

This is the Privacy Policy of Cryoviva Singapore Pte Ltd, a company incorporated in the Republic of Singapore (UEN: 201320349D) (“Cryoviva”, “**we**”, “**us**” or “**our**”).

This Privacy Policy applies to all personal data provided to us through whatever means, including but not limited to personal data provided to us:

- (a) through this website (“**Website**”);
- (b) through our social media platforms, including our Facebook page at <https://www.facebook.com/cryovivasingapore/>;
- (c) when you express your interest to be provided with personalized cord blood banking counselling sessions;
- (d) when you express your interest to be contacted by us to know more about the services that we offer;
- (e) when you enquire about the services we offer;
- (f) when you sign up or register for the services we offer;
- (g) when you undergo medical testing or provide us with your medical history to evaluate the criteria for cord blood storage for future use in Hematopoietic stem cell transplants, or to evaluate whether it is safe to collect cord blood at the time of the birth of your child; and
- (h) when you interact with our employees or volunteers through our social media platforms, through face to face meetings, or by other communications channels including telephone calls, emails; and
- (i) as a result of your registration or attendance at baby fairs, seminars and events.

We take our data protection and privacy responsibilities seriously. We also recognize the importance of the personal data you have entrusted to us and believe that it is our responsibility to properly manage, protect and process your personal data.

Please read the terms below carefully. If you do not agree with how we collect, use, disclose and/or process your personal data, please do not provide any personal data to us. When you use our Website, submit information to us, sign up as our client, subscribe to our mailing list, or otherwise register your interest or sign up for any of our events or services, you are agreeing to the terms in this Privacy Policy.

If you, at any time, have any queries on this Privacy policy or any other queries in relation to how we may manage, protect and/or process your personal data, please do not hesitate to contact our Data Protection Officer (the “**DPO**”) using the contact details set out in paragraph 10 below.

## **1 WHAT CONSTITUTES PERSONAL DATA**

- 1.1 “Personal data” means data, whether true or not, about an individual who can be identified from that data, or from that data and other information to which an organization has or is likely to have access. Common examples of personal data could include names, identification numbers, email address, mailing address, telephone numbers, contact information, credit or debit card information and other billing information, medical information, medical history, photographs and video images.
- 1.2 Whether you provide us with personal data is your choice, however in many instances, this type of information is required to participate in a particular activity, obtain a benefit we may offer, or gain access to certain content on our Website.

## **2 AMENDMENT TO PRIVACY POLICY**

- 2.1 As part of our efforts to ensure that we properly manage, protect and process your personal data, we will be reviewing our policies, procedures and processes from time to time.
- 2.2 We reserve the right to amend the terms of this Privacy Policy at our absolute discretion. Any amended Privacy Policy will be posted on our Website and can be viewed at <http://www.cryoviva.com.sg/privacy-policy.html>. The updated Privacy Policy will supersede earlier versions and will apply to personal data provided to us previously. If you do not accept any amendment to the Privacy Policy, please contact our Data Protection Officer (see paragraph 10).
- 2.3 You are encouraged to visit the above website from time to time to ensure that you are well informed of our latest policies.

### **3 PURPOSES FOR COLLECTION, USE, DISCLOSURE AND PROCESSING OF PERSONAL DATA**

3.1 **General Purposes**. Generally, we collect, use or disclose your personal data for the following purposes (depending on the circumstances):

- (a) verifying your identity;
- (b) providing you with the services you request;
- (c) facilitating billing and payment when you acquire our services;
- (d) evaluating the criteria for cord blood storage in Hematopoietic stem cell transplants, and minimizing the risk for the transplant recipient;
- (e) evaluating the stored cord blood sample to minimize the risks to the maternal / infant donor and recipient (during cord blood transplantation);
- (f) conducting medical and clinical trials;
- (g) providing the relevant hospital and/or laboratory clinician(s) with the required medical information requested for their records;
- (h) contacting you and providing you with information regarding the cord blood banking services we offer;
- (i) sending you pregnancy related information;
- (j) sending you information regarding our loyalty programs;
- (k) following up with you when you express your interest to be contacted by us to learn more about our services;
- (l) inviting you to participate in our events, clinical trials, clinical research or other studies relating to the services that we offer;
- (m) requesting for your feedback;
- (n) assisting you with your enquiries, and responding to your

feedback, complaints and requests;

- (o) administering and/or managing your relationship with us;
- (p) organizing or co-organizing events and workshops with our partners, sponsors and advertisers;
- (q) assessing your suitability when you apply to us for a job or internship;
- (r) if you are our employee or work for us in any capacity, to manage your relationship with us;
- (s) ensuring that content on our Website is presented in the most effective manner;
- (t) making suggestions and recommendations to you and other users of our Website about content, goods and services that may interest you or them;
- (u) analyzing site traffic, understanding customer needs and trends, carrying out targeted promotional activities, personalizing content and improving our services;
- (v) understanding or measuring the effectiveness of advertising we serve to you and others, and delivering relevant advertising to you;
- (w) notifying you of changes to our Website;
- (x) in relation to our corporate governance, audit, operational or business protocols;
- (y) to resolve disputes; and
- (z) any other purposes which we notify you of at the time of obtaining your consent, and any other reasonable purposes related to the aforesaid.

