

## ASIA MICROBIOME LIBRARY PERSONAL DATA PROTECTION POLICY

**PLEASE READ THESE TERMS CAREFULLY AS THEY MAY HAVE IMPORTANT CONSEQUENCES FOR YOU.**

### **Our Promise to Protect Your Personal Data**

As the asia microbiome research and transplant center, AMILI takes its responsibility to protect the personal data seriously. Your privacy is important to AMILI and we are committed to complying with applicable law, including the Singapore Personal Data Protection Act (No. 26 of 2012) (the “**PDPA**”).

### **SECTION 1 – INTRODUCTION**

1. The purpose of this document (“Data Protection Policy”, or “DPP”) is to inform you of how AMILI collects, uses, discloses, processes or otherwise handles (“Handles”) your personal data in accordance with The Personal Data Protection Act (“PDPA”), , and to let you know how you can exercise your rights in respect of your personal data. For general information on Personal Data Protection, please visit the Personal Data Protection Commission (“PDPC”) website (<https://www.pdpc.gov.sg>).
2. For the purpose of this Statement, “**we**”, “**our**” and “**us**” shall refer to AMILI.
3. We value the privacy of every individual and are committed to protect the personal data we collect in accordance with the principles set out in this Policy.
4. The portion of the DPP that applies to your personal data will depend on the nature of your transactions, agreements or interactions with us.
5. Any terms used in this document, such as “individuals”, “personal data” or “reasonable”, which are also defined in the PDPA, should be understood to take on the definition or interpretation as provided by the PDPA or PDPC’s Advisory Guidelines documents.
6. Please note that though we make an effort, as per legal requirements, to provide reasonably adequate information concerning our policies as it pertains to personal data, this DPP is not an exhaustive list of all the situations or scenarios concerning personal data. Feel free to approach your AMILI’s Data Protection Officer (see **WITHDRAWAL OF CONSENT, ACCESS AND CORRECTION OF YOUR PERSONAL DATA** below) if you need clarification about any specific situation.

7. The DPP applies to and forms part of the terms and conditions governing your transactions, agreements or interactions with us, whenever your personal data is Handled by us.
  8. We bring it to your attention, this DPP becomes binding by your taking any of the following steps:
    - a) proceeding with your transactions, agreements or interactions with us;
    - b) submitting information to us via forms or other data collection means or processes (whether through a form, an interview, undergoing examinations or by other means);
    - c) signing up / applying for stool donation program or other AMILI program;
    - d) attending at our premises for visits;
    - e) interacting with our websites, electronic forms;
    - f) calling or sending messages to us;
    - g) transacting with us, or undergoing any treatment or process with us; and
    - h) other means.
  9. This Data Protection Policy supplements but does not supersede nor replace any other consents you may have previously provided to us in respect of your Personal Data, and your consents herein are additional to any rights which any of the Companies may have at law to collect, use or disclose your Personal Data.
  10. We strongly believe in protecting your Personal Data. We will ensure that all reasonable security arrangements are in place to prevent any unauthorized access, collection, use, disclosure, copying modification or disposal of your Personal Data. Where necessary, we will require any person to whom we provide your Personal Data to agree to comply with our Data Protection Policy. While we will use all reasonable efforts to ensure that such persons comply with our Data Protection Policy, we will not be liable to you if any person fails to do so.
- We update the DPP from time to time - this version of the DPP was last updated as at 02 December 2019.**
11. We update this DPP from time to time to ensure that our standards and practices remain relevant and comply with the applicable laws and guidelines. The latest version of this Policy supersedes earlier versions and will apply to personal data

provided to us previously. We encourage you to review this page periodically to keep up to date with any changes to this Policy.

12. Refer to [www.amili.org](http://www.amili.org) for the policy update.
13. We encourage and ask all individuals who interact with AMILI, including any person to whom personal data relates (each a “**data subject**”) to check back to the publicly posted / circulated copies of the DPP.
14. We ask and require that each of the following parties / persons to abide by this DPP:
  - a) all AMILI employees, including any healthcare professional (doctors, nurses, etc.);
  - b) all volunteers and trainees (including interns or trainee);
  - c) third parties (including third party partners, service providers, or affiliates) whom we work with and who have agreed to abide by this DPP.
  - d) All collaborators

## SECTION 2 – PERSONAL DATA

15. This DPP applies to “personal data” which is defined as “data, whether true or not, about an individual who can be (i) identified from that data, or (ii) from that data and other information to which the organization has or is likely to have access to, including data in our records as may be updated from time to time. .” This may include your full name, identification number, passport, photograph, video, mobile telephone number, personal email address, thumbprint, DNA profile, as well as name and residential address of any individual which you have provided us.
16. In some situations, personal data may include tissue specimen, organic materials provided by a data subject (whether as a patient, donor, research participant, or volunteer etc.), but only where such materials are linked with data that can lead to the identification of the data subject.

