

# AVENTUS PRIVACY STATEMENT

## Document Version History

Version	Date
0.1	December 2022
0.2	February 2023

## I. Our Commitment

Aventus Medical Care, Inc. (Aventus), recognizes the value of Informational Privacy in the conduct of its business. As a group operating across the entire Philippines, we adhere to the provisions of the Data Privacy Act of 2012 of the Philippines and the directives of the National Privacy Commission.

## II. Introduction to this Privacy Statement

This Privacy Statement describes Aventus' policies and practices regarding the collection and use of personal information provided by our users or collected by us on the sites and applications where this Privacy Statement is posted, whether on our digital properties or on applications we make available on third-party sites or platforms.

Note, this Privacy Statement may be updated from time to time whenever we undertake new practices or if we adopt new privacy policies or when responding to changes in regulatory requirements or for other purposes. Notice shall be made by posting such changes on our sites and applications, or by other means, consistent with applicable law.

## III. Data Privacy Officer and Enforcement of your Rights

Aventus is a Philippine based entity, with a registered Data Privacy Officer responsible for ensuring the confidentiality, integrity and availability of your personal information. If you have privacy concerns or if you wish to enforce your rights to be informed, to object, to access, to correct, to erasure, to complain or to data portability, please direct your query to Aventus DPO as follows:

**DATA PRIVACY OFFICER**  
4F Feliza Building, VA Rufino St., Legaspi Village  
Makati City, Philippines  
+63287894000 | [dpo@aventusmedical.com.ph](mailto:dpo@aventusmedical.com.ph)

## IV. What We collect and how we collect them

Aventus collects various types of information so we can provide you the best and the most efficient service possible in the market. The following describes the information we collect according to source.

### 1. *From You as a patient / guest*

- a. Platform access credentials you provide when using our platforms such as Patient Portal, TelAventus MD, Accounts Portal, and Surehealth Portal.
  - i. For the Patient Portal, access requires the submission of your patient code provided to you when you visit our clinics. This patient code should not be shared to anyone that you do not trust.
  - ii. For TelAventus MD, we require your complete name, membership card number if availing using HMO, birthdate, address, email address, chief complaint and medical history. This information is required so we can create your medical records. Information provided may be used in future requests for teleconsultation via our platforms.
  - iii. For Accounts Portal, we require you, as authorized user, to provide your company code and email address. Company code is assigned to our client companies and only those authorized shall be given access.
  - iv. For Surehealth Purchase Portal, you will be asked to provide your name, address, birthdate, address, mobile and phone number, email address and payment information.
- b. Transaction Information you provide when you request information, contact us through various platforms, purchase, request a service from us, such as your postal address, telephone or mobile number and email;
- c. Surehealth Information you provide when you register your Surehealth cards
- d. Visitor Information you provide when you visit our office premises or hubs.

### 2. *From Third Parties*

- a. Information from third parties where our platforms are available concerning the use of our applications;
- b. Activity Information about your use, and the use by any person(s) you authorize through your account (for instance, our member's portal, if available to you), of our sites and applications, such as the content you view or post, how often you use our services, and your preferences;
- c. Location Information including precise or approximate location information provided by a mobile or other device interacting with one of our sites, applications, or physical properties (including through beacon technologies), or associated with your IP address or other online or device identifier, where we are permitted by law to process this information

### 3. *From HMO Partners*

- a. Your membership information and/or medical requests provided/coursed through your HMO whenever you desire to use our services. For instance, you requested to have your Annual Physical Exam via your HMO Provider, in which case, your request and your information will be shared to us by your HMO.

### 4. *Other sources*

- a. Pictures or videos captured through our platforms and/or CCTV Cameras installed within our premises;
- b. Call Recordings when you call our hotlines;
- c. Usage, viewing, technical, and device data when you visit our sites, use our applications on third-party sites or platforms, or open emails we send, or connect with our wireless Internet access services and other similar technologies, including your browser or device type, unique device identifier, and IP address;
- d. Public Forum Information posted about us by you made available to all.

## V. Purposes

In general, Aventus processes your data to provide you with medical services you have requested or purchased from us, including, events, publications and other content. We use this information to refine services to better tailor them to your needs and to communicate with you about other services Aventus offers. Most of the time, Aventus needs to process your personal data to fulfill our role as your provider of medical services, with all the attendant benefits Aventus provides. Sometimes Aventus has a legitimate interest in processing data to better understand the needs, concerns, and interests our members and other customers so can operate optimally as a business. And sometimes, Aventus relies upon your consent, in which case we will keep a record of it and honor your choices.

