

Matilda International Hospital and Matilda Medical Centre (we or Matilda) are committed to protecting the personal data of our patients, users of our services, visitors and website visitors. We are bound by the Data Protection Principles set out in the Hong Kong Personal Data (Privacy) Ordinance (the PDPO). We will only collect, use or disclose personal data in accordance with the PDPO and this notice. We may amend this notice at any time and for any reason. In this notice, personal data means any data: (a) relating directly or indirectly to a living individual; (b) from which it is practicable for the identity of the individual to be directly or indirectly ascertained; and (c) in a form in which access to or processing of the data is practicable.

WHEN AND HOW WE COLLECT PERSONAL DATA

We collect personal data directly from you when you interact with us. This may include when you register or make a booking for medical services; undergo admission as a patient; receive medical treatment or care; participate in events, classes, or membership programmes organised by Matilda; contact us with enquiries or feedback; or use our website or digital services. We may also collect personal data from third parties (such as your doctor or insurer) with your consent or as permitted by law.

WHAT PERSONAL DATA WE COLLECT

Clinical and In-Person Services

When you make a booking

When you make a booking, we may collect personal data, including but not limited to your name, gender, date of birth, phone number, email or postal address, preferred booking times and dates, service type, service location, insurance coverage and medical concern. It is mandatory to provide your name, phone number, email or postal address, so that we can provide services to you.

When you undergo the admission process

When you undergo the admission process, we collect personal data, including your name, sex, gender preference, date of birth, nationality, religion, and identification document number; your contact information and emergency contact details; your occupation and employer; your credit or debit card and billing information; and your insurance information. For maternity patients, we also collect your spouse's name, date of birth, identification document number, occupation and employer. Some of this information is mandatory (these fields will be marked with an asterisk on the form).

When you are a patient

When you are a patient, we may collect information about your health and medical condition. We may also obtain other relevant information, including your medical history, from appropriate third parties. Please ensure that the data you provide is accurate and complete to enable us to provide the appropriate healthcare for you.

Digital Engagement and Events

When you attend an event or enrol on a course

We may collect your name and contact details. If health checks are provided at the event, we may also collect information about your health and medical condition.

If you join the Matilda Electronic Health Club

We collect your name, email address, gender, preferred languages and interested health topics. It is optional to provide all information other than your email address.

If you join the Taipan Teddy Club

We will collect your child's name, date of birth and gender, as well as your name, email address and contact number.

Others

General Enquiries

When you contact us by phone, email or in person, we collect your name, contact information, and the details of your enquiry. It is optional to provide any information other than your name and contact information.

Website Use

When you use our website, we collect aggregated information about user activity, such as browsing activities and habits. This information does not identify any individual user. We use cookies to enhance your use of our websites, but we do not store personal data in cookies.

Other Data

To support your medical care and billing, we collect your health data, financial information, and personal relationship data (such as emergency contacts and next-of-kin). Additionally, to safeguard the physical security of our patients, staff, and premises, we maintain CCTV recordings in public areas and may collect geo-location data through our facility's digital services.

WHY WE COLLECT PERSONAL DATA

We collect and keep personal data for the following main purposes: to provide you with medical treatment, care and related services; to manage your admission, booking and discharge; to process payments, insurance claims and billing; to communicate with you about your care and appointments; to comply with legal and regulatory requirements; to improve the quality and safety of our services; to manage our membership programmes and events; to respond to your enquiries and provide customer support; and to send you marketing communications (only with your consent. We only collect personal data that is necessary for these purposes.

HOW WE USE AND DISCLOSE YOUR PERSONAL DATA

We use your personal data to deliver medical treatment and care. This includes sharing relevant health information with doctors, nurses, technicians and other healthcare providers involved in your treatment. We also use personal data for the following operational purposes: managing hospital services, quality assurance, clinical audits and staff training; processing payments and insurance claims; complying with legal obligations, including reporting to government authorities such as the Department of Health and Immigration Department; and conducting research (only with your consent or after removing identifying information).

We may disclose your personal data to your other healthcare providers (such as your referring doctor, general practitioner or other specialists) when necessary for your care. We may also share your personal data with the Hong Kong Government's Electronic Health Record Sharing System (eHealth) with your consent, to support continuity of care across different healthcare providers. Additionally, we may share personal data with third-party service providers who assist us in our operations, such as laboratories, IT service providers, cloud storage providers, and billing agents. These providers are required to protect your personal data and only use it for the purposes we specify.