### What is not personal data

17. Personal data does not include:
  - a) data about a data subject which has been anonymized. Anonymization is the process of removing identifying information such that the remaining data does not identify any particular individual. Techniques can include pseudonymisation<sup>1</sup>,

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<sup>1</sup> Replacing identifiers with other references. For example, replacing an individual’s name with a tag or reference number.

aggregation, replacement, data reduction<sup>2</sup>, data suppression<sup>3</sup>, data shuffling<sup>4</sup>, or masking<sup>5</sup>.

- b) business contact information, defined as an individual's name, position name or title, business telephone number, business address, business electronic mail address, business fax number and any other similar information not provided solely for the individual's personal purposes.
- c) Personal data of a deceased individual who has been dead for more than 10 years.
- d) Personal data that is falsified with the intent to commit fraudulent.

18. AMILI practices and undertakes reasonable safeguards to anonymize personal data in appropriate situations, balancing both the need to rely on and use sufficiently accurate and complete personal data to protect life and health, and avoid mistakes, injury or accidents. Hence, in meeting those obligations, PDPA considers what a reasonable person would consider appropriate in the circumstances when they undertake any action that is subject to data protection.

### SECTION 3 – CONSENT

19. By applying this DPP, you

- a) consent to AMILI and the relevant person(s) (see point 14 above) handling your personal data in ways which enable us to serve you, provide you with the relevant services, attend to the relevant transaction, or to facilitate our interactions with you;
- b) enable the exercise of your rights under the PDPA in an operative and applicable framework, including securing the right to access your personal data, withdraw (or manage) your consents and preferences as to your personal data.

20. Your consent may not be necessary or required in some situations as there may be applicable law or regulation which renders this unnecessary, or where certain permissions or rights or duties have been accorded to the AMILI which enable /

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<sup>2</sup> Removing values that are not required for the purpose. For example, removing 'Ethnicity' from a data set of individuals' attributes.

<sup>3</sup> Banding or hiding the value within a given range. For example, replacing age '43' with the range '40-50'.

<sup>4</sup> Mixing up or replacing values with those of the same type so that the information looks similar but is unrelated to the actual details. For example, the surnames in a customer database could be sanitized by replacing them with those drawn from another database.

<sup>5</sup> Removing certain details while preserving the look and feel of the data. For example, representing a full string of numbers on a credit card as 4346 XXXX XXXX 5379 instead of '4346 6454 0020 5379'.

require us to Handle the personal data. Where such law or regulation applies, we will act in accordance with those other laws and regulations.

### **Withholding / Withdrawing Consent**

21. You are entitled under applicable law to withhold / withdraw consent to the collection, use or disclosure of personal data, and AMILI will respect your choices in this regard. You may withhold consent at any juncture that you are asked for consent, and you may also apply the process / method to withdraw consent as stated in this DPP (see **WITHDRAWAL OF CONSENT, ACCESS AND CORRECTION OF YOUR PERSONAL DATA** below).
22. However, as is recognized by and provided for under the PDPA, it may be that any choice you make to withhold or withdraw consent may impact our ability to proceed with your transactions, agreements or interactions with us, and in particular:
  - a) in some cases, it may also become unsafe or unlawful for us to provide (or continue to provide) medical treatment without the ability to collect, use or disclose personal data;
  - b) b. it may not be possible, without undue risk, cost or liability to AMILI, to proceed with a particular transaction, agreement or interaction with you, and we may be left with no choice but to cease or refrain from the same.
23. AMILI will take the approach that best safeguards us, you and others from risks, and we may well have no choice but to decline to proceed with the transaction, agreement or interaction in question to avoid causing harm or exposing us, you or others to risk.
24. At the same time, it should be noted that your withholding / withdrawal of consent will not prevent us from exercising our legal rights (including any remedies, or undertaking any steps as we may be entitled to at law).

