

Privacy Policy

About our Privacy Policy

Pratyaya is committed to the right to privacy and the protection of personal and health information in accordance with the requirements of the Singapore Privacy Act and any other regulatory requirements.

The Privacy Policy of Pratyaya* outlines how we collect, use, disclose and handle the personal and health information of individuals. Our Privacy Policy can be accessed via our website (www.Pratyaya.com) or by contacting one of our offices.

The Privacy Laws

In addition to any contractual obligations Pratyaya may have to its customers, Pratyaya is bound by the Privacy Act and relevant State legislation regarding the collection, use, disclosure and handling of personal and health information. Collectively referred to as the privacy laws, these laws prescribe the standards for the collection, use, disclosure and handling of personal and health information.

Whose personal information do we collect?

Individuals about whom we collect personal information include:

- Our customers
- Injured workers
- Policy holders
- Health professionals
- Business contacts
- Employees
- Contractors
- Third party service providers.

We may collect personal or health information about individuals and organisations who:

- request services from Pratyaya
- make a claim for workers' compensation
- have been involved in an incident or accident in the workplace
- are employees or contractors of policyholders and serve as contacts or otherwise assist with the administration of a policy
- make a complaint or otherwise contact us
- visit our website or send us an email.

Why we collect personal and health information

If an individual or entity is acquiring a product or service from Pratyaya, we collect and hold personal information:

- as necessary for us to provide you with the services you require
- to administer those services, including payment, invoicing and collecting debts
- to inform the individual of the ways the services provided could be improved
- to research and develop our services, and
- to maintain and develop our business systems and infrastructure.

We collect personal and health information on behalf of regulatory authorities in each state in order to offer, provide, manage and administer Pratyaya services, which include claims management, injury management, premium calculation and risk management. We also collect personal information to conduct customer satisfaction research.

Collection and use of information in particular situations

The usual type of personal information collected may include:

- Name
- Date of birth
- Occupation
- Current address (postal and email)
- Telephone numbers
- Financial details
- ABN/SSN/IC
- Wage and wage roll details
- Employee details
- Health information
- Other information considered necessary to provide services required.

The type of health information collected will include medical records, related to the subject of a workers compensation claim.

Pratyaya will only use or disclose personal information about you:

- in accordance with this Privacy Policy
- for any other purpose communicated to you at or near the time your personal information is collected
- as permitted or required by law
- if we believe it necessary to provide you with a service you have requested
- to implement our terms of service

- to protect the rights, property or personal safety of another Pratyaya client, any member of the public or Pratyaya
- if some or all of the assets and operations of the business are or may be transferred to another party by way of sale of some or all of the business, or
- if you have provided your consent.

How we collect personal and health information

On issuing a certificate of currency or invitation to renew your policy, at the commencement of claim, or contract period, Pratyaya will provide a collection statement setting out:

- Pratyaya's contact details
- the purpose for which personal and/or health information is collected and whether it will be collected from a third party and if so the circumstances of such collection
- the main consequences (if any) if all or some of the personal information is not collected
- the types of organisations to which such information would usually be disclosed (including any disclosures outside of Singapore and if so the countries where practicable to do so)
- any law that authorises or requires its collection
- an individual's rights of access and correction to that information, and
- how an individual can complain about a breach of the Privacy Laws and how Pratyaya will deal with such complaint.

If, in the course of providing our services including, without limitation, managing a claim, it is necessary for us to collect, use or disclose information in circumstances that are not covered in that collection statement, we will try to ensure that the individual is made aware of how and why we need to use that information.

However, we are not required to do this in a number of situations, including:

- when we receive health information in confidence from certain sources
- when we believe it is necessary for us to carry out a law enforcement activity
- where the information is collected in connection with the conduct of certain legal proceedings, and
- where doing so would pose a serious threat to the life and health of an individual.

Pratyaya will only collect personal and health information where there is express or implied consent of the individual, or where we are otherwise authorised by law to do so.

Whilst we generally collect personal or health information directly from the individual, in some cases we may also collect it through third parties, such as employers, medical practitioners, rehabilitation providers, government agencies, lawyers or other authorized representatives and witnesses to an incident.

