

Privacy Policy – LumiHealth

This Privacy Policy (or “Policy”) describes practices of Health Promotion Board (HPB, we, our or us) in connection with information we collect, use and disclose through “LumiHealth,” a health and wellness programme featuring a mobile application (“LumiHealth App”) used with the Apple Watch and iPhone (the “Programme”) presented by HPB, in partnership with Apple. The Programme combines sensor and health and usage data to allow participants to complete certain healthy living activities and to receive smart message notifications about healthy living engagement activities. This Programme is available to Singapore residents who have agreed to the “Programme Participation Agreement” (or “PPA”) in the LumiHealth Programme. The PPA is visible in Settings in the LumiHealth App. The PPA further sets out the collection, use and/or disclosure of all data and/or information which is collected under the Programme (known as “Programme Data”).

By using the Programme and/or providing us with your information, you consent to our collection, use, and disclosure (including transfer) of your information in accordance with this Privacy Policy. Please do not provide us with any information if you do not accept this Policy.

What types of information do we collect?

We may collect two types of information when you use the LumiHealth App and if you participate in the Programme: Personal Information and Non-Personally Identifiable Information. **When this Policy uses the term “Programme Data”, this includes both Personal Information and Non-Personally Identifiable Information.**

By “Personal Information,” we mean data that is associated with an identifiable individual, such as a name, address or e-mail address. Personal Information includes, for example, personally identifiable Programme and demographic information. And in connection with participation in LumiHealth, it also includes personally identifiable wellness or fitness information, including various activities identified through the App on your Apple Watch or iPhone.

By “Non-Personally-Identifiable Information,” we mean information that is not associated with an identifiable individual. Non-Personally-Identifiable information may include information which would otherwise be Personal Information, but which has been de-identified or aggregated.

How do we acquire and use your information?

We acquire Programme Data when you use the LumiHealth App and through your participation in the Programme. When you use the LumiHealth App, we collect information about your use of it, such as the number of times a screen is viewed. After you consent to participate in the

Programme, Programme Data is collected through the LumiHealth App, MyInfo, your use of your Apple Watch or iPhone, or communication with LumiHealth Customer Support. In connection with your participation in the Programme, we collect your contact and demographic information and information about your health and activity from the Apple Health App, as well as information concerning Programme activities (e.g. data about how and when you use the LumiHealth App) coming from your Apple Watch or iPhone. If you consent to participate in the Programme, the full listing of the categories of Programme Data that may be collected, used and/or disclosed as part of your participation in the Programme, including information collected through the App and other information from MyInfo, is described in the PPA.

Your Programme Data will never be sold or used to drive sale of any products. It may be used in accordance with the Terms of Use which may include using the information you share in support of the Programme, to adjudicate rewards, to identify and deliver messages that may be helpful to your health and wellness or otherwise of interest to you. Note that your Programme Data may be transferred to any location outside of Singapore.

We may use "cookies" and other technologies such as pixel tags and web beacons. These technologies are used to track information such as the number of users, their frequency of use, and which parts of the website they have visited. While these technologies can tell us when you use the Programme and which pages you visit, it cannot read data off your hard disk or mobile device. You can choose to disable cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. We also collect information about usage of the App. This helps us better understand user behaviour.

We may collect, use, and disclose your Programme Data which includes your Personal Information, for the purposes listed below and, if you choose to participate in the Programme, as otherwise described in the PPA:

- a. providing you and other users with the services and functions of the Programme, including setting up your account and managing your use and access, informing you about service updates, and managing and providing rewards;
- b. to identify and deliver messages that may be of interest to you;
- c. to develop and refine the Programme,
- d. to understand overall Programme effectiveness and/or its impact on the healthcare system in Singapore; and
- e. assisting you with enquiries and obtaining your feedback;

For what and to whom may we disclose your information?