## **SECTION 4: COLLECTION OF PERSONAL DATA**

### **How AMILI collects personal data**

25. Generally, depending on the situation, we may collect personal data in the following ways:
  - a) when you submit any form, including but not limited to survey and questionnaire forms;

- b) when you undergo a procedure / process where stool specimens are provided (whether as a patient, donor, research participant, or volunteer etc.), such that this is linked with other data in any way such that you can be identified;
- c) when, as a patient, you are examined by our staff or medical equipment, or when you are subject to or participate in a medical examination;
- d) when you interact with our staff, including customer service officers, nurses, doctors, residents, and other representatives etc. via telephone calls (which may be recorded), letters, fax, face-to-face meetings and email;
- e) when your images are captured by our CCTV cameras while you are within our premises, or by photographs or videos taken by us or our representatives when you attend events hosted by us;
- f) when you attend AMILI's events (e.g. public forums and corporate events) and your voice and image data is captured on our audio and video recordings;
- g) when you use our services provided through online and other technology platforms, such as websites and apps, including through the use of any online platforms / technologies or tools (e.g., web portals, medical devices, security tokens, biometric technologies);
- h) when you request that we contact you, be included in an email or other mailing list; or when you respond to our request for additional personal data, our promotions and other initiatives;
- i) when you are contacted by, and respond to, our customer service officers, nurses, doctors, agents and other service providers;
- j) when we receive your personal data from referral parties, public agencies, your employer and other third parties;
- k) when you make or receive payment or provide details to facilitate payment, or secure or administer the application of funding / benefits / subsidies;
- l) when we seek information from third parties about you in connection with your relationship with us, including from next-of-kin and caregivers;
- m) when you browse AMILI website (you generally do so anonymously but please see the section below on cookies), and you provide such information or login with your account credentials; and when you submit your personal data to us for any other reasons.

### **Accuracy of personal data we collect from you**

26. We also rely on you and will assume that you have ensured that all personal data submitted to us is complete, accurate, true and correct.

### **Risks of relying on data we collect from you that is without consent or which is inaccurate**

27. If consents are not procured or if you fail to provide us with complete and accurate information, we may, in some situations, be prevented from providing an accurate stool sample collection and prevent potential patient from getting the correct Fecal Microbiome Transplant (or may be impaired in doing so, resulting in risks to that patient) or cause harm to a data subject.

28. AMILI will take the approach that best safeguards us, you and others from risks, and we may well have no choice but to decline to proceed with the transaction, agreement or interaction in question to avoid causing harm or exposing us, you or others to risk.

### **How much personal data AMILI collect**

29. AMILI will strive to limit the collection of personal data to what is reasonable or necessary for such applicable purposes as described in this DPP.

30. However, it should be noted that in the case of medical / health information, the extensiveness and completeness of information that is collected can mean the difference between saving a life, or preventing the loss of life, and can make a crucial difference between a full and proper diagnosis with appropriate treatment and incomplete or inadequate treatment.

31. Further, the relevance of information may not be immediately apparent at first and personal data may be collected as a matter of precaution to ensure that you or a data subject is adequately protected from or treated for illness.

### **Withholding information**

32. If you withhold information, this can have the same effect as when you withdraw consent (see “**Withholding / Withdrawing Consent**” above), and as stated in the “**Risks of relying on data we collect from you that is without consent or which is inaccurate**” section above, we may well have no choice but to decline to proceed with the transaction, agreement or interaction in question to avoid causing harm or exposing us, you or others to risk.

## **SECTION 5: PURPOSES OF HANDLING YOUR PERSONAL DATA AND TO WHOM WE DISCLOSE IT TO**

33. **Generally**, AMILI handles your personal data for the purposes set out in this section. Any one or more of the listed purposes may apply to your personal data, depending on the actual situation. The following does not purport to be an exhaustive listing, although an effort is made to set out as many salient purposes as may be applicable.
34. In the sub-sections that follow we set out some of the Purposes which apply to collection or use of personal data in certain scenarios and also identify some of the relevant recipients in the disclosure of personal data. We would also highlight that while a party may be listed as a recipient or source of personal data in these sections, that same party may also be a recipient or source (albeit not listed or mentioned expressly) in other scenarios.
35. We may handle your personal data in order to execute AMILI operations, including managing the administrative and business operations of the AMILI and conducting audits and studies for the purposes of improving the efficiency, standards and quality of the AMILI's services and operations.
36. Your consent may not be necessary or required in some circumstances as provided in the "Second Schedule – Collection of Personal Data without Consent", "Third Schedule – Use of Personal Data without Consent" and "Fourth Schedule – Disclosure of Personal Data without Consent" of the PDPA, or there may be other legislation such as Infectious Disease Act which renders this necessary. Where the disclosure is restricted by such legislation, the obligation under such other laws will prevail.
37. When using your personal data to contact you for the purposes under which you have consented, we may contact you via postal mail, electronic mail, SMS, telephone, fax or any other means

