

Privacy Policy

HEALTHGEN PTE. LTD. ("HealthGen", "we", "us", or "our") is committed to protecting the privacy of users of our mobile health application, HealthRoots ("the Application"). This Privacy Policy describes how we collect, use, disclose, and protect personal data in accordance with the Personal Data Protection Act 2012 (PDPA) of Singapore and the Advisory Guidelines for the Healthcare Sector issued by the Personal Data Protection Commission (PDPC).

By using the Application, you consent to the collection, use, and disclosure of your personal data as described in this Privacy Policy. If you do not agree with this Policy, please do not use the Application.

1. Personal Data

1.1 "Personal Data" means any data about an individual who can be identified from that data alone, or from that data combined with other information to which the organisation has or is likely to have access.

1.2 Examples of Personal Data we may collect include:

- Personal details (e.g., email address, date of birth, name, child name, gender, login identifiers)
- Health behavioral information (e.g., food intake, water intake, physical activity records, body measurements, quality of life measures, screen time records)
- Data from connected devices (e.g., wearable activity data where applicable, sleep records)
- Electronic data (e.g., IP address, device information, app usage patterns, activity logs)

1.3 "Processing" means collecting, recording, holding, storing, adapting, altering, retrieving, combining, transmitting, erasing, or destroying Personal Data.

2. Collection of Personal Data

2.1 We may collect Personal Data through the following means:

- Directly from you when you create an account, input health data, or use the Application
- From your healthcare professional ("HCP") when they register you on the platform or enter clinical data on your behalf
- From connected devices where you have enabled such integration
- Automatically through cookies and similar tracking technologies when you use the Application
- From third parties such as partner organisations or healthcare institutions involved in your care

2.2 You must ensure that all Personal Data submitted to us is complete, accurate, true, and correct. Failure to do so may result in our inability to provide you with the services you have requested.

3. Purposes for Collecting, Using, and Disclosing Personal Data

3.1 We may collect, use, and disclose your Personal Data for the following purposes:

- (a) Setting up and managing your account and access to the Application
- (b) Providing the Application's health and wellness functions, including activity tracking, progress monitoring, personalised recommendations (where enabled), motivational notifications, behavioural nudges, and educational content
- (c) Enabling your HCP to monitor your health progress, adherence, and clinical outcomes
- (d) Generating health trend reports and visualisations for clinical review
- (e) Integration with healthcare institution systems (where applicable) for the delivery of healthcare services, in accordance with executed agreements specifying security and safeguard requirements
- (f) Managing our relationship with you, including service personalisation, content recommendations related to your health, and service updates
- (g) Maintaining, improving, and optimising the Application
- (h) Providing customer support and responding to enquiries, feedback, or complaints
- (i) Conducting anonymised and aggregated analysis, research, and evaluation for the purposes of improving health outcomes, service quality, and operational planning
- (j) Supporting clinical research with your explicit consent
- (k) Complying with applicable laws, regulations, legal processes, and requests from government authorities
- (l) Detecting, preventing, and addressing technical or security issues
- (m) Facilitating business asset transactions (e.g., mergers, acquisitions, or asset sales)
- (n) Any other purpose reasonably related to the foregoing

3.2 For purposes requiring your consent that are not listed above, we will notify you and obtain your consent beforehand in accordance with applicable data protection laws.

4. Consent

4.1 By using the Application and providing your Personal Data, you consent to the collection, use, and disclosure of your data as described in this Privacy Policy.

4.2 Where your HCP registers you on the Application, deemed consent may apply for purposes directly related to your treatment and care, in accordance with the PDPA and the Advisory Guidelines for the Healthcare Sector.

4.3 You may withdraw your consent at any time by contacting us at the details provided in Section 10. Upon withdrawal, we will cease to collect, use, or disclose your Personal Data for the relevant purposes, unless required by law. Depending on the nature of your withdrawal, we may be unable to continue providing the Application's services to you, and this may result in the termination of your account. Our legal rights and remedies are expressly reserved.

4.4 If you provide us with the Personal Data of another individual (e.g., a family member or dependent), you represent and warrant that you have obtained their consent for us to collect, use, and disclose their Personal Data in accordance with this Privacy Policy, and that they have accepted the terms of this Policy. You agree to indemnify us against any penalties, claims, or proceedings arising from your failure to obtain such consent.

5. Disclosure to Third Parties

5.1 We may disclose your Personal Data to third-party service providers, agents, partner organisations, affiliates, and related corporations ("External Parties") for the purposes set out in this Privacy Policy. These External Parties are required to protect your Personal Data to a standard comparable to our own.

5.2 We may disclose your Personal Data in the following circumstances:

(a) To your treating HCP or the healthcare institution that enrolled you on the Application, for the purpose of your care and treatment

(b) To service providers engaged by us to support the operation of the Application (e.g., cloud hosting, data analytics), who are contractually bound to protect your data

(c) To partner organisations where the Application is deployed as part of a programme they manage, in accordance with the terms communicated to you at enrolment

(d) Where required by law, regulation, court order, or government authority

5.3 We do not sell or rent your Personal Data.

6. Transfer of Personal Data Outside Singapore

6.1 Your Personal Data is stored on servers located in Singapore. In the event that data needs to be transferred outside Singapore, we will ensure that the receiving party provides a standard of protection comparable to that under the PDPA, in accordance with applicable requirements.

7. Data Retention

7.1 We retain Personal Data only for as long as necessary to fulfil the purposes for which it was collected, or as required by applicable law and regulatory requirements.

7.2 Medical and health data is retained in accordance with the duration stipulated by the Ministry of Health or in adherence with contractual agreements.

7.3 When Personal Data is no longer required, we will take reasonable steps to dispose of it in a secure manner or anonymise it so that it can no longer be associated with you.

8. Data Security

8.1 We make reasonable security arrangements to prevent unauthorised access, collection, use, disclosure, copying, modification, disposal, or similar risks to your Personal Data.

8.2 However, we cannot guarantee complete security of your Personal Data from the use of the Application (e.g., harmful code such as viruses or other risks inherent in electronic transmission and storage).

9. Third-Party Sites

9.1 The Application may contain links to websites or services operated by third parties with different data protection and privacy practices. We are not responsible for the content or privacy practices of such third-party sites. You should review the privacy policies of any third-party sites you visit.

10. Contact Us - Feedback, Consent Withdrawal, Access, and Correction

10.1 You may contact our Data Protection Officers at zacchaeus@healthgenplus.com to:

- Ask questions or provide feedback regarding your Personal Data or this Privacy Policy
- Withdraw consent for any use of your Personal Data as set out in this Privacy Policy
- Request access to and correction of your Personal Data records

10.2 We will respond to your request within 30 calendar days.

10.3 Please note that depending on the nature of your consent withdrawal, we may be unable to continue providing the Application's services to you.

11. Changes to This Privacy Policy

11.1 We may update this Privacy Policy from time to time. Any changes will become effective upon posting within the Application and updating of the "Last Updated" date. Your continued use of the Application after such changes constitutes acceptance of the updated Privacy Policy.

12. Governing Law

12.1 This Privacy Policy is governed by and construed in accordance with the laws of Singapore.

Data Protection Contact

HEALTHGEN PTE. LTD.
139 Cecil Street, #03-12, YSY Building
Singapore 069539
Email: zacchaeus@healthgenplus.com