

Please note this template is for reference purpose only.

## ONLINE PRIVACY POLICY

### INTRODUCTION

The Calcutta Medical Research Institute (CMRI) is a multi-specialty hospital located at 7/2, Diamond Harbour Road, Kolkata, West Bengal – 700027. The Calcutta Medical Research Institute (Trust) consists of three hospitals namely, **CMRI (The Calcutta Medical Research Institute)**, **BMB (BM Birla Heart Research Centre)** and **RBH (Rukmani Birla Hospital)**, collectively referred to as “**CMRI**”. The three units of CMRI, having established themselves in Kolkata and Jaipur, have set milestones in the healthcare Industry for over four decades and are hereinafter referred to as “**We**” or “**Us**” or “**Company**” or “**CMRI**”.

CMRI has created this document Online Privacy Policy [Also referred to as “Privacy Policy” or “Policy” or “Privacy Statement”] in order to demonstrate our privacy commitment to our users .

### GOVERNING LAW

This policy has been created keeping in mind the requirements of the General Data Protection Regulations 2018 of the European Union (“GDPR”).

### APPLICABILITY

This Policy applies to all CMRI vendors, visitors, customers, other personnel and all third party service providers who collect, process and use personal data within India and outside on behalf of CMRI.

### OBJECTIVE

This Privacy Policy, is intended to inform the users of the website, hereinafter referred to as “Data Subject”, “You” or “User” on how we collect, record, organize, store, modify, use, disclose or delete Customer, Employee and Company related data. This Privacy Policy will primarily help you understand:

- a) The nature of information we collect from you
- b) The sources from where your information is collected (In cases where personal data is not directly collected from you)
- c) The manner in which your information is collected
- d) The purpose of collecting your information
- e) The manner in which your information is stored, used and processed
- f) The rights that can be exercised by you
- g) The process to contact the Company for any issues regarding the collection or use of your information or to exercise the above mentioned rights of the data subject.

### WHAT PERSONAL DATA DO WE COLLECT THROUGH THE WEBSITE?

The categories of personal data that we collect about you include the below listed categories of personal data.

**Personal data:**

Please note this template is for reference purpose only.

## ONLINE PRIVACY POLICY

- Name;
- Phone number;
- Address;
- E-mail address;
- Patient/Caregiver/Doctor/Health Care Professional Name;
- Gender;
- Login ID and password;
- Internet Protocol address, cookie data, browser type, browser language, referring URL, files accessed, errors generated, time zone, operating system and other visitor details collected in Our log files, and
- Any other information that is willingly shared by you (collectively referred to as "Personal Data").

### Sensitive Personal Data:

We do not collect sensitive personal data through the Website. If sensitive personal data is required to provide services, we will obtain consent or inform the data subject prior to collection

## HOW WE COLLECT YOUR DATA

We collect information about you through the following means:

- By filling the patient registration form
- By providing details to a CMRI Health Care Professional or CMRI representative
- When you provide your Personal Information to us during course of receiving services
- When you use the features on our Website, such as online appointment booking, submission of queries, details entered in contact us section, customer feedback forms and applicant details recorded in the careers section, etc.
- When you contact us via SMS, email or via our social media handles
- Through the use of cookies

## USE OF COOKIES

To make the site more convenient and easy to navigate, as well as dynamic and useful, we may obtain information about your usage of our site by using a cookie file, which is stored on your browser or on the hard drive of your computer.

The types of data collected will include IP addresses, cookie identifiers, website activity and in the cases where customer fills out a form, it will include all field information filled out by the customer. For more details, please refer the [Cookie Policy](#)

## HOW WE USE YOUR DATA / PURPOSE OF PROCESSING

We use your data to conduct our business and to provide you with the best possible services. Most commonly, we will use your personal data in the following circumstances:

- To provide effective Services;
- To operate and improve the Website and/or our Services;
- To send statements, invoices and payment reminders and to collect payments;

Please note this template is for reference purpose only.

### **ONLINE PRIVACY POLICY**

- To perform studies, research and analysis for improving Our information, analysis, services and technologies; and ensuring that the content displayed are customized to Your interests and preferences;
- To fulfil your requests for information, to contact you and for customer satisfaction reviews;
- To send marketing communications relating to our business or the businesses of carefully selected third parties where you has specifically agreed to this, by email or similar technology. However, you can inform CMRI at any time if you no longer requires such marketing communications;
- To provide third parties such as Practo (engaged in providing support for online appointment booking through CMRI website) with statistical information about our users but those third parties will not be able to identify any individual user from that information;
- To administer or otherwise carry out our obligations in relation to any agreement You have with us;
- To respond to subpoenas, court orders, or legal process, or to establish or exercise Our legal rights or defend against legal claims;
- To investigate, prevent, or take action regarding illegal activities, suspected fraud, violations of our Terms of Use, breach of Our agreement with you or as otherwise required by law;
- To deal with enquiries and complaints made; and

### **USE OF SERVICES BY MINORS**

We recognise the need to provide additional privacy protections with respect to personal data we may collect from children. When we collect personal data from children, we take additional steps to protect children's privacy, including:

- Notifying parents about our information practices regarding personal data about children, including the types of personal information we will collect, the uses to which we may put that information, and whether and with whom we may share that information
- In accordance with applicable law, obtaining consent from parents for the collection of personal information from their children
- Limiting our collection of personal information from children to no more than is reasonably necessary for provision of services

### **CHANGE OF PURPOSE**

We will only use your data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis, which allows CMRI to do so.

