

## Privacy Policy

### STATEMENT OF POLICY

L1NK INC. is committed to protecting your data privacy and complying with Republic Act No. 10173 or the Data Privacy Act of 2012 (DPA), its Implementing Rules and Regulations, and other relevant policies, including issuances of the National Privacy Commission of the Philippines. When you use our services, you're trusting us with your information. We understand this is a big responsibility and we will work hard to protect your information and put you in control. L1NK INC. respects and values your data privacy rights, and we make sure that all personal data collected from you, are processed in adherence to the general principles of transparency, legitimate purpose, and proportionality.

### L1NK INC. Privacy Notice

This Privacy Notice is meant to help you understand what information we collect, why we collect it, and how you can update, manage, export, and delete your information.

We want you to understand the types of information we collect as you use our services. We collect information to provide better services to all our users.

### Personal Data Collected

**We collect the following personal information from you when you register from our website or through our mobile app and electronically submit to us via a mutually agreed document:**

- Name
- Contact information like your mobile number and email (optional)
- Employer or company

**We collect the following personal information from you when you electronically book using our website or app for medical concerns like a) to book for medical appointments whether through tele-consult, haws call or clinic visit; b) to consult using your phone; c.) Get eRx, eLab, Medical Certificate:**

- Gender
- Date of birth
- Company name/association/affiliation
- Government issued identification card
- Health and COVID-19 related information
- Address (for haws call)

### Use

The collected personal information is utilized solely for documentation and processing purposes for your medical concerns like a) to book for medical appointments whether through tele-consult, haws call or clinic visit; b) to consult using your phone; c.) Get eRx, eLab, Medical Certificate within L1NK INC.

L1NK INC. will share your information to third parties only to the extent necessary and for the legitimate purpose of L1NK INC. and for purposes of processing your medical appointment with

the doctor of your choice, either thru tele-consult, haws call or clinic visit, when you avail of the Get eRX, eLab, Medical Certificate and when we collect payment for the services we provide you. While we may need your personal information for other purposes, we will not use or disclose your information without your permission. Your personal information will also be shared to companies with **existing Data Sharing Agreements with L1NK INC., but rest assured, the only information that will be shared are those that are necessary for the legitimate purpose of L1NK INC. and the recipient entity (person/company)**

### **Protection Measures**

Only authorized L1NK INC. Personnel, the medical doctor of your choice, and the recipients of our Data Sharing Agreements may have access to this personal information, the exchange of which will be facilitated through haws – Health And Wellness Solutions mobile app and other specific agreements made between parties via mutually agreed documents. They will be stored in a database for as long as necessary after which physical records, if any shall be disposed of through shredding, while digital files shall be anonymized.

### **Access and Correction**

You have the right to ask for a copy of any personal information we hold about you, as well as to ask for it to be corrected if you think it is wrong. You can also directly edit, amend and update your personal information on our website or app should you wish to do so. For requests and inquiries regarding data privacy please contact our Data Protection Officer, through the following email address: [dpo@hawsinc.com](mailto:dpo@hawsinc.com)

### **Overview**

Access to and/or use of any website or any electronic application owned and/or maintained by L1NK INC./ haws or any of its affiliates or related corporations, including haws' electronic health consultation, prescription and delivery application and our website at <https://hawsinc.com> (collectively, the "haws Sites") and/or any services provided by us or otherwise are made available on or through any of the haws Sites (the "Services") are conditional upon acceptance of L1NK INC./haws's Terms of Service, into which this Privacy Policy is incorporated by reference and this Privacy Policy is an integral part of. By accessing and/or using the haws Sites and/or our Services, you hereby acknowledge that you have read haws' Terms of Service, including this Privacy Policy, and that you are expressly agreeing to L1NK INC./haws's Terms of Service and expressly consenting to our collection, use and disclosure of your personal data in accordance with this Privacy Policy. If you do not agree to L1NK INC./haws's Terms of Service and/or do not consent to such collection, use and disclosure of your personal data, please do not access or use the haws application and haws' Sites and/or our Services.

