

Head Office 157, 2<sup>nd</sup> Floor, Ratchadaphisek Rd., Din Daeng, Din Daeng, Bangkok 10400 Tel. (66) 2 245 7197-98

# **Privacy Policy**

# **Dental Corporation Public Company Limited**

Dental Corporation Public Company Limited, as a healthcare provider on behalf of **Smile Signature Dental Clinic** ("we" refers to "Smile Signature"), we are committed to protecting your personal information, including data collection, data manipulation and disclosure (known as data processing) whilst visiting <a href="https://www.smilesignature.com">https://www.smilesignature.com</a> or other websites under our management or receiving our services or buy products from us

Our Privacy Policy is strictly applied to safeguard all forms of your personal information that refer to your identity, both direct and indirect means. This information (general or personal information) means either information we have directly received from you or third parties.

In addition to Privacy Policy, we are legally obliged to your healthcare information in line with all relevant laws, regulations and legal announcements concerning the protection of personal information which have been ruled by regulatory authorities. We, as a healthcare provider, have developed and implemented this Privacy Policy serving as a part of "Terms and Conditions" for the use of our websites and applications as well as our services. Every time you visit our websites or use our applications, your consent to our Privacy Policy, terms and conditions is automatically obtained. Details include:

### **Personal Data Collection**

Your personal information will be only collected if necessary. This given information can be directly derived from you through several channels which include our websites, applications and other authorized channels e.g. making medical appointment, E-commerce or online transaction processing, E-newsletters and requesting of medical assistance service as well as offline transactions such as patient registration at dental clinic counters. Besides information obtained from you, we might receive your information from third parties which include your family members, friends or someone who are close to you, dental clinic or companies which belong to Dental Corporation Public Company Limited, and government institutes that you provided them a legal approval for data disclosure in accordance with law enforcement. We keep your information confidential except where disclosure is required or permitted by law (for example to government bodies and law enforcement agencies).



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## **Types Of Data**

Among several types of data, your collected data will be manipulated based primarily on objectives of data usage. This information obtained from you or any third party refers to here as

- Information that identifies personal identity, such as photo, gender, date of birth, passport number, national identification number or other numbers that can be used to define personal identity;
- Information that indicates contact details, such as address, telephone number and email account:
- Information for making payment, such as invoice and credit or debit card details as well as bank account and bank statement;
- Information of healthcare services, such as doctor appointment details and personal information of relatives;
- Information obtained during registration of newsletters and other marketing events;
- Information related to statistical figures, such as number of patients and number of website visitors;
- Information related to website visiting, such as IP address, Cookies and Online Appointment System;
- Information of personal health, such as medical history, laboratory results and diagnostic results;
- Information of drug usage and history of allergic reactions; and
- Information related to given personal feedbacks or treatment responses.

Personal information revealing sensitive issues, including racial or ethnic origin, religious or philosophical beliefs and criminal records will not be collected unless it is allowed by you or directed by law enforcement agencies such as

- To prevent or suppress harm to the life, body or health of the data subject, the data subject is unable to give consent for any reason.
- Information that is made public with the express consent of the data subject.
- It is necessary to comply with the law in order to achieve the objectives of medical diagnosis,
  providing health or social services medical treatment health management, the control of
  standards or quality of drugs, pharmaceuticals or medical devices, which have provided
  appropriate and specific measures to protect the rights and freedoms of data subjects,
  especially the confidentiality of personal data in accordance with the duties or ethics of
  profession.



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## **Purposes Of Data Processing**

Once your consent is obtained, data processing will be conducted in accordance with legal agreements or statements. We shall process the data for these particular purposes:

# 1. Medical Purposes:

- Delivering our medical services and enhancing service accessibility through both online and offline channels;
- Making doctor appointments or other medical appointments, including promoting our updated news and services;
- Coordinating with other dental clinics in Smile Signature's network to optimize the efficacy of referral process;
- Identifying patient's identity;
- Delivering messages to remind medical appointments or offering medical assistance;
- Financially defining transactional status, such as credit card payment, invoicing and refunding;
- Safeguarding you during dental center;
- Following the instructions made by our dental center;
- Complying with the laws, regulations and legal announcements ruled by government institutes, such as subpoena compliance, official proclamation or court order or other forms of legal enforcements; and
- Other objectives may include any action that supports mentioned purposes with your consent.

### 2. Marketing Purposes:

- Data processing for marketing objectives will be performed only we are permitted to utilize your information. Marketing purposes may include:
- Offering privileged benefits and promotions.
- Providing marketing information, promoting sales and customer relationship, such as packages and promotions, products and services and the use of photographs for advertising purposes.
- Surveying customer satisfaction as well as developing marketing researches and analysis to be used for marketing improvement and initiation of new products or services that fulfill customers' needs and expectations; and
- Serving as communication channel in order to respond medical and service enquiries including compliments, comments and complaints e.g. lost items and damages.



