



# Data Protection Policy (External)

## **SAM Holdings**

We are committed to improving the quality of life and achieving the best possible outcome for our patients, by combining worldclass medical expertise with cutting-edge technology, supported by research, training and continuous education.

- Singapore Institute of Advanced Medicine Holdings Pte. Ltd. 1 Biopolis Drive #02-01 Amnios, Singapore 138622
- Asia Health Partners Pte. Ltd. E: [dpo@advancedmedicine.sg](mailto:dpo@advancedmedicine.sg)
- Advanced Medicine Imaging Pte. Ltd. W: [advancedmedicine.sg](http://advancedmedicine.sg)
- Proton Therapy Pte. Ltd.
- Advanced Medicine Oncology Pte. Ltd.

# Information Sheet

**Document name:**

Data Protection Policy (External)

**Target Audience:**

- Individuals seeking health/ medical treatment or services
- Customers
- Business entities
- Website users
- Job applicants
- Third-party vendors, suppliers, and service providers
- All external parties who are interacting with SAM Holdings

**Version:**

2.1

**Distribution: (internal/ external)**

External

**Effective date:**

25<sup>th</sup> February 2024

**Approved by:**

Singapore Institute of Advanced Medicine Holdings  
(Collectively referred as SAM Holdings)

- Singapore Institute of Advanced Medicine Holdings Pte. Ltd.
- Asia Heath Partners Pte. Ltd.
- Advanced Medicine Imaging Pte. Ltd.
- Proton Therapy Pte. Ltd.
- Advanced Medicine Oncology Pte. Ltd.

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## 1. Introduction

- 1.1. We, Singapore Institute of Advanced Medicine Holdings Pte. Ltd. (**SAM Holdings**), Asia Health Partners Pte. Ltd., Advanced Medicine Imaging Pte. Ltd., Proton Therapy Pte. Ltd., Advanced Medicine Oncology Pte. Ltd., or (collectively referred as "**SAM Holdings**", "**we**", "**us**", "**our**" or "**company**") are committed to ensuring that your privacy is respected and maintained at all times.
- 1.2. In compliance with the Personal Data Protection Act of Singapore (PDPA 2012), The Ministry of Health's (MOH) guidelines, directives, and other relevant legislation we have implemented policies, procedures, and processes to protect the collection, use and disclosure of your personal data.

## 2. Purpose

- 2.1. The purpose of this policy is to inform how SAM Holdings collect, use, process, and disclose personal data and how you can exercise your rights in respect of your personal data.

## 3. What does this policy cover?

- 3.1. This policy describes in detail how we collect, use, store and disclose personal data of our customers and all 3<sup>rd</sup> party vendors.

## 4. Collection of personal data

- 4.1. Depending on your relationship with us, the type of information that we typically collect and hold will differ. In general, these relationships are classified as:
  - (1) **Individuals seeking health/ medical treatment or services** – Any individual or a patient who visit our clinics, or being channelled via our medical services partners for medical or health care solutions or for any other services
  - (2) **Customers** – Any individual we work with in order to provide health care solutions and services
  - (3) **Business entities** – Any company, hospital, medical clinic, healthcare institute, medical lab, or a business organisation we work with in order to provide health care solutions and services for their business clients or customers

- (4) **Website users** – This will include everyone who visit our website and uses our online platforms, tools, or services.
- (5) **Job applicants** – Individuals who submit CVs to us via email, post and/or in response to our job recruitment advertisements. Applicants who submit CVs to recruitment firms, which are in turn forwarded to or retrieved by us.
- (6) **To all third-party vendors, suppliers, and service providers** – Any Individual, a not-for-profit agency or a commercial organisation who enter into any agreement with us to provide products or services.

## **5. How do we collect your personal data**

### **5.1. At our medical clinics,**

We collect your personal data in the following ways:

- When you register at our clinic admission counters.
- When you are referred to us by other healthcare institutions, healthcare agencies or healthcare professional consultants.
- When medical monitoring devices and instruments used to diagnose or treat a specific health related condition,
- When we seek information from medical sources, hospitals, doctors, and other healthcare professionals in relation to your medical condition.
- When you are being treated or attended by our medical professionals, doctors, nurses, and other clinical staff.
- When you make a payment or provide information to facilitate a payment for the services provided,
- When a caregiver, family member or a third party including next-of-kin provide information about you for medical treatment,
- When you communicate with our clinics via emails or written correspondences.
- When you respond to our request(s) for additional personal data,
- When you provide feedback to us on our quality of service,
- When you submit requests for changes or updates to your personal data or any other requests via email or forms available for such requests.
- When you visit our clinics, your audio and video data are being captured on CCTV recordings.

## 5.2. In general, we collect your personal data in the following ways:

- When you use our services and provide details for the specific business purpose,
- When you enter into any agreement with us and/or provide required documentation or information in respect to the transaction,
- When you interact with our sales & marketing managers, customer service officers, sales representatives, or procurement services executives via phone, email, face to face meetings, interviews, SMS, mail or electronic mail,
- When you submit documents and application forms to us during the purchase request process for the purchase, or in consideration of the purchase, of our products or services,
- When you attend or submit personal data to us to participate in events, workshops, seminars, public forums organised by us and your voice and image data is captured on cameras, audio and/or video recordings,
- When you submit your resume to us via email and/or in response to our job recruitment advertisements,
- When you respond to our queries or request for us to contact you,
- When you submit your resume to recruitment firms or job portals, which are in turn forwarded to or retrieved by us
- When you visit our website, several places on our website make use of cookies,

## 6. Types of personal data we collect

### 6.1. The types of personal data we collect about you include:

- **Personal information** (such as name, NRIC, nationality, gender, date of birth, family history,
- **Medical Information** (such as medical conditions, allergy information, medical and family history)
- **Contact information** (Handphone number, land phone number, address, email address, unit number and postal code etc.)
- **Financial Information** (such as bank account and card payment details, MediSave account details)
- **Photos & Images** – (such as MRI, CT, X-ray required for medical purposes and CCTV footages)

- **Job Applicant data** (such as work experience, educational qualifications, and visa status)

## **7. We obtain your consent**

- 7.1. We will inform you the purpose as to why we collect, use, disclose or store your personal data. We will obtain your consent in writing or in several other ways.

