devices;
  - d. applying and renewing medical device ratings (e.g. N2 and L3 licences), and permits for hazardous substances;
  - e. ordering of customised splints/ surgical wafers/ contact lenses/ biofixtures and other prosthetic devices for patients or institution's needs;
  - f. the maintenance and use of medical equipment / device information and registries;
  - g. installation, commissioning, repair and renewal of preventive/ corrective maintenance licences of hardware and 3D software relating to 3D surgery planning;
  - h. maintaining vendor contact lists, including recording of vendor data for work or business contact purposes;
  - i. arranging for vendor/contractor orientation;
  - j. assessing contractor's financial status, experience and competency for renovation projects;
  - k. facilitating pass applications including security passes and Permit-To-Work;
  - l. submission of Health Declaration Forms for OHS screening;



- m. processing the application for access cards, and tracing and ensuring accountability for cards;
- n. managing SingHealth's retail mall leases;
- o. keeping a record shuttle bus drivers;
- p. contacting and paying interpreters for translation services;
- q. assessing workshop speaker's competency in area of interest and for workshop publicity;
- r. demonstrating pre-requisites for certification programs;
- s. collating and analysing survey results from other departments / organisations (Allied Health) Professionals on training needs and gaps;
- t. processing claiming of CPE/CME/CNE points;
- u. processing claims incurred by research projects;
- v. facilitating the signing of non-disclosure agreements; and
- w. all other purposes reasonably related to the aforesaid.

### **Publicity / outreach**

85. SingHealth makes an effort to remain connected with the community it serves and will collate and Handle personal data sometimes with a view to the following purposes:
- a. providing media announcements and responses, including managing and addressing media requests and stories, profiling the hospital's expertise and achievements in medical management of patient conditions;
  - b. organising promotional events;
  - c. public awareness and education through the sharing of patient experiences and journeys by patients who have received medical treatment;
  - d. administering contests and competitions;
  - e. producing publicity content, including developing articles or communication content for the hospital's publications and other collaterals, and recording information related to video and photo talents used in SingHealth Institution photo shoots;
  - f. mailing out newsletters to recipients;
  - g. updating the SingHealth Institution's web page, or social media page (e.g. Facebook page) or other special interests group (e.g. the Weight Management Support Group); and
  - h. organising, co-ordinating and conducting screenings / treatments in local premises (including but not limited to community centres or other third party locations);
  - i. all other purposes reasonably related to the aforesaid.
86. Such personal data is only Handled with appropriate consents where legally required, and will be used for these stated purposes.

### **Section 7: Your Trusted Representatives – E.g. Next-of-Kin / Guardians / Parents of Minors & other Identified Individuals**

87. SingHealth recognizes that the care of a patient may well involve or impact more than 1 individual, and the persons who must be kept informed, or who could have a say in such matters may well extend beyond the patient.
88. The PDPA places an emphasis on the rights of the data subject, and obligates SingHealth to respect that data subject's wishes. SingHealth 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.

### **Caregivers, Next-of-Kin, Legal Guardians / parents of minors (or disabled individuals)**

89. Where the data subject is a caregiver, next-of-kin, representative (including an executor or administrator to a deceased patient) to a patient and/or former patient (including a deceased patient), or where the data subject is a the legal guardian or parent of a minor / disabled individual who are either patients or former patients of a SingHealth Institution (collectively a “**Patient’s Representative**”), the purposes for the Handling of your personal data include:
- a. contacting the police in coroner’s cases;
  - b. registering your data in registries including new births and deaths, and processing with ICA on such registration;
  - c. identifying occupants who booked guest rooms;
  - d. managing and treating patients, including registering for outpatient or inpatient consultations;
  - e. processing registration for outreach programmes such as support groups and public forums;
  - f. processing financial assistance, conducting intervention (including early intervention), and special programs (e.g. special school applications for disabled children etc);
  - g. claiming caregivers’ training grants (e.g. from the Agency for Integrated Care);
  - h. confirming workshop attendance and issuing acknowledgment receipt of course registration fees;
  - i. obtaining written consent for nursing procedures in paediatric unit;
  - j. facilitating vendor liaisons;
  - k. verifying and recording caregiver night visits;
  - l. recording down the persons to whom deceased bodies are released to;
  - m. prescribing medicines to family members who need to be treated due to close contact with index patients; and
  - n. all other purposes reasonably related to the aforesaid.