IF YOU ARE LOCATED OUTSIDE HONG KONG

Cross-Border Data Transfers

We generally do not transfer personal data outside Hong Kong except in the following circumstances: when your doctor or healthcare provider is located outside Hong Kong; when your insurer is based overseas; when we use overseas cloud service providers or IT systems, or when required for international referrals or second opinions. Where we transfer personal data outside Hong Kong, we take reasonable steps to ensure that the recipient protects your data to a standard comparable to the PDPO. Where required by law, we will obtain your separate consent before the transfer.

Additional Information for Individuals in the European Union

If you are located in the European Union, you have additional rights under the GDPR, including the right to request erasure, restriction of processing, data portability, and to object to processing. You may also lodge a complaint with your local data protection authority.

DATA MANAGEMENT

Data Retention

We will retain your personal data after your consultation, admission, or treatment has finished for operational and legal reasons, typically for seven years for adults after the last treatment or death. For children, we will retain their personal data until the child reaches 21 years old or 7 years after the last treatment, whichever is longer. We retain marketing and membership data until you unsubscribe or request deletion.

Data Security

We take appropriate technical and organisational measures to protect your personal data against unauthorised access, loss or misuse. These include encryption, access controls and staff training.

Your Rights

You have the right to access your personal data and request corrections. Requests should be made in writing to the Patient Service Centre. We may charge a reasonable fee for processing data access requests.

MARKETING COMMUNICATIONS

With your consent, we may send you marketing communications such as health newsletters, event invitations and service promotions. You may withdraw your consent at any time by contacting the Patient Service Centre or clicking the unsubscribe link in our emails. Please note that we may still send you important clinical communications related to your care even if you opt out of marketing communications.

CONTACT US

If you have any questions, comments or complaints about our Privacy Policy and personal data handling practices, please contact the Patient Service Centre at psc@matilda.org or by calling 2849 0355. If you are not satisfied with our response, you may contact the Privacy Commissioner for Personal Data in Hong Kong.

明德國際醫院及明德醫療中心（「我們」或「明德」）致力保護我們的病人、服務使用者、訪客及網站訪客的個人資料。我們受香港《個人資料（私隱）條例》（「《私隱條例》」）所訂明的保障資料原則約束。我們只會根據《私隱條例》及本通知收集、使用或披露個人資料。我們可隨時因任何理由修訂本通知。在本通知中，「個人資料」指符合以下說明的任何資料：(a) 直接或間接與一名在世的個人有關；(b) 從中切實可行地可直接或間接地確定該個人的身分；及(c) 該資料的存在形式，令予以查閱及處理均屬切實可行。

我們收集個人資料的時間及方式

當您與我們互動時，我們會直接向您收集個人資料。這些情況可能包括：您登記或預約醫療服務；辦理入院手續；接受醫療或護理服務；參加由明德舉辦的活動、課程或會員計劃；與我們聯絡以作出查詢或提供意見；或使用我們的網站或數碼服務。在獲得您同意或在法律允許的情況下，我們亦可能從第三方（例如您的醫生或保險公司）收集個人資料。

我們收集的個人資料

臨床及親身接受的服務

當您進行預約時

當您進行預約時，我們可能會收集您的個人資料，包括但不限於您的姓名、性別、出生日期、電話號碼、電郵或郵寄地址、首選的預約時間及日期、服務類型、服務地點、受保範圍及求診原因。您必須提供您的姓名、電話號碼、電郵或郵寄地址，以便我們能為您提供服務。

當您辦理入院手續時

當您辦理入院手續時，我們會收集您的個人資料，包括您的姓名、生理性別、首選性別、出生日期、國籍、宗教信仰及身份證明文件號碼；您的聯絡資料及緊急聯絡人資料；您的職業及僱主；您的信用卡或扣帳卡與賬單資料；以及您的保險資料。對於產科病人，我們亦會收集您配偶的姓名、出生日期、身份證明文件號碼、職業及僱主資料。其中部分資料屬必須提供（該等欄目會在表格上以星號標示）。

當您作為我們的病人期間

當您作為我們的病人期間，我們可能會收集有關您的健康及醫療狀況的資料。我們亦可能從合適的第三方獲取其他相關資料，包括您的病歷。請確保您所提供的資料準確及完整，以便我們能為您提供適切的醫療護理。

數碼互動及活動

當您出席活動或報讀課程時

我們可能會收集您的姓名及聯絡資料。若活動提供健康檢查，我們亦可能會收集有關您的健康及醫療狀況的資料。

當您加入明德電子健康俱樂部時

我們會收集您的姓名、電郵地址、性別、首選語言及感興趣的健康主題。除電郵地址外，提供其他所有資料均屬自願性質。

當您加入大班泰迪俱樂部時

我們會收集您子女的姓名、出生日期及性別，以及您的姓名、電郵地址及聯絡電話。

其他

一般查詢

當您透過電話、電郵或親身與我們聯絡時，我們會收集您的姓名、聯絡資料及查詢詳情。除您的姓名及聯絡資料外，提供其他任何資料均屬自願性質。

網站使用

當您使用我們的網站時，我們會收集有關用戶活動的綜合資料，例如瀏覽活動及習慣。此等資料不會識別任何個別用戶的身分。我們使用 Cookies 以提升您使用本網站的體驗，但我們不會在 Cookies 中儲存個人資料。

