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## Our Promise to Protect Your Personal Data

Singapore Cord Blood Bank Limited (collectively, “**SCBB**”) takes its responsibility to protect personal data seriously. Your privacy is important to SCBB and we are committed to complying with applicable law, including the Singapore Personal Data Protection Act (No. 26 of 2012) (the “**PDPA**”).

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### **Section 1: Introduction – About this DPP**

1. The purpose of this document (“**Data Protection Policy**”, or “**DPP**”) is to inform you of how SCBB collects, uses, discloses, processes or otherwise handles your personal data, and to let you know how you can exercise your rights in respect of your personal data.
2. Please take a moment to read this DPP so that you know and understand the purposes for which we collect, use and disclose your personal data.

#### **This is the full DPP**

3. You may have seen or been referred to shorter summaries of this DPP which were formatted and edited to meet specific purposes, formats or to provide an easy-at-a-glance look at the key or relevant points of the DPP. This is the full DPP and is the authoritative statement of our policy on the handling of personal data.
4. The portion of the DPP that applies to your personal data will depend on the nature of your transactions, agreements or interactions with us.
5. Please note that though we make an effort, as per legal requirements, to provide reasonably adequate information concerning our policies as it pertains to personal data, this DPP is not an exhaustive list of all the situations or scenarios concerning personal data. Feel free to approach our Data Protection Officer (see **Contacting Us – Withdrawal of Consent, Access and Correction of your Personal Data** below) if you need clarification about any specific situation.
6. We update the DPP from time to time to ensure that our standards and practices remain relevant, are up to date, comply with applicable laws and guidelines, and remain applicable to industry trends. **This version of the DPP was last updated as at 04 Oct 2017**. The latest version of the DPP supersedes and replaces the earlier versions.

#### **How this DPP becomes a part of your journey with us**

7. This DPP applies to and forms part of the terms and conditions governing your transactions, agreements or interactions with us, whenever your personal data is handled by us.

#### **About the PDPA**

8. We are subject to the PDPA, as well as specific legislation or regulations concerning relevant aspects of healthcare, and your transactions, agreements or interactions with us.

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More information about the PDPA can be found at the website of the Personal Data Protection Commission (“PDPC”) at [www.pdpc.gov.sg](http://www.pdpc.gov.sg)

### Other Legislation

9. The PDPA is a baseline law that ensures a common standard of protection for individuals’ personal data across organizations in Singapore.
10. For the healthcare sector, existing laws such as Human Organ Transplant Act, the Termination of Pregnancy Act, the Infectious Diseases Act, Private Hospital & Medical Clinics Act, Human Biomedical research Act, etc. will continue to apply concurrently with the PDPA. SCBB will need to ensure that we comply with current sectoral laws and regulations as well as the PDPA.
11. Where there are inconsistencies between the PDPA and existing sectoral laws and regulations in respect of the collection, use or disclosure of personal data, the provisions of the other written laws shall prevail.

### Section 2: Your personal data

#### What kind of data this DPP applies to

12. This DPP applies to “personal data”. “Personal data” refers to “any data, whether true or not, about an individual (i.e. the data subject) who can be identified (a) from that data; or (b) from that data and other information to which we have or are likely to have access to, including data in our records as may be updated from time to time”.
13. Examples of such personal data you may provide to us include (depending on the nature of your interaction with us) your name, NRIC, passport or other identification number, telephone number(s), mailing address, email address and any other information relating to any individuals which you have provided us in any forms you may have submitted to us (including in the form of biometric data), or via other forms of interaction with you.
14. In some situations, personal data may include tissue specimen, organic materials provided by a data subject (whether as a patient, donor, research participant, or volunteer etc.), but only where such materials are linked with data that can lead to the identification of the data subject.

### Section 3: Consent

#### What this DPP enables us to do

15. By interacting with us, submitting information to us, or signing up for our services, you agree and consent to SCBB, as well as its representatives and/or agents (collectively referred to herein as “**the Group**”, “**us**”, “**we**” or “**our**”) collecting, using, disclosing and sharing amongst themselves your personal data, and disclosing such personal data to the Group’s authorized service providers and relevant third parties in the manner set forth in this DPP.

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16. This DPP supplements but does not supersede nor replace any other consents you may have previously or specifically provided to the Group in respect of your personal data, and your consents here are in addition to any other consents which you may have given to the Group, or any rights given at law to the Group to collect, use or disclose your personal data.
17. Your consent may not be necessary or required in some situations as there may be applicable law or regulation which renders this unnecessary, or where certain permissions or rights or duties have been accorded to SCBB which enable / require us to handle the personal data. Where such law or regulation applies, we will act in accordance with those other laws and regulations.

### **Withholding / Withdrawing Consent**

18. You are entitled under the PDPC to withhold / withdraw consent to the collection, use or disclosure of your personal data. You may withhold consent at any juncture that you are asked for consent, and you may also apply the process / method to withdraw consent as stated in this DPP (see Contacting Us – Withdrawal of Consent, Access and Correction of your Personal Data below).
19. However, it may be that any choice you make to withhold or withdraw consent may impact our ability to proceed with your transactions, agreements or interactions with us. In particular, in some cases, it may become unsafe or unlawful for us to provide (or continue to provide) to you our services in connection with the cord blood donation/banking without the ability to collect, use or disclose personal data. It may also not be possible, for us to proceed with a particular transaction, agreement or interaction with you. In such cases, our legal rights and remedies are expressly reserved.