#### **Granting access to a patient’s personal data to a Patient’s Representative**

90. SingHealth will accept any notification from a court or competent legal authority as to the identification of any individual appointed under applicable law, regulation or court order as a Patient’s Representative and SingHealth will grant any such person access to the personal data of the patient where required by such law, regulation or court order.
91. Where the patient is a minor, we will, unless otherwise alerted with due proof of contrary authorisation / order, make the reasonable assumption that each parent (meaning 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 (including any doctor, counsellor, or administrator) take the view that such access could jeopardize the health, safety or well being of any person.
92. Every patient who is of majority age (i.e. above 18 years old) and with full legal 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, siblings, and children) may be contacted in respect of emergencies or in situations where contact is needed to safeguard to preserve the health, safety or well being of the patient.
93. Should any patient of legal age of majority, with full legal capacity, wish for any SingHealth Institution 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 individuals 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**

94. 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, SingHealth reserves the right to decline access, pursuant to our obligations under the PDPA.

### **Contacting persons in emergencies / safeguarding of health, safety & well being**

95. Notwithstanding the above, SingHealth has a 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 8: Research Purposes**

96. At SingHealth, we are committed to serving the needs of all our patients by constantly pushing the frontiers of our services through research. To the extent that research refers to human biomedical research under the HBRA ([https://www.moh.gov.sg/content/moh\\_web/home/legislation/legislation\\_and\\_guidelines/\\_human-biomedical-research-act.html](https://www.moh.gov.sg/content/moh_web/home/legislation/legislation_and_guidelines/_human-biomedical-research-act.html)). We have committed a significant amount of resources into our research processes (<https://research.singhealth.com.sg/Pages/ORIC.aspx>) so that the outcome of our research studies may offer better clinical care and outcomes to all our patients today and for generations to come.
97. All other activities such as efficiency reviews, study of support activities mentioned elsewhere in this DPP which are intended to improve the quality and delivery of our healthcare services. SingHealth is in compliance with PDPA and will apply reasonable safeguards to the Handling of your personal data when executing such activities.

### **Section 9: Academic Medicine**

98. In order to deliver better services and care to our patients, SingHealth actively engages in the sharing and teaching of medical knowledge with our healthcare interns and students. In order to train and inspire future generations of medical professionals, it is important for us to let them gain experience through first-hand patient contact and involvement in our core hospital operations. This should not be confused with medical research - any research done in this regard is part of training and education to qualify medical professionals and support training purposes.
99. As such, depending on which specific class of data subjects you belong to and subject at all times to the requirements of the PDPA, we may use your personal data for education purposes which include:

#### **If you are a patient/volunteer/next-of-kin of patient**

- a. tracking and identification of training 'subjects' for audit purposes;
- b. tracking and identification of training 'specimen';
- c. creating materials for education purposes;
- d. compiling patient data for business development patient support group and education events held overseas;
- e. as case notes for case presentation/final examination purposes;
- f. applying for permits as part of the development process in academic medicine; and
- g. all other purposes reasonably related to the aforesaid.

#### **If you are a trainer/mentor/researcher/healthcare education faculty member/author of education materials**

- a. tracking and identification of training 'subjects' for audit purposes;
- b. tracking and identification of training 'specimen';
- c. applying for permits as part of the development process in academic medicine;
- d. application for continuing education points/ accreditations for participants/ attendees at the various professional portal;
- e. facilitation of the program scheduling and progress tracking/monitoring and selection of suitable applicants into the respective programs;
- f. inviting you to share your expertise and knowledge to allow for education and transfer of knowledge among peers/colleagues within SingHealth cluster; and
- g. all other purposes reasonably related to the aforesaid.

