



## *Personal Data Protection Policy*

### **SUMMARY**

This Personal Data Protection Policy (the “**Personal Data Policy**”) sets out how The DRx Group Pte Ltd, its subsidiaries and associated companies (collectively, the “**Group**”) may collect, use or disclose your personal data (“**Personal Data**”) for reasonable business purposes only if there is consent or deemed consent from the individual and information on such purposes have been notified. We may also collect, use or disclose personal data if it is required or authorised under applicable laws.

By interacting with us, providing information to us by submitting employment application, or signing up for any products and services offered by us or accessing and/or using our services and products, you agree and consent to the **Group**, (collectively, “**DRx**”, “**we**”, “**us**”, “**our**”) collecting, using, disclosing and sharing amongst themselves your Personal Data, and disclosing such Personal Data to the DRx’s authorised service providers and relevant third parties in the manner set forth in this Personal Data Policy.

This Personal Data Policy supplements but does not supersede nor replace any other consents you may have previously provided to **DRx** in respect of your Personal Data. Your consents herein are additional to any rights which to **DRx** may have at law to collect, use or disclose your Personal Data. **DRx** will take the necessary steps to ensure that our practices conform to the **Singapore Personal Data Protection Act (PDPA) 2012**.

### **PERSONAL DATA**

Personal data refers to data about an individual (whether true or not) who can be identified from that data or other information we have or likely to have access to.

Examples of Personal Data which we may collect include your name, NRIC, passport or any other identification number, telephone numbers, mailing address email address, date of birth, gender, nationality, photograph, financial information (such as bank account or credit/debit card numbers), signature and any other information 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.

### **COLLECTION OF PERSONAL DATA**

We collect personal data from employees, patients, customers, business contacts, partners, personnel, contractors and other individuals. Generally, the ways (whether directly or indirectly) in which we may collect your Personal Data related to any of our goods, services and/or recruitment process:

1. When it is necessary for business purposes or to meet the purposes for which the individuals have submitted the information such as patient registration form and/or customer registration form.
2. When you submit any form, including but not limited to customer inquiry forms or other forms relating to our goods and/or services;
3. When you provide your Personal Data to us at any of our subsidiaries whether through leaving a copy of your business card with us or otherwise;
4. When you submit an employment application or when you provide document or information including your resume/CVs in connection with any position in DRx.



5. 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, during interviews with you, from business partners public agencies, previous employer, referral intermediaries and the relevant authorities;
6. When your representatives, agents, intermediaries, and/or next-of-kin discloses your Personal Data to us on your behalf, or in connection with their own transactions, agreements or interactions with us;
7. When your employer or previous employer discloses your Personal Data to us on your behalf or in connection with their own transactions, agreements or interactions with us;
8. When you enter into any agreement or provide other documentation or information in respect of your interactions with us or when you use our goods and/or services;
9. When you interact with our staff, including queries, request, applications, complaints and feedback from you. For example, via letters, fax, face to face meetings, email, SMS, WhatsApp, telephone conversations (which may be recorded), through our websites, social media platform such as Facebook, Instagram or provided by third parties. If any individuals contact us, we may keep a record of that contact;
10. When you respond to our promotions marketing events loyalty programs, memberships, initiatives or to any request for additional Personal Data;
11. When you purchase and make payment for any of our products/drugs and/or services including online purchases;
12. 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, DRx staff and/or agents when you attend our events;
13. When we need to verify your identity;
14. When it is necessary for business purposes or to meet the purposes for which the individuals have submitted the information,

We will only collect, hold, process, use, communicate and/or disclose such personal data, in accordance with this policy. If any party is acting as an intermediary or otherwise on behalf of a third party individual or supplying us with information regarding a third party individual (such as a friend, a colleague, an employee etc), such intermediary party undertakes that you are an authorised representative or agent of such third party individual and that you have obtained all necessary consents from such third party individual to the collection, processing, use and disclosure by us of their personal data. Because we are collecting the third party individual's data from you, you undertake to make the third party individual aware of all matters listed in this policy preferably by distributing a copy of this policy to them or by referring them to our website.

## **USE OF PERSONAL DATA**

We use personal data for the following purposes:

- to provide our goods and/or services
- to remind and/or reschedule patient's/clients's appointments
- to provide to drug compounding pharmacy/manufacturer for some specified drugs prescribed
- to respond to the individual's request or for the purposes for which it was provided to us as stated at the time of the collection (or as is obvious from the context of collection)
- to maintain contact with clients/patients and other contacts
- to keep clients/patients and other contacts informed of the product/services we offer, seminars and other events we are holding, that may be of interest to them



- for general management and reporting purposes, such as invoicing and account management
- for recruitment purposes
- for purposes related to the employment of our personnel and providing internal services to our personnel
- and all other purposes related to our business.

Any individual may choose to unsubscribe from mailing lists, registrations, or elect not to receive further marketing information from us by contacting our Data Protection Officer, or if we have contacted such individual by email, such individual may use the unsubscribe function in that email to notify us. Such requests will be processed within 30 days.

