

## **Privacy Policy**

### **INTRODUCTION**

Fortmed Medical Clinics Makati Inc. (referred as "Fortmed", "we", "us" or "our") recognizes the importance of protecting your Personal Data. This statement is one way of sustaining your trust in our company, our products and our services. Our privacy statement describes how we collect, protect and manage information from you through our websites, information systems and processes.

Fortmed respects the confidentiality of Personal Information and is committed to comply with Philippine Data Privacy Act of 2012. We value data privacy rights and makes sure that all personal information collected from our customer, vendors, partners, employees, associates and other stakeholders, are processed in adherence to the general principles of transparency, legitimate purpose and proportionality.

This Privacy Policy explains:

- What information we collect and why we collect it;
- How we use that information and to whom we may disclose it;
- The choices available for you to manage your personal information;
- How we safeguard your personal information;
- By providing Fortmed with your personal information in the use of any of our products and services as described in this Privacy Policy, you have explicitly authorized and consented to our collection, use, access, transfer, storage and processing of said personal data.

### **PERSONAL AND SENSITIVE PERSONAL INFORMATION WE COLLECT**

Personal information is information that can be used on its own or with other information to identify, contact, or locate a single person, or to identify an individual in context.

Sensitive Personal Information refers to personal information:

1. About an individual's race, ethnic origin, marital status, age, color, and religious, philosophical or political affiliations;
2. About an individual's health, education, genetic or sexual life, or to any proceeding for any offense committed or alleged to have been committed by such individual, the disposal of such proceedings, or the sentence of any court in such proceedings;
3. Issued by government agencies peculiar to an individual which includes, but is not limited to, social security numbers, previous or current health records, licenses or its denials, suspension or revocation, and tax returns; and
4. Specifically established by an executive order or an act of Congress to be kept classified.

### **CONSENT**

By providing your Personal and Sensitive Personal Information or by buying/availing of our products and services, you confirm your agreement to the terms and conditions contained in this Privacy Policy. Your rights under this Privacy Policy will be upheld when invoked by your lawful heirs or assigns.

### **PERSONAL AND SENSITIVE PERSONAL INFORMATION**

As part of our dealings with you, we may collect your personal data including but not limited to:

- Your name, gender, civil status, date of birth, address, telephone or mobile numbers, email address, mailing address, proof of identification and any other information relating to you or your health which you have provided us in submission of any form as a result of our interaction with you;
- Your employment history, education background, resume and income information when you apply for a job with us;
- Information about your visit and use of our websites, digital platforms, and mobile apps, including but not limited to social media profile information, IP Addresses, your browsing behavior within and throughout our digital assets, and session lengths, that are collected by our website analytics tools and cookies that we may place on your computer. You may disable the use of cookies on your browser at any time;

- Your work related information regarding your company, your ownership and participation when your company refers you to us for medical services

### **COLLECTING PERSONAL INFORMATION**

We may collect and store your Personal Information in a variety of ways:

- When you purchase or avail of any of our products, services, promos, activities, and events;
- When you interact with our sales or customer care agents, reservation officers or specialists, through email, phone, chat services or face-to-face meetings;
- When you provide personal information in relation to inquiries, requests, and complaints
- When you respond to surveys, promotions, and other marketing and sales initiatives;
- When you submit a job application;
- When we receive references from third parties or our business partners (i.e. when you have been referred by them);
- When you submit your personal information to us for any other reason.

### **PERSONAL INFORMATION OTHER THAN YOURS**

When you disclose to us another person's personal information (i.e. your dependent, spouse, children and/or parents) you attest that consent has been obtained from that person to disclose and process personal information in accordance with this policy.

### **USE AND DISCLOSURE OF PERSONAL INFORMATION**

#### **USES OF YOUR PERSONAL INFORMATION**

Fortmed collects uses and discloses your Personal Information for the following purposes:

- Provide you with products and services that you have requested, including medical results
- Enhance your customer experience by delivering product services that match your preference and needs;
- Communicate relevant services, advisories including responses to your queries, requests and complaints;
- Provide information about our products and services which may be of interest to you;
- Comply with the requirements of the law and legal proceedings such as court orders; comply with legal obligation or to prevent imminent harm to public security safety or order;
- Process information for statistical, analytical and research purposes.

#### **OTHER USES BY NATURE OF OUR DEALINGS**

Aside from the general uses mentioned previously, we may use your personal information depending on your dealings with us in any of the following manner:

#### **WHEN YOU INQUIRE OR MAKE AN APPOINTMENT FOR MEDICAL SERVICES**

- To conduct appropriate due diligence checks;
- To register your inquiry and address any follow-up calls;
- To prepare all necessary sales documentation and any other documentation as may be requested;
- To communicate all advisories and changes;
- Any other purpose relating to any of the above.

#### **WHEN YOU APPLY FOR EMPLOYMENT OR BECOME OUR EMPLOYEE**

- To process your application including any of the following:
- Conducting a background check;
- Conducting aptitude and personality tests and checks;
- Conduct of interviews;
- Facilitating medical check-ups and clearances;

- Collecting information about your suitability for the position;
- To administer benefits and payroll processing;
- To organize training and development;
- To assess your performance;
- To perform other actions necessary or desirable in the implementation of your employment contract;
- Any other purpose relating to any of the above.