**If you are a participant of SingHealth's attachment programme/clinical attachment applicant/student/medical resident**

- a. reporting annual volume of student clinical training postings/electives training/ rotations/ training efforts/ student feedback to various funding entities (e.g. MOH, SingHealth Talent Development Fund etc.);
- b. application for continuing education points/ accreditations for participants/ attendees at the various professional portal (e.g. SNB, SMC etc);
- c. facilitation of the program scheduling and progress tracking/monitoring and selection of suitable applicants into the respective programs; and
- d. all other purposes reasonably related to the aforesaid.

**If you are a donor of specimens or information for use in training or academics at SingHealth Institutions**

- a. using the information or specimens you make available to us to contextualize and assist in preparing the education and training materials; and
- b. (if you consent to disclosure) including such information (including about the specimens) as may be relevant to assist in the education and training materials.

**Section 10: Other Purposes & Recipients**

100. Subject to the provisions of any applicable law, your personal data may also be provided, for any and all of the Purposes listed above (where applicable), to the following entities or parties, whether they are located overseas or in Singapore:
- a. other SingHealth entities, including SingHealth and Ministry of Health Holdings;
  - b. other healthcare institutions, including Alexandra Health System, National Neuroscience Institute; Tan Tock Seng Hospital and Khoo Teck Puat Hospital;
  - c. educational institutions and research institutions, including Duke-NUS, National University of Singapore Hospital;
  - d. SingHealth Academic Partners (e.g. Academic Medicine Education Institute, Schools, other Sponsoring Institutes for Residency) or other institutions in respect of the education or training or students or vocational trainees (e.g. Yong Loo Lin School of Medicine, Duke-NUS Medical School, Lee Kong Chian School of Medicine, Institute of Technical Education) or to other relevant educational institutions (e.g. Singapore Institute of Technology);
  - e. private companies and industry sponsors for research, including AWAK Technologies, SG Med International, Biozyn Science, Roche Singapore, Johnson & Johnson, etc.;
  - f. research funding agencies such as NMRB, A\*STAR, Healthcare Promotion Board etc.;
  - g. third parties which help assess and facilitate financial assistance for patients (e.g. Singapore Cancer Society);

- h. third party healthcare institutions (or other SingHealth Institutions) with whom the relevant SingHealth Institution might offer services in co-ordination of treatment such as in the provision of consultative services (e.g. hospice care services, other hospitals)
  - i. patent agents and patent offices;
  - j. service providers or administrators of registries and databases which support or are part of / connected with medical devices or equipment (e.g. implants, wearables, etc) which you may be supplied with or procure (including but not limited to foreign-based registries, e.g. the IMACS Registry in the United States) whether in connection with participation studies you opt into, or other devices or equipment which you procure;
  - k. third party laboratory service providers;
  - l. document handlers including, without limitation, information / record storage service providers for both electronic and non-electronic media (e.g. Crown Worldwide, Markono Logistics etc), scanning or service providers who help digitise records, record extraction service providers or record disposal service providers;
  - m. our fundraising partners including Singapore Tatler, Tote Board;
  - n. organisations which administer or support foundations or endowments including but not limited to SingHealth Fund Limited, Duke-NUS;
  - o. organisations which support or facilitate innovation in healthcare operations or research including but not limited to the National Health Innovation Centre,
  - p. professional accreditation bodies including professional associations, councils, profession-governing bodies;
  - q. (excluding HBRA related research) content partners for research and educational publications, including research journal publishers, research collaborators;
  - r. (excluding HBRA related research) organisations that support or facilitate research include those that may administer databases (e.g. the Extracorporeal Life Support Organisation for EMCO specialists);
  - s. other government statutory bodies such as National Library Board, Media Development Authority;
  - t. community agencies, including social service agencies and family health agencies;
  - u. counterparties and their respective banks in relation to fund transfers, payments, drawing of cheques, and other transactions;
  - v. caretakers of patients, including parents, next-of-kin, caregivers, legal guardians;
  - w. employers of patients;
  - x. social media platforms, including Facebook;
  - y. parties providing referrals of patients to SingHealth Institution, including general practitioners;
  - z. companies providing services relating to insurance and/or reinsurance to the SingHealth Institution;
  - aa. banks, credit card companies and their respective service providers;
  - bb. our professional advisers such as our auditors and lawyers;
  - cc. hotels, travel agents and foreign embassies in relation to overseas travel arrangements for international patients;
  - dd. crematoriums and undertakers;
  - ee. the Central Provident Fund Board and its agent banks in relation to CPF medical payment schemes processing; and
  - ff. any other party to whom you authorise us to disclose your personal data to.
101. In addition, where permitted under the PDPA, we may also collect, use and disclose your personal data for the further purposes which we may describe in our documents and agreements, for which we will seek consent.

