

Patient Privacy Policy

Policy Statement

This Patient Privacy Policy (“Policy”) sets forth the standards of SHIP Clinic governing the privacy and security of patients’ personal information, particularly health information, as well as the controlled release and disclosure of such information, consistent with the Data Privacy Act of 2012 and other applicable laws.

This Policy describes the way in which SHIP Clinic may collect, hold, utilize, share, and dispose of the above-mentioned data. By availing of the services given by SHIP Clinic, you signify your acknowledgment of this arrangement and terms of service. Your continued availment of the services of SHIP Clinic following the posting of changes to this policy will be regarded your acknowledgment of those changes.

Our Commitment to Protect Your Privacy

We understand that data about you and your health is personal. We are committed to protecting your health data/information. As a patient of SHIP Clinic and its other related entities, the care and treatment you receive is private and confidential in nature and will be recorded in a medical record. We use and share this data to provide you with quality care and to comply with certain legal prerequisites. This record will be accessible to all health care and allied health experts who require access as described in this Policy, many of whom will be involved in your treatment.

As part of our commitment to keeping the secrecy of your care, SHIP Clinic will share your data only to the extent necessary to ensure with your treatment, conduct our professional operations, collect payment for the services we offer you, and to comply with the laws that govern health care. While we may require your personal data for other purposes, we will not use or disclose your information without your authorization.

SHIP Clinic may, from time to time, audit and update this Policy to adjust to changing corporate practices, and to take into account new laws and innovation. We reserve the right to make the reexamined or changed Policy effective for health data we already have about you as well as any data we receive in the future. The use, storage and divulgence of all data held by SHIP Clinic will be governed by the most recent privacy policy, posted on www.ship.ph. SHIP Clinic will inform you of any corrections or amendments by posting an updated version of the policy on this website.

This Policy relates to all people, divisions, and units in SHIP Clinic who have access to, use, or disclose secured health information. The Policy is managed by the Data Privacy Management Department. It is intended to serve as a foundation for privacy practices of SHIP Clinic. Divisions, departments, or units within SHIP Clinic may force privacy safeguards in addition to those required by this policy and procedure.

Processing of Health Information

This section describes ways that SHIP Clinic use and disclose health data. It does not list every possible use or disclosure, but the ways your data may be utilized and disclosed fall into the following categories:

- Treatment and Communication
- Billing and Collection
- Health Care Processes and Professional Services
- Legal Compliance and Health-Related Services
- Research and Training

A. Collection, Use and Disclosure

a) Treatment and Communication

Your health data is used to supply you with medical treatment or services. We may utilize and share health data about you with physicians, nurses, allied medical personnel, case managers, or other SHIP Clinic personnel included in your care. Different divisions of the clinic may also share health data about you to coordinate the services you need, such as, outsourced laboratory and other diagnostic centers.

In special cases, we may also disclose your health data to providers not affiliated with the Clinic to facilitate care or treatment they provide you. These include other physicians outside SHIP Clinic who are involved in your care outside the clinic setting or in case of hospital admission, and other medical referral system.

Electronic exchange of health data helps guarantee better coordination of care. The doctors and other medical staff of SHIP Clinic utilize digital technology in order to facilitate faster and prompt referrals within the healthcare team. They may utilize messaging platforms such as SMS, emails, Viber, Messenger and other comparable services in order to communicate with the team.

Upon your request, we may send electronic results of your laboratory and other diagnostic tests to you or your authorized representative. We may also utilize and disclose health data to contact you as a reminder that you have an appointment for care at SHIP Clinic. We will communicate with you using the data (such as telephone number and email address) that you provide us. Unless you notify us to the contrary, we may use the contact information you provide to communicate general information about your care such as appointment location, department, date and time, as well as for patient experience and satisfaction surveys.

b) Billing and Collection

We may utilize and disclose your personal and health data to confirm, charge and receive payment for health care services that we or others give to you. This includes submission of your health data to receive payment from Philhealth, or other party that pays for some or all of your health care or to verify that your payor will pay for your health care. We may also tell your payor about a treatment you are going to get to determine whether your payor will cover the

treatment. For certain services, in the event that your authorization is required to release health data to obtain payment, you will be asked for authorization.

In cases of non-payment, your personal and health data will be sent to legal services for collection purposes who may conduct credit investigations and send demand letters to collect payment for services provided to you.

c) Health Care Processes and Professional Services

We may utilize and disclose health data for health care operations. This includes functions vital to run SHIP Clinic and guarantee that all patients receive quality care. We may moreover share your data with partnered health care providers so that they may jointly perform certain business operations along with SHIP Clinic. We may combine health data about many of our patients to improve on the services being offered, to decide what services are no longer required and to assess whether certain treatments are viable.

We may share data with physicians, nurses, allied medical personnel, part-time staff, or other SHIP Clinic personnel to guarantee quality assurance and compliance with measures of care. We may also compare the health data we have with data from other treatment facilities to see where we can improve the care and services we offer. In these occurrences, SHIP Clinic will work to anonymize, cover or mask, encrypt or de-identify your personal and health data as much as possible.

SHIP Clinic contracts with outside entities that perform business services for us, such as Global Virtuoso, government entities, billing companies, management specialists, quality assurance specialists, accounting or legal firm. In certain circumstances, we may need to share your health data with a business associate so it can perform a service on our behalf. We will have a data sharing agreement or written contract in place with the business associate requiring protection of the privacy and security of your health data.

d) Legal Compliance and Health-Related Services

We may disclose your data to the Department of Health and other fitting government agencies for activities authorized by law such as reviews, investigations, inspections, and licensure. When vital to prevent a serious risk to your health and security or the health and security of others, we may utilize and disclose certain data about you. Such disclosure will only be to someone able to prevent or respond to the threat, such as law enforcement, or a potential victim.