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### **Data Disclosure**

We reserve the rights to disclose or transfer your personal information to certain third parties, located in or out of Thailand, in line with relevant laws, regulations concerning the protection of personal information ruled by regulatory authorities or government agencies. Information disclosure are allowed for third parties, including:

- Clinics or companies in Smile Signature group and Smile Signature's business partners;
- Clinics and Companies in the network and business partners;
- Agents, service providers or partners who provide services to us or take any action on our behalf such as an information technology service provider or dental lab service provider;
- Banks and other financial companies e.g. credit cards and debit cards;
- Government officers or parties for security and safety;
- Immigration and customs enforcement; and
- Government institutes, departments or units that are authorized by laws.

### **Websites and Third Parties**

Our websites and applications might contain certain hyperlinks which are technically connected with other websites since these websites are owned and operated by third parties. They govern the use of personal information you submit or are collected by cookies whilst visiting these websites. We do not accept any responsibility or liability for the privacy practices of such third party websites and your use of such websites is at your own risk.

### **Data Confidentiality and Security**

Your personal information will be confidentially kept in our system as long as it is required, either for our purposes mentioned previously or indications of laws and legal execution. In case that you do not allow us to process your given data, you reserve the rights to withdraw your consent anytime. Subsequently, your personal information will be automatically disposed of safely and securely according to our information disposal policy.

The Company will keep your personal information very well in accordance with the technical measures and administrative measures. (Organizational Measures) to maintain appropriate security and security in the processing of personal data and to prevent personal data breaches. The Company has established policies, regulations and rules for personal data protection such as security standards of information technology systems. and measures to prevent recipients from using or disclosing information outside the intended purpose or without power. The company has updated such policies, rules and regulations periodically as necessary and appropriate.



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### **Cookies policy**

When you visit our website, we will automatically collect certain information from you through the use of cookies. Cookies are small pieces of information or text placed on your computer when you visit a website and used to store or track information about your use of the website and use it for trend analysis, website administration, track the movement of the user's website usage or to remember the user's settings. Some cookies are strictly necessary to enable the site to function properly. Other cookies allow us to enhance your browsing experience, gain a better understanding of your use of our website, tailor content to your preferences, and make your interactions with the site more convenient. Because cookies remember usernames, including the language setting. Most internet browsers let you decide whether or not to accept cookies. If you refuse, remove or block tracking by cookies may affect your user experience. Your ability to use all or part of the features or areas of the website may be limited without cookies

In addition, some third parties may issue cookies through our website in order to serve advertisements related to your interests based on your browsing activities. These third parties may collect your browsing history or other information to know how you access the website and the pages that you visit after leaving our website. The information collected through these automated intermediaries may be related to personal information you have previously provided on our website.

# **Individual Rights for Personal Data Protection**

You are entitled to contact us, personal data protection agencies and other relevant parties to proceed these following actions:

- Obtaining access to the personal data held about you. This also refers to receiving verifying copies of original document and making a request for data transferring from us to other data controllers or yourself;
- Objecting to the collecting and restricting of the manipulating and disclosure of personal data;
- Requesting for incorrect, inaccurate or incomplete personal data to be corrected. This also refers to a request for data deletion or data disposal when your consent cannot be obtained;
- In case that we or any of our staff do not follow the restriction of Privacy Policy including unlawful data collecting, data manipulating and data disclosure, you have the rights to appeal to personal data protection agencies in accordance with The Thailand Personal Data Protection Act;
- Objecting to revoke consent which was previously given for data processing. Consent can be withdrawn at any time unless specified by legal contracts or agreements;
- However, consent withdrawal for data processing might result in inadequate data to deliver services or achieving certain objectives that are mentioned previously. You may receive delayed services with a certain degree of inconvenience.



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### **Contacting Us About Privacy Policy**

If you wish to exercise your rights in accordance with this Privacy Policy, please contact us by providing written letter attached with a copy of identification document. If you have any questions or comments, please contact:

Dental Corporation Public Company Limited 157, 2nd Floor, Ratchadapisek Rd. Din Daeng District, Bangkok 10400

Phone (Main): +66 91-773-3157 (for customers)

Email: dpo@dentalhospitalthailand.com (for customers)

Necessary information to keep us informed includes:

- Name and surname, national identification number/ passport number
- Enquiry details or situation explanation
- Your contact address and telephone number including email account

### **Changes To Our Privacy Policy**

This Privacy Policy may be revised and updated from time to time in order to act relating to changes of current circumstances and available services. Your suggestions, relevant laws and regulations of Privacy Policy are uploaded and available on https://www.smilesignature.com

This Privacy Policy is valid from 16 April 2021.