### **To order test kits for patients or provide FMT service**

38. We may Handle your personal data, particularly if you are a donor, to provide stool sample where blood and stool test are ordered by doctors/clinician.
39. The personal data may be disclosed / shared with healthcare professionals (such as doctors, physicians, residents, nurses, allied health professionals, technicians, dispatch personnel who are assisting on or providing medical services), other medical institutions / facilities (including labs, pharmacies, counsellors, care providers such as next-of-kin, service providers etc.), and healthcare providers. In

each case the disclosure or sharing of such personal data is solely to such persons or entities which are involved in the care of the patient.

40. The purposes for which such personal data is Handled includes :

- a) Conducting donor screening process for eligible FMT donor and follow up with donors for their stool samples.
- b) managing your relationship with us, and providing medical services and advice, including and without limitation to the management of your appointments, registration, getting consent to order blood and stool test, sending notifications to you, communicating FMT related issues, securing instructions on donor's test results;
- a) ensuring appropriate delivery of core patient care services including delivering results of tests and other medical updates;
- b) ensuring proper and complete diagnosis including and without limitation to identifying health / treatment risks (e.g. collecting, identifying and communicating vulnerabilities, conditions, allergies, potentially adverse reactions etc.) and monitoring specimen testing (blood, stool, nasal swap) and reporting recording patient infection data;
- c) ensuring a patient's health and safety (including, for example, advising you of a product or drug recall);
- d) coordinating with donors for FMT face to face interview provided AMILI clinician.;
- e) coordinating with donors with Innovative Diagnostics Pte Ltd for full blood count test
- f) coordinate and facilitate sample collection from home after confirmation of donor.
- g) all other purposes reasonably related to the aforesaid

41. We may also handle personal data (such as telephone number and email address) to contact you and/or your representatives to remind you the dates of sample collection or face to face interview appointment or tests appointment at the AMILI.

#### **For FMT donation**

42. We may handle your personal data in order to execute FMT operations. In brief, this relates to planning, execution, administration and implementation of functions or

things which are necessary to run the relevant FMT donor program. Your personal data may also be used to respond to the service needs of patients as well as other data subjects.

Purposes under this heading include:

- a) acknowledging, responding to, processing and handling your complaints, queries, requests, feedback and suggestions;
- b) managing the administrative and business operations of the AMILI, including file management, tracing of old reports, old films and old clinical notes for review and audit studying and improving efficiency, standards and quality of the AMILI's services and operations;
- c) complying with internal policies and procedures
- d) recording telephone call conversations (including overseas calls) to mediate complaints against staff and train call centre assistants;
- e) requesting feedback or participation in surveys;
- f) processing payment to donors for their samples and time;
- g) handling potential legal claims, manage litigation cases and review legal cases;
- h) analysis for statistical, profiling or other purposes for us to conduct category analysis, financial analysis, investigate service lapses, and to review, develop and improve the quality of our products and services;
- i) conduct reviews, reporting and examining case studies, incidents, issues encountered with a particular data subject so as to understand, minimize and avoid risks, service failures or hazards;
- j) undertaking preventative measures to safeguard any individual, property or defend and maintain legal rights;
- k) to identify and establish ways to improve or deliver more appropriate services or developments to better address the needs of program;
- l) to combine, collate, compile, analyze, review or submit reports or recommendations to meet the Purposes listed above;
- m) to ensure that staff, volunteers, students (including medical students, trainees or other staff) are properly trained to provide the services or execute their functions in the context of FMT donation operations generally;
- n) to meet organizational auditing, accreditation and compliance requirements concerning service standards;

- o) sending staff for occupational health reviews; and
- p) all other purposes reasonably related to the aforesaid

43. For these purposes, disclosures may be made to AMILI's staff who have a need to know, such as administrators, clinicians, executive / administrative staff, as well as persons who can assist AMILI in undertaking these purposes such as analysts, consultants, advisors, educators, or other similar persons.

#### **To make facilitate claims for reimbursement**

- 44. We may handle your personal data to reimburse you for the samples and time for you participation.
- 45. The purposes connected with such Handling of the personal data which include authorizing reimbursement instructions.

