



Last Modified: 20220405

BIOMARK PRIVACY POLICY

BioMark Pte. Ltd. (UEN: 201717820D), and its subsidiaries (collectively, the "**BioMark Group**", "we", "us" or "our") **places the utmost importance on protecting** the privacy of those who provide their personal information to us.

This privacy policy describes the information about you that we collect, how we use this information, with whom it is shared, how and where it is stored, and your rights in respect of this information.

Please read this privacy policy carefully to understand how we handle your personal information.

By signing up to, accessing or using any of our services on our BioMark Doctor Platform ("Platform"), BioMark Mobile Application ("App"), or any other BioMark service made available online via any of our websites (collectively referred to as "**Services**"), you confirm that you have read and understood this privacy policy.

1. ABOUT BIOMARK

- 1.1. The BioMark Group's objective is to create a connected ecosystem amongst the various stakeholders (i.e. patients, healthcare professionals, pharmaceutical companies and laboratories). For example, we enable doctors to connect with patients and assist these patients in making sense of their medical data being generated. We do this by assisting stakeholders with the management, , storage, and processing of data thereby creating useful insights for all our stakeholders, especially patients and healthcare professionals. The intent is to make this data more meaningful to all our stakeholders, thereby improving the overall healthcare experience for the end consumer.
- 1.2. We have set out to achieve the above objective by providing our stakeholders with the necessary tools for biomarking in the form of integrated, secure Platforms (Doctor Platform, Lab Platform, Pharma Platform) and our proprietary Patient App that generates, organizes, filters and derives insights primarily from medical data obtained from in vitro tests, which are complex, often from multiple sources and difficult to track.
- 1.3. For privacy / personal data related queries, you can contact us at privacy@biomarking.com.

2. COLLECTION AND USE OF PERSONAL DATA

We collect and process any of the following information about you and refer to this hereafter as "**Personal Data**" throughout this policy:

2.1 Information you give us

You may be required to give us information about yourself when you use, or sign up to our Platform, App, or other services. Apart from electronic means, our collection of your Personal



Data may also take place, without limitation, when you contact us by phone, or email, or when we received it from third parties you may have authorized to collect and disclose your information to us on your behalf.

Our App may also at times collect information from your phone pertaining to your GPS Location, Wifi network, Camera, Phone Storage, Physical Activity, and other sensor data as part of our efforts to enhance our services to you.

2.2 The information you voluntarily give us may include, but is not limited to:

- (a) your name, ethnicity, gender, date of birth;
- (b) your personal profile information, including employment, and income details, login details (including facial or fingerprint recognition) and passwords, profile picture, language preference, feedback, ratings, order details, type of services used;
- (c) your contact information, such as your telephone number, e-mail address, residential address;
- (d) electronic information, such as your geolocation, IP address or other unique device identifiers, usage data of our services, website, Platform or App;
- (e) verification information, such as national identity number, passport number, or any other national registration number;
- (f) financial information such as payment and banking information;
- (g) health-related data gathered from wearables, or Google Fit or Apple Health applications, or other medical devices, for instance heart rate and distance traveled captured via smartwatches, or your blood glucose as captured by CGM devices
- (h) health-related data, for example, height, weight, blood pressure, sleeping habits, resting heart rate, and social habits such as smoking and drinking habits; and
- (i) health test data arising from blood tests, laboratory tests, diagnostic scans and imaging, and treatment or therapeutic data including treatment plans and prescriptions, (collectively, "**Personal Data**").

2.3 Sources of your Personal Data

Your Personal Data has and/or will be obtained from the following sources:

- (a) information provided or submitted by you;
- (b) information generated during your use of our website, services, Platform or App – for example, we may collect your IP address and device information when you visit our website.
- (c) information provided by third parties (such as third-party agents, other users, our service providers or business partners), including third-party websites;
- (d) information gathered through promotional and / or marketing activities;



- (e) cookies that your web browser stores on your device when you visit our website – please refer to our Cookie Policy below;
- (f) publicly available or publicly accessible information (as applicable); and
- (g) such other written or verbal communications or documents delivered to us prior to or during the course of providing our services (contractual or otherwise) to you.
- (h) information collected by your mobile device, or your wearables, or other medical devices (smartwatches, glucometers, etc)