## **DISCLOSURE OF YOUR PERSONAL INFORMATION**

We may disclose your personal information to the following as reasonably necessary depending on the product and service concerned:

- Our Employees and officers;
- Your Employer or Prospective Employer;
- Your Health Maintenance Organization (HMO)/Insurance Company/Third party Healthcare Administrators (TPA);
- The Department of Health (DOH);
- Professional advisers such as lawyers and auditors;
- Banks, credit card companies and their respective service providers;
- Suppliers or subcontractors, third party service providers, consultants that have been contracted by Fortmed to provide medical, financial, technical, architectural, administrative services such as information technology, payroll, accounting, sales administration, procurement, training and other services;

We may likewise disclose your personal information as reasonably necessary and for the purpose set out in this policy to any of the following:

- Members of our group of companies or our subsidiaries and affiliates;

We may disclose your personal information:

- To the extent that we are required to do so by applicable law and/or rules and regulations;
- In connection with any ongoing or prospective legal proceedings;
- To any person who we reasonably believe may apply to a court or other competent authority for disclosure of such personal information where, in our reasonable opinion, such court or authority would be reasonably likely to order disclosure of such personal information;
- Any company with which we share information about you for the above purposes is contractually required to comply with confidentiality standards, undertake to respect any individual's right to privacy and comply with the Data Privacy Act. We also require that these organizations use this information only for our purposes and follow our reasonable directions with respect to this information. This includes organizations which handle or obtain Personal Information as service providers for Fortmed.

## **RETENTION AND DISPOSAL OF YOUR PERSONAL INFORMATION**

We will retain documents (including electronic documents) containing your personal data:

- to the extent that we are required to do so by law;
- to the extent required by or pursuant to our contract;
- if we believe that the documents may be relevant to any ongoing or prospective legal proceedings; and

Thereafter your personal information shall be disposed or discarded in a secure manner that would prevent further processing, unauthorized access, or disclosure to any other party or the public.

## **ACCESSING AND UPDATING YOUR PERSONAL INFORMATION**

### **ACCESSING YOUR PERSONAL INFORMATION**

You may instruct us to provide you with any personal information we hold about you. Provision of such information will be subject to the supply of appropriate evidence of your identity

- We may withhold personal information that you request to the extent permitted by law
- You may instruct us at any time not to process your personal information for marketing purposes
- In practice, you will either expressly agree in advance to our use of your personal information for marketing purposes, or we will provide you with an opportunity to opt out of the use of your personal information for marketing purposes

### **UPDATING YOUR PERSONAL INFORMATION**

If the personal information that we hold about your needs to be corrected or updated, Fortmed shall make all reasonable efforts to ensure that data collected is current, complete and accurate. If you want to access and update your personal data, you may send the request to [claudine.dy@fortmed.org](mailto:claudine.dy@fortmed.org) or get in touch with respective customer support of the product or services that you have engaged with.

As part of our security measures, we will contact you and conduct the necessary verification measures to process your request. Once we have implemented the necessary correction we shall then notify you that your request have been process.

### **WITHDRAWAL OF CONSENT**

If you wish to withdraw your consent given for any or all purposes set out in this Policy, you may send your detailed request [claudine.dy@fortmed.org](mailto:claudine.dy@fortmed.org). Depending on the nature of your consent withdrawal, Fortmed may not be in a position to continue to provide our products and services to you

## **PROTECTING YOUR INFORMATION**

### **HOW WE SAFEGUARD YOUR PERSONAL INFORMATION**

We maintain physical, technical and organizational safeguards to protect your personal data against loss, theft, unauthorized access, disclosure, copying, use or modification. We also put in effect safeguards such as:

- Using secured servers behind advance threat protection appliances, firewalls, encryptions and other security tools;
- We limit access of your personal information to those who are qualified and authorized to process them. All such persons, wherever they are located, are required by us to protect the confidentiality and privacy of your personal information in a manner consistent with our privacy policies and practices;
- Our information system/infrastructure undergoes regular security vulnerability and penetration testing to ensure your personal information is properly protected.

### **THIRD PARTY WEBSITES**

Our websites may contain hyperlinks and details of third party websites. We have no control over, and are not responsible for, the privacy policies and practices of third parties. We therefore advise you to study their privacy policy. Once you leave 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.

## COOKIES AND SIMILAR TECHNOLOGIES

A cookie is a small file which asks permission to be placed on your computer's hard drive. Once you agree, the file is added and the cookie helps analyze web traffic or lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.

We use traffic log cookies to identify which pages are being used. This helps us analyze data about web page traffic and improve our website in order to tailor it to customer needs. We only use this information for statistical analysis purposes, after which the data is removed from the system.

Overall, cookies help us provide you with a better website, by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us. We may use your browsing behavior to develop promotional offers, products, and services that we feel are beneficial to you.

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of the website.

## MANGEMENT AND SECURITY

A Data Privacy Officer for Fortmed has been appointed to manage and safeguard the handling of your Personal Data compliant with the Philippine Data Privacy Act of 2012 or RA 10173 and this Policy. Fortmed Management is committed to ensure that its Privacy Management Program is constantly reviewed, monitored and enhanced. Fortmed regards personal data breaches very seriously.

## UPDATES TO THE POLICY

Fortmed will amend this Privacy Policy from time to time. Fortmed may also update this policy to apply changes due to new laws and regulation affecting the data privacy act, changes in our business operations and environment. Any updates of changes will be posted on Fortmed main site with a date stamped so that you are informed of the latest Policy update.

## HOW TO CONTACT US

For any comments, questions, complaints or requests relating to this Privacy Policy statement you may get in touch with:

<b>DATA PROTECTION OFFICER</b>	<b>EMAIL ADDRESS</b>	<b>CONTACT NUMBER</b>	<b>ADDRESS</b>
	dataprotection@fortmed.org	0917-8658010	4 <sup>th</sup> Floor Crown Center 158 Jupiter cor. N. Garcia Sts. Makati City