

Matilda International Hospital

Privacy Policy

1. Introduction

Matilda International Hospital of 41 Mount Kellett Road, The Peak, Hong Kong (**we**) are committed to protecting the personal data of our patients, users of our services, hospital visitors and website visitors (**customers**). We are bound by the Data Protection Principles set out in the Hong Kong *Personal Data (Privacy) Ordinance* (the **PDPO**).

We will only collect, use or disclose personal data in accordance with the PDPO and this Privacy Policy.

We may amend this Privacy Policy at any time and for any reason. The updated version will be available by following the “Privacy” link on our website homepage at <http://www.matilda.org/en/compliance/data-privacy-security>. You should check the Privacy Policy regularly for changes.

In this Privacy Policy, **personal data** means any data: (a) relating directly or indirectly to a living individual; (b) from which it is practicable for the identity of the individual to be directly or indirectly ascertained; and (c) in a form in which access to or processing of the data is practicable.

2. When do we collect personal data?

We collect personal data in a number of ways. The most common circumstances in which we collect personal data are when you:

- make a booking for a consultation;
- undergo the admission process;
- are a patient in the hospital;
- attend an event organised or co-organised by Matilda;
- enroll in a class with us;
- enter a contest held by Matilda;
- join the Matilda Electronic Health Club or Taipan Teddy Club; or
- contact us with a question or comment.

3. What personal data do we collect and how do we use and disclose that personal data?

The types of personal data we collect from you and the purposes for which your personal data will be used and disclosed will depend on the circumstances in which that information is collected. We will inform you of the purposes for which we intend to use your personal data, and the types of third parties to whom we may disclose your personal data, in a Personal Information Collection Statement at or before the time we collect your personal data.

Generally, we may use or disclose your personal data for the purpose for which you provided it to us, purposes which are directly related to the purpose for which you provided it to us, and any other purposes to which you have consented.

Generally, we will not transfer your personal data outside Hong Kong, except where mentioned below.

3.1 *When you make a booking*

When you make a booking, we may collect personal data including but not limited to your name, gender, date of birth, phone number, email or postal address, preferred booking times and dates, service type, service location, insurance coverage and medical concern. It is mandatory to provide your name, phone number, email or postal address, preferred booking date, and service type, so that we can provide services to you. The other information is optional.

We may use your personal data to:

- arrange your consultation;

- contact you with clinical communications about your consultation and/or treatment;
- provide you with any information that is relevant to your consultation and/or treatment;
- contact you asking for feedback about your experience with us; and
- evaluate, plan and improve the services we provide.

With your consent, we may also use your contact details and medical history to: (a) send you reminders about health and medical services (for example, a reminder to come back for an annual checkup); and/or (b) to send you our e-Health Newsletter and keep you informed on hospital activities which may be of interest to you. We may send you these communications by mail, email, telephone, SMS or instant messaging. We will only send you these communications if you opt-in to receive them. Even if you opt-in initially, you may later withdraw your consent to receive these communications by contacting the Patient Service Centre at psc@matilda.org or by calling 2849 0355. (Note that, even if you do not opt-in to the above communications, we may still contact you with clinical communications relating to your consultation and/or treatment, such as test results or requirements for further consultations.)

We may disclose your personal data for the above purposes to third party contractors and advisors who provide services (such as laboratories, imaging centres, information technology support and hosting, administrative and legal and professional services) which assist us to carry out our business (**service providers**).

3.2 When you undergo the admission process

When you undergo the admission process, we may collect personal data including:

- your name, gender, date of birth, , nationality, religion, Hong Kong ID card, passport or birth certificate number;
- your occupation and employer;
- your contact information and your emergency contact person's contact information (including address, telephone numbers and email address);
- your expected date of admission and admitting doctor;
- if you are a maternity patient, your spouse's name, date of birth, Hong Kong ID card or passport number, occupation and employer;
- your credit or debit card information and billing information, including name of cardholder, card number, billing address and expiry date; and
- your insurance information such as your policy number and package coverage.

Some of this information is mandatory (mandatory information will be marked with an asterisk), so that we can provide services to you. The remaining information is optional.

We may use your personal data to:

- arrange your admission;
- contact you with clinical communications about your admission and/or treatment ;
- provide you with any information that is relevant to your admission and/or treatment;
- contact you asking for feedback about your experience with us; and
- evaluate, plan and improve the services we provide.

With your consent, we may also use your contact details and medical history to: (a) send you reminders about health and medical services (for example, a reminder to come back for an annual checkup); and/or (b) to send you our e-Health Newsletter and keep you informed on hospital activities which may be of interest to you. We may send you these communications by mail, email, telephone, SMS or instant messaging. We will only send you these communications if you opt-in to receive them. Even if you opt-in initially, you may later withdraw your consent to receive these communications by contacting the Patient Service Centre at psc@matilda.org or by calling 2849 0355. (Note that, even if you do not opt-in to the above communications, we may still contact you with clinical communications relating to your admission and/or treatment, such as test results or requirements for further consultations.)

We may disclose your personal data for the above purposes to our service providers.

3.3 When you are a patient

When you are a patient, we may collect information about your health and medical condition.

We may use this personal data and personal data we collected in the booking or admission process to:

- verify your identity;
- provide treatment and other medical services to you;
- arrange further consultations or treatments if necessary;
- arrange a referral to a specialist if necessary;
- contact you or your doctor regarding the results of any test or treatment;
- process your payment and insurance claim;
- contact you asking for feedback about your experience with us;
- evaluate, plan and improve the services we provide;
- provide internal teaching and research; and
- investigate and respond to any subsequent complaint, issue or dispute.