3. PURPOSES OF COLLECTING YOUR PERSONAL DATA

3.1. We, or third-party data processors and service providers acting on our behalf, may collect, use and store the Personal Data provided by you to enable you to receive our services for which you have signed up for. More specifically, we may collect, use and store your personal information for the following reasons:

For Non-Medical Practitioners

- (a) to inform you of your blood profile;
- (b) to inform you of the possible health risks based on the analysis of your blood test results, whether autonomously generated by the App and/or through a review by a doctor;
- (c) to provide you with a visualisation of whether your biomarkers are within or outside the normal range (with data provided by a designated lab);
- (d) to provide you with static definitions on what the biomarker could mean;
- (e) to provide you with recommendations on further tests for your consideration;
- (f) to provide you with internal and externally produced articles and research with tips on how to improve your biomarkers;
- (g) where you have consented for your information to be available to a specific doctor, to allow that doctor access to your information to view your test results, order tests on your behalf, view your history and set reminders for further tests and follow-up doctor visits.
- (h) where you have consented for your information to be made available to another person, to allow that person access to your information to contact you for consultations or for any queries;
- (i) for membership registration; and to offer you benefits and privileges;
- (j) where you have consented, to promote and market products and services which may be relevant to you from us or for conducting marketing, promotional and profiling activities in connection with services and related products from our vendors and business partners;
- (k) to deliver notices, services or products to you;
- (l) to create a data pool which may be used for research and development for drugs, medicines and other health products and services;



- (m) for the facilitation of transactions that you have or may have with us;
- (n) for processing of orders (including orders of medical tests) and payment clearing; for remitting payments to you;
- (o) for consumer care and/or defect rectification works;
- (p) to respond to your inquiries;
- (q) for evaluation purposes and for the further enhancement of our products and services;
- (r) for our internal record keeping;
- (s) the prevention of crime including but not limited to fraud, money-laundering, and bribery;
- (t) any app feature that pertains to COVID-19 shall be accessing personal and sensitive data required to directly support your health as part of this public health emergency. Any data collected in relation to COVID-19 shall be anonymized and will not be used for other purposes;
- (u) meeting any legal or regulatory requirements relating to our provision of services and products and to make disclosure under the requirements of any applicable law, regulation, direction, court order, by-law, guideline, circular, code applicable to us or any of our member companies; and / or
- (v) in order to fulfill any purpose directly related to the above purposes, and

For Medical Practitioners

- (a) All the foregoing as may be applicable to you; and
- (b) for enabling accessing any patient records or any features on the Platform,
(all collectively referred to hereinafter as "**Purpose**").

3.2. By signing up to, accessing or using any of our services on the Platform, App, or any other Services that we offer, and voluntarily providing us with your Personal Data, you are also deemed to have been notified of the Purpose for which we require your Personal Data, and to have consented to our collection and use of your Personal Data in the manner set out in this privacy policy.

3.3. If we want to use your Personal Data for other purposes not covered by this privacy policy, we will notify you and obtain your prior consent where applicable, and ensure that the use of your Personal Data complies with the applicable law. Notwithstanding, for the avoidance of doubt, please note that we are allowed to use your Personal Data in the ways because of one or more of the following apply:

- (a) we have obtained your consent;
- (b) we need to do so in order to perform our contractual obligations with you;
- (c) we have legal and regulatory obligations that we have to discharge; or
- (d) the use of your personal data as described is necessary for our legitimate interests.



- 3.4. Your Personal Data collected by us will not be sold, exchanged, shared, transferred or given to a third party for their own direct marketing purposes without your prior consent.
- 3.5. We need certain types of Personal Data so that we can provide our services to you. If you do not consent to our collection and use of your Personal Data in the manner set out in this privacy policy, we may not be able to provide our services to you.

