



Doctors Hospital

PROTECTING YOUR PERSONAL DATA

HOW WE RESPECT YOUR RIGHTS AND YOUR PRIVACY.

Who we are:

CTMH | Doctors Hospital (the trading name of P.M.C. Limited), is an eighteen bed, medical/surgical hospital. Established in the Cayman Islands in 2000, CTMH | Doctors Hospital offers Caymanians, residents and visitors to the Cayman Islands alike access to a full range of health care services provided by our internationally recognized resident physicians and visiting specialists, including surgical, maternity, general/family practice and 24-hour urgent care. Our investment in state-of-the-art technology reflects our commitment to providing quality health care within the Cayman Islands.

CTMH | Doctors Hospital is registered with the Cayman Islands Health Practice Commission as required by the Health Practice Law, (2017 Revision) and certified as a healthcare facility under registration number HPC/HCF/020.

CTMH | Doctors Hospital is affiliated with, (i) [Cayman Islands Imaging Ltd. which provides radiology and imaging services to CTMH | Doctors Hospital and its patients](#), and (ii) [CTMH | Doctors Hospital Pharmacy \(the trading name of Professional Pharmacy Services Ltd\) which provides pharmacy and prescription services to CTMH | Doctors Hospital and its patients](#). This Privacy Statement applies to each of these three corporate entities and [references in this Privacy Statement to “CTMH | Doctors Hospital”](#) shall be a reference them collectively.

Whether as a patient or employee CTMH | Doctors Hospital is committed to protecting your privacy and compliance with the Cayman Islands Data Protection Law (2017 Revision) (“the Data Protection Law”). In this Privacy Statement for the purposes of the Data Protection Law we set out what “personal data” and “sensitive personal data” as defined by the Data Protection Law (referred to herein collectively as “data” unless otherwise indicated) we collect about you, how we obtain that data, how we use and share that data, and the rights and options you have in relation to that data held and processed by us.

What data do we collect about you and how do we obtain it?

At CTMH | Doctors Hospital we collect data about you, whether as a patient, an employee, visitor, supplier, complainant, enquirer, survey respondent, professional expert or consultant, or member of the public, in a number of ways. This may be from registration or application forms, including on-line registration and submissions by you, referral details from our clinical or administration team, from other third party healthcare providers or hospitals, from CCTV recordings or still images, from referees including referring physicians, specialists and primary care physicians, and directly from you or your authorized representative.

We may hold and process the following basic personal information about you: your name, address, telephone numbers, date of birth, gender, emergency contacts and next of kin contacts, email address, social media contact details, your IP address, marital status, occupation, residency status, place of birth, preferred name or previous name.

We may hold and process also data as to your family, your employer, your health insurer/health plan and your banking, credit/debitcard information and other details relevant to payment, including your creditworthiness, and details of any offences and alleged offences, including as to any criminal record you may have and the disposition of any such proceedings.

We will likely also hold data about you such as notes, records and reports concerning or relevant to you, your health, your medical treatment and care, and your medical history including but not limited to:

- Your physical appearance, characteristics, behaviour, and visual images of you
- Your lifestyle, social circumstances, and personal information such as your smoking status, alcohol intake and any disabilities to which you are subject
- Your responses to surveys and questionnaires
- Details of your medical condition or conditions and disease processes, illnesses from which you suffer or to which you are susceptible
- The results and reports of investigation such as x-ray imaging, CT/MRI scans and laboratory tests, including your DNA test results and genetic information
- Diagnoses, prognoses, opinions, and recommendations for future care or treatment
- Your prescriptions and your prescription/medication history
- Personal information from people who care for or know you, such as relatives and health or social care professionals
- Your religion and racial, ethnic origin, including any religious or other relevant beliefs
- Your identified gender or sexual orientation, and sex life
- Whether or not you are subject to any protection orders regarding your health, wellbeing and human rights, and whether or not you have executed a formal advance health care directive under the provisions of the Health Care Decisions Law, 2019

How we hold this data

Data may be held by CTMH | Doctors Hospital in a variety of formats, including paper records, electronically on computer systems, in pictures/photographs, video or audio files.

Why do we collect data?

At CTMH | Doctors Hospital we need to collect and maintain this data:

- so that we can provide the best possible health care for our patients
- to support and manage our employees and the efficient operation of our hospital
- to provide feedback on our services to our patients and on the management of our staff
- to maintain our accounts and records, and for security at our hospital
- to support medical research and investigation
- to comply with our legal reporting obligations to the health or other authorities.