### **1. Provision of Medical Services**

Aventus processes your personal information to provide medical services you require, which includes liaising with third party HMOs, specialist doctors, clinics, hospitals, and/or medical institutions, if needed. Aventus may also use this information for us to personalize your experience at our touchpoints and for us to conduct market research by understanding and analyzing customer behavior, location, preferences, and demographics in order to improve our services.

Aventus relies on fulfillment of contract as the lawful basis under the Data Privacy Act of 2012 for processing members' personal information

### **2. Other Business and Legal Purposes**

We may also collect, use, and/or disclose your personal data for purposes connected or relevant to our business for us to comply with our legal obligations and requirements; enforce obligations owed to us and administering debt recovery and debt management; prevent, detect, and investigate crime; analyze and manage commercial risks; maintain our accounting books for record keeping; conduct any form of investigation relating to disputes, billing, fraud, offenses or prosecutions, among others; and 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 us (including but not limited to responding to regulatory complaints, disclosing to regulatory bodies, and conducting audit checks, due diligence and investigations).

### **3. Events**

Aventus hosts live, in-person or online events throughout the year. These include wellness conferences and other activities. If you register for one of our events and you are a member, we will access the information in your member account to provide you with information and services associated with the event.

If you are not a member and you sign up for one of our events, we will collect the following information: name, email, company, title, industry, address, phone number, meal preferences, if applicable, and the like.

Aventus uses the information provided by event attendees to provide them with event services, including badge printing, tailoring sessions to meet the audience profile and to determine the sessions likely to require the biggest rooms, and related purposes connected with the event.

If you are a presenter at one of our events, we will collect information about you including your name, employer and contact information, and photograph, and we may also collect information provided by event attendees who evaluated your performance as a presenter. We may also make and store a recording of your voice and likeness in certain instances.

Aventus relies on a legitimate interest basis for collecting, storing and processing this information.

We keep a record of your participation in Aventus events as an attendee or presenter. This information may be used to provide you with membership services or to tell you about other events and publications. It may also be used to help Aventus understand our members' needs and interests to better tailor our products and services to meet your needs.

#### **4. *Your correspondence with us***

If you correspond with us by email, the postal service, or other form of communication, we may retain such correspondence and the information contained in it and use it to respond to your inquiry; to notify you our other services; or to keep a record of your complaint, request, or similar concern. Note, Aventus has a legitimate interest in maintaining personal information of those who communicate voluntarily with us.

## ***VI. Use of our Websites and Platforms***

### **1. *Websites***

As is true of most other websites, Aventus' website collects certain information automatically and stores it in log files. The information may include internet protocol (IP) addresses, the region or general location where your computer or device is accessing the internet, browser type, operating system and other usage information about the use of the our website, including a history of the pages you view. We use this information to help us design our site to better suit our users' needs. We may also use your IP address to help diagnose problems with our server and to administer our website, analyze trends, track visitor movements, and gather broad demographic information that assists us in identifying visitor preferences.

Aventus has a legitimate interest in understanding how members, customers and potential customers use its website. This assists us with providing more relevant products and services, with communicating value to our sponsors and corporate clients, and with providing appropriate staffing to meet member and customer needs.

#### **a. *Cookies***

Our websites may make use of "cookies" to store and track information such as the number of users and their frequency of use, profiles of users, and their online preferences. Cookies do not

capture information that would personally identify you, but the information collected may be used to assist us in analyzing the usage of our websites and to improve your online experience with us. You can disable the cookies by changing the setting on your browser. However, this may affect the functionality of our websites.

b. **External Links**

Our websites may also contain links to other websites that are not owned or maintained by us and over which we have no control. These links are provided only for your convenience. This Privacy Statement only applies to our website. When visiting these third-party websites, you should read their privacy policies.

**2. Other Portals**

We have built platforms available through your mobile phones or through separate webpages linked to our website to improve the quality of our services. Please take time to read the privacy notices posted on these platforms before proceeding.

**VII. When and how we share information with others**

**1. General**

We do not otherwise reveal your personal data persons or businesses outside Aventus for their independent use unless:

- a. you request or authorize it;
- b. the information is provided to comply with the law (for example, to comply with a search warrant, subpoena, or court order),
- c. enforce an agreement we have with you, or to protect our rights, property or safety, or the rights, property or safety of our employees or others;
- d. the information is provided to our agents, vendors or service providers who perform functions on our behalf;
- e. to address emergencies or acts of God; or
- f. to address disputes, claims, or to persons demonstrating legal authority to act on your behalf;

**2. Aggregated Information**

We may also gather aggregated data about our patients and Site visitors and disclose the results of such aggregated (but not personally identifiable) information to our partners, service providers, advertisers, and/or other third parties for marketing or promotional purposes.

