

MY DOC EXPRESS

Privacy Policy

mydocexpress.com

1. OUR COMMITMENT TO YOUR PRIVACY

- 1.1 Welcome to My Doc Express. We value your privacy and work hard to protect the information you provide to us. We respect your rights to privacy and are committed to complying with the Data Privacy Act of 2012 (Republic Act No. 10173), its Implementing Rules and Regulations, and the issuances of the National Privacy Commission ("NPC") (together, the "Data Privacy Act").
- 1.2 This Privacy Policy sets out how we collect, hold, use, disclose, retain and protect personal information provided to us or collected by us, offline or online, including through our website, our telehealth platform, and the services offered on them (the "Services").
- 1.3 In this Privacy Policy, "we", "us" and "our" mean Medis Technologies PH, Incorporated (Company Reg. No. 2025050202809-01) of Level 10, IBP Tower, Dona Julia Vargas Ave. & Jade Drive, Ortigas Center, Pasig City 1605, NCR, the operator of My Doc Express and the personal information controller for the purposes of the Data Privacy Act.
- 1.4 This Privacy Policy forms part of, and should be read together with, our Terms and Conditions. Capitalised terms not defined here have the meaning given in the Terms and Conditions.

2. PERSONAL INFORMATION WE COLLECT

- 2.1 The types of personal information we may collect about you include (but are not limited to):

As a patient:

- (a) your name, date of birth, and sex;
- (b) your contact details, including email address, mailing address, street address and telephone number;
- (c) identity verification information, including a government-issued identification document and, where required, a photograph used to confirm that the identification belongs to you;
- (d) your payment details, processed through our third-party payment processor;
- (e) your intake submissions, including the answers you give in structured intake forms and the health concerns you describe;
- (f) images, photographs, screenshots, documents, test results and other material you upload or send in connection with a consultation, including through the asynchronous messaging service;
- (g) the content of your messages with doctors and with our support team, which in the case of a consultation forms part of your clinical record;
- (h) consultation outcomes, including clinical advice, referrals, electronic prescriptions and medical certificates issued to you;
- (i) records of the consents and acknowledgements you give, including the version of the terms accepted and the date and time of acceptance;

- (j) your general practitioner's details (if provided), your preferences and opinions, and information you provide through patient surveys; and
- (k) details of your requests and of the services or support we have provided or that you have inquired about, and our responses.

As a user of our Services:

- (l) your browser session and geo-location data, device and network information, statistics on page views and sessions, acquisition sources, search queries and browsing behaviour;
- (m) information about your access and use of our Services, including through cookies, the type of browser and operating system you use, and the domain name of your internet service provider; and
- (n) additional personal information you provide directly or indirectly through your use of our Services, associated applications or social media platforms, or accounts from which you permit us to collect information.

As a doctor or doctor applicant:

- (o) your professional licence and registration details, qualifications, and information about your criminal history collected as part of credentialing.

2.2 We may collect personal information directly from you or from third parties. We collect only personal information that is necessary and relevant to provide the requested Services, consistent with the principles of transparency, legitimate purpose and proportionality under the Data Privacy Act. If you do not wish to provide personal information, we may not be able to provide the requested Services.

3. SENSITIVE PERSONAL INFORMATION

- 3.1 Sensitive personal information is given a higher level of protection under the Data Privacy Act. It includes information about health, racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, sex life, genetic information, and criminal offences, as well as government-issued identifiers.
- 3.2 The sensitive personal information we may collect includes:
 - (a) as a patient: your health information, including your intake submissions, symptoms and history you describe, images and test results you upload, message threads with doctors, medical records, prescriptions, imaging, clinical letters and consultation outcomes, and government-issued identification used for identity verification; and
 - (b) as a doctor: information about your criminal history and professional licence details.
- 3.3 We will not collect sensitive personal information without your explicit consent, unless otherwise allowed by law. In the case of health information, we also rely on the lawful bases in sections 12 and 13 of the Data Privacy Act, including processing necessary for the provision of medical treatment by a medical practitioner subject to an adequate standard of confidentiality.
- 3.4 Where you provide explicit consent, your sensitive personal information will only be used and disclosed for the purposes for which it was collected, for directly related purposes, or as otherwise allowed by law.

