



Privacy Policy:

Scope:

This policy applies to the Patient Program, Patient awareness camps and Patient Access Program which is administered by Kartavya Healthon Pvt Ltd

Purpose:

The purpose of the Policy is to define the privacy policy of the program in relation to sensitive personal information that is obtained from the Patients & doctors pursuant to the Program. At Patient Support Program, we need to respect the privacy of patient information and have provided this explanation about our information practices to show our commitment to protecting patient privacy.

Definitions:

Patient: Patient who is contacting voluntarily either through phone, email, or fax or in person to the patient support program for enrollment and availing program services.

Doctor : Doctor who is prescribing or treating physician of the patient who wishes to enroll for the patient program.

Sensitive Personal Data or Information: means such personal information of a person which consists of information relating to physical, physiological and mental health condition, sexual orientation, medical records and history, Biometric information, any detail relating to the above clauses as provided to body corporate for providing service; and any of the information received under above clauses by body corporate for processing, stored or processed under lawful contract or otherwise: provided that, any information that is freely available or accessible in public domain or furnished under the Right to Information Act, 2005 or any other law for the time being in force shall not be regarded as sensitive personal data or information for the purposes of these rules.

Administrator : Administrator means Kartavya Healthon Pvt. Ltd (Kartavya)

Policy:

This Privacy Policy describes Patient information collection, use and disclosure of patient Personal Information.

1. The Information Collection We may collect & hold information relating to patient that have been provided to us (such as on Program Consent form, Feedback form, Camp attendance form, Email, Voice) or that we may have obtained from another source (such as patient Prescribing / Treating doctor prescription or report). This information may include, amongst other things name, address, telephone numbers, medical information (such as the medicine name, dosage, disease indication, disease state, Rx), lifestyle information and any other information collected in relation to patient use of our services ("information")

2. Sensitive Personal Information

The personal information given to us is presumed to be true, complete and accurate in all respects and patient may or may not agree to notify us immediately of any changes to that. Personal information held by Patient Programs Patient Support Program , patient awareness camps may include name, date of birth, current and previous addresses, telephone/mobile phone number, email address, Income.

Information usage:

Patient personal information may be used by Kartavya for a number of purposes connected with the patient programs and functions, which includes:

- Verify patient identity
- Assist patient to subscribe to Patient Programs Patient Support services /programs
- Provide the required services
- Dealing with requests, enquiries or complaints and other patient care related activities; and all other general administrative purposes;
- Carrying out market and product analysis
- Contacting patient (including by post, email, fax, short text message (SMS), or telephone) for our services which we think may be of interest to patient (unless patient ask us in writing not to contact)
- Registering patient details and allocating or offering patient's value added services, discounts or other benefits and fulfilling any requests or requirements patients' may have in respect of our services / programs;
- Carrying out any activity in connection with Pharmacovigilance norms and adverse event reporting;
- Carrying out activities connected with the running of our program such as personnel training, quality control, network monitoring, testing and maintenance of computer and other systems and in connection with the transfer of data in respect of which patient data is used.
- Provide free medicine to patients who are eligible under patient access program as per terms & conditions of the program and the complete terms of the program signed by them.
- Kartavya however, assures that it will not disclose patient personal information to any other companies, its sponsors (clients) or persons, marketing agents, affiliates which could lead to invasion of patient's privacy. However, Patient programs may tie-up with such agencies like diagnostic center, hospitals, and Treating doctors from time to time and provide patient identifiable data to such agencies for providing services or offers that may be beneficial to the patient as part of the program services only.

Sharing / disclosing Patient personal information:

In order to deliver the services patients require, Patient Support program may disclose patient personal information to departments within the organization (i.e. Kartavya). The

personal information is disclosed to these departments only in relation to Patient Programs program providing its services to its patients. These organizations carry out -

- Customer services
- Mailing operations
- Fulfillment services
- Information technology service
- Supply chain / Medicine Delivery services
- MIS

Kartavya takes reasonable steps to ensure that these departments are bound by confidentiality and privacy obligations in relation to the protection of patient personal information. In addition, Patient program may disclose patient personal information to

- Authorized treating doctors of the patient
- Financial Institutions who provide loans (EMI) for treatment and medicine purchase to patients
- Government, regulatory authorities and other organizations, as required or authorized by law
- Kartavya program may also disclose patient personal information acting in good faith if it believes such action is necessary to confirm with a legal requirement or comply with the legal process, protect and defend the rights or property of Patient.

Information Security:

- Patient Programs program requires its employees /contractors / service providers to perform their duties in a manner that is consistent with legal responsibilities in relation to privacy. Client also reviews on a regular and ongoing basis the information security practices to ascertain how ongoing responsibilities can be achieved and maintained. Kartavya reiterate Patient programs commitment to respect patient Privacy at all times on a priority basis by ensuring that this information does not fall in the hands of any outside Agency other than organizations (i.e. Kartavya) or its departments
- Employees /contractors / service providers of kartavya will take reasonable steps to ensure that the personal information collected, use or disclose in relation to its program is accurate, complete, up-to-date and stored in a secure environment protected from unauthorized access, Intrusion or breach, modification or disclosure. In case of any concerns the privacy officer can be contacted at privacyofficer@kartavyahealtheon.com
- All access to patient data will have stringent password controls and Audit trails / logs with highest physical security for data storage and secured transmission within the Kartavya Patient programs information network.

Internet use/ Email:

Kartavya will make every effort to maintain the security of its internet connections; however for reasons outside of our control, security risks may still arise. Any personal information transmitted to us or from any online website's or services or email's will therefore be at patient's own risk, however we will use our best efforts to ensure that any such information remains secure and accurate within our Information Security framework. We cannot protect any information that patient make available to the general public – for example, on message boards or in chat rooms.

Please note that when patient are accessing a non Patient Programs Program website, they should always read their privacy policy or website terms and conditions – especially if they are considering providing them with their personal information. Patient's are also responsible for maintaining the secrecy of their passwords and/or any account information.

We may use cookies and other interactive techniques such as web beacons to collect non-personal information about how patient interact with our website, and web-related products and services, to:

- understand what patient's like and use about our website;
- understand what patient's do not like and do not use on our website;
- provide a more enjoyable, customized service and experience, and
- help us develop and deliver better products and services tailored to our patients' interests and needs.
- We may use a persistent cookie to record details such as a unique user identity and general registration details on patient's PC. This helps us recognize patient's on subsequent visits to this website so that patient's don't have to re-enter their registration details each time they visit us and allows us to carry out the activities mentioned above.
- Most browser technology (such as Internet Explorer, Netscape etc) allows choosing whether to accept cookies or not – patient can either refuse all cookies or can set their browser to alert them each time that a website tries to set a cookie.

Administration Rights:

The Administrator reserves the right to amend or discontinue this document at any time with prior consent of Clients / Our clients. Patient programs are committed to protecting patient privacy, however if any query arises about the handling or protection of patient personal information or about Patient Programs program privacy statement, please write to: privacyofficer@kartavyahealthon.com

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