

Privacy Notice

THIS NOTICE DESCRIBES HOW MEDICAL INFORMATION ABOUT YOU MAY BE USED AND DISCLOSED AND HOW YOU CAN GET ACCESS TO THIS INFORMATION. PLEASE REVIEW IT CAREFULLY.

Privacy Statement

PureCS (henceforth referred to as "we", "us", or "our") is dedicated to protecting your privacy and ensuring security of your personal information. This Privacy Notice describes how PureCS collects, uses, shares and protects information about you when you use services that run on underlying technology services provided by PureCS.

This Privacy Notice applies to all sensitive & non-sensitive information (including but not limited to PII, PHI & confidential information). Information that uniquely identifies you is referred to as Personally Identifiable Information (PII). Information that you provide to us for purposes of obtaining medical care through our services is referred to as 'Protected Health Information' (PHI). Such information is subject to laws and regulations of the UAE (including but not limited to, UAE laws, Ministerial Decrees, Department of Health (DOH), Central Bank of UAE (CBUAE), Dubai Health Authority (DHA), Ministry of Health and Prevention (MoHAP), as well as international regulations/standards such as GDPR, and HIPAA.

UAE laws dictate how PureCS can use, process and share data collected from you and describe your rights with respect to this information. This Privacy Notice supplements these laws and regulations. If there is a conflict between this Privacy Notice and any UAE Laws, UAE Laws will apply.

Collection of Information

PureCS may collect some or all of the following information, including but not limited to the following:

- Personally Identifiable Information (PII):
 - Name
 - Date of birth

- Gender
 - Contact details (address, phone number, email)
- Protected Health Information:
 - Medical history
 - Prescriptions
 - Lab/test results
 - Health insurance information
 - Doctor reviews
- Financial Information:
 - Billing and payment details
 - Insurance details
- Technical Information:
 - IP address
 - Browser type and version
 - Operating system
- Information from Third-Party Services:
 - If you access our services from an advertisement on a third-party website, application or service, we may receive information from the owner of the Third-Party Service related to you or that advertisement.
- Any other information you may consent to provide to us.
- Separate authorization will be requested in case of uses and disclosures not covered under the obtained consent.

We may combine such information with information we already have collected about you.

When there are errors in your Personally Identifiable Information, e.g., name, mobile number, date of birth, etc., we will make corrections to ensure the information is accurate. Upon your authorization, your Personally Identifiable Information can be changed or updated.

How We Use Your Information

We use information collected from you to provide underlying technology services that support the provision of the following services, including but not limited to:

- Provision of Healthcare Services:
 - Diagnosing and treating medical conditions

- Managing and coordinating care
 - Communicating with other healthcare providers
- Administrative Purposes:
 - Scheduling appointments
 - Billing and payment processing
 - Insurance claims
- Legal and Regulatory Compliance:
 - Reporting to public health authorities
 - Complying with court orders and legal/regulatory obligations
- Service Improvement:
 - Conducting patient satisfaction surveys
 - Analyse service usage to improve our offerings
- For any other purposes disclosed to you at the time we collect your information or pursuant to your consent.

Disclosure of Your Information

We are committed to maintaining your trust, and we want you to understand when and with whom we may share the information we collect.

All collected sensitive information (including but not limited to PII, PHI & confidential information), that is disclosed electronically via email will be sent securely via password protected file or encrypted email.

We may share your information with the following entities:

- Healthcare Providers:
 - Other doctors, nurses, and healthcare professionals involved in your care
- Insurance Companies:
 - To process claims and secure payment for services provided
- Regulatory Bodies:
 - As required by law for compliance and reporting purposes
- Service Providers:
 - Third-party vendors who assist us with administrative, technical, and operational tasks
- PureCS Affiliates

- We may share your information with our affiliates within UAE for continuation and coordination of your healthcare.
- We will not disclose your PHI for any criminal, civil, or administrative investigation related to seeking, obtaining, providing, or facilitating reproductive health care.

Legal purposes

We may disclose information to respond to court orders, legal process, law enforcement requests, legal claims or government inquiries, and to protect and defend the rights, interests, health, safety, and security of PureCS, patients, users, or the public.

Legitimate Business Transfers

If you choose to engage in public activities on third-party sites that we link to, you should be aware that any information you share there can be read, collected, or used by other users of these sites and forums. You should use caution in disclosing personal information while participating in these areas. PureCS is not responsible for information you choose to submit in public areas.

No information provided by patients during medical consultations or requests for medical appointments is ever used for marketing purposes.

We do not share information collected from you with third parties for their own direct marketing purposes.

Data Security

We use measures to protect data collected from you from loss, theft, misuse, unauthorized access, disclosure, alteration, destruction or any other harm in accordance with applicable UAE Laws. These measures include, but not limited to:

- Data encryption
- Access controls and authentication procedures
- Regular security audits and assessments
- Network defences & safeguards

You acknowledge and agree that no data storage system or transmission of data over the Internet or any other public network can be guaranteed to be entirely secure. Furthermore,

you hereby release and hold PureCS harmless from any liability arising from actions or events beyond its reasonable control.

Data Retention

We are committed to ensuring that data collected from you is retained only for as long as necessary to fulfil the purposes for which it was collected, as well as to comply with legal, regulatory, and operational requirements. Data will be retained for as per regulatory requirements of UAE.