L1NK INC./haws may at any time and at our sole discretion, amend and update this Privacy Policy Statement, without notice to the user. You are responsible for regularly reviewing this Privacy Statement. Any such amendments, modifications and/or updates will be effective immediately upon posting of such updated Privacy Statement or the amended policies (if any) or supplemental terms (if any) on the applicable Service(s). Your continued access or use of the Application or our Services after posting such amendments, modifications and/or updates confirms your acceptance and consent to be bound by the Privacy Statement, as amended.

This Privacy Policy applies only to information we collect through the Platforms not limiting to email, text and other electronic communications set through or in connection with the Platforms when any person uses the website or any electronic application owned and/or maintained by L1NK INC./haws or any of its affiliates or related corporations, including haws electronic health consultation, prescription and delivery application and our website at <https://hawsinc.com> (collectively, the “haws Sites”) and/or any services provided by us or otherwise are made available on or through any of the haws Sites (the “Services”). This policy does not apply to information collected by any third party. When you click on links on the Platform, you may leave our site. We are not responsible for the privacy practices of other sites, and we encourage you to read their privacy statements.

## **1. How we collect professional/personal information; use of professional/personal information**

**“Professional/Personal information”** refers to any information whether recorded in a material form or not, from which the identity of an individual is apparent or can be reasonably and directly ascertained by the entity holding the information, or when put together with other information would directly and certainly identify an individual.

**“Sensitive personal information”** refers to personal information:

- (1) About an individual’s race, ethnic origin, marital status, age, color, and religious, philosophical or political affiliations;
- (2) About an individual’s health, education, genetic or sexual life of a person, or to any proceeding for any offense committed or alleged to have been committed by such person, the disposal of such proceedings, or the sentence of any court in such proceedings;
- (3) Issued by government agencies peculiar to an individual which includes, but not limited to, social security numbers, previous or current health records, licenses or its denials, suspension or revocation, and tax returns; and
- (4) Specifically established by an executive order or an act of Congress to be kept classified.
- (5) Specific to Providers/Medical Practitioners professional data, certifications and related information viable to their area of specialization.

We collect and use your professional/personal information through the haws Sites, haws app and other modes of communication but not limited to emails, phone or text or otherwise:

- To facilitate your access to a range of Health and Medical specialists in the Philippines and beyond. Allowing you to arrange appointments and consults in modes as: Tele-Consult, (House) haws Calls, Clinic Visits in the mobile first application.
- To allow continuity of care after consultation, you have access and option to continue your transactions with pharmacies and diagnostic centres.
- To facilitate structured care for you and your family in the Philippines. Residents in the Philippines including OFWs will be able to transact on behalf of their family members in the Philippines. Overall, the platform becomes a go-to for all Health, Medical and Wellness requirements for multiple individuals, whenever, wherever they may be.
- To provide services via your employment for General check-ups related to Medical Leave in employment. An initial health assessment is also available at your service for further care with our Medical Specialists.
- Patients/Customers/Families of patients will have the opportunity to approve and allow referral assessments by other specialists via the application.
- to provide our Services to meet your healthcare and/or employee benefit needs including and not limited to verifying your identity, responding to, handling and processing queries, requests, applications, complaints and feedback from you, managing your relationship with us, processing or facilitating the utilisation of your healthcare and/or employee benefit needs, processing payment or credit transactions, and notifying you when

updates to the haws Sites and/or our Services are available);

- to customise and improve our Services to make your experience more secure and convenient (including improving the quality of our Services through the performance of quality reviews and similar activities and creating de-identified or anonymised information which is not used or intended to be used to personally identify an individual for the purposes of data analytics and research);
- where you have provided consent, to market and promote our Services to you (including providing you with promotional messages, newsletters, e-mails, products and services);
- to comply with any applicable laws, regulations, codes of practice, guidelines, or rules, or assist in law enforcement and investigations conducted by any governmental and/or regulatory authority;
- for any other purposes for which you have provided the information; and
- for any other incidental business purposes relating to or in connection with the above. We only collect professional/personal information about you that we consider reasonably necessary for achieving these purposes, such data may be provided voluntarily by you directly or via a third party (for example your family member, including your employer if they process or facilitate the requested services of haws as enumerated above) who has been duly authorised by you to disclose your professional/personal information.

