

# Health Promotion Board Privacy Statement governing the use of the Healthy 365 mobile application.

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## Introduction

When you use the Healthy 365 mobile app (the "App"), which is run by the Health Promotion Board (HPB), you're agreeing to follow our rules. We might change these rules from time to time. If we do, we'll let you know in the App, and if you keep using the App after that, it means you're agreeable with the new rules.

We collect your Information (see clause section 1) when you use the App, and we explain how we use and share this Information in our Privacy Statement. Remember that this Privacy Statement can change, and it's up to you to check for updates.

The App lets you join in health challenges, events, programmes, or other activities ("Programmes") managed by HPB. Each of these has its own terms and conditions which you need to follow. The way we handle your Information from these Programmes is also explained in our Privacy Statement. If there's a disagreement between the Programme rules and the Privacy Statement, the Programme terms and conditions will be the ones to follow.

Sometimes, the App might link to other websites or services that have different privacy rules from ours. We're not in charge of their content or how they handle your privacy, so you should read their privacy notices too.

**PLEASE READ THE FOLLOWING PRIVACY STATEMENT CAREFULLY BEFORE USING THIS APP.**

## Privacy Statement

Personal Data submitted to the HPB via this App will be treated in accordance with our HPB Privacy Statement set out in <https://www.hpb.gov.sg/privacy-statement> and this Healthy 365 Privacy Statement. In using this App, you acknowledge and agree to be bound by the HPB and Healthy 365 Privacy Statements. If there is any conflict between the Privacy Statements, this Healthy 365 Privacy Statement will prevail. This Privacy Statement must be read in conjunction with the Healthy 365 Terms and Conditions set out in <https://go.gov.sg/h365-termsofuse>.

If you choose to use the App, you consent to the collection, use and disclosure of your Personal Data by HPB for the purposes as set out herein. If you provide us with any Personal Data belonging to and/or relating to any third party (e.g., information about your child), by submitting such information to us, you

represent that you have obtained the relevant consent of any such third party to provide us with their personal data. To safeguard your Personal Data, all electronic storage and transmission of Personal Data is secured with appropriate security technologies. We retain Personal Data as may be required for business, legal, contractual, regulatory or compliance purposes, which may vary according to circumstances. We will take reasonable steps to dispose or anonymise Personal Data that is no longer needed.

You agree to only submit Personal Data which is accurate and not misleading and to keep it up to date and inform us of any changes to the Personal Data that you have provided to us. We shall have the right to request for documentation and carry out the necessary checks to verify the Personal Data provided by you as part of our user verification processes or as required under law.

## **1. Collection of information about you**

- 1.1 We collect various types of Personal Data from you through the App. Personal Data refers to information whether true or not, about an individual who can be identified from that information and other information to which HPB has or is likely to have access. Personal Data includes, for example, personally identifiable information such as name, address, photos, videos, personal contact details or emergency contacts. And in connection with participation in any Programme, it also includes personally identifiable wellness or fitness information, including various activities identified through the App such as weight and height entries, steps counts, moderate to vigorous physical activity (MVPA) minutes, sleep patterns, meal logs, survey responses on lifestyle behaviour. For your convenience, we may also display to you data you had previously supplied us or to the Government of Singapore or any Singapore public sector agency (e.g., Personal Data from your MyInfo Account Data such as your SingPass/MyInfo UUID, NRIC Number/FIN, sex, dialect, date of birth, mobile number, email, registered address, occupation, employment sector, marital status, local registered birth records and sponsored child records). For the avoidance of doubt, "Singapore public sector agencies" shall refer to public sector agencies as defined in the Public Sector (Governance) Act 2018 (No. 5 of 2018) ("**PSGA**"). This will speed up the transaction and save you the trouble of repeating previous submissions. Should the data be out-of-date, please supply us the latest data via the Healthy 365 app.
- 1.2 When you use the App, we may monitor your usage of the App and collect Non-Personally Identifiable Information which means information not associated with an identifiable individual. Non-Personally Identifiable Information refers to information that does not identify you and may include information which would otherwise be Personal Information, but which has been de-identified or aggregated. We may collect such Non-Personally Identifiable Information through your activities and transactions on the App, your location and the browser, operating system or device which you use to access the App.

Together, we refer to your Personal Data and Non-Personally Identifiable Information as “Information” in this statement.

## **2. How we use your Information**

2.1 We may use Information collected from you for any one or more of the following purposes:

- (i) operating and providing services and campaigns to you, including but not limited to the planning, implementation and conduct of all programmes (including Programmes) and campaigns, sending personalised messages, recommendations, notifications or nudges, evaluation of results, determination of winners, identifying and contacting you should you qualify for any rewards or commit a breach of any applicable terms and conditions, conducting investigation of any violation of the applicable terms and conditions, sending of marketing collaterals,
- (ii) administering, processing and facilitating any transactions or activities by you, whether with us, Singapore public sector agencies, third party service providers or collaborators, and whether for your own benefit, or for the benefit of a third party on whose behalf you are duly authorized to act,
- (iii) helping us analyse the usage of the App or Programme engagement to understand the effectiveness and to improve the App and Programmes,
- (iv) devising, organising and implementing programmes and other activities for or related to the promotion of good health and healthy lifestyles amongst the people of Singapore, health education programmes, and the prevention or detection of diseases,
- (v) conducting research and publish findings in academic and/or scientific journals.

