

### Personal Data Protection Policy

The purpose of this document ("<u>Data Protection Policy</u>") is to inform our client of how I-Wellness Services Pte Ltd manages Personal Data which is subject to the Singapore Personal Data Protection Act (No. 26 of 2012) By submitting information to us, or signing up Health Screening Packages and Vaccination offered by us, you agree and consent to I-Wellness Services Pte Ltd as well as their respective representatives and/or employers of collecting, using, disclosing and sharing amongst themselves your Personal Data, and disclosing such Personal Data within the Organizations authorized.

This Data Protection Policy supplements but does not supersede nor replace any other consents you may have previously provided to **I-Wellness Services Pte Ltd** in respect of your Personal Data, and your consents herein are additional to any rights which to any of the Companies may have at law to collect, use or disclose your Personal Data.

**I-Wellness Services Pte Ltd** may from time to time update this Data Protection Policy to ensure that this Data Protection Policy is consistent with our future developments, industry trends and/or any changes in legal or regulatory requirements. Subject to your rights at law, you agree to be bound by the prevailing terms of the Data Protection Policy as updated from time to time on our website <u>http://www.pdpc.gov.sg/faqs/faqs-for-individuals</u>

Please check back regularly for updated information on the handling of your Personal Data.

### 1. Personal Data

1.1 In this Data Protection Policy, "<u>Personal Data</u>" refers to any data, whether true or not, about an individual who can be identified (a) from that data; or (b) from that data and other information to which we have or are likely to have access, including data in our records as may be updated from time to time.

1.2 Examples of such Personal Data you may provide to us include (depending on the nature of your interaction with us) your name, <u>NRIC, passport or other identification</u> <u>number, telephone number(s), mailing address, email address, academy details, and</u> <u>any other information</u> relating to any individuals which you have provided us in any forms you may have submitted to us, or via other forms of interaction with you.



### 2. Collection of Personal Data

- 2.1 Generally, we collect Personal Data in the following ways:
- a) When you submit an application form or other forms relating to any of our health screening services (defined below);
- b) When you request that we contact you which included email or other media devices
- c) When you submit your Personal Data to us for any other reasons.
- d) Facilitating the completion of transactions with Individuals;

2.2 When you browse our website, you generally do so anonymously but please see the section below on cookies. We do not at our website automatically collect Personal Data unless you provide such information or login with your account credentials.

2.3 If you provide us with any Personal Data relating to a third party (e.g. information of your spouse, children, parents, and/or employees), by submitting such information to us, you represent to us that you have obtained the consent of the third party to provide us with their Personal Data for the respective purposes.

2.4 You should ensure that all Personal Data submitted to us is **complete**, **accurate**, **true and correct**. Failure on your part to do so may result in our inability to provide you with the Products and Services you have requested. Client is allow to update their information via <u>http://www.lwell.sg</u>

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

3.1 **Generally,** I-Wellness Services Pte Ltd collects, uses and discloses your Personal Data for the following purposes:

- a) Responding to your queries and requests;
- b) Responding to complaints, queries and/or requests;
- c) Record-keeping need;
- d) Accounting, Billing or auditing purposes;
- e) Conducting market research for statistical profiling and other purposes in order to improve I-Wellness Services Pte Ltd services;



- f) Preventing, detecting or investigating any actual or crime, fraud, misconduct, unlawful action, breach or dispute;
- g) Legal purposes (including but not limited to obtaining legal advice and dispute resolution); AND
- h) Transmitting Personal Data to third parties engaged by or working in collaboration with I-Wellness Services Pte Ltd to facilitate any of the above-mentioned purposes.

3.2 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, I-Wellness Services Pte Ltd may contact you using such Singapore telephone number(s) (including via voice calls, text, fax or other means) with information about our Products and Services or those products and services offered by our preferred partners (including discounts and special offers).

3.3 In relation to particular 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.

3.4 You have a choice to withdraw your consent for receiving marketing or promotional materials/communication. You may contact us using the contact details found below.

3.5 Please be aware that once we receive confirmation that you wish to withdraw your consent for marketing or promotional materials/communication, it may take up to **30 working days** for your withdrawal to be reflected in our systems. Therefore, you may still receive marketing or promotional materials/communication during this period of time. Please note that even if you withdraw your consent for the receipt of marketing or promotional materials, we may still contact you for other purposes in relation to the Products and Services that you hold.

#### 4. Disclosure of Personal Data

4.1 I-Wellness Services Pte Ltd will take reasonable steps to protect your Personal Data against unauthorized disclosure. Subject to the provisions of any applicable law, your Personal Data may be disclosed, for the purposes listed above (where applicable), to the following:

(a) I-Wellness Services Pte Ltd related corporations and employees to provide content, Products and Services to you, address your questions and requests in relation to your arrangements with us as well as our Products and Services, to activate, deactivate, install, maintain and operate our systems and/or services;



(b) agents, contractors or third party service providers who provide operational services to I-Wellness Services Pte Ltd, such as courier services, telecommunications, information technology, payment, printing, billing, payroll, processing, technical services, training, market research, academy, security or other services to I-Wellness Services Pte Ltd;

(c) vendors or third party service providers in connection with marketing promotions and services offered by I-Wellness Services Pte Ltd or its preferred partners;

(d) external banks, credit card companies and their respective service providers;

(e) our professional advisers such as auditors and lawyers;

(f) relevant government regulators, statutory boards or authorities or law enforcement agencies to comply with any laws, rules, guidelines and regulations or schemes imposed by any governmental authority; and

(g) any other party to whom you authorize us to disclose your Personal Data to

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

6.1 If you:

(a) have any questions or feedback relating to your Personal Data or our Data Protection Policy;

(b) would like to withdraw your consent to any use of your Personal Data as set out in this Data Protection Policy; or

(c) would like to obtain access and make corrections to your Personal Data records, please contact I-Wellness Services Pte Ltd as follows:

#### Write in: Data Protection Officer

3 Ang Mo Kio Street 62 #08-31 Link @ AMK Singapore 569139



6.2 Please note that if your Personal Data has been provided to us by a third party (e.g. a referrer), you should contact that organization or individual to make such queries, complaints, and access and correction requests to I-Wellness Services Pte Ltd on your behalf.

6.3 If you withdraw your consent to any or all use of your Personal Data, depending on the nature of your request, I-Wellness Services Pte Ltd may not be in a position to continue to provide its Products and Services to you, administer any contractual relationship in place, which in turn may also result in the termination of any agreements with I-Wellness Services Pte Ltd, and your being in breach of your contractual obligations or undertakings. I-Wellness Services Pte Ltd legal rights and remedies in such event are expressly reserved.