Data Minimization

We adhere to the principle of data minimization, ensuring that we collect, use, and retain data that is only necessary to fulfil specific and legitimate purposes. Our data minimization practices include:

- We clearly define the purpose for which data is collected before initiating any data collection process.
- We ensure that the data collected is directly relevant and necessary to achieve the specified purpose.
- We limit the collection of data to what is adequate, relevant, and necessary in relation to the purposes for which it is processed.
- We avoid collecting excessive or unnecessary data.
- We regularly review our data collection practices to ensure compliance with the principle of data minimization.
- We update our data collection forms and processes to remove any fields that are not essential.
- We train our employees on the importance of data minimization and best practices for collecting and handling personal data.
- Employees are instructed to collect only the data required for their specific tasks and to avoid collecting extraneous information

Opt-Out

Where applicable, if you no longer wish to receive marketing communications from us, you can opt out by clicking the "unsubscribe" link at the bottom of our marketing emails. Once you

opt out, you will no longer receive marketing communications, but we may still send you important administrative messages related to your account or services you have requested.

Withdraw

We respect your right to control your data and provide you with the option to discontinue certain data processing activities or withdraw your consent at any time. If you have previously given consent for the processing of your data, you can withdraw your consent any time by contacting us at privacy@purecs.com. Withdrawing consent will not affect the lawfulness of processing based on consent before its withdrawal. It may, however, impact our ability to provide certain services to you.

Legal Basis for Processing Data

Our processing of your data is based on the following legal grounds:

- We process data based on your explicit consent for specific purposes, such as marketing communications or participation in research studies. You have the right to withdraw your consent at any time.
- We process data when it is necessary for the performance of a contract to which you are a party, or to take steps at your request before entering a contract. This includes processing data for providing healthcare services, managing appointments, and billing.
- We process data to comply with our legal and regulatory obligations. This includes processing data for reporting to health authorities, complying with local laws, and maintaining accurate financial records.
- We process data to protect the vital interests of individuals, particularly in emergency medical situations where the processing of your sensitive & non-sensitive information (including but not limited to PII, PHI & confidential information) is necessary to provide urgent care.
- We process data to perform tasks carried out in the public interest or in the exercise of official authority vested in us. This includes processing data for public health monitoring and research.
- We process data based on our legitimate interests, provided that such processing does not override your rights and freedoms.

Cross-Border Data Transfers

We do not transfer collected sensitive information (including but not limited to PII, PHI & confidential information) to countries outside the United Arab Emirates (UAE) unless there is a legitimate reason that fulfils the regulatory requirements of UAE (including but not limited to regulatory review & approval). Reasonable security controls will be applied for cross-border data transfers as described above.

Data Breach Notification

We take security of collected sensitive information (including but not limited to PII, PHI & confidential information) seriously and have established procedures to handle data breaches swiftly and effectively. In the event of a data breach, following steps will be taken to notify affected individuals and relevant authorities:

- Upon detecting a data breach, we will take immediate steps to contain and mitigate the breach to prevent further harm.
- We will assess the nature and extent of the breach, including the types of data involved, the potential impact on individuals, and the likelihood of harm.
- If the data breach is likely to result in a risk to the rights and freedoms of individuals, we will notify the relevant data protection authorities and affected users without undue delay and, where feasible, within reasonable time of becoming aware of the breach.

Your Rights

You have the following rights regarding your information:

- **Access:** You can request access to your sensitive & non-sensitive information (including but not limited to PII, PHI & confidential information) and obtain a copy.
- **Correction:** You can request correction of any inaccurate or incomplete information.
- **Deletion:** You can request deletion of your sensitive & non-sensitive information (including but not limited to PII, PHI & confidential information), subject to certain conditions.
- **Restriction of Processing:** You can request restriction of processing of your sensitive & non-sensitive information (including but not limited to PII, PHI & confidential information).

- **Data Portability:** You can request a copy of your sensitive & non-sensitive information (including but not limited to PII, PHI & confidential information) in a structured, commonly used, and machine-readable format.
- **Objection:** You can object to the processing of your sensitive & non-sensitive information (including but not limited to PII, PHI & confidential information) for certain purposes.
- **Automated Decision-Making/Profiling:** You have the right to not be subject to a decision based solely on automated processing where it produces legal effects or significantly affects you.
- **Restrictions on Disclosure:** You may request limitations on the use or disclosure of your PHI through your healthcare provider.
- **Confidential Communications:** You may request PHI communications through alternative means or locations.
- **Accounting of Disclosures:** You may request a record of certain PHI disclosures from the healthcare provider, excluding those for treatment, payment, and healthcare operations.

Third-Party Links and Content

Some of the services may contain links to content maintained by third parties that we do not control. We are not responsible for the privacy practices of these third parties, and the privacy practices of these third parties are not covered by this document.

Changes to the Privacy Policy

We may update this Privacy Notice from time to time. When we update the Privacy Notice, we will revise the “Effective Date” date below and post the new Privacy Notice. We recommend that you review the Privacy Notice to stay informed of our privacy practices.

Contact Us

For any privacy-related questions or complaints, please contact privacy@purecs.com.

By using our services, you acknowledge that you have read and understood this Privacy Notice.

Effective Date:

5th June 2024