

Q&M Free Dental Clinic Pte Ltd – Privacy Statement

Your privacy is very important to Q&M Free Dental Clinic Pte Ltd and its affiliates, associates and subsidiaries (collectively the “Company”, “Group”, “we”, “us” and “our”) and we respect the privacy of every person (each, “User”, “you”, “your”, “yours”). This Privacy Statement explains how we collect, use, store, access, transfer and handle (“Handle”) the Data which you provide to us while using our Services or visiting our websites in accordance with the Singapore Personal Data Protection Act (No.26 of 2012) (the “Act” or “PDPA”).

The offerings of the Group include, but are not limited to, providing healthcare and laboratory testing services, , distribution of healthcare related software solutions, supplies and equipment, education and training (collectively, the “Services”). By accessing and/or using our Services or websites, you agree and consent to us Handling your Data in accordance to this Privacy Statement.

Personal data (“Data” or “Personal Data”) means data, whether true or not, about an individual who can be identified:

- a. from that data; or
- b. from that data and other information to which the Company has or is likely to have access, including data in the Company’s records as may be updated from time to time.

Collection of Personal Data

The PDPA requires that we seek the consent of the individual before we handle the personal data about the individual. Where children are minors, or where individuals lack the ability to give consent under relevant regulation, the parent or legal guardian shall be deemed to have the right to consent to us handling the Data in accordance to the PDPA.

Data which the Company collects and/or has access to includes, but is not limited to your:

- a. name or alias, gender, identification number (for e.g. NRIC/FIN or passport number), date of birth, nationality, country and city of birth, race, religion, occupation, spoken language and marital status;
- b. details related to other individuals disclosed by you (e.g. emergency contact, details of parent or legal guardian);
- c. mailing/residential/office address, telephone numbers, email address and other contact details;
- d. dental and medical history, health issues and disabilities;
- e. diagnostic information, photographs and other audio-visual information (for e.g. x-rays);
- f. Your Data as a customer and/or user of our Services or website (including booking appointments online, sending enquiries/email to the Company);
- g. Your financial information required to process certain transactions in relation to our Services, if required (for e.g. payments or refund);
- h. Data you choose to disclose and/or upload on our websites;

- i. Data derived from cookies when you visit any of our websites; and
- j. any additional information provided to the Company by you or any other persons/parties who have relevant knowledge of your Data.

Purposes for the Collection and Use of Personal Data

We will limit the use of Data collected to only purposes for which we have obtained consent for. As published here or on the Company's website under Privacy Policy, we may Handle your Data for the following purposes ("Purposes"):

- to provide you with the requested Services and to fulfil our obligations to you;
- responding to your queries and requests;
- managing the administrative and business operations of the Company and complying with internal policies and procedures;
- administering and/or managing your relationship with the Company;
- monitoring customer-employee interactions for quality assurance, employee training and performance evaluation purposes;
- meeting or complying with any applicable rules, laws, regulations, codes of practice or guidelines issued by any legal or regulatory bodies which are binding on the Company (including but not limited to responding to regulatory complaints, disclosing to regulatory bodies or conducting audit checks, due diligence and investigations);
- Analysing the use of and/or improve our Services, develop new Services, and customise our Services;
- communicating to you information in relation to the Company's products and services; or
- purposes which are reasonably related to the Services and the operations of the Company.

If you have provided your Singapore telephone number(s), the Company may contact you using such Singapore telephone number(s) (including via voice calls, short message services, fax or other means) with information about the Company's Services.

If you anticipate or observe use of your Personal Data for purposes not listed above, please contact the Data Protection Officer at dpo@qnm.sg.

Disclosure of Personal Data

We do not share your Data publicly or with third parties for purposes other than to fulfil our obligations to you. We do partner with other businesses from time to time to assist us in our marketing, sales, business improvements and may share your Personal Data for these purposes.

In addition, Data we collect during our course of business may be disclosed as part of any potential or actual reorganisation, merger, acquisition, or similar transaction, in which case Personal Data may be transferred to third parties as one of our business assets.

The Company will take reasonable steps to protect your Data against unauthorised disclosure. Subject to the provisions of any applicable law, the Data may be disclosed, for the purposes listed above (where applicable), to the following parties:

- a. the Company's related corporations and their employees;
- b. agents, contractors or third party service providers who provide operational services to the Company;
- c. the Company's professional advisers such as auditors and lawyers;
- d. 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; or
- e. any other party to whom you have authorised the Company to disclose your Data to.

Links to Other Sites

Our websites may contain links to external websites that are not operated by us. The Company does not have control over the content and policies of these websites and will not be liable for any non-compliance on its behalf. As such, you are strongly encouraged to review the privacy policies of these external websites.

Withdrawal of Consent, Access and Correction of Personal Data

You may at any time, upon giving reasonable notice, withdraw your consent for us to Handle your Personal Data by contacting us via the contact details listed below:

Data Protection Officer ("DPO")

Location: Q & M Dental Group (Singapore) Ltd
2 Clementi Loop #04-01 Logis Hub @ Clementi Singapore 129809

Email: dpo@qnm.sg

If you withdraw your consent, you will be informed of the consequences of withdrawing such consent.

We wish to inform you that as a healthcare institution, we are required by law to retain your Data for a certain period. As such, if the Company deems your request to be in contravention of any applicable law, the Company would not be able to process such request.

Any feedback or complaints pertaining to the Data and/or the Policy should be directed to the DPO via the email contact listed above.

If you suspect that your Data has been compromised, please inform our DPO immediately via the email contact listed above.

Accuracy of Personal Data

We shall rely on you to ensure that the Data provided is current, accurate and complete. You agree to notify us of any changes to your Personal Data.

Protection and Transfer of Personal Data

We retain your Personal Data for the period necessary to fulfil our obligation to you unless a longer period is required or allowed by law. Once we reach the end of the Retention Period, we take reasonable steps to erase, destroy, anonymise or prevent access or use of such Data for any purpose other than compliance with this Privacy Statement or for purpose required by law.

The safety and security of your Data is of utmost importance and we endeavour to take reasonable steps to protect your Data by having in place commercially acceptable security measures to protect against the destruction, loss, misuse and alteration, unauthorised disclosure or access of the information under our control. However, no method of transmission over the internet, or method of electronic storage, is 100% secure and reliable, and the Company does not guarantee absolute security of your Data.

Our employees and contractors are bound by strict obligations in relation to confidentiality and know that they are required to strictly adhere to this Privacy Statement and other applicable laws and regulations. We do not generally transfer your Data to territories outside of Singapore but if we do so when authorised by you, we shall ensure that such cross-border transfer shall be conducted in accordance with the requirements under the PDPA.

Any other person/party (for e.g. family member, insurer, employer and/or practitioner from other healthcare institution) shall have to obtain and provide the Company with a written authorisation from you if they want access to your Data. Without your consent, the Company shall not transfer or release any Data.

Updates to This Policy

We may from time to time vary this Policy. You are encouraged to check this Policy regularly to ensure that you are aware of any variations made by us. Your continued relationship with the Company will be deemed as an acceptance to any such variations.

Governing Law

This Policy is governed by the laws of Singapore.