We may disclose your Programme Data which includes your Personal Information, to third parties for certain purposes as described above and as further described below. In all cases we will require the recipient to protect the Programme Data and use it only for the purpose it was provided consistent with this Privacy Policy and, if you are participating in the Programme, your PPA. We may share your Programme Data which includes your Personal Information, if:

- a. the recipient has been authorised to provide services on our behalf;
- b. the recipient is our service provider who provides us with necessary services including but not limited to IT services, hosting and maintenance services, organising of our events, accounting, data analytics services, email messaging services, delivery services, handling of payment transactions, marketing, etc;
- c. the recipient is our consultant or professional adviser including but not limited to accountants, lawyers and auditors;
- d. you have specifically consented to such disclosure;
- e. required by law, such as pursuant to a subpoena, regulatory oversight, or other legal process,
- f. we believe in good faith that disclosure is necessary (a) to protect our rights, the integrity of the Programme, or your safety or the safety of others, or (b) to detect, prevent or respond to fraud, intellectual property infringement, violations of our Terms of Use, violations of law, or other misuse of the Programme or App; and/or
- g. you opt in to share your Programme Data with Apple Inc (“Apple”), in order to help build and improve your LumiHealth experience and the Programme. If you opt in, your contact information and other information that directly identifies you will be separated from the rest of your data collected under the Programme and replaced with a random code before it is provided to Apple.

We will not knowingly collect Personal Information from minors under the age of seventeen (17).

How do we protect your information?

The security, integrity, and confidentiality of your information are extremely important to us. We have implemented technical, administrative and physical security measures that are designed to protect your information from unauthorised access, disclosure, use and modification. We regularly review our security practices to consider appropriate new technology and methods. We also periodically subject the Programme to simulated intrusion tests and have developed comprehensive disaster recovery plans. However, please be aware that despite our best efforts, no security measures are perfect or impenetrable.

What happens if I no longer want to participate?

As stated in the PPA, you are free to change your mind and stop participating in the Programme at any time. You can withdraw from the Programme through the App by choosing “Withdraw from LumiHealth” in settings or contacting LumiHealth support at the number listed below.

You may also be withdrawn from the Programme if you engage in any practices that are found to violate the Programme Terms of Use.

If you withdraw or are withdrawn from the Programme, no additional Programme Data will be collected about you, however, information that was previously collected about you may continue to be used as described in this Policy and the PPA.

After termination of the Programme or user withdrawal, HPB will keep data in accordance with any relevant applicable law, and in compliance with legal guidelines, if any.

Linking to other websites and applications

From time to time, the Programme may provide links to other websites or applications, not owned or controlled by HPB, that we think might complement and enhance your experience with the Programme. This Policy applies solely to information we collect through the Programme. If you access or use a linked website or application, the privacy policy of that other website or application will apply to your access or use. We encourage you to review each such third party’s privacy statement as well as their terms of use. We are not responsible for the content and privacy policies or notices of those websites or applications.

HPB Contact Information

If you wish to contact us, have any enquiries or feedback on this Policy, or need more information on or access to data which you have previously provided to us, email us at lumihealthsupport@hpb.gov.sg or call our LumiHealth support at 1800 222 5555.

Changes to HPB Privacy Policy

HPB may change this Policy from time to time; when updates are made, the version date (located at the bottom of this Policy) will also be updated to reflect that a revision occurred, and will be made available in our LumiHealth App as well as on our website at: <https://www.lumihealth.sg>.

The updated Policy will take effect immediately and will supersede all earlier versions but will continue to apply to Programme Data provided to us previously. Each time you access the LumiHealth Website or App and any updates, upgrades, new versions, documentation and content and services provided by or through LumiHealth, you acknowledge and agree that the latest version of this Policy shall apply.

We encourage you to periodically reread this Policy to see if there have been any changes that may affect you. To be sure you are aware of any material change, we will message you through LumiHealth. This Policy is not intended to and does not create any contractual or other legal rights in or on behalf of any party.

Effective Date: 22 October 2020