

## uCare.io Privacy Policy

The purpose of this Privacy Policy is to inform you of how uCare.io Pte Ltd and its consultants, vendors, agents and authorised service providers (collectively, the "uCare.io Group") manages Personal Data (as defined below) in accordance with the Personal Data Protection Act 2012 (PDPA).

Please take a moment to read this Privacy Policy so that you know and understand the purposes for which we collect, use and disclose your Personal Data.

By interacting with us, submitting information to us and using [www.ucare.ai](http://www.ucare.ai), [www.ucare.io](http://www.ucare.io), [www.algobox.ai](http://www.algobox.ai) (the "uCare.io Website"), you agree and consent to the uCare.io Group (collectively referred to herein as "uCare.io", "uCare", "the Group", "us", "we" or "our") collecting, using, disclosing and sharing amongst themselves your Personal Data, and disclosing such Personal Data to our authorised service providers and relevant third parties in the manner set forth in this Privacy Policy.

This Privacy Policy supplements but does not supersede nor replace any other consents you may have previously provided to uCare.io in respect of your Personal Data, and your consents herein are additional to any rights which any member of the uCare.io Group may have at law to collect, use or disclose your Personal Data.

uCare.io may from time to time update this Privacy Policy to ensure that this Privacy Policy is consistent with our future developments, industry trends and/or any changes in legal or regulatory requirements. Subject to your rights at law, you agree to be bound by the prevailing terms of this Privacy Policy as updated from time to time at this link: [www.ucare.io](http://www.ucare.io) or [www.ucare.ai](http://www.ucare.ai). Please check back regularly for updated information on the handling of your Personal Data.

### 1. **Personal Data**

- 1.1 In this Privacy Policy, "Personal Data" refers to any data, whether true or not, about an individual 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, including data in our records as may be updated from time to time.
- 1.2 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, information about your vital signs (e.g. blood pressure, heartrate etc) and, in the case of third party individuals, 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.

### 2. **Collection of Personal Data**

- 2.1 Generally, we collect Personal Data in the following ways:
  - (a) when you submit any forms to us;
  - (b) when you enter into any agreement or provide other documentation or information in respect of your interactions with us, or when you use our services;
  - (c) when you interact with our employees via telephone calls (which may be recorded), letters, fax, face-to-face meetings, social media platforms and emails;
  - (d) when you interact with us via our websites;

- (e) when you request that we contact you or request that you be included in an email or other mailing list;
  - (f) when you respond to our promotions, initiatives or to any request for additional Personal Data;
  - (g) when you are contacted by, and respond to, our marketing representatives and customer service officers;
  - (h) when we seek information about you and receive your Personal Data in connection with your relationship with us; and/or
  - (i) when you submit your Personal Data to us for any other reasons.
- 2.2 When you browse our website, you generally do so anonymously but please see paragraph 5 below for information on cookies and other technologies (including without limitation web beacons and behavioural tracking technologies) which we have implemented on our website. We do not, at our website, automatically collect Personal Data unless you provide such information to us.
- 2.3 If you provide us with any Personal Data relating to a third party, by submitting such information to us, you represent to us that you have obtained the consent of that third party to provide us with their Personal Data for the respective purposes.
- 2.4 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 products and services you have requested, or delays in providing you with products and services you have requested, or processing your applications.

### 3. **Purposes for the Collection, Use and Disclosure of Your Personal Data**

- 3.1 **Generally**, uCare.io 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 your account and your use of the uCare.io Website;
  - (d) managing and planning the administrative and business operations of uCare.io and complying with internal policies and procedures;
  - (e) facilitating business asset transactions (which may extend to any mergers, acquisitions or asset sales);
  - (f) 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;
  - (g) studies and analyses on user behaviour, responses, monitoring and interactions for ourselves and on behalf of our clients;
  - (h) design and development of products and user interfaces, and service improvement;

- (i) matching any Personal Data held which relates to you for any of the purposes listed herein;
- (j) preventing, detecting and investigating crime and analysing and managing commercial risks;
- (k) managing the safety and security of our premises and services (including but not limited to carrying out CCTV surveillance and conducting security clearances);
- (l) monitoring or recording phone calls and customer-facing interactions for quality assurance, employee training and performance evaluation and identity verification purposes;
- (m) 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;
- (n) conducting any form of investigations including but not related to those relating to disputes, billing, fraud, offences, prosecutions etc;
- (o) meeting or complying with any applicable rules, laws, regulations, codes of practice or guidelines issued by any legal or regulatory bodies (including but not limited to responding to regulatory complaints, disclosing to regulatory bodies and conducting audit checks, due diligence and investigations); and/or
- (p) purposes which are reasonably related to the aforesaid.

3.2 Furthermore, where permitted under the PDPA, uCare.io may also collect, use and disclose your Personal Data for the following “Additional Purposes”:

- (a) providing or marketing services and benefits to you, including promotions, loyalty, reward and/or membership programmes and sending of healthcare-related updates, event invitations, newsletters and marketing and promotional information to you pursuant to such membership programmes;
- (b) matching Personal Data with other data collected for other purposes and from other sources (including third parties) in connection with the provision or offering of services;
- (c) sending you details of services, health-related information, special offers and rewards, either to our customers generally, or which we have identified may be of interest to you;
- (d) conducting market research, aggregating and analysing customer profiles and data to determine health-related patterns and trends, understanding and analysing customer behaviour, location, preferences and demographics for us to offer you other products and services as well as special offers and marketing programmes which may be relevant to your preferences and profile; and/or
- (e) purposes which are reasonably related to the aforesaid.

3.3 If you have provided us with your Singapore telephone number(s) and have indicated that you consent to receiving marketing or promotional information via your Singapore telephone number(s), then from time to time, uCare.io may contact you using such Singapore telephone number(s) (including via voice calls, text, fax or other means) with information about our products and services.