If you choose to access and/or use the haws Sites and/or our Services, we may require you to provide contact and identity information, medical history and other professional/personal information as indicated on the forms in the relevant haws Site. Some examples of professional/personal information and sensitive personal information which we may also collect from you include but not limited to:

- your name, identification number such as passport number, local in-country recognized Identification Cards. For verification, more than a single Identification Card may be requested.
- Residential and delivery address, including but not limited to e-mail address, telephone number, nationality, gender and date of birth;
- personally identifiable medical and health-related information which you provide to us such as information or records relating to your medical or health history, health status, laboratory testing results, biometric measurements and diagnostic images;
- personally identifiable medical and health-related information about you prepared by healthcare providers and/or treatment providers who provide our Services to you such as medical records and treatment and examination notes; and
- professional identifiable certifications, credentials viable to your area of Medical Specialization as a Provider/Medical Practitioner/Physician.
- Other information which you may input into the haws Sites or provide to us pursuant to our provision of our Services.

We will maintain a file about you and your use of the haws Sites and/or our Services. We will collect, use and retain the data in your file, and such other data that we may obtain from time to time in connection with your current and past activities on the Haws Sites, for as long as the purpose for which the data is collected continues or where otherwise necessary for legal purposes or the purposes of our normal business operations.

We may also look across multiple users to identify problems, and in particular, we may examine your personal data to identify users using multiple user-IDs or aliases. We may also compare and review your personal data for errors, omissions and/or accuracy.

Under some circumstances, we may require certain financial information from you. We will use your financial information (including credit card information or online payment system account information) to verify the accuracy of your name, address, and other information, detect any fraud or other criminal activity, and bill you for your use of our Services.

We may track certain information based upon your behaviour on the haws Sites. We use this information to do internal research on our users' demographics, interests, and behaviour to better understand, protect and serve our users in general and you in particular. This information

may include information about the computer or mobile device you are using, and your IP address, site activity, browser type, connection speed, access times and physical location.

We may use data collection devices such as “cookies” on certain pages of the haws Sites to promote trust and security, help analyse our web page flow and measure promotional effectiveness. “Cookies” are small files placed on your hard drive that assist us in providing the haws Sites and/or our Services. We may offer features that are only available through the use of a “cookie”. We also use “cookies” to reduce the number of times you need to enter your password. “Cookies” can also help us provide you with information that is targeted to your interests. You are always free to decline our “cookies” (if your browser permits you to do so), although in that case you may not be able to use certain features on the haws Sites and you may be required to enter your password more frequently during a session on the haws Sites.

You convey your consent by accepting our Privacy Policy and submitting your personal information to us for collection, processing and retention pursuant to existing laws. You expressly waive and release us from any and all claims, causes of action, liability or damages arising from the lawful use of the personal information submitted to us and all related information.

We adopt and enforce all standards and regulations prescribed by law, including but not limited to the Data Privacy Act of 2012, and all other applicable laws, rules and regulations in the Philippines.

## **2. Warranties and representations**

1. You have the legal capacity to agree with the terms and conditions and privacy policy on your own personal capacity, you are at least 18 years old, of sound mind, and not under the influence of drugs or liquor as to impede your judgment, and as a parent or guardian of a child or ward who is less than 18 years old, whom you accompany at all times while accessing and/or using the haws application/sites. In the event that the ward reaches the age of 18 years old, the legal guardian must remove the personal information of the ward unless the ward has given express consent for the use of personal information in using the haws application/sites and the ward is a family member.
2. You have been given express consent to use the haws application/sites by your family member and that you will remove the personal information of the family member in the absence or withdrawal of consent.
3. You are contracting as a parent/guardian of a person who is of legal age but is incapacitated to give consent by reason of an intellectual disability or mental illness to the extent that such person even if of legal age, lacks sufficient understanding or capacity to make, communicate or implement responsible personal decisions or decisions regarding his/her person (hereinafter referred to as incapacitated person), and such child/ward/incapacitated person must be whom you accompany at all times while accessing and/or using the haws application/sites and/or the Services. In the event that said incapacitated person attains capacity, or no longer wishes to use our services, the parent/guardian must remove the personal information of the ward unless the ward has given express consent for the use of personal information in using the haws application/sites and the ward is a family member;
4. Your access to the haws application/sites is for lawful use and haws shall not be responsible for any unauthorized registration or unlawful or improper use of the haws application/sites;