**Deemed consent:** When you visit our clinics to obtain health care services provided by us, for an example, for a health check-up, we may measure your blood pressure, height, and weight. By proceeding with these tests, you are deemed to consent to the collection of your personal data voluntarily and it is reasonable that you allow us to collect the personal data for this specific service.

## **8. You can withdraw your consent**

- 8.1. At any time, you can withdraw or withhold any consent given or deemed to have been given to us to collect, use, disclose or store your personal data.
- 8.2. If you make such a request, we will review it and reply to you on the consequence of withdrawing consent as this will impact our ability to continue to provide the services without access to your personal data. In certain instances, it will be unsafe and unlawful for us to provide health care services or treatment without having access to your personal records that carry your medical history.
- 8.3. In the best of your interest, SAM Holdings in certain circumstances may decline to proceed with your withdrawal of consent if we conclude and/or convinced that it may cause harm or a risk to your on-going or future medical treatment or consultations.

## **9. We ensure you have access, make corrections, and ensure accuracy of your personal data**

- 9.1. We will expect from you that you will accurately submit personal data to us and the information provided are complete, accurate, true, and correct. We will also take reasonable measures to make sure that your personal data we collect, use, disclose or store are accurate, complete, and kept to date.
- 9.2. We will make reasonable efforts to ensure your personal data are accurate and complete. Our aim is to make sure that when making decisions based on your personal data, to ensure we consider all relevant parts of accurate personal data.

## **10. We make reasonable arrangements protect your personal data**

- 10.1. We have put in place reasonable security controls and technical measures to protect the personal data held by us. These systems have the capacity to prevent any unauthorized access from external sources.
- 10.2. However, there is no guarantee to safeguard the personal data we have in our possession. We are committed to ensure that we will do our best protect your personal data held by us.

## **11. We retain your personal data as long as we need to fulfil the purposes**

- 11.1. Your personal data will not be retained longer than necessary by us, unless a separate legislation or a direction requires us do so. We have created a data retention policy and a procedure so that personal data is deleted after a reasonable period, once we have fulfilled the purpose.
- 11.2. We will dispose of or destroy such documents containing your personal data in a proper and secure manner when the retention limit is reached.

## **12. How we transfer your personal data**

- 12.1. If your personal data is needed to be transferred to another organization outside Singapore, we will ensure that the standard of data protection in the recipient country is comparable to that of Singapore's PDPA. If this is not the case, we will enter into a contractual agreement with the receiving party to accord similar levels of data protection as that in Singapore.

## **13. How we notify a data breach**

- 13.1. If we encounter an incident or a breach related to your personal data and has reasonable grounds to believe that a data breach has occurred, we will take steps to mitigate the impact of the breach. Thereafter we will assess whether the breach is notifiable under PDPA by carrying out an assessment whether the breach can cause harm to any individual. If the breach is assessed to be notifiable, Sam Holdings will notify the it to the affected parties within 72 hours, including the PDPC.

## **14. Data portability**

- 14.1. If you would like to request about your personal data in our possession, we are able to provide your personal data in commonly used machine-readable format.

This includes personal data you have provided us when you registered with us to receive healthcare services from our clinics as well as your healthcare related data, we have gathered from you during your visits to our clinics.

We will respond to your request within 21 days from the date of receiving the request. We will inform you if we require more time to process your request.

You can make a data portability request at any time by:

- Email: [dpo@advancedmedicine.sg](mailto:dpo@advancedmedicine.sg)
- By post: 1 Biopolis Drive, #02-01, Amnios, Singapore 138622
- By visiting any of our clinics and filling-in the necessary forms provided by our counter staff

## **15. How we demonstrate accountability**

- 15.1. In our efforts to comply with the PDPA and to demonstrate our accountability, we have implemented a governance structure and introduced a sound “Data Protection Management Program” within the Sam Holdings.
- 15.2 We have established clear internal and external policies and SOP’s (Standard Operating Procedures). We have operationalized policies and procedures and trained our staff members through continuous and periodical staff awareness programs and workshops.
- 15.3. We have put processes in place to all our communications. These include:
  - To receive your feedback and respond to them when it is required,
  - To submit your suggestions or complaints to provide a better service,
  - To request for access and/or to make corrections to your personal data held by us,
  - To notify you if we encounter any incident or a breach related to your personal data,
  - To give you a choice if you wish to opt-in or opt-out to receive regular updates from us,

## **16. Contact our Data Protection Officer (DPO)**

- 16.1. You may contact our Data Protection Officer if you have any enquiries or feedback on our personal data protection policies and procedures; or wish to make any request in the following manner.

### **Data Protection Officer:**

Contact number: 6708 7890

Email address: [dpo@advancedmedicine.sg](mailto:dpo@advancedmedicine.sg)

Address: 1 Biopolis Drive, #02-01, Amnios, Singapore 138622