We may also use or divulge health data about you when required to do so by laws not specifically mentioned in this Policy.

e) Research and Training

As an affiliated clinic for the SHIP Foundation, the organization's personnel may utilize and access your health data. We will have an information sharing agreement or written contract in place with SHIP Foundation requiring protection of the privacy and security of your health data.

SHIP Clinic has an active research program. We for the most part, ask for your written consent before asking you to participate, use your health data, or share it with others to conduct research. Under limited circumstances, we may utilize and disclose your health data without your consent. In these situations, we will anonymize, veil or mask, encrypt or de-identify data to protect your information and so that no patient is individually identifiable. We will obtain approval through an autonomous review process to ensure that research conducted without your consent poses negligible risk to your privacy.

f) Other uses and disclosures

SHIP Clinic does not require prior consent or authorization in the disclosure of your health data in the following occasions:

Public Health Activities

- To prevent or control disease, harm or disability;
- To report births and deaths;
- To report the abuse or neglect of children, senior citizens and dependent adults;
- To report reactions to medications or issues with products;
- To inform you of the recall of products you may be using;
- To inform a person who may have been exposed to a disease or may be at risk for contracting or spreading a disease or condition;
- To inform the suitable government authority if we believe you have been the victim of abuse, neglect or domestic violence; we will only make this disclosure when required or authorized by law;
- To inform the Department of Health and other appropriate government agencies when you seek treatment at SHIP Clinic for certain diseases or conditions mandated to be reported by law.
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Disputes and Lawsuits

To guarantee the quality of care you get while seeking treatment at SHIP Clinic, we may access and disclose your health data if you have concerns or complaints with respect to your medical management at SHIP Clinic. We may also access and disclose your health data if you bring a lawsuit against SHIP Clinic, its officials, nurses, allied medical personnel and other employees and physicians.

In the event that you are involved in a lawsuit, we may disclose health data about you in response to a court or administrative order or in response to a subpoena, lawfully enforceable discovery request, or other lawful process by someone else involved in the dispute.

B. Storage, Security, Retention and Destruction

SHIP Clinic will guarantee that personal and health data under its custody are secured against any inadvertent or illegal destruction, modification and disclosure as well as against any other illegal processing. SHIP Clinic will execute suitable security measures in storing collected personal and health data. All health data gathered and kept in medical records shall be retained for as long as the patient regularly seeks treatment at the institution. Hard copies of medical

records more than five (5) years old shall be kept at a secure off-site facility. After an inactive period of fifteen (15) years, hard copies of medical records shall be brought to an appropriate facility for melting and destruction with secure protocols in place. Electronic copies of medical records shall be held for a comparable period.

Rights Relating to your Health Information

An imperative portion of SHIP Clinic's Privacy Policy is this segment which clarifies your data privacy rights regarding your health data. You (or your authorized representative) have the right to:

- Be informed
- Reasonable access to your health data
- Request a rectification to your personal data
- An accounting of hospital disclosures of your health data
- Request confinements on certain utilization and disclosures of your health information
- Receive a copy of SHIP Clinic's Privacy Policy

a) Information

You have the right to be educated that your personal and health data will be, are being, or were, collected and handled. You have the right to be educated of the purposes for which they will be, are being, or were processed and the duration for which the information will be kept.

b) Reasonable Access of your Health Information

You have the right to obtain a copy of your relevant health data. The medical data available to you are the following:

- Clinical Abstract/Discharge Summary
- Laboratory and other diagnostic results
- Consent for Admission and/or Procedure
- Medical Certificate

To request for a duplicate of your medical records, you may send an email request to SHIP Clinic's email address. SHIP Clinic may charge a fee for the cost of providing copies to you.

c) Request a Correction to your Personal Information

In the event that the personal data SHIP Clinic has on file about you is erroneous or incomplete, you may ask us to rectify the personal data in your records. If your personal data is accurate and complete, or if the data was not made by the clinic, we may deny your request. If we deny any part of your request, we will provide you with a written clarification of our reasons for doing so. Requests to make a correction to your records must be in writing and must describe each item that you want changed and the reason you are requesting the change. We may require extra documentation from you or your authorized representative as proof before preparing your request.

d) An Accounting of Clinic Disclosures of your Personal and Health Information

You have the right to request a list of how your personal data was shared for purposes other than treatment, payment, health care operations and lawful compliance. Your health data on the other hand, will never be shared with third parties without your authorization.

e) Request Restrictions on Certain Uses and Disclosures of Your Medical Information

You have the right to request reasonable limitations on certain uses or disclosures of your personal and health data. Requests for limitations must be in writing. In most cases, we are not required to agree to your requested restriction. However, in the event that we do concur, we will comply with your request unless the information is needed to provide you emergency treatment or comply with the law.

Some examples of restriction requests that the clinic cannot honor include:

- Requests to restrict other clinic staff from accessing your medical data.
- Requests restricting the clinic from giving your name to an individual that will be asked to pay a portion of your bill.
- Request restricting the clinic from reporting your identity and condition to an entity or organization where the clinic is required by law to do so.
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Inquiries and Complaints

The confidentiality of your health data is a significant part of the care we provide to you. For things relating to the handling of your protected health data or if you believe that your privacy rights have been violated, you may file a written complaint with our Data Privacy Management Department via:

Email: shipclinicshaw@gmail.com
Mail: Data Protection Officer
Data Privacy Management Department
SHIP Clinic
566 Shaw Boulevard, Mandaluyong City

Effectivity

The provisions of this Policy are effective this date until amended.