

## Proposed Website Content

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#### 1. Disclaimer

The information and materials contained in or accessed through this website are designed for informational and educational purposes only. It should not be construed as medical advice nor should it be used for diagnostic or treatment purposes. If you feel you have a health problem, please consult a medical professional.

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These terms and conditions set forth in this disclaimer are subject to change and update at any time. By choosing to visit this site, you are bound by the terms set forth in this document, and by such revisions as they are posted.

### Personal Data Privacy Policy

This document (“Personal Data Privacy Policy”) is to inform you how Luminous Dental Group Holdings Pte Ltd value the privacy of every individual and are committed to protect the personal data we collect in accordance with the principles set out in this Policy. In accordance with The Personal Data Protection Act (“PDPA”), this Personal Data Protection Policy (“Policy”) describes how we may collect, use, disclose and manage your personal data. For general information on Personal Data Protection, please visit the Personal Data Protection Commission (“PDPC”) website (<https://www.pdpc.gov.sg>).

Luminous Dental Group Holdings Pte Ltd or any of its subsidiaries, associated companies, corporations, joint ventures and partnerships and any entity directly or indirectly controlling or controlled by or under common control with Luminous Dental Group Holdings shall be collectively referred to as “LDGH”, “we”, “us” or “our” in this policy.

By interacting with us, submitting information to us, or signing up for any products and services offered by us, you agree and consent to the LDGH, as well as its representatives and/or agents collecting, using, disclosing and sharing amongst themselves your Personal Data, and disclosing such Personal Data to LDGH's authorised service providers and relevant third parties in the manner set forth in this Personal Data Privacy Policy.

We may update this Policy from time to time to ensure that our standards and practices remain relevant and comply with the applicable laws and guidelines. The latest version of this Policy supersedes earlier versions and will apply to personal data provided to us previously. We encourage you to review this page periodically to keep up to date with any changes to this Policy.

## **1. Personal Data**

- 1.1 Personal data is refers to any data, whether true or not, about an individual who can be
- i. identified from that data, or
  - ii. from that data and other information to which the organization has or is likely to have access to.

This may include your full name, identification number, passport, photograph, video, mobile telephone number, personal email address, thumbprint, DNA profile, as well as name and residential address of any individual which you have provided us.

## **2. Collection of Personal Data**

- 2.1 Generally, we collect Personal Data in the following ways:
- i. when you submit any form, including but not limited to customer inquiry forms or other forms relating to any of our services;
  - ii. when you enter into any agreement or provide other documentation or information in respect of your interactions with us, or when you use our services;
  - iii. when you interact with our staff, including patient care officers, for example, via telephone calls (which may be recorded), letters, fax, face-to-face meetings, social media platforms and emails;
  - iv. when you interact with us via our websites or use services on our websites;
  - v. when you request that we contact you or request that you be included in an email or other mailing list;
  - vi. when you respond to our promotions, initiatives or to any request for additional Personal Data;
  - vii. when you submit an employment application or when you provide documents or information including your resume and/or CVs in connection with any appointment as an officer, director, representative or any other position;
  - viii. when your images are captured by us via CCTV cameras while you are within our premises, or via photographs or videos taken by us or our representatives when you attend our events;
  - ix. when you are contacted by, and respond to, our marketing representatives and patient care officers;
  - x. when we seek information about you and receive your Personal Data in connection with your relationship with us, including for our products and services or job applications, for example, from business partners, public agencies, your ex-employer, referral intermediaries and the relevant authorities; and/or
  - xi. when you submit your Personal Data to us for any other reasons.

2.2 When you browse our website, you generally do so anonymously but please see paragraph 8 below for information on cookies and other technologies which we have implemented on our website. We do not, at our website, automatically collect Personal Data unless you provide such information to us.

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, or delays in providing you with products and services you have requested, or processing your applications.

## **3. Purpose for the Collection, Use and Disclosure of your Personal Data**

- 3.1 Generally, LDGH collects, uses and discloses your Personal Data for the following purposes:
- i. responding to, processing and handling your queries, feedback, complaints and requests;
  - ii. verifying your identity;
  - iii. managing and planning the administrative and business operations of LDGH and complying with internal policies and procedures;
  - iv. facilitating business asset transactions (which may extend to any mergers, acquisitions or asset sales);

- v. requesting feedback or participation in surveys, as well as conducting market research and/or analysis for statistical, profiling or other purposes for us to design our services, understand customer behaviour, preferences and market trends, and to review, develop and improve the quality of our products and services;
  - vi. matching any Personal Data held which relates to you for any of the purposes listed herein;
  - vii. preventing, detecting and investigating crime and analysing and managing commercial risks;
  - viii. managing the safety and security of our premises and services (including but not limited to carrying out CCTV surveillance and conducting security clearances);
  - ix. monitoring or recording phone calls and customer-facing interactions for quality assurance, employee training and performance evaluation and identity verification purposes;
  - x. in connection with any claims, actions or proceedings (including but not limited to drafting and reviewing documents, transaction documentation, obtaining legal advice, and facilitating dispute resolution), and/or protecting and enforcing our contractual and legal rights and obligations;
  - xi. conducting any form of investigations including but not related to those relating to disputes, billing, fraud, offences, prosecutions etc;
  - xii. 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 LDGH (including but not limited to responding to regulatory complaints, disclosing to regulatory bodies and conducting audit checks, due diligence and investigations); and/or
  - xiii. taking or filming photographs and videos for corporate publicity or marketing purposes, and featuring your photographs and/or testimonials in our articles and publicity materials;
  - xiv. providing or marketing services and benefits to you, service upgrades, loyalty, reward and/or membership programmes;
  - xv. matching Personal Data with other data collected for other purposes and from other sources (including third parties) in connection with the provision or offering of services;
  - xvi. sending you details of services, clinic updates, health-related information and rewards, either to our customers generally, or which we have identified may be of interest to you;
  - xvii. purposes which are reasonably related to the aforesaid.
- 3.2** If you have provided us with your telephone number(s) and have indicated that you consent to receiving marketing or promotional information via your telephone number(s), then from time to time, LDGH may contact you using such telephone number(s) (including via voice calls, text, fax or other means) with information about our products and services.
- 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 calendar 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.
- 3.6** 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 services that you have requested or purchased from LDGH.