4. ACCURACY, RETENTION AND SECURITY OF PERSONAL DATA

- 4.1. As the accuracy of your Personal Data depends largely on the information you provide to us, kindly inform us as soon as practicable if there are any errors in your Personal Data or if there have been any changes to your Personal Data. Please note that we need certain types of Personal Data so that we can provide our services to you. If you do not provide us with accurate Personal Data, or ask us to delete it, we may no longer be able to provide our services to you.
- 4.2. We retain your Personal Data for as long as you use the services we provide or as is required by or allowed by applicable laws. We may retain the Personal Data and that of other individuals that you provide to us for a reasonable period having regard to the Purpose for which the Personal Data was collected. As soon as practicable, we will cease to retain your Personal Data, or at least Personal Data in a form that can be associated with a particular individual, i.e., your Personal Data may still be retained in either an anonymized or aggregated form, once it is no longer required for the Purpose it was collected for and retention is no longer necessary for legal or business purposes.
- 4.3. Once we receive your Personal Data, we will use all reasonably practicable steps and security measures as required under the applicable laws, to ensure that your Personal Data is stored securely and protected by us and our data processors against unauthorised or accidental access, processing, erasure, loss or use. Your Personal Data will be kept confidential and secure except for the Purpose set out in this Privacy Policy and will only be disclosed on a "need-to-know" basis. If we outsource or entrust your Personal Data with third party service providers or data processors, we will use contractual and other means to monitor their compliance with this privacy policy.
- 4.4. We have adopted organisational, physical and technical security measures that are in line with the industry standards to protect the personal data you provide. Our security measures may include SSL certificate signing, TLS encryption and hashed password storage.
- 4.5. You are responsible for keeping your username, password or any other login details ("Login ID") strictly confidential. You must not disclose or otherwise reveal your Login ID to any third parties. Please let us know immediately if you believe your Login ID has been compromised.
- 4.6. The transmission of information through the internet is not completely secure. Although we use security measures to secure your Personal Data, we cannot guarantee the security of your Personal Data transmitted to us and any transmission is at your own risk.



5. DISCLOSURE OF PERSONAL DATA

We will share your Personal Data with the following categories of third parties, including:

- (a) any person to whom we are compelled or required to do so under law; any party pursuant to an order of a court;
- (b) any related and associated companies, affiliates and subsidiaries of the Company, including those established in the future;
- (c) any data processors processing your Personal Data on our behalf;
- (d) where applicable, third parties who provide related services or products in connection with our business such as our vendors, business partners, and any party assisting us in carrying out the Purpose as laid out above;
- (e) where you have consented for your information to be available, parties which participate in joint marketing schemes with us;
- (f) any agent, contractor or service provider who provides administrative, order processing, payment clearing, credit reference, debt collecting or other services necessary to the operation of our business;
- (g) organisations including their professional service providers and relevant regulatory authorities whether within or outside Singapore, in connection with the acquisition, disposition and / or intended acquisition or disposition of the Company's assets and / or the Company itself whether directly or indirectly;
- (h) any party or organisation who is bound by confidentiality agreements with us;
- (i) any person to whom we are, in our belief in good faith, under an obligation to make disclosure as required by any applicable law; including, but not limited to government agencies, statutory authorities and industry regulators;
- (j) our auditors, consultants, accountants, lawyers or other financial or professional advisers.

6. TRANSFER AND SHARING OF PERSONAL DATA

- 6.1. Any third parties with whom we share your personal information are limited in their ability to use your personal information for any purpose other than to provide services to us. We will always ensure that any third parties with whom we share your personal information are subject to the same data protection principles as we are.
- 6.2. Please rest assured that we will only disclose the minimum amount of information which we think is necessary for the Purpose and that we will take all appropriate safeguards to ensure the integrity and security of your Personal Data.
- 6.3. In addition, you will appreciate that we are part of the Pathology Asia Holdings group of companies ("Group") which operates in different countries through affiliates, subsidiaries, and third-party service providers. As the Group has a global business and our operations are



spread across various jurisdictions, as a result, we may collect and transfer your Personal Data on a global basis. That means that we may transfer your Personal Data to locations outside of your country/region.

- 6.4. For Personal Data collected from your jurisdiction, we shall ensure that the Personal Data transferred outside your jurisdiction will be protected at a standard that is comparable to that under the applicable data privacy laws of your jurisdiction, as may be amended from time to time. We shall procure a similar contractual undertaking from any overseas recipient of your Personal Data in that regard. We will ensure that such transfer of your Personal Data takes place subject to this privacy policy (unless otherwise agreed by you) and complies with any applicable laws. If you have any concerns about the international transfer of your Personal Data, please contact us using the details set out in this privacy policy.
- 6.5. Accordingly, access to your Personal Data may be granted to other entities within the group of companies or to our third-party service providers and may be transferred out of Singapore for data storage, onward transmission and / or processing by other entities within the group globally. Save as expressly detailed above, we will never share, sell or rent any of your Personal Data with any third party without notifying you and/or obtaining your consent. Where you have given your consent for us to use your Personal Data in a particular way, but later change your mind, you should contact us and we will stop doing so.