- 3.4 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.
- 3.5 You have a choice to withdraw your consent for receiving marketing or promotional materials/communication. You may contact us using the contact details found below.
- 3.6 Please be aware that once we receive confirmation that you wish to withdraw your consent for marketing or promotional materials/communication, it may take up to 30 calendar days for your withdrawal to be reflected in our systems. Therefore, you may still receive marketing or promotional materials/communication during this period of time.
- 3.7 Please note that even if you withdraw your consent for the receipt of marketing or promotional materials, we may still contact you for other purposes in relation to the uCare.io Services.

#### 4. **Disclosure of Personal Data**

- 4.1 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) the uCare.io Group;
  - (b) agents, contractors, sub-contractors or third party service providers who provide operational services to uCare.io, 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 uCare.io;
  - (c) vendors or third party service providers and our marketing and business partners in connection with marketing promotions, products and services;
  - (d) our corporate clients;
  - (e) 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);
  - (f) external banks, credit card companies, other financial institutions and their respective service providers;
  - (g) our professional advisers such as consultants, auditors and lawyers;
  - (h) relevant government ministries, regulators, statutory boards or authorities or law enforcement agencies to comply with any laws, rules, guidelines and regulations or schemes imposed by any governmental authority (including the Ministry of Health); and/or
  - (i) any other party to whom you authorise us to disclose your Personal Data to.

#### 5. **Use of Cookies, Web Beacons, and Similar Technologies**

- 5.1 When you use the uCare.io Website, we or our authorized service providers may use cookies, web beacons, and other similar technologies for collecting and storing information to help provide you with a better, faster, and safer web experience.

5.2 The information collected by us or our authorised service providers may recognise a visitor as a unique user and may collect information such as how a visitor arrives at our sites, what kind of browser a visitor is on, what operating system a visitor is using, a visitor's IP address and a visitor's click stream information and time stamp (for example, which pages they have viewed, the time the pages were accessed and the time spent per web page).

5.3 However, we do not store any of your personal data on any of our cookies, web beacons or other similar technologies. The use of cookies, web beacons and similar technologies by us on our website has different functions. They are either necessary for the functioning of our services, help us improve our performance, or serve to provide you with extra functionalities.

**Cookies** – Small text files (typically made up of letters and numbers) placed in the memory of your browser or device when you visit a website or view a message. Cookies allow a website to recognize a particular device or browser. There are several types of cookies:

- Session cookies expire at the end of your browser session and allow us to link your actions during that particular browser session.
- Persistent cookies are stored on your device in between browser sessions, allowing us to remember your preferences or actions across multiple sites.
- First-party cookies are set by the site you are visiting
- Third-party cookies are set by a third party site separate from the site you are visiting.

Cookies can be disabled or removed by tools that are available in most commercial browsers. The preferences for each browser you use will need to be set separately and different browsers offer different functionality and options.

**Web beacons** - Small graphic images (also known as “pixel tags” or “clear GIFs”) may be included on our sites and services. Web beacons typically work in conjunction with cookies to profile each unique user and user behaviour.

**Similar technologies** – Technologies that store information in your browser or device utilizing local shared objects or local storage, such as flash cookies, HTML 5 cookies, and other web application software methods. These technologies can operate across all of your browsers. We do not use these technologies for storing information to target advertising to you on or off our sites.

We may use the terms “cookies” or “similar technologies” interchangeably in our policies to refer to all technologies that we may use to collect or store information in your browser or device or that collect information or assist in identifying you as a unique user in the manner described above.

5.4 We offer certain site features and services that are available only through the use of these technologies. You are always free to block, delete, or disable these technologies if your browser so permits.

However, if you decline cookies or other similar technologies, you may not be able to take advantage of certain site features or services tools. For more information on how you can block, delete, or disable these technologies, please review your browser settings.

## 6. **Use of Anonymised Data**

- 6.1 We may from time to time use your Personal Data in anonymised form for the purposes of testing our algorithms and to conduct training for the uCare.io Group in connection with the improvement of service quality and our service offerings. Where we use your Personal Data in anonymised form, we will put in place appropriate safeguards and measures to minimise the chance of your Personal Data being re-identified by any parties.

## 7. **Third-Party Sites**

Our website may contain links to other websites operated by third parties, including for example our business partners. We are not responsible for the data protection practices of websites operated by third parties that are linked to our website. We encourage you to learn about the data protection practices of such third party websites. Some of these third party websites may be co-branded with our logo or trade mark, 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.

## 8. **Contacting Us – Withdrawal of Consent, Access and Correction of your Personal Data**

- 8.1 If you:

- (a) have any questions or feedback relating to your Personal Data or our Privacy Policy;
- (b) would like to withdraw your consent to any use of your Personal Data as set out in this Privacy Policy; or
- (c) would like to obtain access and make corrections to your Personal Data records,

please contact our **Data Protection Officer** as follows:

- Email: dpo@ucare.ai
- Office address: 360 Orchard Road, #10-07A, Singapore 238869

- 8.2 Please note that if your Personal Data has been provided to us by a third party, you should contact that organisation or individual to make such queries, complaints, and access and correction requests to uCare.io on your behalf.

- 8.3 If you withdraw your consent to any or all use of your Personal Data, depending on the nature of your request, uCare.io may not be in a position to continue to provide its products and services to you, or administer any contractual relationship in place, which in turn may also result in the termination of any agreements with uCare.io, and your being in breach of your contractual obligations or undertakings. uCare.io's legal rights and remedies in such event are expressly reserved.

## 9. **Governing Law**

- 9.1 This Privacy Policy shall be governed in all respects by the laws of Singapore.

Version date: 16 April 2020