



卓蔚安醫療集團

PMC Medical Group

Privacy Policy Statement

Dec 2020

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1. Introduction

- 1.1. This statement is adopted as the Privacy Policy Statement (“Statement”) of PMC Medical Group (the “Company”). The purpose of this statement is to establish the policies and practices of the company’s commitment to protect the privacy of personal data and to act in compliance with the provisions of the Personal Data (Privacy) Ordinance (the “Ordinance”) and relevant guidelines issued by the Privacy Commissioner for Personal Data from time to time.
- 1.2. To ensure compliance with the Ordinance, internal guidelines on protection of personal data are established and updated from time to time for reference and use by the staff of the Company.
- 1.3. The Company retains the right to change this Statement.

2. Kinds of personal data held by the company

- 2.1. There are three broad categories of personal data held in the Company. They are personal data related to customers and (potential) employees and (potential) affiliated doctors and nurses of the Company.
- 2.2. Personal data held by the Company regarding customers may include the following:
 - (a) name, address, occupation, contact details, date of birth, nationality and health-related information of customers and their identity card and/or passport numbers and place and date of issue thereof;
 - (b) current employer, nature of position, medical benefits and its benefit usage information of customer;
 - (c) information obtained by the Company in the ordinary course of the business;
 - (d) information obtained from a medical professional for a reference on the health condition of customers; and
 - (f) information which is in the public domain.
- 2.3. Personal data relating to employment held by the Company may include the following:
 - (a) name, address, contact details, bank account number, qualification, date of birth and nationality of employees and potential employees and their spouses and their identity card and/or passport numbers and place and date of issue thereof;
 - (b) additional information compiled about potential employees to assess their suitability for a job in the course of the recruitment selection process which may include references obtained from this current of former employers or other sources;
 - (c) additional information compiled about employees which may include records of remuneration and benefits paid to the employee, records of job postings, transfer and training, records of medical checks, sick leave, and other medical claims and performance appraisal reports of the employees;
 - (d) relevant personal data pertaining to former employees may be required by the Company to fulfil its obligations to the former employees and its legal obligations under certain ordinances; and
 - (e) information which is in the public domain.
- 2.4. Personal data held by the Company regarding (potential) affiliated doctors and nurses may include the following:

- (a) name, address, contact details, year of graduation, bank account number and qualifications of affiliated doctors and nurses and potential affiliated doctors and nurses;
- (b) additional information compiled about (potential) affiliated doctors and nurses to assess their suitability for being appointed as affiliated doctors and nurses of the Company and relevant information required by the Company to fulfil its obligation under certain ordinances; and
- (d) The Company may hold other kinds of personal data which it needs in the light of experience and the specific nature of its business.

3. Purposes the personal data are held

3.1. It is necessary for customers to supply the Company with data in connection with the provision of medical and related services, and in the ordinary course of the business. Failure by customers to supply such data may result in the Company being unable to provide the medical and related services.

3.2. The purposes for which data relating to a customer may be used as follows

- (a) processing of applications/request and provision of medical and related services provided by the Company;
- (b) enabling the provision of medical and other related services, services related to claim processing, investigation or analysis of such claim;
- (c) performing statistical or other research related to the medical services provided, or data matching;
- (d) marketing the medical and related services of the Company (if the consent (which includes an indication of no objection) of the data subjects has been obtained, save in the circumstances exempted in the Ordinance);
(Any data subject who does not wish the Company to use his/her personal data in direct marketing may contact the Company's Corporate Data Protection Officer according to the information provided in paragraph 10 of this Statement.)
- (e) communicating with the customer or the customer's authorized organizations/persons;
- (f) meeting any disclosure requirements imposed by law or court orders or pursuant to guidelines issued by regulatory or other relevant authorities with which the Company are expected to comply; and
- (g) purposes relating thereto.

3.3. The purposes for which data relating to employees and potential employees may be used are as follows:

- (a) processing employment applications;
- (b) determining and reviewing salaries, bonuses and other benefits;
- (c) consideration for promotion, training, secondment or transfer;
- (d) consideration of eligibility for and administration of staff benefits and entitlements;
- (e) providing employee references;
- (f) registering employees as authorized users/healthcare service providers with statutory authorities or relevant organization for purposes directly related or associated to the employment;
- (g) meeting any disclosure requirements imposed by law or court orders or pursuant to guidelines issued by regulatory or other relevant authorities with which the Company are expected to comply;

and

(h) monitoring compliance with internal rules of the Company;

(i) purposes relating thereto.

3.4. The purposes for which data relating to (potential) affiliated doctors and nurses may be used are as follows:

(a) processing the appointment of affiliated doctors;

(b) registering affiliated doctors and nurses with relevant institutions for purposes directly related to or associated with their appointments;

(c) monitoring compliance with the internal rules of the Company;

(d) meeting any disclosure requirements imposed by law or court orders or pursuant to guidelines issued by regulatory or other relevant authorities with which the Company are expected to comply;

and

(e) purposes relating thereto.