其他資料

為了支援您的醫療護理及賬單處理，我們會收集您的健康資料、財務資料以及個人關係資料（例如緊急聯絡人及近親）。此外，為保障我們的病人、員工及處所的安全，我們會在公共區域保留閉路電視錄像，並可能透過我們設施的數碼服務收集地理位置資料。

我們收集個人資料的目的

我們收集及保留個人資料的主要目的如下：為您提供醫療、護理及相關服務；管理您的入院、預約及出院事宜；處理付款、保險索償及賬單；就您的護理及預約事宜與您聯絡；遵守法律及監管規定；提升我們服務的質素及安全；管理我們的會員計劃及活動；回應您的查詢並提供客戶支援；以及向您發送市場推廣通訊（僅在獲得您同意的情況下）。我們只會收集為達致上述目的而必須的個人資料。

我們如何使用及披露您的個人資料

我們使用您的個人資料以提供醫療及護理服務。這包括與參與您治療的醫生、護士、技術人員及其他醫療服務提供者分享相關的健康資料。我們亦會將個人資料用於以下營運目的：管理醫院服務、質素保證、臨床審計及員工培訓；處理付款及保險索償；遵守法律義務，包括向政府當局（如衛生署及入境事務處）作出呈報；以及進行研究（僅在獲得您同意或在移除識別身分資料後進行）。

在為您提供護理的必要情況下，我們可能會向您的其他醫療服務提供者（例如您的轉介醫生、普通科醫生或其他專科醫生）披露您的個人資料。在獲得您的同意下，我們亦可能與香港政府的電子健康紀錄互通系統（醫健通）分享您的個人資料，以支援不同醫療服務提供者之間護理服務的連貫性。此外，我們可能會與協助我們營運的第三方服務提供者（例如化驗室、資訊科技服務提供者、雲端儲存服務提供者及賬單代理）分享個人資料。該等服務提供者必須保護您的個人資料，並只能將其用於我們指定的目的。

若您身處香港境外

跨境資料轉移

我們一般不會將個人資料轉移至香港境外，以下情況除外：當您的醫生或醫療服務提供者身處香港境外；當您的保險公司設於海外；當我們使用海外雲端服務提供者或資訊科技系統時；或因國際轉介或尋求第二醫療意見而有需要時。當我們將個人資料轉移至香港境外時，我們會採取合理步驟，以確保接收方對您的資料之保護標準與《私隱條例》相若。如法律有所規定，我們會在轉移前另行取得您的同意。

為歐盟境內人士提供的額外資訊

若您身處歐盟境內，根據《通用資料保障規則》（GDPR），您享有額外權利，包括要求刪除資料、限制資料處理、資料可攜性，以及反對資料處理的權利。您亦可向當地的資料保障機構提出投訴。

資料管理

資料保留

在您的診症、入院或治療結束後，基於營運及法律原因，我們會保留您的個人資料。就成年人而言，資料一般會在最後一次接受治療或病人身故後保留七年。對於兒童，我們會保留其個人資料直至該兒童年滿 21 歲，或直至最後一次接受治療後的七年，以較長者為準。我們會保留市場推廣及會員資料，直至您取消訂閱或要求刪除為止。

資料保安

我們採取適當的技術及組織措施，以保護您的個人資料免受未經授權的存取、遺失或濫用。這些措施包括加密、存取控制及員工培訓。

您的權利

您有權查閱您的個人資料並要求作出更正。有關要求必須以書面形式向病人服務中心提出。我們可能會就處理查閱資料的要求收取合理費用。

市場推廣通訊

在獲得您同意的情況下，我們可能會向您發送市場推廣通訊，例如健康通訊、活動邀請及服務推廣。您可以隨時聯絡病人服務中心，或點擊我們電郵中的取消訂閱連結，以撤回您的同意。請注意，即使您選擇拒絕接收市場推廣通訊，我們仍可能會向您發送與您護理相關的重要臨床通訊。

聯絡我們

如閣下對我們的私隱政策及個人資料處理常規有任何疑問、意見或投訴，請電郵至 psc@matilda.org 或致電 2849 0355 與病人服務中心聯絡。若閣下對我們的回覆未感滿意，可聯絡香港個人資料私隱專員。