

# APAC Notice of Patient Privacy Practices

Pacific Edge Ltd. together with its affiliates, including Pacific Edge Diagnostics New Zealand Ltd. and Pacific Edge Diagnostics USA, Ltd. (collectively called “Pacific Edge, “we” or “us” in this Privacy Notice) are committed to maintaining the privacy of personal health information provided to us.

This Notice explains how we may collect, store, use, disclose and destroy or de-identify such personal information (including health information).

We are required to maintain the privacy of health information about you (“Protected Health Information”), and to notify you of our legal duties and privacy practices in relation to your Protected Health Information.

This Notice will take effect on and will remain in effect until it is amended or replaced by us.

This Notice is given in accordance with our obligations under the New Zealand Privacy Act (2020), The Australian Privacy Act (1988), the Singapore Personal Data Protection Act (2012), and in compliance with other applicable jurisdictions, where Pacific Edge may collect information, including; US legislature (“HIPAA Privacy & Security Rules”) and EU/UK (General Data Protection Regulations (GDPR). These obligations set forth the requirements to ensure the Protection and Privacy of Individually Identifiable Health Information. We are required under these collectively called “Privacy Rules” to abide by the terms of this Notice.

Pacific Edge is committed to a process of secure storage, handling, transport and deletion of electronic Protected Health Information (ePHI) and ensures conformance to the following policies and processes.

1. There is an overarching information security policy signed off by the CEO and Board of Directors committing Pacific Edge to secure data practices
2. Pacific Edge are required under collective “Privacy Rules” to abide by the terms of our Privacy Notice.
3. Pacific Edge privacy and security policies are directed by all national and international laws and regulations applicable to its service provision, including security and data breach notification and data protection requirements.
4. Pacific Edge has a weekly process of addressing known or potential security issues
5. Pacific Edge requires all personnel that have any contact with ePHI to complete Acceptable Use Policy; Privacy and Information Security training on an annual basis.
6. Pacific Edge audits the security posture of all third parties that may come in contact with ePHI and undertakes a comprehensive Business Associate Agreements (BAA) with those third parties

7. Pacific Edge requires that all data storage is in secure audited facilities
8. Pacific Edge requires that all ePHI transmission is undertaken using encrypted channels with authorisation/authentication procedures in place.
9. Pacific Edge encrypts all ePHI at rest
10. Pacific Edge has agreements in place with all third parties to ensure notification and control of any data breaches, in conformance with HIPAA and our BAA's.

## **Your Protected Health Information**

In order to provide you with laboratory services, we will receive your Protected Health Information from your healthcare provider that asked us to test your sample. Privacy Standards, require us to protect any health information that will identify you, such as your name and date of birth, telephone number or address.

We protect this information regardless of the form in which we receive it (e.g. oral, written or recorded in other media).

## **What Personal Information Do We Collect or Store**

We may collect personal information about you as result of you ordering testing services, including your:

- a. name
- b. date of birth
- c. address (postal and email)
- d. gender
- e. telephone numbers
- f. unique identifying number (e.g. national health index number or social security number)
- g. health professional(s)
- h. test results and other health information
- i. other information necessary to perform our services and other functions and activities.

## **Collection of Personal Information**

We may collect personal information about you:

- a. directly from you when you order our testing services or when we perform these testing services,
- b. when you contact us to update personal information that we hold about you,

- c. from your medical practitioner or another health professional, and
- d. from any other person with your authorisation or where otherwise permitted by law.

## **Use and Disclosure of Personal Information**

We will not use or disclose your personal information except in accordance with privacy law. We may use or disclose your personal information for the purposes of:

- a. providing you or your representative with services and information regarding our testing services
- b. communicating with you or your representative
- c. communicating with, or providing information to, your medical practitioner or other health professional
- d. communicating with your health insurance provider
- e. providing you with any information requested by you
- f. gauging customer satisfaction and providing customer services
- g. improving our information or services
- h. maintaining our records
- i. providing technical support or administration
- j. addressing feedback or complaints and resolving disputes
- k. providing you with promotional materials and news, where you have agreed to receive such information
- l. legislative and regulatory compliance
- m. enforcing the terms and conditions governing the testing services we provide to you
- n. billing and debt recovery

## **Holding Personal Information**

We will not hold your personal information for longer than is reasonably required for the purposes for which we may lawfully use that personal information. Your rights to access and correct personal information

- a. Where we hold personal information about you, you have a right to request access and correct that personal information in accordance with applicable privacy laws. If you want to access or correct your personal information, please contact our Privacy Officer who will tell you how to make a request.

- b. We do not provide any test results directly to you unless you have made a specific request in writing. You may ask your medical practitioner or other health professional for a copy of your test results, if you wish.

## **Security**

We will use all reasonable endeavours to effect and maintain adequate security measures to safeguard the personal information we hold from loss or unauthorised access, use, modification or disclosure.

We will dispose of personal information in accordance with privacy law.

## **Amendments**

- a. We may amend this Privacy Policy from time to time. Notice of any such amendments will be announced on our website and will be effective immediately, unless we state otherwise. You are responsible for reviewing our website regularly to obtain timely notice of any such amendments.
- b. If you continue to order testing services from us or if you provide personal information after we post changes to this Privacy Policy, this will constitute your acceptance of such changes to this Privacy Policy.

## **Contacting Our Privacy Officer**

If you have any questions about this Privacy Policy or our privacy and data protection practices, or want to access or correct any personal information we hold about you, please contact our Privacy Officer: [privacy@pacifiedgedx.com](mailto:privacy@pacifiedgedx.com).