### **Section 4: Collection of Personal Data**

#### **How we collect personal data**

20. Generally, depending on the situation, we may collect personal data in the following ways:
  - a. when you submit any form;
  - b. when you undergo a procedure / process where tissue specimens, organic materials are provided such that this is linked with other data in any way such that you can be identified;
  - c. when you donate cord blood to SCBB;
  - d. when you interact with our staff, including customer service officers, nurses, doctors, residents, and other representatives etc. via telephone calls (which may be recorded), letters, fax, face-to-face meetings and email;
  - e. when your images are captured by our CCTV cameras while you are within our premises, or by photographs or videos taken by us or our representatives when you attend events hosted by us;
  - f. when you attend our events (e.g. public forums and corporate events) and your voice and image data is captured on our audio and video recordings;
  - g. when you use our services provided through online and other technology platforms, such as websites and apps, including through the use of any online platforms /

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- technologies or tools (e.g., web portals, medical devices, security tokens, biometric technologies);
- h. when you request that we contact you, be included in an email or other mailing list; or when you respond to our request for additional personal data, our promotions and other initiatives;
  - i. when you are contacted by, and respond to, our customer service officers, nurses, doctors, agents and other service providers;
  - j. when we receive your personal data from referral parties, public agencies, your employer and other third parties;
  - k. when you make payment or provide details to facilitate payment, or secure or administer the application of funding / benefits / subsidies;
  - l. when we seek information from third parties about you in connection with your relationship with us;
  - m. when you make a monetary donation; and
  - n. when you submit your personal data to us for any other reasons.
21. When you browse our website you generally do so anonymously (but please see the section below on cookies).

### **Collection of personal data about you from third parties and collection of data about third parties from you**

22. We may also collect personal data about you from third parties such as:
- a. your representatives / intermediaries / agents or your next-of-kin who may either be doing so on your behalf, or in connection with their own transactions, agreements or interactions with us;
  - b. your employers; and
  - c. your service providers (e.g. your insurers, your bank etc.).
23. If you provide us with any Personal Data relating to a third party (e.g. information of your next-of-kin, spouse, children, parents, and/or employees), by submitting such information to us, we rely on you and will assume that you are representing to us that you have obtained the consent from the third party to provide us with their personal data for the respective purpose for which we are collecting this personal data.

### **Accuracy of personal data we collect from you**

24. 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 services you have requested, or delays in providing you with products and services you have requested, or processing your applications.
25. If consents are not procured or if you fail to provide us with complete and accurate information, we may, in some situations, have no choice but to decline to proceed with the transaction, agreement or interaction in question to avoid causing harm or exposing ourselves, you or others to risk. Our rights and remedies in such situations are expressly reserved.

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### Withholding information

26. If you withhold information, this can have the same effect as when you withdraw consent (see “Withholding / Withdrawing Consent” above), and as stated in the paragraph above, we may have no choice but to decline to proceed with the transaction, agreement or interaction in question to avoid causing harm or exposing ourselves, you or others to risk.

### **Section 5: Purposes for the Collection, Use and Disclosure of Your Personal Data**

27. **Generally**, SCBB collects, uses and discloses your personal data for the following purposes:
- a. responding to, processing and handling your queries, feedback, complaints and requests;
  - b. verifying your identity;
  - c. managing and planning the administrative and business operations of the Group and complying with internal policies and procedures, including to meet auditing, accreditation and compliance requirements;
  - d. facilitating business asset transactions (which may extend to any mergers, acquisitions or asset sales);
  - e. 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;
  - f. matching any Personal Data held which relates to you for any of the purposes listed herein;
  - g. personalising your experience at our customer touch points;
  - h. preventing, detecting and investigating crime and analysing and managing commercial risks;
  - i. managing the safety and security of our premises and services (including but not limited to carrying out CCTV surveillance and conducting security clearances);
  - j. monitoring or recording phone calls and customer-facing interactions for quality assurance, employee training and performance evaluation and identity verification purposes;
  - k. conduct reviews, reporting and examining case studies, incidents, issues encountered with a particular data subject so as to understand, minimize and avoid risks, service failures or hazards;