4. HOW WE USE PERSONAL INFORMATION

- 4.1 We may collect, hold, use and disclose personal information for the following purposes:
- (a) to enable you to access and use our Services and associated applications, including creating and administering your account and verifying your identity;
 - (b) as a patient, for doctors to provide their services to you, including conducting synchronous consultations and reviewing and responding to asynchronous messaging consultations;
 - (c) to create and maintain your clinical record, including intake submissions, message threads, and consultation outcomes;
 - (d) to issue electronic prescriptions, medical certificates and other consultation documents, and to enable authorised verification of those documents under clause 6.2;
 - (e) to record and evidence the consents and acknowledgements you give;
 - (f) if you have applied to be a doctor on our platform, to consider your application and conduct credentialing;
 - (g) to contact and communicate with you about our Services, including consultation status updates;
 - (h) for internal record keeping, administrative, invoicing and billing purposes;
 - (i) for analytics, market research and business development, including to operate and improve our Services, using aggregated or de-identified information wherever practicable;
 - (j) to offer additional benefits to you and, subject to your consent where required by law, for advertising and marketing, including promotional information about our products and services and those of third parties we consider may interest you;
 - (k) to maintain the safety and quality of the Services, including clinical audit and complaint investigation; and
 - (l) to comply with our legal and regulatory obligations and to resolve disputes.
- 4.2 We do not use your clinical information for marketing. Marketing preferences can be withdrawn at any time under clause 8.4.

5. DISCLOSURE OF PERSONAL INFORMATION

- 5.1 We may disclose personal information to:
- (a) as a patient, the doctors who provide services to you, including the doctor reviewing your asynchronous messaging consultation;
 - (b) a pharmacy, laboratory or other provider, where you direct us to send a prescription, request or referral;
 - (c) third-party service providers enabling them to provide services to us, including IT, data storage, web-hosting and server providers, communications providers, payment systems operators, professional advisors, and maintenance providers;
 - (d) as a doctor, patients as required to allow patients to use our Services and benefit from your services;

- (e) our employees, contractors and related entities, on a need-to-know basis;
 - (f) our existing or potential agents or business partners, and sponsors or promoters of additional benefits we offer;
 - (g) anyone to whom our business or assets (or any part of them) are, or may in good faith be, transferred, subject to obligations of confidentiality and continuity of protection;
 - (h) credit reporting agencies, courts, tribunals and regulatory authorities, in the event you fail to pay for services provided to you;
 - (i) courts, tribunals, regulatory authorities and law enforcement officers, as required or allowed by law, in connection with actual or prospective legal proceedings, or to establish, exercise or defend our legal rights;
 - (j) regulatory bodies, doctors or allied health professionals, where we reasonably believe disclosure is necessary to lessen or prevent a serious threat to the life, health or safety of any individual, or to public health or safety; and
 - (k) any other third parties as permitted or required by law.
- 5.2 Clinical information is disclosed only with your consent or where the Data Privacy Act or other law permits or requires disclosure. Doctors are bound by professional confidentiality obligations in addition to this Privacy Policy.

6. OVERSEAS TRANSFERS AND DOCUMENT VERIFICATION

- 6.1 We may disclose personal information to recipients located outside the Philippines, including cloud hosting and service providers. We remain accountable for personal information transferred overseas and will ensure any such transfers comply with the Data Privacy Act and NPC issuances, including, where necessary, entering into appropriate data sharing or outsourcing agreements imposing equivalent obligations of protection.
- 6.2 Where we operate a document verification facility, a third party holding a document issued through the platform may confirm its authenticity. Verification confirms only whether the document was genuinely issued; it does not disclose your clinical information, except with your consent or where disclosure is required or permitted by law.

7. RETENTION OF PERSONAL INFORMATION

- 7.1 We retain personal information only for as long as necessary for the purposes for which it was collected, or as required by law.
- 7.2 Clinical records — including intake submissions, message threads with doctors, uploaded materials, consultation outcomes, prescriptions and certificates — are medical records. We retain them for the period required by Philippine law and applicable professional standards, and in any event for at least 10 years from the date of the relevant consultation.
- 7.3 Consent and acknowledgement records are retained for the same period as the clinical record to which they relate. Payment records are retained as required by tax and accounting law. When retention is no longer required, personal information is securely deleted, destroyed or irreversibly de-identified.