**3. On Medical Record Generated**

The following shall be provided access to your medical record, subject to compliance with the requirements of the Data Privacy Act of 2012:

- a. Your employer relative to APE and PEME results. Your employer routinely requests your medical report generated through the availment of our APE and PEME Services. Said report contains the findings necessary to determine your fitness to work.

- b. Your Spouse/Partner/Immediate Family Member. Only when it is necessary to protect your life as a patient.
- c. The Legal Guardian. Whenever you are a dependent-minor or a dependent under guardianship, your guardian shall be given access to your record, upon request.
- d. Government/the Courts/regulatory agencies. Only when required by law and or to protect our legitimate interests, such as the results of the drug tests availed of.

### ***VIII. Data subject rights***

The Data Privacy Act of 2012 provides certain rights for data subjects. A good explanation of them (in English) is available on the website of the Philippine National Privacy Commission Website (<https://www.privacy.gov.ph/know-your-rights/>).

This Privacy Statement is intended to provide you with information about what personal data Aventus collects about you and how it is used. If you have any questions, please contact us at [dpo@aventusmedical.com.ph](mailto:dpo@aventusmedical.com.ph).

If you wish to confirm Aventus is processing your personal data, or to have access to the personal data Aventus may have about you, please contact us at [dpo@aventusmedical.com.ph](mailto:dpo@aventusmedical.com.ph).

You may also request information about: the purpose of the processing; the categories of personal data concerned; who else outside Aventus might have received the data from us; what the source of the information was (if you didn't provide it directly to Aventus); and how long it will be stored.

You have a right to correct (rectify) the record of your personal data maintained by Aventus if it is inaccurate. You may request that Aventus erase that data or cease processing it, subject to certain exceptions. You may also request that Aventus cease using your data for direct marketing purposes, if initially you have provided your consent.

You also have a right to lodge a complaint with the appropriate data protection authority if you have concerns about how Aventus processes your personal data. When technically feasible, Aventus will—at your request—provide your personal data to you or transmit it directly to another controller.

Reasonable access to your personal data will be provided at no cost you if you are a member, conference attendees and others upon request made to Aventus at [dpo@aventusmedical.com.ph](mailto:dpo@aventusmedical.com.ph). If for some reason access is denied, Aventus will provide an explanation as to why access has been denied.

For questions or complaints concerning the processing of your personal data, you can email the Aventus' DPO at [dpo@aventusmedical.com.ph](mailto:dpo@aventusmedical.com.ph).

### ***IX. Security of your information***

To help protect the privacy, security, integrity and confidentiality of your personal data, we maintain physical, technical and administrative safeguards. We review, update and test our security procedures on an ongoing basis. We restrict access to your personal data to those

employees who need to know that information to provide benefits or services to you. In addition, we train our employees about the importance of confidentiality and maintaining the privacy and security of your information. We commit to taking appropriate disciplinary measures to enforce our employees' privacy responsibilities.

While best practice precautions will be taken to ensure that the information you provide is protected against unauthorized or unintended access, we cannot be held responsible for unauthorized or unintended access that is beyond our control.

## ***X. Data storage and retention***

The personal data collected from you by us is retained for the period of time that the purpose for which the personal data was collected continues. Please refer to the below Data Retention Schedule specifying the prescribed periods of retention depending on the classification of documents:

Retention Guidelines are as follows:

No.	Category	Retention Period	Basis
1	Medical Records	15 years	Health Privacy Code
2	Human Resource	3 years from Cessation of Employment	Labor Code
3	Finance	5 years for physical , 10 for electronic	Generally Accepted Accounting Principles
4	Legal	10 years	Prescriptive Period under the Civil Code
5	Others	5 years	Company Policy

We will destroy the personal data thereafter, unless it is necessary to retain the personal data longer for our satisfaction and compliance with legal, regulatory or accounting requirements, or to protect our interest.

## ***XI. Questions, concerns or complaints***

If you have questions, concerns, complaints, or would like to exercise your rights, please contact the Aventus' DPO:

**DATA PRIVACY OFFICER**  
4F Feliza Building, VA Rufino St., Legaspi Village  
Makati City, Philippines  
+63287894000 | [dpo@aventusmedical.com.ph](mailto:dpo@aventusmedical.com.ph)