



Data Protection Policy

Commitment to Privacy

Colorectal Clinic Associates Pte Ltd (“CCA”, the “Practice”, “Us”, “CCA” or “We”) respects your privacy, and is committed to protecting the privacy, confidentiality and security of personal data you provide to us.

This statement sets out the Privacy Policy for CCA with respect to the collection, use and/or disclosure of your personal data, in accordance with the Personal Data Protection Act (Act 26 of 2012) (the “PDPA”). Please note that this Privacy Policy complements, and does not limit or replace, the purposes for which you provide the Practice with your personal data which may be expressly stated in any form for submission of personal data to the Practice.

Personal Data

This refers to Personal health information and other data that CCA collects to identify an individual and determine appropriate care. The personal data collected will generally include:

- (i) Patient’s name, NRIC number, contact information
- (ii) Nationality, gender, marital status, date of birth
- (iii) Current medication or treatments used by the patient;
- (iv) Test and laboratory results
- (v) Previous/current medical history, including, where relevant, a family medical history; and
- (vi) Name of any health service provider or medical specialist to whom the patient is referred
- (vii) Name of insurance provider and any information pertaining to patients’ medical insurance coverage
- (viii) Next-Of-Kin information

Collection, Use and Disclosure of Personal Data

The information collected will help us serve you in your medical requirements. We may collect and use your personal data for any or all of the following purposes:

- (i) providing medical services to you and meeting your healthcare needs within CCA;
- (ii) to avail the services which CCA provides, including, where necessary, the transferring to or sharing of your personal data with third party medical service providers such as specialists, general practitioners, imaging providers, pathology providers, or other allied health professionals
- (iii) where there is a serious and imminent threat to an individual’s life, health, or safety;
- (iv) where there is a serious threat to public health or public safety;
- (v) responding to queries, enquiries and feedback made by you;
- (vi) maintenance and updating of the data;
- (vii) administrative or operational purposes;
- (viii) collection of fees, charges and expenses for services provided;
- (ix) verification and identification purposes;
- (x) filing of medical claims on your behalf with the relevant company, employer or

- insurance provider;
- (xi) processing payment or credit transactions;
 - (xii) Billing, accounting, auditing and the maintenance of proper book-keeping for the Practice's operations and business;
 - (xiii) the disclosure of the relevant books, documents, records and information (in hard or soft copy) to the auditors for the preparation of financial reports;
 - (xiv) compliance with the applicable laws and regulations
 - (xv) Any other incidental business purposes related to or in connection with the above.

Consent

Your consent is important to us. We will not collect, use or disclose your personal data unless:

- (i) consent to the collection, use or disclosure has been obtained from you; or
- (ii) the collection, use or disclosure of your personal data without your consent is required or authorized under the PDPA or other written law.

If you have provided the Practice with any personal data relating to any other individuals, you warrant that you have obtained the necessary consents of these individuals.

Withdrawal of Consent

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 at any time 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 to our Data Protection Officer at the contact details provided below.

Please be aware that once we receive confirmation that you wish to withdraw your consent to receiving marketing communications, it may take up to thirty (30) working days for your withdrawal to be reflected in our systems. During this period of time you may still receive emails, messages or calls from us.

Upon receipt of such notice, CCA will inform you of the likely consequences of withdrawing your consent. Depending on the nature of the withdrawal of consent, we may no longer be in a position to continue to provide our services to you. Such a withdrawal may therefore result in the termination of any doctor-patient relationship that you may have with us.

Data Quality

We will take reasonable steps to make sure that the personal data we collect, use or disclose is accurate, complete and up to date.

Accuracy

We endeavour to ensure that all decisions involving your personal data are based upon accurate and timely information. While we will do our best to base our decisions on accurate information, we rely on you to disclose all relevant information and to inform us of any significant changes.

While all reasonable efforts will be made to keep your personal data accurate, you are kindly requested to disclose all relevant information, inform us of any change and to ensure that all your personal data that is submitted to us is current, complete, accurate, true and correct.

Safeguards: Protecting Your Information

The Practice maintains personal data in the format of written and electronic files. We will protect your personal data with appropriate safeguards and security measures to prevent misuse, loss and unauthorized access, modification and disclosure. These measures are subject to ongoing review and monitoring.

Access to personal data will be authorised only for the doctors and employees associated with CCA, other agents who require access in the performance of their duties, and to those otherwise authorised by law. We provide personal data to health care providers acting on your behalf, on the understanding that they are also bound by law and ethics to safeguard your privacy.

We will not keep personal data for longer than is necessary and will take reasonable steps to destroy or permanently de-identify personal information if it is no longer required.

Access and Correction

You are entitled to have access to the personal data about you that is in the possession or under the control of the Practice and information about the ways in which the personal data has been or may have been used or disclosed within a year before the date of the request. This can be done by you making a written application to the Data Protection Officer requesting for any such information. We may charge you a fee (representing our costs in administering your request) for supplying such information and reserve the right to refuse requests which, in our opinion, occur with unreasonable frequency.

We will also, where you have requested that we correct an error or omission in the personal data about you that is kept with us, correct such data as soon as practicable and send the corrected personal data to every organisation to which the personal data was sent before it had been corrected, if applicable, unless that organisation does not need the corrected personal data for any legal or business purpose.

We may however choose not to provide you with access to or correct such information, in accordance with the exceptions under the PDPA. This would include cases where:

- (i) We are satisfied on reasonable grounds that the correction should not be made;
- (ii) The request for access is frivolous or vexatious or the information requested is trivial;
- (iii) The personal data is related to a prosecution and all the proceedings related to the prosecution have not been completed;
- (iv) The personal data, if disclosed, would reveal confidential commercial information that could, in the opinion of a reasonable person, harm our competitive position; and

(v) The personal data was collected, used or disclosed for the purposes of an investigation and associated proceedings and appeals have not been completed.

Please also note that we are not required to correct information relating to clinical observations or opinions made in good faith.

Updates to the Privacy Policy

The Practice may modify this Privacy Policy at any time. If there are updates to the Privacy Policy, we will address the changes promptly and update the revision date of this document. We encourage you to contact us through our Data Protection Officer with any questions or concerns you might have about your privacy or our Privacy Policy. We will investigate and respond to your concerns about any aspect of our handling of your information.

Enquiries & Requests

We have designated the Data Protection Officer who will be responsible for ensuring the Practice's compliance with applicable data protection laws. If you have any queries or requests or wish to make any applications concerning your personal information or data, please contact the Designated Person using the details provided below:

Data Protection Officer
Colorectal Clinic Associates
38 Irrawaddy Road
#10-48/49 Mount Elizabeth Novena Hospital
Singapore 329563
Email: enquiries@colorectalclinic.com
Tel: +65 6643 9922