### **OTHER WEBSITES AND ONLINE FORUMS**

Our website may contain links to other third-party web sites. CMRI is not responsible for the privacy practices of those web sites. We encourage you to be aware when you leave the site

Please note this template is for reference purpose only.

## **ONLINE PRIVACY POLICY**

and read the privacy policy and terms of use of any website that you may use that collects personal data.

### **SECURITY MEASURES**

The security of your personal data is important to us. We have adopted reasonable security practices and procedures including role-based access, password protection, encryption etc. to ensure that your data remains secure. We restrict access to your personal data to our employees, agents, third party service providers, partners, and agencies on a need to know basis and in relation to the Purposes as specified above in this Policy.

While we will endeavour to take all reasonable and appropriate steps to keep secure any information which we hold about you and prevent unauthorized access, you acknowledge that the internet is not 100% secure and that we cannot provide any absolute assurance regarding the security of Your Personal Information.

### **DISCLOSURE OF PERSONAL INFORMATION TO OTHERS**

We are the sole owners of the information collected on this website. We will not sell, rent, transfer or otherwise disclose your personal information to any third party or international organisation, without your consent except to our employees, officers, insurers, professional advisers, agents, partners, or subcontractors insofar as reasonably necessary for the purposes set out in this policy and for the purpose of providing services to you. We may disclose your personal data to any member of our company, including our subsidiaries and partners, insofar as reasonably necessary for the purposes set out in this policy. In case of any cross border transfers of your data, we will ensure that adequate safeguards are adopted to ensure protection of personal data in accordance with applicable regulatory requirements.

### **DATA RETENTION**

We will only retain your data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. The personal data you submit is not transferred, stored or hosted outside of India. We have appropriate measures in place to ensure that personal data remains secure. We will delete/destroy the personal data in a secure manner post retention period as per the organisation's retention policy.

### **AUTOMATED DECISION MAKING**

Automated decision-making takes place when an electronic system uses personal information to make a decision without human intervention. We do not envisage that any decisions will be taken about you using automated means. However, we will notify you in writing if this position changes.

### **YOUR RIGHTS**

You have the right to withdraw your consent at any point and to request access, rectification, erasure or restriction of processing of personal data submitted to us by writing to us at [ckbh.dataprivacy@ckbirlahospitals.com](mailto:ckbh.dataprivacy@ckbirlahospitals.com)

Please note this template is for reference purpose only.

## ONLINE PRIVACY POLICY

. EU Users can also write to us at the email address mentioned above to exercise their rights as per the GDPR.

For your protection, we may only implement requests with respect to the Personal data associated with the particular email address that you use to send us your request, and we may need to verify your identity before implementing your request. We will try to comply with your request as soon as reasonably practicable.

**Please note** that we may need to retain certain information for recordkeeping purposes and/or to complete any undertaking that you began prior to requesting a change or deletion. There may also be residual information that will remain within our databases and other records, which will not be removed.

### OPT OUT

In cases where we rely on your consent for processing your personal data, the request for consent shall be presented in a manner, which is clearly distinguishable from the other matters, in an intelligible and easily accessible form, using clear and plain language. Further, when processing personal data pertaining to children below the age of 16 years, we obtain consent from the holder of parental responsibility over the child. We also make reasonable efforts to verify in such cases that consent is given or authorised by the holder of parental responsibility over the child, taking into consideration available technology.

In cases where the lawful basis of processing your personal data is consent, you have the right to opt out or withdraw your consent at any point of time. You can opt-out of receiving email communications from CMRI by clicking on the 'unsubscribe link' in our emails.

**Please note:** If you withdraw your consent for the use or disclosure of your personal data for purposes set out in this Privacy Notice, you may not have access to all our Services and we might not be able to provide you all of the Services and customer support offered to our users and authorized under this Privacy Notice.

### NOTIFICATION OF CHANGES

We may update this Privacy Policy from time to time with or without advance notice. There is a tab at the end of the Privacy Policy, which indicates when the Privacy Policy was last updated.

### QUESTIONS, COMMENTS AND INFORMATION

If you have any questions related to processing of personal data or reporting of an incident/breach etc., please send an email to [ckbh.dataprivacy@ckbirlahospitals.com](mailto:ckbh.dataprivacy@ckbirlahospitals.com)

### Discrepancies and grievances

Any discrepancies or grievances will be addressed in a timely manner and expeditiously (within one month from the date of receipt of the grievance) by CMRI. The details of the Grievance Officer are as defined at the beginning of the policy.

### Corporate Restructuring

Please note this template is for reference purpose only.

### **ONLINE PRIVACY POLICY**

In the event of a merger, reorganization, dissolution or similar corporate event, or the sale of all or substantially all of our assets, we expect that the information that we have collected, including personal data, would be transferred to the surviving entity in a merger or the acquiring entity by use of appropriate technical and physical safeguards. All such transfers shall be subject to our commitments with respect to the privacy and confidentiality of such personal data as set forth in this Privacy Policy. This Privacy Policy shall be binding upon CMRI and its legal successors in interest.

**Last updated on: *24/June.2020***