

Privacy Notice of Bumrungrad Hospital Public Company Limited

นโยบายความเป็นส่วนตัวสำหรับผู้ป่วย (Privacy Notice) ของบริษัท โรงพยาบาลบำรุงราษฎร์ จำกัด (มหาชน)

Privacy Notice of
Bumrungrad Hospital Public Company Limited

Bumrungrad Hospital Public Company Limited and its affiliated companies (hereinafter referred to as the "Hospital" or "We", as the case may be) are the hospitals that are accredited to international standards with various specialists for medical treatments. The Hospital, as the data controller under the Personal Data Protection Act B.E. 2562 (A.D. 2019) ("PDPA"), are aware of the importance of protecting the personal data of patients, contacts, emergency contacts, and others who involved with the Hospital (hereinafter referred to as "You" or "Data Subject"), we therefore announce this Privacy Notice (the "Notice") to inform you of the protection of your personal data that is collected, used, disclosed and/or transferred to any other relevant persons by the Hospital.

We ensure that the processing of your personal data will be secured by our appropriate and sufficient security measure. We will not process your personal data for purposes other than those specified in this Notice unless you consent thereto.

1. Definitions

"Personal Data" refers to any information that identifies or can be used to identify you, which is collected by the Hospital as specified in this Notice.

"Sensitive Data" refers to personal data classified as sensitive data under the PDPA that the Hospital is permitted to collect, use, and/or disclose with your explicit consent, e.g., the information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, a natural person's sexual orientation or criminal record, or data concerning health, disabilities, trade union membership, genetic data, biometric data, and other data processed for the purpose of uniquely identifying a natural person.

2. Personal Data Collected, Used and/or Disclosed by the Hospital

The Hospital will collect, use, and/or disclose your Personal Data which includes, but is not limited to, the following:

2.1 General Personal Data

- 1) Personal information, e.g., title, rank, position, first name, middle name, last name, age, date of birth, gender, photograph, nationality, country of residence, national ID card number, passport number, hospital number, signature, marital status, weight, and height.
- 2) Contact information, e.g., address, mobile phone number, home phone number, and email address.
- 3) Service information, e.g., record of doctor's appointments, room requirements and other additional services.
- 4) Educational information, e.g., education background.
- 5) Information appearing on legal documents, e.g., national ID card, passport, house registration, driver's license, government official identification card, certificate of name/surname change, marriage certificate, divorce certificate, and birth certificate.

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- 6) Contact information and emergency contact information, e.g., first name, middle name, last name, relationship with patients, and mobile phone number.
- 7) Information about the person who has the authority to act on behalf of data subject (legal representative, guardian, and curator), e.g., name, surname, and national ID card.
- 8) Financial information, e.g., billing information, credit or debit card information, and bank account details.
- 9) Information on news subscriptions and marketing activities, e.g., seminar enrollment and promotion registration.
- 10) Information from the Hospital's websites such as IP address, cookies, online doctor appointment, and online doctor consultation.
- 11) Other, e.g., audio recordings, photograph, and data from CCTV footage.

2.2 Sensitive Data

The Sensitive Data that we will collect, use, or disclose includes, but is not limited to, information concerning religion, health, disabilities, genetic or bio data, medical history, record of drug/food allergy, treatment result, physical examination result, laboratory result, diagnosis result, medical record, medical certificate, surgical record, X-ray photo, weight, height, blood type, picture/audio/animation from medical/surgery/operation procedures, and information that appears in the copy of national ID card, e.g., religion, ethnicity and blood group . We will process your Sensitive Data only to the extent required by law or with your prior explicit consent.

3. Source of Your Personal Data

We may collect Personal Data you voluntarily release to us, whether through hospital service request forms, social media accounts, phone calls, or other forms filled out through the Hospital's websites and applications such as appointment forms, inquiry forms, product purchase or service request forms, news subscription forms, including wearable medical devices.

We may receive your Personal Data from other sources, e.g., your family members or intimate persons, any other third party assigned by you to disclose your Personal Data, and hospitals, affiliated companies, representatives, or alliances of the Hospital.

4. Purposes and Legal Bases

4.1 We will process your personal data based on legal bases as provided below:

- 1) We rely on contractual basis to process your personal data in order to, for instance,
 - a) review your various application requests before entering into a contract;
 - b) medical treatment rights' claim,
 - c) request payment;
 - d) issue invoices and/or receipts;
 - e) communicate for the purchase of products and/or services;
 - f) perform contractual obligations;