4. Security of personal data

It is the policy of the Company to ensure an appropriate level of protection for personal data in order to prevent unauthorized or accidental access, processing, ensure or other use of that data, commensurate with the sensitivity of the data and the harm that would be caused by occurrence of any of the aforesaid events. It is the practice of the Company to achieve appropriate levels of security protection by restricting physical access to data by incorporating security measures into the storage and equipment in which data is held.

Measure are taken the integrity, prudence, and competence of persons having access to personal data. Data is only transmitted by secure means to prevent unauthorized or accidental access. If a data user engages a data processor (whether within or outside Hong Kong) to process personal data on data user's behalf, the data user must adopt contractual or other means to prevent unauthorized or accidental access, processing, erasure, loss or use of data transferred to the data processor for processing.

5. Accuracy of personal data

It is the policy of the Company to ensure accuracy of all data collected and processed by the Company. Appropriate procedures are implemented to provide for all personal data to be regularly checked and updated to ensure that it is reasonably accurate having regard to the purposes for which that data is used. In do far as personal data held by the Company consists of statements of opinion, all reasonably practicable steps are taken to ensure that any facts cited in support of such statements of opinion are correct.

6. Collection of personal data

6.1. In the course of collecting personal data, the Company will provide the individuals concerned with a Personal Information Statement ("PICS") informing them the purpose of collection, classes of persons to whom the data may be transferred, their right to access and collect the data, and other relevant information.

6.2. In relation to the collection of personal data on-line, the following practices are adopted:

(a) On-line Security

The Company will follow strict standards of security and confidentiality to protect any information provided to the Company online. Encryption technology is employed for sensitive data transmission on the Internet to protect individual's privacy.

(b) Use of Cookies

Cookies are small pieces of data transmitted from a web server to a web browser. Cookie data is stored on a local hard drive such that the web server can later read back the cookie data from a web browser. This is useful for allowing a website to maintain information on a particular user.

Cookies are designed to be read only by the website that provides them. Cookies cannot be used to obtain data from a user's hard drive, get a user's e-mail address or gather a user's sensitive information.

The Company will only use cookies as a session identifier and will not store user's sensitive information in cookies. Once a session is established, all the communications will use the cookies to identify a user. The cookies will expire once the session is closed. Most web servers are initially set up to accept cookies. Cookies can be chosen to "not accept" by changing the settings on the web browsers. If users try to disable cookies from their web browser, they may not be able access the Company's related websites and services.

Users' visit to the Company's websites will be recorded for analysis and information may be collected through technologies such as cookies, tags, and web logs etc. The information collected is anonymous research data and no personally identifiable information is collected. The Company mainly collects the information to understand more about our user interests to improve our service arrangement.

(c) On-line Correction

Personal data provided to the Company through an on-line facility, once submitted, it may not be facilitated to be deleted, corrected, or updated on-line. If deletion, correction, and updates are not allowed online, users should approach relevant members or departments of the Company.

(d) On-line Retention

Personal data collected on-line will be transferred to relevant members of the Company or departments for processing. Personal data will be retained in the Company's own database for a period allowing the Company for performing customers' requests and subsequent follow up actions.

7. Data access requests and data correction requests

7.1 It is the policy of the Company to comply with and process all data access and correction requests in accordance with the provisions of the Ordinance, and all staff concerned to be familiar with the requirements for assisting individuals to make such requests.

7.2 The Company may, subject to the Ordinance and the guideline thereon issued by the Privacy Commissioner for Personal Data ("Privacy Commissioner"), impose a fee for complying with a data access request ("DAR"). The Company is only allowed to charge a DAR requestor for the costs

which are related to and necessary for complying with a DAR. If a person making a data access request requires an additional copy of the personal data that the Company has previously supplied pursuant to an earlier data access request, the Company may charge a fee to cover the full administrative and other costs incurred in supplying that additional copy.

7.3 Data access and correction requests to the Company may be addressed to the Company's Data Protection Officer ("DPO") or another person as specifically advised.

8. Retention of personal data

The Company shall take all practicable steps to ensure that person data is not kept longer than is necessary for the fulfilment of the purposes for which such data is or is to be used.

If a data user engages a data processor (whether within or outside Hong Kong) to process personal data on data user's behalf, the data user must adopt contractual or other means to prevent any personal data transferred to the data processor from being kept longer than is necessary for processing of the data.

9. Other Practices

The following are maintained by the Company to ensure the compliance with the Ordinance:

- (a) A Log Book as provided for in section 27 of the Ordinance;
- (b) Internal policies and guidelines on compliance with the Ordinance for use by staff of the Company;
- (c) Data Access Request Form and Data Correction Request Form for individual access and correction requests of personal data held by the Company.

10. Appointment of data protection officer

10.1 To co-ordinate and oversee compliance with the Ordinance and the personal data protection policies of the Company, a DPO has been appointed by the Company.

10.2 The contact details of the DPO area as follows:

The Company Data Protection Officer
PMC Medical Group
1357, 13/F, Fook Cheong Building,
63 Hoi Yuen Road, Kwun Tong, Kowloon