## **3. Sharing with and Disclosure to Third Parties**

Subject to limitations provided by Philippine laws, and consistent without terms and conditions, privacy policy, and our business activities, by using our services, you specifically give your consent and agree to L1NK INC. disclosing your personal data to:

- with our employees, our subsidiaries, affiliates, partners and/or related corporations in pursuant of our legitimate purpose, and business activities
- with third parties with whom L1NK INC./haws may enter into promotional agreements for

- the purpose of providing the service such as giving of discounts;
- our third party service providers/contractors (including independent contracting doctors and their staff providing the Services to you, any third party service provider which hosts or manages data from the haws Sites, credit, debit and charge card companies, banks or other entities processing payment instructions given by you through the haws Sites, lawyers, auditors, any other agents or subcontractors acting for and on our behalf);
- with our consultants, lawyers, accountants and other professionals like IT experts or technicians pursuant to legal compliance, addressing security issues, frauds, in case of emergencies or to protect the rights of L1NK INC., and it's users;
- your employer, medical provider(s) and insurer(s) and their respective related companies and/or other relevant parties with whom L1NK INC./haws have data sharing agreements, who may process or facilitate the processing of your claims for medical care and/or utilisation of your healthcare and/or employee and/or insurance healthcare benefit needs; and/or
- government or regulatory authorities in Philippines including other countries in operation. Whether within or outside of Philippines, to the extent required in the normal course and scope of our business in the provision of our Services (including for the avoidance of doubt, claims tracking and processing of and facilitating the processing of claims for medical care and/or utilisation of healthcare and/or employee and/or insurance healthcare benefit needs),
- With the general public if you submit content relating to L1NK INC., haws website, haws app, in any social media, haws website, haws app, blogs, the world wide web, or in any public forum that is accessible by the general public
- where required by applicable law, statute, stock exchange regulation or by-law, regulatory or governmental order or court order, and/or where we believe in good faith that disclosure is necessary to protect your safety or the safety of others, or our rights, or investigate fraud.
  - We also reserve the right to disclose your personal data to a buyer or other successor in the event of a merger, divestiture, restructuring, reorganisation, dissolution or other sale or transfer of some or all of haws's assets, whether as a going concern or as part of bankruptcy, liquidation or similar proceeding, where personal data maintained on the haws Sites is among the assets transferred and/or any other person or organisation disclosed by us when you provide the information.

The purposes listed in the above clauses may continue to apply even in situations where your relationship with us (for example, pursuant to your employment contract) has been terminated or altered in any way, for a reasonable period thereafter (including, where applicable, a period to enable us to enforce our rights under a contract with you).

We may also disclose your anonymised data to data analytics platforms, technical support providers, and delivery service providers.

If you use or agree to the use of our delivery services to deliver your prescription, you authorise haws to share basic identification and, where necessary, medical data with our delivery partner for the purposes of verifying your identification on collection of your prescription. haws will take all reasonable steps to protect your personal data in accordance with this Privacy Policy.

Part of our next release includes partnering with local pharmacies. If you use or agree to the use of our pharmacy partner to fulfil your prescription, you authorise haws to share basic identification and, where necessary, medical data with our pharmacy partner for the purposes of verifying your identification on collection of your prescription. haws will take all reasonable steps to protect your personal data in accordance with this Privacy Policy.

If you use or agree to the use of our Services pursuant to your healthcare and/or employee and/or insurance healthcare benefit plan, you authorise haws to share basic identification and, where necessary, medical data, including information relating to your diagnosis, referral, management and treatment through the haws application and affiliate haws Sites with your employer, medical provider(s) and insurer(s) and their respective related companies and/or other relevant parties who may process or facilitate the processing of your claims for medical care and/or utilisation of your healthcare and/or employee and/or insurance healthcare benefit needs and consent to and authorise any of them to share the same with any relevant party for

the purposes of processing or facilitating the processing of your claims for medical care and/or utilisation of your healthcare and/or employee and/or insurance healthcare benefit needs. You further acknowledge that you are financially responsible for all charges not covered under your health plan and/or employment and/or insurance policies.