#### **SECTION 6: SECURITY**

46. AMILI Pte Ltd will take reasonable efforts to protect personal data in our possession or our control by making reasonable security arrangements to prevent unauthorized access, collection, use, disclosure, copying, modification, disposal or similar risks. However, we cannot completely guarantee the security of any personal data we may have collected from or about you that is beyond our control. E.g., that no harmful code will enter our website (for example viruses, bugs, trojan horses, spyware or adware).

#### **SECTION 7– RETENTION OF YOUR PERSONAL DATA**

- 47. We will review your personal data held by us on a regular basis to determine if such personal data is still needed. Your personal data will not be retained longer than needed for the purpose under which it was collected, unless there are business, industry and/or legal requirements for the retention of such. Your personal data will also not be kept for “just in case” it may be needed for other purposes that you have not been notified.
- 48. We may anonymize your personal data on record as an organization is considered to have ceased retention personal data when it longer has the means to associate the personal data with particular individuals. The anonymizing of data could be found under the section on Anonymization in the Advisory Guidelines on Selected Topics in the PDPC website.

49. We will retain employee personal data for a reasonable period for up to 7 years in accordance with its legal and business purposes, even after the person ceases to be employed by AMILI. With regard to medical data, we will retain medical records in accordance to the duration stipulated by Ministry Of Health.

## **SECTION 8– IT MATTERS**

50. While we strive to protect your personal data, we cannot ensure the security of the information you transmit to us via the Internet, and we urge you to take every precaution to protect your personal data when you are on the Internet. We recommend that you change your passwords often, use a combination of letters and numbers, and ensure that you use a secure browser.
51. If applicable, you undertake to keep your username and password secure and confidential and shall not disclose or permit it to be disclosed to any unauthorized person. Please inform us as soon as reasonably practicable if you know or suspect that someone else knows your username and password or believe the confidentiality of your username and password has been lost, stolen or compromised in any way or that actual or possible unauthorized transactions have taken place. We are not liable for any damages resulting from any security breaches, on unauthorized and/or fraudulent use of your username and password.

## **Cookies**

52. When you interact with us on our websites, we automatically receive and record information on our server logs from your browser. We may employ cookies in order for our server to recognize a return visitor as a unique user including, without limitation, monitoring information relating to how a visitor arrives at the website, 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).
53. Cookies are small text files placed in the 'Cookies' folder on your computer's hard disk and allow us to remember you. The cookies placed by our server are readable only by us, and cookies cannot access, read or modify any other data on a computer. All web-browsers offer the option to refuse any cookie, and if you refuse our cookie then we do not gather any information on that visitor.
54. Should you wish to disable the cookies associated with these technologies, you may do so by changing the setting on your browser. However, you may not be able to enter certain part(s) of our website.

### **Third-Party Sites**

55. Our website may contain links to other websites operated by third parties. We are not responsible for the privacy practices of websites operated by third parties that are linked to our website. We encourage you to learn about the privacy policies of such third-party websites. Some of these third-party websites may be co-branded with our logo or trademark, 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.

### **SECTION 9 – WITHDRAWAL OF CONSENT, ACCESS AND CORRECTION OF YOUR PERSONAL DATA**

56. It is the obligation of the individual to ensure that all personal data submitted to us is true, accurate and complete. If you wish to withdraw your consent to the use of your personal data, correct or obtain access to your personal data held by us, please contact our Data Protection Officer.

57. We may charge you a fee for the provision of your personal data held by us, or for information about the ways in which the data may have been used or disclosed in the past one year.

58. We will not be able to provide access to data which are opinion data kept solely for evaluation purpose such as opinion of suitability, eligibility, qualification of individuals for employment, promotion or continuance in employment.

59. Once your consent is withdrawn, it is our obligation to cease, and cause our data intermediaries and agents to cease, such collection, use and disclosure within reasonable notice period. As a result, we may not be able to proceed with some transactions that you have requested.

### **SECTION 10 – CONTACTING US**

60. If you wish to withdraw any consent you have given us at any time, or if you wish to obtain access or make corrections to your personal data held by us, or if you do not accept any amendment to this Policy, please contact:

#### **The Data Protection Officer**

Mr. Leow Zheng Dong

Finance, Head

15 Jalan Kilang Barat

Frontech Center

#05-03

Singapore 159357

Tel: (65) 9729 4146

Email: [william.leow@amili.org](mailto:william.leow@amili.org)

## **SECTION 12 – CONTACTING US**

### UPDATES TO THIS POLICY

AMILI reserves the right to make changes at any time to take into account of changes in our business and legal requirements without prior notice.