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- g) deliver products or services;
 - h) proceed to collect or receive payment of products or services.
- 2) We rely on legitimate interest to process your personal data in order to, for instance,
- a) verify your identity;
 - b) send medical appointment reminders;
 - c) collect contact information for future inquiries in case an emergency arises and the patient is unable to provide their own information;
 - d) provide or deliver services as requested;
 - e) monitor and review the performance of a contractual obligation;
 - f) provide post-sales services;
 - g) manage customer relationship;
 - h) send and follow up a questionnaire to assess customers' service satisfaction;
 - i) verify and confirm your identity before entering into transactions or contracts;
 - j) financially and internally audit;
 - k) monitor the accuracy of payments, billing, refunds, and compensation;
 - l) monitor compliance with the Hospital's regulations;
 - m) investigate or verify facts;
 - n) consult for establishment of legal claim or proof in legal process; and
 - o) record through CCTV for security protection in the buildings or premises.
 - p) Your Personal Data may be disclosed to lawyers, legal and tax consultants, auditors, internal auditors, financial auditors, and any other consultants involved in the process of completing the purposes specified above.
- 3) We rely on legal obligations to process your Personal Data in order to comply with the laws related to medical facilities, for instance, new patient registration, doctor's appointment, medical services, diagnosis, medical treatment, patient examination, preliminary physical examination, medication dispensing, use of Personal Data for the purpose of experimentation in internal laboratories of the medical facility, collection and use of contact person's information to approve of or deny the request for medical treatment, medical benefit claim, and ethical and professional compliance.
- 4) We rely on legal obligation to process your personal data in order to, for instance, collect Personal Data as required by law, disclose or submit Personal Data to government agencies as required by law, and comply with applicable laws, regulations, orders of competent authorities, and court orders.
- 5) We rely on vital interests to process your personal data in order to prevent and suppress danger to life, body, or health, for instance, emergency contact and contagion control and prevention.
- 6) In the event that you have given your explicit consent, we will process your Sensitive Data to send news, advertisements, notifications, benefits and promotions of products and services, beneficial campaigns or invitations to the Hospital's activities via all communication channels that you have provided to the Hospital.

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4.2 We will process your Sensitive Data based on legal bases as provided below:

- 1) We rely on legal obligations to process your Sensitive Data in order to achieve the objectives relating to preventive or occupational medicine, medical diagnosis, health or social services, medical treatments, and health management, for instance:
 - a) Diagnosis and medical treatment;
 - b) Symptoms examination and preliminary physical examination;
 - c) Use of Personal Data for the purpose of laboratory diagnostics of the Hospital;
 - d) Referral of patient to another hospital for further treatment;
 - e) Processing of genetic data to verify identity or relationships before the process of organ transplantation; and
 - f) Compliance with ethics and professional ethics.
- 2) We rely on contractual obligations to process your Sensitive Data in order to achieve objectives relating to diagnosis and treatment, for instance, disclosure of Sensitive Data to external laboratories or an external radiology room to conduct experiments and diagnosis.
- 3) We rely on legitimate interest to process your Sensitive Data in order to establish legal claim as permitted by law, for instance, collecting medical expenses from patients, invoicing, requesting patients to pay off the invoice, issuing a receipt, and examining patient's billing and debt payment status.
- 4) We rely on vital interests to process your Sensitive Data in order to prevent and suppress dangers to life, body, or health such as emergency contact contagion control and prevention.
- 5) We process your health data, biological samples, and the data obtained from such samples, in an anonymized form, for quality, service, and Hospital operation improvement.
- 6) In the event that you have given your explicit consent, we will process your Sensitive Data for the purposes set forth in each of the following consent:
 - a) Use of a copy of your national ID card that contains Sensitive Data such as religion and blood type to verify your identity;
 - b) Disclosure of your health data and medical certificate to insurance company to claim your health insurance benefit;
 - c) Disclosure of your health data and medical certificate to your employer, embassy, agency, organization, governmental agencies, or any relevant person to collect payments for your medical services;
 - d) Disclosure of your health data to insurance company as requested by you or the insurer for the purpose of entering into an insurance agreement;
 - e) Disclosure of your health data to third parties such as your family members, relatives, dependents, or intimate persons upon their request;
 - f) Disclosure of your health data, medical certificate and health record to the airline for Fit for Air Travel;

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- g) Processing of your health data for purposes of healthcare service quality improvement;
- h) Disclosure of your health data to our business partners for purposes of developing medical products; and
- i) Processing of your health data, biological samples, and the data obtained from such samples, and disclosure of such data to external laboratories for research and academic purposes.
- j) De-identify your health data, biological samples, and the data obtained from such samples to be unidentifiable data for research and academic purposes.
- k) Disclose your sensitive data to internal organizations such as Bureau Veritas to verify Internal Organization for Standardization (ISO), Joint Commission International (JCI), and Healthcare Accreditation Institute (Public Organization) (HAI) for quality improvement and accreditation of the Hospital.

5. Disclosure of Your Personal Data

We will not disclose your Personal Data for purpose other than purposes specified herein, unless having been consented to do so.

Personal Data that you have provided to us may be transferred outside Thailand and disclosed to our international agents or partners that you have contacted for our services. We will endeavor to ensure that your right to privacy is protected by security protection measures of our standard.

