

Privacy Notice – AST Thailand

At Aetna Services (Thailand) Limited (“AST”) we are committed to protecting and respecting your privacy.

This privacy notice describes how personally identifiable information and personal health information (“PHI”) (collectively referred to as “Personal Data”) about you (the “Data Subject”) may be collected, used and disclosed, and how you can get access to this information. Please review it carefully.

The entity which controls your Personal Data is AST which has its registered office at 98 Sathorn Square Office Tower, 14th - 15th Floor, North Sathorn Road, Silom, Bangrak, Bangkok 10500, Thailand.

1. Introduction

In order to provide you with primary medical services through the use of verbal telephone calls or video consultation via the VHealth Mobile Application (the “vHealth Services”), you may be required to provide us with your Personal Data to ensure your maximum benefit from the vHealth Services. Therefore, AST will have to collect, use and disclose your Personal Data, where you have provided fully informed and explicit consent, in accordance with the applicable laws of Thailand, to provide you with the vHealth Services.

We will never use or share your Personal Data for any purpose other than as defined in this privacy notice and strictly for the purpose of rendering the vHealth Services for the benefit of the person identified by the Personal Data collected.

2. Scope

vHealth Services is operated globally and is committed to full compliance with all applicable laws and regulations of any jurisdiction.

3. Fundamental Principles

AST's privacy practices comply with the applicable laws of Thailand which govern the collection, use, processing and disclosure of your Personal Data which may be in force from time to time. We will process your Personal Data in accordance with the following principles and protections:

- Your Personal Data will be processed lawfully, transparently and fairly
- Limiting Personal Data use to an appropriate purpose as allowed by you
- Limiting the processing and storage of your Personal Data to the minimum necessary
- Making sure this privacy notice is accurate and sufficient
- Maintaining open and transparent privacy policies
- Being accountable to you for processing your Personal Data
- Making sure your consent is obtained and easy to withdraw
- Defining and protecting your Personal Data, and other particularly sensitive information
- Ensuring our service providers apply similar or equivalent standards of privacy controls where they process your Personal Data on our behalf
- Not transferring your Personal Data outside of Thailand other than in accordance with applicable legal requirements and principles and as provided herein.
- Giving you the right to concise, timely, comprehensive information regarding our processing of your Personal Data
- Giving you the right to rectify incomplete, inaccurate, unnecessary or excessive Personal Data.
- Giving you the right to object to the collection, use processing and/ or disclosure of your Personal Data (as may be permitted by the applicable laws of Thailand).
- Making sure we have procedures to support your exercising of any Data Subject rights.

- Applying security measures, including technical and procedural support for integrity, confidentiality and availability.
- Maintaining the confidentiality of your Personal Data even after our relationship with you has terminated.

4. International Transfers

In order to better protect your data, AST uses data centres based in Singapore and Hong Kong SAR that comply with all the privacy, security and contingency measures and regulations.

With your acceptance, you are also entering into an agreement for such matters with Aetna Global Holdings Limited (England & Wales) and Aetna Global Benefits (Bermuda) Limited (Bermuda), subsidiaries of Aetna International Inc. in the USA who own the agreements with servers in the Singapore and Hong Kong SAR. By accepting this privacy notice, you are agreeing to the international transfer of your Personal Data as stated above.

You should check whether it is lawful to access our vHealth Services in the territory where you are, if you are outside of Thailand.

5. Contact Information

You may request information, file a complaint, withdraw your consent and exercise your rights of access, rectification, suppression, limitation of treatment, portability and opposition to processing by emailing the Data Protection Officer at dpo@aetna.com, indicating your name, what service was used and your telephone number, and attaching your identification card or any other document that permits us to identify you.

If you have a question, would like a copy of this privacy notice or you believe your privacy rights have been violated, you may contact the Data Protection Officer at the above email address. There will be no retaliation for filing any complaint or exercising any subject rights.

6. What Personal Data is Collected

- Personal Data is information or data that directly identifies you or when used in combination with information available publicly or in the possession of AST, and which may provide a high probability of identifying you.
- Personal Data also includes PHI about the individual identified by the data.