7. FAILURE TO SUPPLY OR CONSENT TO THE COLLECTION, USE AND DISCLOSURE OF PERSONAL DATA

- 7.1. Except for Personal Data which is collected, used and disclosed for direct marketing purposes, you must provide us with the Personal Data which we request from you. If you do not consent and supply us with your Personal Data, this will result in the following:
 - (a) we will be unable to provide you with access to our Platform, App or Services;
 - (b) we will be unable to provide you with information, notices, services and/or products requested;
 - (c) your ability to enter and participate in any contests or promotions organised by us may be affected; and
 - (d) the ability of third parties to enter into the necessary agreements in relation to the provision of services to you may be affected.
- 7.2. It is optional for you to provide the categories of Personal Data which we request from you for direct marketing purposes.

8. YOUR RIGHTS TO ACCESS, LIMIT AND CORRECT YOUR PERSONAL DATA

- 8.1. We respect your legal rights to your Personal Data. We list below your legal rights and the measures we take to protect these rights. Not all data protection laws are the same so not all of these rights apply in all jurisdictions.



- 8.2. You may contact our Data Protection Officer by email at privacy@biomarking.com at any time and you may:
 - (a) check whether we hold or use your Personal Data and request access to such data;
 - (b) request that we correct any of your Personal Data that is inaccurate, incomplete or out-of-date;
 - (c) request that we limit the processing of your Personal Data;
 - (d) request for information concerning the ways your Personal Data has been or may have been used or disclosed by us within a year before the date of your request;
 - (e) request that we specify or explain our policies and procedures in relation to Personal Data and the categories of Personal Data collected, used and disclosed by us;
 - (f) withdraw, in full or in part, your consent given previously or request deletion of your Personal Data, in each case subject to any applicable legal restrictions, contractual conditions and a reasonable time period. Please note, however, that we may still be entitled to process your Personal Data if we have another legitimate reason (other than consent) for doing so;
 - (g) in some circumstances, have the right to receive some Personal Data in a structured, commonly used and machine-readable format and/or request that we transmit this data to a third party where this is technically feasible. Please note that this right only applies to Personal Data which you have provided to us; and
 - (h) lodge a complaint with the competent authority if you think that any of your rights have been infringed by us.
- 8.3. We will take appropriate technical measures to enable you to control how we use your Personal Data. In addition to exercising some of your rights through our website, Platform or App, you can exercise all your rights by contacting us using the details set out below.

9. CHANGES TO OUR PRIVACY POLICY

- 9.1. We may occasionally change all or part of this privacy policy. Any changes will be effective immediately upon our posting of the updated privacy policy. If we make any material changes to this privacy policy, we will notify you of the changes through our website, Platform, or App, or through other means such as e-mail.
- 9.2. If we make changes to the type of Personal Data collected, the Purpose for collecting your Personal Data, who we may share your Personal Data with or how we may use your Personal Data, we will notify you in advance of such changes through website, Platform, or App or through other means such as e-mail, and request your consent, when required by applicable laws.
- 9.3. You should review this privacy policy periodically. By continuing to use our website, Platform, App or services, you will be deemed to have accepted to the changes or updates to this privacy policy. If you do not consent to such changes or updates made to the privacy policy, we will not



be able to provide you access to our website, Platform, or App or provide our services to you.

10. THIRD-PARTY DISCLAIMER

We may include or offer links to third-party products or services on or through our Platform, App or Services. These third-party websites have their own separate and independent privacy policies and user terms which you must review before using their services. We take no responsibility or liability for the content and activities of these third party linked websites or their products and services. We seek to protect the integrity of our website, Platform and App, and welcome any feedback on these third-party links.

Please address all requests and/or questions or concerns which you may have regarding the subject matter and contents of this privacy policy to privacy@biomarking.com.



COOKIE POLICY

This Cookie Policy explains how BioMark Pte. Ltd. and its subsidiaries (collectively the "**BioMark Group**", "**we**", "**us**", and "**our**") uses cookies and similar technologies to recognize you when you visit our websites.