## **Section 11: Use of Singapore telephone numbers for Marketing**

102. If you have provided your Singapore telephone number(s) and have indicated that you consent to receiving marketing or promotional information via your Singapore telephone number(s), then from time to time, the SingHealth Institution may contact you using such Singapore telephone number(s) (including via voice calls, text, fax or other means) including, among other things, with information about our products and services (including discounts and special offers).
103. In relation to particular products or services or in your interactions with us, we may also have specifically notified you of other purposes for which we collect, use or disclose your personal data. If so, we will collect, use and disclose your personal data for these additional purposes as well, unless we have specifically notified you otherwise.

## **Section 12: Security, Retention & IT matters**

### **Security**

104. Each SingHealth Institution will take reasonable efforts to protect personal data in our possession or our control by making reasonable security arrangements to prevent unauthorised access, collection, use, disclosure, copying, modification, disposal or similar risks. However, we cannot completely guarantee the security of any personal data we may have collected from or about you. E.g., that no harmful code will enter our website (for example viruses, bugs, trojan horses, spyware or adware).

### **Retention**

105. Each SingHealth Institution retains such personal data as may be required for business or legal purposes, and such purposes do vary according to the circumstances.
106. Whilst each SingHealth Institution 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.
107. As such that, with respect to the medical records of patients, unless specific contrary instructions from the patient are received, the relevant SingHealth Institution may (but is not obliged to) retain such medical records for as long as the SingHealth Institution 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.
108. One important aspect of medical records is that there are laws which require that we retain them to meet legal, regulatory and compliance purposes, and the retention period required to meet these purposes can include are lengthy. National systems such as National Electronic Health Records (NEHR) are also where many medical records are stored. We comply with the laws, operational and regulatory procedures and processes which apply to the retention of such records on NEHR.

### **IT Matters**

109. 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. We recommend that you change your passwords often, use a combination of letters and numbers, and ensure that you use a secure browser.

110. If applicable, you undertake to keep your username and password secure and confidential and shall not disclose or permit it to be disclosed to any unauthorised person. Please inform us as soon as reasonably practicable if you know or suspect that someone else knows your username and password or believe the confidentiality of your username and password has been lost, stolen or compromised in any way or that actual or possible unauthorised transactions have taken place. We are not liable for any damages resulting from any security breaches, on unauthorised and/or fraudulent use of your username and password.

### **Cookies**

111. When you interact with us on our websites, we automatically receive and record information on our server logs from your browser. We may employ cookies in order for our server to recognise a return visitor as a unique user including, without limitation, monitoring information relating to how a visitor arrives at the website, 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).
112. Cookies are small text files placed in the 'Cookies' folder on your computer's hard disk and allow us to remember you. The cookies placed by our server are readable only by us, and cookies cannot access, read or modify any other data on a computer. All web-browsers offer the option to refuse any cookie, and if you refuse our cookie then we do not gather any information on that visitor.
113. Should you wish to disable the cookies associated with these technologies, you may do so by changing the setting on your browser. However, you may not be able to enter certain part(s) of our website.

### **Third-Party Sites**

114. Our website may contain links to other websites operated by third parties. We are not responsible for the privacy practices of websites operated by third parties that are linked to our website. We encourage you to learn about the privacy policies of such third party websites. Some of these third party websites may be co-branded with our logo or trademark, even though they are not operated or maintained by us. Once you have left our website, you should check the applicable privacy policy of the third party website to determine how they will handle any information they collect from you.

