

PRIVACY POLICY

Personal Data Privacy Protection Policy

The **NOVODENTAL** (“us”, “we”, “our”), is committed to protecting and respecting your personal data privacy in compliance with applicable laws and regulations, including Republic Act No. 10173, otherwise known as the Data Privacy Act of 2012 (“DPA”), and its implementing rules and regulations.

This privacy policy explains how Novodental collect, uses, processes, stores and protects your personal information in connection with the dental services we provide.

By visiting our clinics, availing our services, accessing our platforms, or simply submitting your personal information to us, you acknowledge that you have read and understood this Privacy Policy and agree to the collection and processing of your personal data in accordance with the applicable laws.

1. Definition of Terms

For Purposes of this Privacy Policy, the following terms shall mean:

“Applicable Laws” refers to the Republic Act No. 10173 or the Data Privacy Act of 2012, its implementing Rules and Regulations, and all related issuances and regulations.

“Personal Data” or “Personal Information” refers to any information from which and individual may be identified, whether directly or indirectly, including sensitive personal information and privileged information.

“Sensitive Personal Information” includes information relating to age, health, medical history, treatment plans/records, and other information classified as sensitive by the Philippine law.

“Processing” refers to any operation or set of operations performed upon personal data including collection, recording, organization, storage, updating, retrieval, consultation, use, disclosure, transfer, blocking, erasure or destruction.

“Platforms” refer to Novodental’s websites, online appointment system, social media accounts, and other digital channels that is operated by or on behalf of Novodental.

“Physical Clinics” refer to all dental clinics, offices, laboratories operated by Novodental.

2.Service Description

Novodental is engaged in providing dental healthcare services, cosmetic dentistry, oral rehabilitation, orthodontics, dental surgery, preventive care and other related healthcare and wellness services.

NOVODENTAL may process your personal data in connection with:

- Dental consultation and treatments;
- Appointment scheduling and patient management;
- Diagnostics procedures and medical records management;
- Patient care;
- Marketing, promotions, and patient engagement activities;
- Billing and payment processing.

3.Personal Information We Collect

During your Interaction with Novodental, we may collect the following personal data:

Basic Personal Information

- Full Name
- Date of birth
- Address
- Email Address
- Mobile or telephone number
- Gender

Sensitive Personal Information

- Medical and Dental History
- X-rays, photographs, scans, and diagnostics results.

Financial Information

- Payment records
- Billing Information
- Bank or credit card details processed through accredited payment providers.

CCTV Information

- Video recordings and images captured through CCTV systems that are installed within our clinics and facilities for safety and security purposes.

You present that all personal data submitted to us is accurate, complete and updated.

4.Methods of Collection

We may collect your personal information through the following means:

- When you undergo consultation, and treatment;
- When you schedule appointments online or in person;
- When submit patient records or medical records;
- When you communicate with our staff through phone, email, social media or other messaging platforms;
- When you participate in promotions;
- When you make payments;
- When you visit our clinics that are monitored by CCTV systems;

5.Purpose of Processing Personal Information

Novodental processes personal information for the following purposes:

Healthcare and Patient Care

- To provide dental care services;
- To assess medical conditions and treatment suitability;
- To coordinate appointments and follow-up care;
- To maintain accurate patient records;
- To process laboratory and diagnostics request;

Administrative and Operational Purposes

- To maintain clinic operations and internal records;
- To improve customer experience and service quality;
- To process billing and payments;

Marketing and Communications (Subject to your consent, we may:)

- Send appointment reminders;
- Inform you about promotions, new services;

If you do not consent or withdraw your consent, we may not be able to give you the products and promotional benefits that is related to our promotions.

6. Method of Use, Storage and Security and Protection of Personal Information

Novodental implements reasonable organizational, physical and technical security measures to protect your personal information against unauthorized access, disclosure, misuse, alteration, destruction or loss.

Your personal information may be stored through;

- Secure internal systems;
- Physical files secured within authorized premises;
- Cloud-based platforms maintained by Novodental IT Developers.

Access to your personal information is limited only to authorized personnel who require such information to perform their duties.

CCTV photos and video recordings (“CCTV Media”) captured within the clinic premises, offices and laboratories for the safety, security and protection of the patients, staff, and visitors are securely stored and accessible only to authorized personnel. These recordings may be used when necessary for the clinic premises, offices and laboratories operations, security concerns, or legal proceedings to protect the right and interests of the clinic, offices and laboratories, CCTV media may also be shared with appropriate government authorities when required for investigations or compliance with applicable law and regulations.

7. Sharing and Disclosure of Personal Information

Novodental may share your personal data with:

- Licensed dentists, doctors, and other healthcare professionals;
- Laboratories;
- IT service providers
- Authorized representative upon your consent.

All disclosure is limited to information reasonably necessary for the stated purpose and subject to confidentiality obligations.

8. Retention of Personal Information

Novodental retains personal information only for as long as necessary to fulfill the purpose for which it was collected, comply with legal obligations, and enforce agreements.

Dental records may be retained in accordance with healthcare regulations and applicable laws.

When retention is no longer necessary, personal Information shall be securely deleted, anonymized, destroyed, or disposed of using reasonable and secure methods.

9. Rights of Data Subject

Under the Data Privacy Act, you have the following rights:

- **Right to Correct Information**
Request correction of inaccurate or incomplete information.
- **Right to Withdraw Consent**
Withdraw previously provided consent where processing relies on consent.
- **Right to File a Complaint**
Lodge complaints with the Clinic or appropriate regulatory authorities.
Request may require identification verification before processing.
- **Right to Object**
Object certain processing activities, including marketing communications.
- **Right to Data Portability**
Request a copy of personal information in a usable format where applicable.

10.CCTV Privacy Notice

Novodental uses CCTV systems within and around its clinics and offices to ensures the safety and security of patients, employees, visitors, and properly,

Purpose of CCTV Monitoring

- To protect patients, staff, and visitors;
- To support investigations and legal proceedings;
- To prevent theft, fraud and unauthorized activities;
- To main clinic security and operational safety.

CCTV Retention

CCTV recordings are generally retained for a limited period unless required for investigations, legal proceedings, or regulatory compliance.

Access to CCTV footage is restricted to authorized personnel only.

CCTV systems are not installed in areas where there is a reasonable expectation of privacy, such as restrooms.

11. Changes to this Privacy Policy

Novodental reserves the right to amend or update this Privacy Policy at any time to reflect changes in legal, regulatory, operational, or business requirements.

Updated versions shall be posted on our official platforms and shall take effect upon publication unless otherwise stated.

12.Contact Information

For questions, concerns, requests, or complaints regarding this Privacy Policy or the processing of your personal data, you may contact:

Data Protection Officer

Open every (Mon-Sat, 8:30am-5:30pm)

Email: dpo@novodental.com.ph

Phone: 09563056000

Address: One Park Drive Tower 1, Unit 1201,1218 & 1219, 12th floor, 9th Ave. Cor 11th Drive, Bonifacio Global City, Taguig City, 1634