It explains what these technologies are and why we use them, as well as your rights to control our use of them. In some cases, we may use cookies to collect personal information, or that becomes personal information if we combine it with other information.

What are cookies?

Cookies are small data files that are placed on your computer or mobile device when you visit a website. Cookies are widely used by website owners in order to make their websites work, or to work more efficiently, as well as to provide reporting information.

Cookies set by us are called "first party cookies". Cookies set by parties other than us are referred to herein as "third party cookies". Third party cookies enable third party features or functionality to be provided on or through our website (e.g. advertising, interactive content and analytics). The parties that set these third-party cookies can recognize your computer both when it visits our website and also when it visits certain other websites.

Why do we use cookies?

We use both first- and third-party cookies for several reasons. In particular, we use the following cookies:

- (a) **Strictly necessary cookies.** These are cookies that are required for the operation of our websites. They include, for example, cookies that enable you to log into secure areas of our website, use a shopping cart or make use of e-billing services.
- (b) **Analytical/performance cookies.** They allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily.
- (c) **Functionality cookies.** These are used to recognise you when you return to our website. This enables us to personalise our content for you, greet you by name and remember your preferences (for example, your choice of language or region).
- (d) **Targeting cookies.** These cookies record your visit to our website, the pages you have visited and the links you have followed. We will use this information to make our website more relevant to you.
- (e) **Tracking cookies.** These cookies are used to track and share your referral-related activities on our websites.

Please note that third parties (including, for example, advertising networks and providers of external



services like web traffic analysis services) may also use cookies, over which we have no control. These cookies are likely to be analytical/performance cookies or targeting cookies.

How can I control cookies?

You have the right to decide whether to accept or reject cookies. You can exercise your cookie rights by setting your preferences in the notification banner when you first visit our websites or via your browser. You may select which categories of cookies you accept or reject. Essential cookies cannot be rejected as they are strictly necessary to provide you with services.

If you choose to reject cookies, you may still use our website though your access to some functionality and areas of our website may be restricted.

As mentioned, you may also set or amend your web browser controls to accept or refuse cookies. As the means by which you can refuse cookies through your web browser controls vary from browser-to-browser, you should visit your browser's help menu for more information.

What about other tracking technologies, like web beacons?

Cookies are not the only way to recognize or track visitors to a website. We may also use other, similar technologies from time to time, like web beacons (sometimes called "tracking pixels" or "clear gifs"). These are tiny graphics files that contain a unique identifier that enables us to recognize when someone has visited our websites or opened an e-mail including them. This allows us, for example, to monitor the traffic patterns of users from one page within a website to another, to deliver or communicate with cookies, to understand whether you have come to the website from an online advertisement displayed on a third-party website, to improve site performance, and to measure the success of e-mail marketing, if any.

In many instances, these technologies are reliant on cookies to function properly, and so declining cookies will impair their functioning.

Do you serve targeted advertising?

Third parties may serve cookies on your computer or mobile device to serve advertising through our websites. These companies may use information about your visits to this and other websites in order to provide relevant advertisements about goods and services that you may be interested in. They may also employ technology that is used to measure the effectiveness of advertisements. This can be accomplished by them using cookies or web beacons to collect information about your visits to this and other sites in order to provide relevant advertisements about goods and services of potential interest to you.

The information collected through this process does not enable us or them to identify your name, contact details or other details that directly identify you unless you choose to provide these.



How often will you update this Cookie Policy?

We may update this Cookie Policy from time to time in order to reflect, for example, changes to the cookies we use or for other operational, legal or regulatory reasons. Please therefore re-visit this Cookie Policy regularly to stay informed about our use of cookies and related technologies.

NOTICE

Any notice or other communication in connection with this website (each, a “**Notice**”) shall be in writing and delivered by hand, electronic mail or registered post.

A Notice to BioMark shall be sent to the following addresses, or such other address as BioMark may notify from time to time:

BIOMARK PTE. LTD. (201717820D)

Address: #06-04, Frontech Centre, 15 Jalan Kilang Barat, Singapore 159357

Email: hello@biomarking.com

Contact: +65 98960831

MYBIOMARK SDN. BHD. (1277297-V)

Address: Wisma Kemajuan, L34, 3rd Floor, No. 2, Jalan 19/1B, 46300 Petaling Jaya, Selangor

Email: hello@biomarking.com

Contact: +60 11-5410 7588