We may disclose your Personal Data to our group companies and affiliates, vendors, business partners, or third parties, e.g., insurance companies, financial institutions, primary doctors, medical professionals, medical specialists, and/or medical practitioners, medical technology clinic, manufacturers or distributors of drugs and medical supplies, embassy, person who handle international travel, customer service provider, marketing, advertising and communication service providers, information system providers, cloud service provider, nearby hotels that are affiliated with us, transport service providers, document storage service providers, debt collection service providers, accounting and legal consultants, auditors, internal auditors, financial auditors, and your family, relatives, intimate persons, agencies or employers, and internal organizations such as Bureau Veritas, Joint Commission International (JCI), and Healthcare Accreditation Institute (Public Organization) (HAI). We may proceed any other actions to complete the purposes specified in this Notice in order to benefit our services.

We will endeavor to ensure that these individuals and organizations will process your Personal Data strictly in accordance with this Notice and as permitted by law.

Where it is necessary to disclose your Personal Data in order to comply with the law, court orders, or orders of any governmental or regulatory agency such as the Immigration Office, or to relevant agencies in order to verify your Personal data to prevent fraud or corruption, we reserve the right to do so without your prior consent.

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6. Collection of Personal Data of Minors, Incompetent Persons, and Quasi-Incompetent Persons

Where we must process the Personal Data of minors, incompetent persons, or quasi-incompetent persons, we shall have their parents, legal representative, guardian, or curator, as the case may be, consented on behalf of them.

If a minor or a quasi-incompetent person is legally permitted to give consent on their own behalf, we shall require combined consent from them and their legal representative.

If we become aware of the unauthorized collection of Personal Data from minors, incompetent persons, and quasi-incompetent persons without the consent being given in the manner according to the above, we will delete or destroy such data from the Hospital's system immediately.

7. Retention Periods & Security Protection Measures

7.1 We will retain your Personal Data for as long as it is necessary to fulfil the purposes specified in this Notice and may retain your Personal Data as long as agreed on in the contract, or in accordance with accounting standard, prescription periods, legal obligations, or establishment or exercise of legal claim as permitted by the law.

7.2 We have an examination system for deletion or destruction of Personal Data in the event of the expiration of the retention period, or if such Personal Data is unrelated to or beyond the necessity for the purpose of collecting specified by this Notice.

7.3 We will retain your Personal Data in the form of documents, electronic files, computer systems, or other means with appropriate personal data security protection measures against loss, and unauthorized or unlawful access, use, change, modification and disclosure.

7.4 We have limited access of your Personal Data and adopted technology to secure your data from cyber-attacks, unauthorized access to our computer and electronic systems. We further ensure that any processing of your personal data by data processors or other third parties will take place under appropriate monitoring.

8. Data Subject's Right

8.1 Under the PDPA you, as the Data Subject, are entitled to:

- 1) Request access to, or copies of, your Personal Data processed by the Hospital.
- 2) Request transfer of your Personal Data, in a form collected by us and readable, usable, and disclosable in an electronic format, to another party (the Hospital reserves the right to charge you a fee, the amount of which is at our discretion.)
- 3) Object to the collection, use, and/or disclosure of Personal Data to the extent permitted by law.
- 4) Have your Personal Data deleted, destroyed, or anonymized by any method permitted by law.
- 5) Sequester your Personal Data from further use by any method unless the law provides otherwise.

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- 6) Withdraw your consent given us at any time, unless otherwise restricted by law or contracts. Your withdrawal will not extend to Personal Data to which you have granted consent for processing.
- 7) File a complaint with the competent officer authorized under the PDPA in the event that you believe we have violated, or do not comply with, the PDPA.

8.2 We will endeavor to maintain the accuracy and completeness of your Personal Data. When there is a change or modification to your Personal Data or when you detect that your Personal Data is incorrect, you have the right to make corrections thereto.

8.3 The exercise of your rights specified above must comply with law. The Company reserves the right to refuse any request on grounds permitted by law. In the event that we deny your request, the request and reasons for denial will be recorded in the personal data processing record as required by law.

8.4 To exercise your right, you may contact us via the contact information provided hereunder. We will process your request and then inform you of the result within 30 days from the date of receiving your request. Where we refuse your request, you will be informed accordingly.

9. Amendment

We reserve the right to alter, adjust, and/or modify this Notice in order to comply with applicable guidelines, laws, and regulations. If such changes occur, we will inform you of the amended, adjusted, or modified content in the designated channel as soon as it becomes effective. New Notice will only apply to you upon your use of service after the revision.

10. Contact Us

Should you wish to exercise any legal rights as specified above or have any questions, concerns, suggestions or complaints with regard to our Notice, you can contact us via the following channels:

BUMRUNGRAD HOSPITAL PUBLIC COMPANY LIMITED

33 Soi 3 (Nana Nua), Sukhumvit Road, Khlong Toei Nua, Vadhana, Bangkok
Phone +66 2066 8888

Data Protection Officer

33 Soi 3 (Nana Nua), Sukhumvit Road, Khlong Toei Nua, Vadhana, Bangkok
Email: dpo@bumrungrad.com

With Best Regards,
BUMRUNGRAD HOSPITAL PUBLIC COMPANY LIMITED
31 May 2022