## **Section 13: Contacting Us – Withdrawal of Consent, Access and Correction of your personal data**

115. If you have any questions or feedback relating to your personal data or our DPP, would like to withdraw your consent to any use of your personal data as set out in this DPP; or would like to obtain access and make corrections to your personal data records, please contact the relevant SingHealth Institution as follows:

| S/No | Institution | DPO Email  | Contact Address   |
|------|-------------|--|---|
| 1.   | SGH         | <a href="mailto:pdpa@sg.com.sg">pdpa@sg.com.sg</a>   | Data Protection Officer, Singapore General Hospital, Outram Road, Singapore 169608                  |
| 2.   | SKH         | <a href="mailto:pdpa@skh.com.sg">pdpa@skh.com.sg</a> | Data Protection Officer, Sengkang Health, 110 Sengkang East Way, Singapore 544886                   |
| 3.   | CGH         | <a href="mailto:dpo@cgh.com.sg">dpo@cgh.com.sg</a>   | Data Protection Officer, CGH, 2 Simei Street 3 Singapore 529889                                     |
| 4.   | KKH         | <a href="mailto:pdpa@kkh.com.sg">pdpa@kkh.com.sg</a> | Data Protection Officer, KK Women's and Children's Hospital, 100 Bukit Timah Road, Singapore 229899 |

|     |            |  |  |
|-----|------------|--|--|
| 5.  | NCCS       | <a href="mailto:Data.Protection.Office@nccs.com.sg">Data.Protection.Office@nccs.com.sg</a> | Data Protection Officer, 30 Hospital Boulevard, Singapore 168583   |
| 6.  | NDCS       | <a href="mailto:DPO@ndcs.com.sg">DPO@ndcs.com.sg</a>                                       | Data Protection Officer, National Dental Centre Singapore, 5 Second Hospital Avenue, Singapore 168938                                |
| 7.  | NHCS       | <a href="mailto:pdpa@nhcs.com.sg">pdpa@nhcs.com.sg</a>                                     | Data Protection Officer, National Heart Centre Singapore, 5 Hospital Drive, Singapore 169609   |
| 8.  | NNI        | <a href="mailto:pdpa@nni.com.sg">pdpa@nni.com.sg</a>                                       | Data Protection Officer, Operations & Quality Management, National Neuroscience Institute, 11 Jalan Tan Tock Seng, Singapore, 308433 |
| 9.  | SNEC       | <a href="mailto:pdpa@sneec.com.sg">pdpa@sneec.com.sg</a>                                   | Data Protection Officer, Singapore National Eye Centre, 11 Third Hospital Avenue, Singapore 168751                                   |
| 10. | SHP        | <a href="mailto:shppdpa@singhealth.com.sg">shppdpa@singhealth.com.sg</a>                   | Data Protection Officer, SingHealth Polyclinics, 167 Jalan Bukit Merah #15-10 Connection One (Tower 5) Singapore 150167              |
| 11. | BVH        | <a href="mailto:enquiries@bvh.com.sg">enquiries@bvh.com.sg</a>                             | Data Protection Officer, Bright Vision Hospital, 5 Lorong Napiri, Singapore 547530   |
| 12. | SingHealth | <a href="mailto:pdpa@singhealth.com.sg">pdpa@singhealth.com.sg</a>                         | Data Protection Officer, SingHealth, 168 Jalan Bukit Merah #16-01, Surbana One, Singapore 150168                                     |
| 13. | SERI       | <a href="mailto:pdpa@sneec.com.sg">pdpa@sneec.com.sg</a>                                   | Data Protection Officer, Singapore National Eye Centre, 11 Third Hospital Avenue, Singapore 168751                                   |
| 14. | SHF        | <a href="mailto:pdpa@singhealth.com.sg">pdpa@singhealth.com.sg</a>                         | SingHealth Fund, 167 Jalan Bukit Merah #06-01, Surbana One, Singapore 150167   |
| 15. | SCH        | <a href="mailto:pdpa@singhealthch.com.sg">pdpa@singhealthch.com.sg</a>                     | Data Protection Officer, SingHealth Community Hospitals, 10 Hospital Boulevard, Singapore 168582                                     |

116. Please note that if your personal data has been provided to us by a third party (e.g. general practitioners who refer you to us), you should contact such party directly to make any queries, feedback, and access and correction requests to the SingHealth Institution on your behalf.
117. This Data Protection Policy and your use of this website shall be governed in all respects by the laws of Singapore.