We may disclose your personal data for the above purposes to:

- visiting doctors;
- your doctor and other healthcare community support providers;
- our service providers;
- your insurer; and
- our bank, payment processor or collection agency.

If your doctor, healthcare providers or insurer is outside Hong Kong, then we may transfer your personal data outside Hong Kong after obtaining your consent.

If you are an inpatient and your relatives and friends call or visit, we may tell them where you are and your general condition.

We may be required or permitted by law to disclose personal data, for example, to register a birth or death or to report a communicable disease to the authorities.

3.4 When you attend an event or enroll for a course

When you attend an event organised by Matilda, we may collect your name and contact details. We may use this personal data to register you for the event, to contact you with updates and reminders about the event and to contact you after the event asking for feedback. We may disclose your personal data for the above purposes to any service provider who assists us to stage the event.

If we provide health checks at the event, we may collect information about your health and medical condition. We may use your personal data to carry out the health check. We will not disclose the results of your health check to any third party unless we have your consent to do so.

When you enroll in a class organised by Matilda, we may collect your name and contact details. We may use this personal data to register you for the class, to contact you with updates and reminders about the class and to contact you after the class asking for feedback. We may disclose your personal data for the above purposes to any service provider who assists us to stage the event. For some international courses (e.g. First Aid International or international baby massage), we may need to transfer your personal data to a service provider outside Hong Kong.

3.5 If you enter a contest

If you enter a contest held by Matilda, we may collect your name and contact details. We may use your personal data to enter you into the contest and to contact you if you win.

3.6 If you join the Matilda Electronic Health Club

If you join the Matilda Electronic Health Club, we will collect your name, email address, gender, preferred languages and interested health topics. It is optional to provide all information other than your email address.

We may use your personal data to send you our e-Health Newsletter and keep you informed on hospital activities and health issues which may be of interest to you, and to improve our content and communications. We may disclose your personal data for the above purposes to service providers who assist us to prepare and send our e-Health Newsletter.

You can unsubscribe from Matilda Electronic Health Club by clicking the “unsubscribe” link in the e-Health Newsletter or contacting us at unsubscribe@matilda.org.

3.7 If you join the Taipan Teddy Club

If you join the Taipan Teddy Club, we will collect your child’s name, date of birth and gender; as well as your name, email address and contact number. We may use your personal data to send you invitations to events and updates on the hospital services. We may disclose your personal data for the above purposes to service providers who assist us to prepare and send updates and to stage events. You can unsubscribe from the Taipan Teddy Club by contacting us at unsubscribe@matilda.org.

3.8 If you contact us

If you contact us, we may collect personal data including your name, contact information, and any other personal data that you include in your communication. It is optional to provide any information other than your name and contact information. We may use your personal data to respond to your question or comment. We will not disclose your personal data outside Matilda, other than to service providers, unless you consent to us doing so to answer your question or take action in response to your comment.

3.9 If you use our website

We collect aggregated information about user activity on our website, including browsing duration or frequently visited pages, for our business planning and website improvement. However, this information does not identify any individual user.

We use cookies to enhance your use of our websites. However, we do not store personal data in cookies. For more information, review our [Cookies Policy](#).

4. How is personal data stored and secured?

We may retain your personal data after your consultation, admission or treatment has finished for operational and legal reasons, typically for a period of seven years. We may retain medical records for up to 26 years after the most recent update. We may keep your contact details for marketing communications, the Matilda Electronic Health Club and Taipan Teddy Club for as long as you agree to receive them, and retain certain information after you unsubscribe to ensure you are not accidentally re-subscribed.

We will take all practicable steps to ensure that your personal data is protected against unauthorised access, processing, erasure, loss or use. Our security measures include:

- encryption and password-protection of data;
- use of security and anti-malware protection;
- regular updates to systems; and
- security training for staff.

5. Accessing and correcting your personal data

You may contact us to seek access to or seek to correct personal data which we hold about you. There are certain exemptions under the PDPO which may apply to personal data access and correction requests. We may require that you the person requesting access or correction provide suitable identification and we may charge a reasonable administration fee for complying with a data access request. Requests for access to, to correct personal data held by us should be directed to info@matilda.org.

6. Questions, comments and complaints

We welcome your questions, comments or complaints about our Privacy Policy and personal data handling practices. Please contact the Patient Service Centre at pssc@matilda.org or by calling 2849 0355.

If you are not happy with our handling of your complaint, you may contact the [Privacy Commissioner for Personal Data](#) in Hong Kong.

7. If you are located in the European Union

Matilda does not have any operations in the European Union and most of our customers are located in Hong Kong. However, if you are located in the European Union, the General Data Protection Regulation (GDPR) requires that we provide you with following additional information:

- Generally, the legal basis for our processing of your data under the GDPR is for the purposes of our legitimate interests. Matilda has a legitimate interest in providing health and medical services to its customers, developing and growing its business and its commercial relationships, and understanding the needs of its customers. We will only rely on those legitimate interests to process personal data which the processing is necessary for the purposes of those legitimate interests, and those legitimate interests are not overridden by your interests or fundamental rights and freedoms.

The main exceptions to this include marketing communications, the Matilda Electronic Health Club and Taipan Teddy Club, which are based on your consent. You may withdraw your consent at any time, as described in section 3 above.

- You may have additional rights under the GDPR. Information about these rights is available [here](#).
- If you are not happy with our handling of your complaint, you may contact your local data protection authority in the European Union. A list is available [here](#). Alternatively, you may contact the [Privacy Commissioner for Personal Data](#) in Hong Kong.