#### **4. Disclosure of personal data**

**4.1** LDGH will take reasonable steps to protect your Personal Data against unauthorised 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 entities or parties, whether they are located overseas or in Singapore:

- i.** amongst the LDGH members and affiliates (including their staff and medical practitioners);
- ii.** third party doctors, clinics, hospitals and/or medical institutions;
- iii.** agents, contractors, sub-contractors or third party service providers who provide operational services to LDGH, such as courier services, telecommunications, information technology, payment, printing, billing, debt recovery, processing, technical services, transportation, training, market research, call centre, security, or other services to LDGH;
- iv.** vendors or third party service providers and our marketing and business partners in connection with marketing promotions, products and services;
- v.** any business partner, investor, assignee or transferee (actual or prospective) to facilitate business asset transactions (which may extend to any merger, acquisition or asset sale);
- vi.** external banks, credit card companies, other financial institutions and their respective service providers;
- vii.** our professional advisers such as consultants, auditors and lawyers;
- viii.** relevant government ministries, 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 (including the Ministry of Health); and/or
- ix.** any other party to whom you authorise us to disclose your Personal Data to.

#### **5. Protection of your Personal Data**

**5.1** We will practice strong data protection and take reasonable efforts to protect your personal data held by us, we cannot be held responsible for unauthorized and unintended access that is beyond our control.

#### **6. Retention of personal data**

**6.1** We will review your personal data held by us on a regular basis to determine if such personal data is still needed. Your personal data will not be retained longer than needed for the purpose under which it was collected, unless there are business, industry and/or legal requirements for the retention of such. Your personal data will also not be kept for “just in case” it may be needed for other purposes that you have not been notified.

**6.2** We may anonymize your personal data on record as an organization is considered to have ceased retention personal data when it longer has the means to associate the personal data with particular individuals. The anonymizing of data could be found under the section on Anonymization in the Advisory Guidelines on Selected Topics in the PDPC website.

#### **7. Transfer of your data out of Singapore**

**7.1** Should there be a need to transfer your personal data to a country outside of Singapore, we will ensure that the organization or country provides a standard of protection to the personal data that is comparable to that provided under Singapore’s PDPA.

#### **8. Use Of Cookies**

Our website uses “cookies” to help you personalize your online experience. A cookie is a text file that is placed on your hard drive by a web page server. Cookies cannot be used to run programs or deliver viruses to your computer. Cookies are uniquely assigned to you, and can only be read by a web server in the domain that issued the cookie to you.

The information collected by us or our authorised service providers may recognise a visitor as a unique user and may collect information such as how a visitor arrives at our sites, 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).

Cookies may also be used to ensure a smooth user experience, perform analytics, and for showing relevant advertisements. Please note that third parties (such as analytics software) may also use cookies, over which we have no control.

However, if you decline cookies or other similar technologies, you may not be able to take advantage of certain site features or services tools. For more information on how you can block, delete, or disable these technologies, please review your browser settings.

**9. Contacting us – Withdrawal of consent, Access and Correction of your Personal data.**

- 9.1 It is the obligation of the individual to ensure that all personal data submitted to us is true, accurate and complete. If you wish to withdraw your consent to the use of your personal data, correct or obtain access to your personal data held by us, please contact our Data Protection Officer.
- 9.2 We may charge you a fee for the provision of your personal data held by us, or for information about the ways in which the data may have been used or disclosed in the past one year.
- 9.3 We will not be able to provide access to data which are opinion data kept solely for evaluation purpose such as opinion of suitability, eligibility, qualification of individuals for employment, promotion or continuance in employment.
- 9.4 Once your consent is withdrawn, it is our obligation to cease, and cause our data intermediaries and agents to cease, such collection, use and disclosure within reasonable notice period. As a result, we may not be able to proceed with some transactions that you have requested.

With the European Union Law in place, the General Data Protection Regulation or “GDPR” gives certain rights to individuals in relation to their personal data.

- You have the right be informed of and request access to the personal data we process about you.
- You have the right to request to amend or update your personal data where it is inaccurate or incomplete.
- You have the right to request us temporarily or permanently stop processing all or some of your personal data.
- You have the right to object the processing of your personal data where we no longer have a legitimate or legal need to process it, processed for direct marketing purposes and not be subject to a decision based solely on automated decision making, including profiling, where the decision would have a legal effect on you or produce a similarly significant effect.
- You have the right to request a copy of your personal data in a machine readable format and the right to transmit that personal data for use in another party’s service.
- You have the right to request your personal data to be deleted.

Data Protection Officer  
Tampines Junction, 300 Tampines Avenue 5, #09-02 Singapore 529653  
Contact number: +65 6679 5700

**10. Governing law**

This Personal Data Protection Policy and your use of this website shall be governed in all respects by the laws of Singapore.

Last Updated 25 May 2018.