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- l. conducting analysis for statistical, profiling or other purposes for us to conduct category analysis, financial analysis, investigate service lapses, and to review, develop and improve the quality of our products and services;
  - m. identifying and establishing ways to improve or deliver more appropriate products, services or developments to better address the needs of data subjects;
  - n. 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;
  - o. conducting any form of investigations including but not related to those relating to disputes, billing, fraud, offences, prosecutions etc;
  - p. 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 Group (including but not limited to responding to regulatory complaints, disclosing to regulatory bodies and conducting audit checks, due diligence and investigations); and/or
  - q. purposes which are reasonably related to the aforesaid.
28. **In addition**, we may collect, use and disclose your personal data for the following purposes depending on the nature of our relationship:
- a. If you have decided that you would like to donate your cord blood to SCBB:
    - i) assessing suitability of donors for participation in the donor programme;
    - ii) processing and managing the cord blood units and our relationship with you; and
    - iii) all other purposes reasonably related to the aforesaid.
  - b. If you have decided that you wish to retain your cord blood for use by your family and next-of-kin:
    - i) processing and maintaining your cord blood units for such purposes; and
    - ii) all other purposes reasonably related to the aforesaid.
  - c. If you wish to contribute towards our fundraising efforts or participate in our fundraising events or have expressed an interest in doing so:
    - i) reaching out to you, including via fundraising mailers and newsletters;
    - ii) inviting you to our fundraising events;
    - iii) soliciting donations;
    - iv) processing the donations, including processing tax deductions for eligible donations by donors and filing mandatory financial reports with police licensing unit for donations received by our institutions;
    - v) managing our relationship with you, including sending of thank you letters and collaterals such as annual review and donation forms;
    - vi) featuring you (in accordance with the law) in our collaterals or publicity media; and

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- vii) all other purposes reasonably related to the aforesaid.
  - d. Where you have consented, in accordance with applicable law, to the use of your cord blood for research purposes:
    - i) processing your cord blood donation for use by researchers; and
    - ii) all other purposes reasonably related to the aforesaid.
  - e. If you submit an application to us as a candidate for employment or internships:
    - i) conducting interviews;
    - ii) processing your application (including but not limited to pre-recruitment checks involving your qualifications and facilitating interviews);
    - iii) obtaining references and for background screening;
    - iv) assessing your suitability for the position applied for;
    - v) enrolling successful candidates as our employees and facilitating human resource planning and management; and
    - vi) all other purposes reasonably related to the aforesaid.
29. Furthermore, where permitted under the Act, the Group may also collect, use and disclose your personal data for the following "Additional Purposes":
- i) 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;
  - ii) organising roadshows, tours, campaigns and promotional or events and administering contests and competitions; and
  - iii) purposes which are reasonably related to the aforesaid.
30. 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, we may contact you using such telephone number(s) (including via voice calls, text, fax or other means) with information about our products and services.
31. 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.
32. We 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:
- a. within the Group, to our affiliates and related corporations, including Singapore Health Services Pte Ltd;
  - b. third party doctors, clinics, hospitals and/or medical institutions;
  - c. our fundraising partners, including SingHealth Foundation;
  - d. companies providing services relating to insurance to SCBB;
  - e. agents, contractors, sub-contractors or third party service providers who provide operational services to us, 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 us;

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- f. vendors or third party service providers and our marketing and business partners in connection with marketing promotions, products and services;
- g. our corporate clients;
- h. 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);
- i. external banks, credit card companies, other financial institutions and their respective service providers;
- j. our professional advisers such as consultants, auditors and lawyers;
- k. relevant government ministries, national registries, regulators, statutory boards or authorities or law enforcement agencies; and/or
- l. any other party to whom you authorise us to disclose your personal data to.

### **Section 6: Cookies ad Third Party Sites**

- 33. When you visit or interact with our sites, services, we or our authorized service providers may use cookies, and other similar technologies for collecting and storing information to help provide you with a better, faster, and safer web experience. Cookies are small text files placed in the 'Cookies' folder on your computer's hard disk and allow us to remember you. The cookies placed by our server are readable only by us, and cookies cannot access, read or modify any other data on a computer. All web-browsers offer the option to refuse any cookie, and if you refuse our cookie then we do not gather any information on you.
- 34. Should you wish to disable the cookies associated with these technologies, you may do so by changing the setting on your browser. However, you may not be able to enter certain part(s) of our website.
- 35. Our website may contain links to other websites operated by third parties. We are not responsible for the privacy practices of websites operated by third parties that are linked to our website. We encourage you to learn about the privacy policies of such third party websites. Some of these third party websites may be co-branded with our logo or trademark, even though they are not operated or maintained by us. Once you have left our website, you should check the applicable privacy policy of the third party website to determine how they will handle any information they collect from you.

### **Section 7: Contacting Us – Withdrawal of Consent, Access and Correction of your personal data**

- 36. If you have any questions or feedback relating to your personal data or our DPP, would like to withdraw your consent to any use of your personal data as set out in this DPP; or would like to obtain access and make corrections to your personal data records, please contact us as follows:

Call: (65) 6229-3716

Email: [dpo@scbb.com.sg](mailto:dpo@scbb.com.sg)

Write to us: The Data Protection Officer,  
Singapore Cord Blood Bank,  
03-01, Novena Specialist Centre,  
8 Sinaran Drive, Singapore 307470.

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37. Please note that if your personal data has been provided to us by a third party (e.g. doctors and physicians who refer you to us), you should contact such party directly to make any queries, feedback, and access and correction requests to us on your behalf.
38. This Data Protection Policy shall be governed in all respects by the laws of Singapore.

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