We will notify you of such other purpose not mentioned above at the time of obtaining your consent, unless processing of your personal data without your consent is permitted by applicable data protection laws.

3.2 **Business purposes.** We may also use your personal data for purposes connected or relevant to our business, such as:

- (a) complying with our legal obligations and requirements;
- (b) enforcing contractual terms and conditions, and legal obligations owed to us;
- (c) accounting, risk management and record keeping;
- (d) carrying out research, planning and statistical analysis;
- (e) staff training;
- (f) monitoring customer-employee interactions for quality assurance, employee training and performance evaluation purposes;
- (g) improving the quality of services provided by us;
- (h) any other reasonable purposes related to the aforesaid.

3.3 **Additional purposes.** If you have consented, we may use your personal data, from time to time, for additional purposes such as:

- (a) informing you of the latest activities, programs, special offers and promotions offered by us and/or our related entities, sponsors, strategic business partners and associates; and
- (b) using your photographs on the Website, our social media platforms and/or in publicity materials.

3.4 When using your personal data to contact you for the above purposes, we may contact you via regular mail, fax, e-mail, SMS, telephone or any other means.

3.5 **Do Not Call Registry.** We may call or send marketing messages to your Singapore telephone number if you have consented and you have not registered your number with the No Voice Call Register or No Text Message Register. Even if you have registered with the Do Not Call Registry, we may still call or send marketing messages to you if you have provided us with clear and unambiguous consent to

do so.

- 3.6 You may opt-out of receiving future promotional communications from us by following the unsubscribe instructions provided in our communications.
- 3.7 If you provide us with the personal data of another person, you warrant that you have informed him/her of the purposes for which we are collecting his/her personal data and that he/she has consented to your disclosure of his/her personal data to us for those purposes. You agree to indemnify and hold us harmless from and against any and all claims by such individuals relating to our collection, use and disclosure of such personal data in accordance with the terms of this Privacy Policy.
- 3.8 In order to conduct our business operations smoothly, we may also be disclosing the personal data you have provided to us to our third parties who provide necessary services to us, including but not limited to service providers and data processors working on our behalf and providing services such as accounting, hosting and maintenance services, security services, delivery services, etc.

## **4 NON-PERSONAL DATA**

- 4.1 Non-personal data is data that does not personally identify you. Non-personal data can include certain personal data that has been anonymized. We obtain non-personal data from information you provide us and automatically when you access our Website.
- 4.2 We use non-personal data in a variety of ways, including helping to analyze Website traffic, understand customer needs and trends,

carry out targeted promotional activities and to improve our services. We may use your non-personal data by itself or aggregate it with information we obtain from others. We may share your non-personal data with our affiliated companies and third parties for such purposes.

## **5 COOKIES, LOG DATA AND OTHER TECHNOLOGIES**

- 5.1 Cookies are small text files placed by browsers on your devices. Our Website may use cookies to learn how our users interact with our content and this helps us to enhance user experience for our website. If you do not wish for cookies to be used you may actively delete or block them. You may not be able to take advantage of all the features of our Website if you delete or disable cookies. For more information on how to see what cookies have been set and how to manage and delete them, please visit: <http://www.allaboutcookies.org/>.

## **6 SPECIFIC ISSUES FOR THE DISCLOSURE OF PERSONAL DATA TO THIRD PARTIES**

- 6.1 We respect the confidentiality of the personal data you have provided to us. In that regard, subject to the disclosures you have consented to in this Privacy Policy, we will not disclose your personal data to third parties without first obtaining your consent permitting us to do so.
- 6.2 In addition, you agree and acknowledge that we may share your personal data to selected third parties (for the purposes described in paragraphs 2.1 and 2.2) including:
- (a) our affiliated companies (as Cryoviva Singapore Pte Ltd is part of a multi-national group of companies);
  - (b) our third party vendors including but not limited to vendors that administer our promotions and events, provide us with marketing or promotional assistance, analyze data, or assist us with customer service;
  - (c) advertising networks, analytics companies and other vendors for advertising purposes, such as monitoring the effectiveness of advertisements and making advertisements more relevant to you; and

(d) analytical and search engine providers that assist us in the improvement and optimization of the Website.

5.4 You agree that we may disclose or share your personal data with our consultants and professional advisors (such as accountants, lawyers, auditors) for the purposes of obtaining advice.