The Do Not Call (DNC) provisions apply in relation to DRx sending specified messages to Singapore telephone numbers via voice calls/SMS/MMS/Tests/Faxes. DRx will check against DNC registry within 30 days before doing marketing unless they have clear and unambiguous consent in evidential form.

## ***DISCLOSURE OF PERSONAL DATA***

**DRx** will take reasonable steps to protect your Personal Data against unauthorised disclosure. We do not disclose personal data to third parties except:

1. when required by any applicable law;
2. where such disclosure is required for performing obligations in the course of or in connection with our provision of goods or services requested by you;
3. when we have the individual's consent or deemed consent or in cases where we have engaged third parties such as data intermediaries or subcontractors specifically to assist with our organisation's activities. Any such third parties whom we engage will be bound contractually to keep all information confidential.

## ***WITHDRAWAL OF CONSENT***

1. The consent that you provide for the collection, use and disclosure of your personal data will remain valid until such time it is being withdrawn by you in writing. You may withdraw consent and request us to stop using and/or disclosing your personal data for any or all of the purposes listed above by submitting your request in writing or via email to our Data Protection Officer at [DPO@drx-group.com](mailto:DPO@drx-group.com).
2. Upon receipt of your written request to withdraw your consent, we may require reasonable time (depending on the complexity of the request and its impact on our relationship with you) for your request to be processed and for us to notify you of the consequences of us acceding to the same, including any legal consequences which may affect your rights and liabilities to us. In general, we shall seek to process your request within ten (10) business days of receiving it.
3. Whilst we respect your decision to withdraw your consent, please note that depending on the nature and scope of your request, we may not be in a position to continue providing our goods or services to you and we shall, in such circumstances, notify you before completing the processing of your request. Should you decide to cancel your withdrawal of consent, please inform us in writing in the manner.



4. Please note that withdrawing consent does not affect our right to continue to collect, use and disclose personal data where such collection, use and disclose without consent is permitted or required under applicable laws.

## **ACCESS TO AND CORRECTION OF PERSONAL DATA**

1. If you wish to make (a) an access request for access to a copy of the personal data which we hold about you or information about the ways in which we use or disclose your personal data, or (b) a correction request to correct or update any of your personal data which we hold about you, you may submit your request in writing or via email to our Data Protection Officer at the contact details provided below.
2. Please note that a reasonable fee may be charged for an access request. If so, we will inform you of the fee before processing your request.
3. We will respond to your request as soon as reasonably possible. Should we not be able to respond to your request within thirty (30) days after receiving your request, we will inform you in writing within thirty (30) days of the time by which we will be able to respond to your request. If we are unable to provide you with any personal data or to make a correction requested by you, we shall generally inform you of the reasons why we are unable to do so (except where we are not required to do so under the PDPA).

## **ACCURACY OF PERSONAL DATA**

We generally rely on personal data provided by you (or your authorised representative). In order to ensure that your personal data is current, complete and accurate, please update us if there are changes to your personal data by informing our Data Protection Officer in submitting 'Change of Personal Data and Consent Form' at the respective outlet or via email at [DPO@drx-group.com](mailto:DPO@drx-group.com).

## **PROTECTION OF PERSONAL DATA**

1. To safeguard your personal data from unauthorised access, collection, use, disclosure, copying, modification, disposal or similar risks, we have introduced appropriate administrative, physical and technical measures such as up-to-date antivirus protection, encryption and the use of privacy filters to secure all storage and transmission of personal data by us, and disclosing personal data both internally and to our authorised third party service providers and agents only on a need-to-know basis.
2. You should be aware, however, that no method of transmission over the Internet or method of electronic storage is completely secure. While security cannot be guaranteed, we strive to protect the security of your information and are constantly reviewing and enhancing our information security measures.



## ***RETENTION OF PERSONAL DATA***

We will cease to retain personal data, as soon as it is reasonable to assume that the purpose for collection of such personal data is no longer being served by such retention, and such retention is no longer necessary for legal or business purposes.

## ***TRANSFER OF PERSONAL DATA OUTSIDE OF SINGAPORE***

We generally do not transfer your personal data to countries outside of Singapore. However, if we do so, we will obtain your consent for the transfer to be made and we will take steps to ensure that your personal data continues to receive a standard of protection that is at least comparable to that provided under the PDPA.

## ***DATA PROTECTION OFFICER***

If you would like to obtain access and make corrections to your Personal Data records, or have any feedback related to your Personal Data or further queries about how we are handling your personal data, or withdraw your consent to any use of your Personal Data as set out in this Personal Data Policy, please contact our Data Protection Officer at [DPO@drx-group.com](mailto:DPO@drx-group.com).

## ***MODIFICATIONS***

We reserve the right to modify or amend this Policy at any time. The effective date will be displayed at the footer of this Policy. To keep you informed, we will notify changes to this Policy by prominently identifying the alteration for a period of not less than two weeks on our home page at <http://www.drx-group.com>.