#### **4. Security**

Your privacy is important to us. We have put in place administrative, technical and physical security measures (which shall at least be equivalent to industry standard practices) to protect your privacy and personal data, in such manner and to such extent as we deem reasonably appropriate in our sole discretion to prevent unauthorised access, collection, use, disclosure, copying, modification, disposal or similar risks. However, there is no such thing as “perfect security” and we do not guarantee in any way, and you should not expect, that your personal data or private communications will always remain private and/or safe from any abuse or misuse by third parties.

Your personal data to be used by haws is stored on haws’ cloud service providers which meets industry standards and maybe stored outside the Philippines in compliance with the laws. We will use such procedural and technical safeguards as we deem reasonably necessary in our sole discretion to protect your privacy and protect your personal data against loss, theft and unauthorised access, collection, use, disclosure, copying, modification or disposal. Included in our cloud subscription are maintenance and support that facilitates security techniques deemed appropriate at our sole discretion, to reasonably protect data against loss, theft, and unauthorised access, collection, use, disclosure, copying, modification or disposal by users inside and outside Haws. If we transfer any data from our core cloud service provider to another of choice, we will take appropriate steps to ascertain whether, and ensure that, the recipient of your transferred personal data is bound by legally enforceable obligations to provide to the transferred personal data a standard of protection comparable to existing standards. We will also transfer your personal data only if such transfer is necessary for the performance of a contractual obligation between haws and you.

haws’s employees are required, as a condition of their employment, to treat personal data held by haws as confidential, and to maintain the confidentiality of that personal data.

haws, its affiliates and related companies shall perform their best effort and adhere to standard industry practice to maintain confidentiality and integrity in collecting and processing personal information. Proper measures and safeguards are in place to ensure the confidentiality of the personal information processed, prevent its use for unauthorized purposes and comply with the requirements under the law.

#### **5. Accessing and Updating your Data**

If you wish to access, update or otherwise change or remove any personal data that you provide for haws’s use you may do so in your direct access to the account that you have created, consented and transacted. At any point you need assistance, please send us an email at [support@hawsinc.com](mailto:support@hawsinc.com). However, if you remove any personal data, which is necessary for us to provide you with Services, our provision of our Services to you may become impossible, impeded or deficient. Please note that withdrawing consent does not affect our right to continue to collect, use and disclose personal data where such collection, use and disclosure is required under applicable laws.

#### **6. Your rights**

You are entitled to the following data privacy rights:

1. Be informed whether professional/personal information pertaining to him or her shall be, are being or have been processed;
2. Be informed of the relevant information before entry of your professional/personal information into the processing system or at the next practical opportunity;
3. Object to the processing of your professional/personal information;
4. Reasonably access your professional/personal information.

5. Dispute the inaccuracy or error in your professional/personal information and call our attention for correction immediately and accordingly, unless the request is vexatious or otherwise unreasonable;
6. Suspend, withdraw or order the blocking, removal or destruction of your professional/personal information from our filing system upon discovery and substantial proof that the professional/personal information are incomplete, outdated, false, unlawfully obtained, used for unauthorized purposes or are no longer necessary for the purposes for which they were collected;
7. Be indemnified for any damages sustained due to such inaccurate, incomplete, outdated, false, unlawfully obtained or unauthorized use of professional/personal information.

For any questions, clarifications or concerns on any of the provisions of this Privacy Policy, you may contact our us at [support@hawsinc.com](mailto:support@hawsinc.com)

You may also write to our Data Protection Officer at [dpo@hawsinc.com](mailto:dpo@hawsinc.com)

## **7. Governing Law**

This Privacy Policy is governed by and shall be construed in accordance with Philippine law, without giving effect to any principles of conflicts of law. By accessing and/or using the Haws Sites and/or our Services and providing personal data or information requested, you agree to submit to the exclusive jurisdiction of the Philippine courts.

## **8. Contact haws**

If you have further questions about this Privacy Policy or wish to contact us regarding our privacy practices and policies, please do not hesitate to send us an email at [support@hawsinc.com](mailto:support@hawsinc.com) or [dpo@hawsinc.com](mailto:dpo@hawsinc.com)

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