5.5 We may also disclose your personal data as required or permitted by law. We may disclose your personal data to regulatory authorities, statutory bodies or public agencies for the purposes of complying with their respective requirements, policies and directives.

5.6 The instances listed in paragraphs 5.4 and 5.5 above are not intended to be exhaustive. The law provides for other exceptions.

## **7 REQUEST FOR ACCESS AND/OR CORRECTION OF PERSONAL DATA**

7.1 You may request to access and/or correct the personal data currently in our possession or control by submitting a written request to us. We will need enough information from you in order to ascertain your identity as well as the nature of your request, so as to be able to deal with your request. Hence, please submit your written request to our DPO whose contact details are set out in paragraph 10.

7.2 For a request to access personal data, once we have sufficient information from you to deal with the request, we will seek to provide you with the relevant personal data as soon as reasonably possible. Otherwise, we will notify you of the soonest possible time within which we can provide you with the information requested. Please note that data protection laws may exempt certain types of personal data from being subject to your access request.

7.3 For a request to correct personal data, once we have sufficient information from you to deal with the request, we will correct your personal data as soon as practicable. Otherwise, we will notify you of the soonest practicable time within which we can make the correction.

7.4 We may charge you a reasonable fee for the handling and processing of your requests to access your personal data. Accordingly, we may provide you with a written estimate of the fee we will be charging. Please note that we are not required to respond



to or deal with your access request unless you have agreed to pay the fee.

## **8 REQUEST TO WITHDRAW CONSENT**

- 8.1 You may withdraw your consent for the collection, use and/or disclosure of your personal data in our possession or under our control by submitting your request to our DPO via one of the contact methods listed in paragraph 10 below.
- 8.2 We will process your request within a reasonable time from such a request for withdrawal of consent being made, and will thereafter not collect, use and/or disclose your personal data in the manner stated in your request.
- 8.3 However, your withdrawal of consent could result in certain consequences arising from such withdrawal. Depending on the extent of your withdrawal of consent, we may not be able to provide some of our products, services or functions.

## **9 ADMINISTRATION AND MANAGEMENT OF PERSONAL DATA**

- 9.1 We will take reasonable efforts to ensure that your personal data is accurate and complete, if your personal data is likely to be used by us to make a decision that affects you, or disclosed to another organization. However, this means that you must also update us of any changes in your personal data that you had initially provided us with. We will not be responsible for relying on inaccurate or incomplete personal data arising from your not updating us of any changes in your personal data that you had initially provided us with.
- 9.2 We will also put in place reasonable security arrangements to ensure that your personal data is adequately protected and secured. Appropriate security arrangements will be taken to prevent any unauthorized access, collection, use, disclosure, copying, modification, leakage, loss, damage and/or alteration of your personal data. Unfortunately, transmission and transfer of information via the internet is not completely secure. We cannot assume responsibility for any unauthorized use of or access to your personal data by third parties which are wholly attributable to factors beyond our control.

9.3 Your personal data may be transferred to and stored in a country outside Singapore. You consent to the transfer to, storage and processing of your personal data in such countries. We will take all reasonable steps which are necessary to ensure that your personal data is accorded a standard of protection that is comparable to the protection which your personal data enjoys under the laws of Singapore. Where these countries or territories do not have personal data protection laws which are comparable to that in Singapore, we will enter into legally enforceable agreements with the recipients to ensure that they protect your personal data to the same standard as required under Singapore law.

## 10 CONTACT DETAILS

10.1 If you have any queries, complaints or comments about this Privacy Policy, or if you would like to contact us for any other reason set out in this Privacy Policy, you may contact us through one of the following methods:

- (a) Singapore telephone number: +65 6737 8482.
- (b) E-mail : DPO@cryoviva.com.sg  
(Attention it to the 'Data Protection Officer')
- (c) Office address : 350 Orchard Road, #15-01 Shaw House  
Singapore 238868 (Attention it to the 'Data Protection Officer')

10.2 We endeavor to respond to you, and, if applicable and appropriate, make the requested change in our active databases as soon as reasonably practicable. Please note that we may not be able to fulfil certain requests while allowing you access to certain benefits and features of our Website.

## **11 THIRD PARTY LINKS AND MATERIALS**

11.1 Our Website may contain links to third party websites. The fact that we provide links to a website is not an endorsement, authorization or representation of our affiliation with the third party. We do not exercise control over third party websites nor are we responsible for the privacy practices employed by third party websites. These websites may place their own cookies or other files on your computer, collect data or solicit personal data from you. We encourage you to note when you leave our Website and to read the privacy policies of the other websites you visit to ensure that you are aware of their data protection policies before submitting any personal data to such third party websites.

## **12 GOVERNING LAW**

12.1 This Privacy Policy and your use of this website shall be governed in all respects by the laws of Singapore.

Thank you for taking the time to learn about our Privacy Policy.