What is the legal basis for our collection of your data?

The specific legal basis and justification for the collection and processing of data by CTMH | Doctors Hospital is set out at Schedule 2, Conditions 1-6 and Schedule 3, Conditions 1-3 and 5-8 respectively to the Data Protection Law. Generally, the basis for our collection and processing of data will fall under one or more of the following heads:

- **Consent:** You have given consent for us to collect and process your data for a specific purpose
- **Medical purposes:** The processing is necessary for medical purposes
- **Vital interests:** The processing is necessary to protect the vital interests of you or another person
- **Legal obligation:** The processing is necessary for us to comply with a legal obligation to which we are subject
- **Legitimate interests:** The processing is necessary for our legitimate interests or the legitimate interests of a third party
- **Contract:** The collection and processing is necessary for a contract we have with you or preliminary to that contract
- **Public function:** The processing is necessary for us to perform a task in the public interest or imposed by law
- **Information made public:** The data has been made public by you
- **Legal proceedings:** The processing is necessary in connection with legal proceedings or obtaining legal advice

The foregoing is a general summary of the legal basis for the collection and processing of data by CTMH | Doctors Hospital under the Data Protection Law and for further information you are invited to review the provisions of the Data Protection Law and the guidance on the Data Protection Law provided by the Cayman Islands' Office of the Ombudsman and available on-line at ombudsman.ky/data-protection.

With whom do we share your data and why?

When sharing your data, we will make every reasonable effort to anonymize your data.

We may need to share data concerning you under a variety of circumstances. For most purposes the sharing of data will be with your consent, for example with other medical health care providers, laboratories, your health insurer etc. in order to support your health care needs.

There may be other circumstances where we may be obliged by law to disclose your data to third parties, for example under the provisions of the Public Health Law (2002 Revision). Where we share your data with third parties that sharing of data will be in compliance with one or more of the conditions set out at Schedule 2, Conditions 1-6 and Schedule 3, Conditions 1-3 and 5-8 of the Data Protection Law as detailed more specifically above.

International transfer of your data

Where we need to transfer your data outside the Cayman Islands, for example to a testing laboratory, this will be with your consent to the transfer and we will comply with the "Eighth Principle" under Schedule 1, Part 1 to the Data Protection Law. We may be entitled to transfer your data outside the Cayman Islands under other circumstances in which case we will comply with one or more of the Conditions set out at Schedule 4 to the Data Protection Law.

How long do we retain your data?

We will retain your data for such period as we consider reasonably necessary in accordance with the provisions of the Data Protection Law.

Your rights in regard to your data

Your rights in regard to your data collected and processed by CTMH | Doctors Hospital are set out at Part 2 to the Data Protection Law and can be summarized as follows:

- Your right to be informed in regard to your data
- Your right to access your data
- Your right to correct your data held by us
- Your rights regarding any automated decision-making processes
- Your right to have us stop processing your data
- Your right to stop processing your data for the purposes of direct marketing
- Your right to compensation for damage for contravention of the Data Protection Law
- Your right to make a complaint to the Ombudsman

More detailed information is available on-line at <https://ombudsman.ky/data-protection>

Questions, concerns or complaints

If you have any questions, concerns or complaints in regard to your data held by CTMH | Doctors Hospital, including as to the exercise of any of your rights in regard to that data under the Data Protection Law, you may contact our Data Protection Officer, who will be pleased to assist you.

Our Data Protection Officer and their contact details are as follows:

Mr. Patrick Turbide
CTMH | Doctors Hospital
PO Box 2000 Grand Cayman KY1-1104
Tel 345-322-6321
Email: dpo@doctorshospitalcayman.com

If you are not satisfied with our response to your requests or have a concern with regard to our processing of your data which we have not addressed to your satisfaction, you may complain to the Office of the Ombudsman by accessing their complaint form online at: ombudsman.ky/data-protection/public or via their offices at Office of the Ombudsman, 5th Floor, Anderson Square, 64 Shedden Road, George Town, PO Box 2252, Grand Cayman KY1-1107. Telephone: (345) 946-6283

This Privacy Statement was last updated in June 2020. CTMH | Doctors Hospital may update or amend this Privacy Statement from time to time to reflect any changes in its procedures in regard to your data and/or amendments to the relevant law.