7. How Personal Data is used, processed and disclosed

- AST collects, processes and discloses your Personal Data for the purposes of providing you with the vHealth Services.
- AST may disclose your Personal Data to our affiliates, directors, employees, physicians, case managers and medical experts or any other agents or representatives of AST, or if necessary, service providers on a need-to-know basis for the purpose of providing the vHealth Services to you.
- AST does not share your Personal Data for any purpose not both: (a) defined in this privacy notice or in your consent; and (b) required for providing the vHealth Services.
- AST also may use your Personal Data to review or evaluate the performance of our systems in providing the vHealth Services to you, and to improve the quality or timeliness of our vHealth Services. AST also may create anonymised information which does not include your name, address, birth date, or other information that could be used to identify you. This anonymised information may be used for quality improvement, research and other purposes.

For example, AST may use this anonymised information to demonstrate the reliability of our information management systems or to generate medical research information.

- We do not use third-party cookies or non-AST web beacons i.e. web based data collection by other than AST such as advertising or tracking links.
- Other disclosures mandated by applicable laws: AST may be called upon to disclose your Personal Data by a duly empowered branch of Government or Court in any country in which our patients are a citizen.

- To the extent permitted by applicable laws of Thailand, we may collect, use and disclose your Personal Data without your consent, if:
 - (1) it is for achieving the purpose relating to preparation of historical documents or archives for public interest or relating to research or statistics, where the suitable preventive measures are provided;
 - (2) it is for preventing or suppressing a danger to a person's life, body or health;
 - (3) it is necessary for the performance of a contract, which you are a party, or the compliance with your request prior to entering into a contract;
 - (4) it is necessary for the performance of a task carried out in the public interest by AST, or for the exercising of governmental authority authorized to AST;
 - (5) it is necessary for legitimate interests of AST or any other persons or juristic persons, except that such interests are less important than your fundamental rights in your Personal Data; and
 - (6) it is necessary for compliance with laws.

8. Data Retention

- AST will retain your Personal Data for as long as it is needed for providing the vHealth Services to you but for not more than 10 years.
- When you are no longer eligible for the vHealth Services, your Personal Data is securely destroyed or permanently de-identified in accordance with the applicable laws of Thailand. Any and all codes, links, or other data that could be used to relate the de-identified data to you are permanently destroyed.
- Such permanently de-identified data is no longer Personal Data and is retained by AST indefinitely. Note that it is not possible to identify you from this de-identified data, and therefore data subject rights would not be applicable to this data.

- We insist that any service providers who we retain to provide support services to AST, adhere to our Privacy Policy and Principles as well as all globally applicable data privacy laws.

9. Security Enforcement

- We safeguard your Personal Data with tested and certified technical and organisational security controls. We educate our staff on our Privacy Policy and Principles, as well as their roles and responsibilities in complying with them.

10. Global Compliance

- We are committed to complying with applicable data privacy laws in all regions where we have subsidiaries and affiliates.

11. Your Personal Data Rights

Apart from the abovementioned and to the extent permitted by the applicable laws of Thailand, you have the following rights in relation to your Personal Data:

- You have the right to withdraw your consent to the collection, use, processing and disclosure of your Personal Data at any time.
- We strive to keep your Personal Data accurate and current and we will update or disclose it to you whenever you request us to do so. You are responsible for communicating modifications, rectifications or additions to your Personal Data in order that AST may change it accordingly and keep it current.
- You are able to access and obtain a copy of your Personal Data .
- You can request us to disclose the details of a possession of your Personal Data obtained without your consent.
- You can correct or update your Personal Data or request us to do so if it is inaccurate or outdated.
- You have the right to receive your Personal Data from us. Additionally, in case we arrange your Personal Data in the format which is readable or commonly used by ways of automatic tools or equipment and can be used or disclosed by automated means, you are also entitled to: (1) request us to send or transfer your Personal Data in such formats to other data controllers if it can be proceeded by the automatic means; and (2) request to directly obtain your Personal Data in such formats that we send or transfer to other data controllers, unless it is technically impossible.
- You have the right to request us to restrict the use of your Personal Data or erase or destroy your Personal Data or anonymize your Personal Data which cannot identify you.
- You have the right to file a complaint in the event that we, our employees or our service providers violate or do not comply with the applicable laws of Thailand.

12. Access to our services

- Access to AST sites are controlled and restricted to registered patients, and our own staff of physicians, case managers and medical experts. AST has implemented manual and technical, physical and electronic security controls to best ensure that our systems and data are secure. These controls are continuously monitored and upgraded as required by changing business processes, new data security threats and as better security controls become available.