8. YOUR RIGHTS AND CONTROLLING YOUR PERSONAL INFORMATION

- 8.1 By providing personal information to us, you acknowledge that we will collect, hold, use and disclose it in accordance with this Privacy Policy. You are not required to provide personal information; however, if you do not, it may affect your use of the Services.
- 8.2 If we receive personal information about you from a third party, we will protect it as set out in this Privacy Policy. If you are a third party providing personal information about somebody else — including a parent or legal guardian providing information about a minor — you represent and warrant that you are lawfully entitled to provide it.
- 8.3 Under the Data Privacy Act, you have the rights to: be informed; object to processing; access your personal data; rectify inaccurate or incomplete data; erasure or blocking of data, subject to the conditions of the Data Privacy Act and our record-keeping obligations; damages for violations of your rights; data portability, including a copy of your data in an electronic or structured format; and to lodge a complaint with the National Privacy Commission.
- 8.4 If you have agreed to receive direct marketing, you may change your mind at any time by contacting us using the details below or using the opt-out facility in the communication. We only send direct marketing communications with your consent where required by law.
- 8.5 You may request details of the personal information we hold about you, and correction of information that is inaccurate, out of date, incomplete, irrelevant or misleading. We will respond within the periods required by the Data Privacy Act, and our security procedures may include requesting proof of identity before disclosing personal information to you.
- 8.6 Erasure of clinical records is subject to legal and professional retention obligations: where we are required to retain a medical record, we may block further processing instead of deleting it, and will tell you when that is the case.

9. STORAGE, SECURITY AND DATA BREACHES

- 9.1 We are committed to ensuring that the personal information we collect is secure. We have implemented reasonable and appropriate organisational, physical and technical measures intended to protect personal information from misuse, interference, loss, and unauthorised access, modification and disclosure, having regard to the sensitivity of health information. These include access controls and staff confidentiality obligations, and encryption of data in transit and at rest.
- 9.2 While we take measures to safeguard information, no transmission over the internet can be guaranteed to be absolutely secure. Please take care when transmitting information to us and keep your account credentials confidential.
- 9.3 If we become aware of unauthorised access to, disclosure of, or loss of your personal information, we will activate our data breach response plan and comply with the notification requirements under the Data Privacy Act and NPC rules, including notifying the NPC and affected individuals within the required periods where the notification threshold is met.

10. COOKIES AND WEB BEACONS

- 10.1 We may use cookies on our online Services. Cookies are text files placed in your browser to store your preferences. Cookies do not, by themselves, tell us your email address or other personally identifiable information, but they allow third parties, such as Google and Facebook, to display our

advertisements to you as part of retargeting campaigns. If you provide personal information through our online Services, it may be linked to data stored in the cookie.

- 10.2 You can block cookies through your browser settings. Blocking all cookies (including essential cookies) may prevent access to parts of our online Services.
- 10.3 We may use web beacons (clear GIFs) to monitor visitor behaviour and collect data about page viewing, for example to count visitors or deliver cookies.
- 10.4 Analytics and advertising cookies are not used to collect or infer clinical information, and we do not share your clinical information with advertising platforms.

11. LINKS TO OTHER WEBSITES

- 11.1 Our Services may contain links to other websites. We have no control over those websites and are not responsible for the protection and privacy of personal information you provide while visiting them. Those websites are not governed by this Privacy Policy.

12. MINORS

- 12.1 The Services are not directed at minors acting on their own behalf. Personal information about a minor may be provided only by the minor's parent or legal guardian, as set out in the Terms and Conditions, and is processed with the guardian's consent and, where appropriate to the minor's age and capacity, the minor's assent.

13. CHANGES TO THIS PRIVACY POLICY

- 13.1 We may update this Privacy Policy from time to time. The current version is always available on our website, marked with its version and effective date. We will notify you of material changes — for example by notice on the Platform or by email — before they take effect. Changes do not reduce the protections applying to information collected under an earlier version without your consent.

14. CONTACT AND COMPLAINTS

- 14.1 If you have any questions, concerns, requests or complaints about this Privacy Policy or how we handle your personal information, please contact our Data Protection Officer:

Data Protection Officer

Name: Voss Gibson

Email: admin@mydocexpress.com

Postal address: Level 10, IBP Tower, Dona Julia Vargas Ave. & Jade Drive, Ortigas Center, Pasig City 1605, NCR

- 14.2 We will acknowledge your complaint promptly and endeavour to resolve it within fifteen (15) business days. If you are not satisfied with our response, you may lodge a complaint with the National Privacy Commission (privacy.gov.ph).