2.2 Your Information may also be used for the development, testing, and improvement of artificial intelligence (AI) systems. Such use includes, but is not limited to, training machine learning models, testing AI algorithms, and improving the functionality of AI systems. We may utilize your Personal Data to deliver personalised insights and recommendations to you. We may also use AI systems and AI algorithms to provide services to you in connection with the App or any Programme. HPB is committed to ensuring that the use of your Information for AI purposes is conducted with the utmost respect for your privacy. Information used for these purposes will, as far as practicable, be de-identified to reduce the risk of personal identification.

2.3 We may contact you to obtain feedback and send information about the App and / or any Programme and campaigns conducted on the App or otherwise. In addition, we may contact you to seek your participation in future studies, for research and analytics purposes which will facilitate HPB’s formulation of health promotion programmes and policies. In this regard, you hereby give HPB your expressed consent to use your Personal Data to contact you for the aforementioned reasons.

2.4 You agree that HPB may link your Information with or supplement it with other Information available to HPB including Information from Singapore public sector agencies' initiatives (e.g., Screen For Life, Healthier SG) and/or third parties, such as healthcare providers for any of the purposes listed at clauses 2.1 and 2.2 above.

### **3. Disclosure of your Information**

3.1 Unless prohibited by law, we may share Information with the Government of Singapore and/or Singapore public sector agencies for the purpose of facilitating efficient and effective public service delivery to you.

3.2 We may also share your information with the following parties:

- (i) the recipient has been authorized to provide services on our behalf,
- (ii) the recipient is our service provider who provides us with necessary services or services on our behalf including but not limited to IT services, hosting and maintenance services, organizing of our events, accounting, data analytics services, email messaging services, sending personalised messages, recommendations, notifications or nudges, advertising services, marketing, delivery services, handling of payment transactions, designing / developing / training / testing / assessing / deploying / monitoring AI models / systems / services / outputs etc.,
- (iii) the recipient is our consultant or professional adviser including but not limited to accountants, lawyers and auditors,
- (iv) is a third party with whom HPB partners or collaborates (e.g., WhyQ) to devise, organize and implement, or to provide support or assistance to any third parties in devising, organizing and implementing, any Programme or any activities referred to in clause section 2, and/or
- (v) is a healthcare provider (e.g., public healthcare institutions, general practitioners) or care provider (e.g., Agency for Integrated Care) with whom HPB partners with for the implementation of Healthier SG (if applicable) and other initiatives.

Where necessary to support the purposes of data sharing with the parties listed in paragraphs 3.2(iv) and 3.2(v), these parties may link or supplement your Information with other Information available to them for such purposes.

HPB reserves the right to change its third parties. Your continued use of the App therefore represents your agreement to the disclosure and use of your Information, where applicable, by third parties that HPB has service agreements with or is in collaboration with.

3.3 Your Information may also be disclosed if required by law, such as pursuant to a subpoena, regulator oversight or other legal process.

## **4 Location Data**

- 4.1 Certain services which are available on the App may make use of location data sent from your mobile device. You can turn this function off at any time by turning off the location services settings for the App on your device. When you turn on your location services settings, you consent to allow us, the Government of Singapore, Singapore public sector agencies, third parties engaged by us to provide services on our behalf and/or to us to transmit, collect, process and use your location data to provide and improve location-based products and services.

## **5. Rights and Obligations of the User**

- 5.1 By using our App, including registering for a User Account, you represent, warrant and/or agree that:

- (i) any and all information you provide is true and correct, and you remain fully responsible for the accuracy of the information given;
- (ii) you will supply us with the latest Personal Data via the App, acknowledging that HPB has the right to request for documentation and carry out the necessary checks to verify the Personal Data provided by you as part of our user verification processes or as required under law;
- (iii) without further notice to you, HPB may disclose to third parties and use any photographs, video recording, or other data collected from/about you or otherwise relating to your use of this App (identifiable data) for all purposes relating to the App, Programmes conducted on the App (including but not limited to the planning, implementation and conduct of activities, the evaluation of results, the determination of winners, the sharing of information with companies/ organisations/ institutions, and the award of prizes)

### **5.2 Withdrawal from Healthy 365**

- 5.2.1 If you wish to close your account on the App, you may do so through the App by choosing "Withdraw from Healthy 365" in settings or contacting our Customer Care hotline at 1800 223 1313, 8am to 5pm, Monday to Friday, excluding Public Holidays (\*Airtime charges apply for mobile calls to 1800 service lines.). We may require that you provide certain information to process your request.

- 5.2.2 If you close your account, there may be a cessation of the services offered through the App and no additional information will be collected about you. However, Information that was previously collected or generated about you may continue to be used as described in this statement.