We try to ensure that any person we engage to collect information on our behalf does so in accordance with applicable privacy laws.

Who we disclose personal and health information to

In appropriate circumstances, we must disclose information to persons who are legally entitled to receive it.

We have a duty to maintain the confidentiality of our customers' affairs, including personal and health information except where the disclosure of the personal or health information is done with the employee or customers' consent or is compelled by law. We disclose personal or health information to third parties where we reasonably believe the disclosure is necessary to assist us in providing, managing and administering the services we provide and products we offer.

Personal and health information collected in relation to a claim may be disclosed to a number of different types of organisations, including but not limited to:

- an individual's employer or previous employers
- our regulatory authorities
- individuals and organisations outside of Pratyaya providing services to Pratyaya, such as IT service providers, website hosts and back-up service providers
- health and rehabilitation service providers
- independent medical examiners
- lawyers acting on behalf of Pratyaya
- government agencies that might have an interest in, or information relevant to, the claim
- courts or tribunals
- other persons authorised by the individual, or by law, to receive the information (such as legal representatives).

In line with modern business practices and to meet individuals' specific needs, we may disclose personal or health information to organisations that help us maximise the quality and efficiency of our services and our business operations. This means that individuals and organisations outside of Pratyaya, such as:

- outsourced services providers (mail houses, debt recovery, marketing services)
- our advisors (including auditors and lawyers)
- government and regulatory authorities and other organisations as required or authorised by law

- organisations involved in a transfer or sale of our assets or business
- organisations involved in managing our corporate risk, and
- our related companies, will sometimes have access to personal information held by Pratyaya and may collect or use it on behalf of Pratyaya.

Pratyaya may disclose personal information outside Singapore to group companies and/or one or more third parties with whom it has a business relationship for the purposes set out in this Privacy Policy. As at the date of this Privacy Policy, the countries to which we disclose information include India and United States.

In determining and managing a claim we may engage an investigator or loss adjuster to carry out surveillance and make other enquiries to help us decide whether or not to accept the claim, or to determine whether or not there is an ongoing entitlement to benefits. For this purpose we may disclose personal or health information to the investigator, and may receive personal information about an individual that has been collected by the investigator.

We require all investigators and loss adjusters to comply with applicable privacy legislation. Investigators must also comply with applicable legislation relating to surveillance, any protocols agreed with regulatory authorities and with our policies for the conduct of surveillance.

Where personal information is disclosed to other organisations, we seek to ensure that this information is held, used and disclosed consistently with the Privacy Act, any relevant state legislation and other applicable privacy laws, regulations and codes.

If you provide us with information about others

When you provide us with personal information about other individuals, we rely on you to make, or have made them aware of:

- Pratyaya's contact details
- the purpose for which the information is collected
- the main consequences (if any) if all or some of the personal information is not collected
- the types of organisations to which such information would usually be disclosed (including any disclosures outside of Singapore and if so the countries where practicable to do so)
- any law that authorises or requires its collection
- an individual's rights of access and correction to that information, and
- how an individual can complain about a breach of the Privacy Laws and how Pratyaya will deal with such complaint.

If it is sensitive information, we rely on you to have obtained consent to the above. If you have not done either of these things, you must tell us before you provide the relevant information.

Our website practices

We sometimes use cookie technology on our website to provide information and services to website visitors. Cookies are pieces of information that a website transfers to your computer's hard disk for record keeping purposes and are a necessary part of facilitating online transactions. Most web browsers are set to accept cookies. Cookies are useful to determine overall traffic patterns through our website.

If you do not wish to receive any cookies you may set your browser to refuse cookies. This may mean you will not be able to take full advantage of the services on the website.

For the purposes of viewing certain parts of our website, you may be required to provide log-in information. You are responsible for the security and confidentiality of this information.

If our website contains links to other websites outside of the Pratyaya site, these linked sites are not under the control of Pratyaya and we are not responsible for the conduct of the companies that operate these linked sites. Before disclosing your personal information on any other website, we recommend you review the terms and conditions of that site.

Security of your personal information

Your personal information may be stored in hard copy documents, as electronic data, security video footage or in our software or systems. We will take all reasonable steps to protect any personal information that we hold from misuse, interference and loss, and to protect it from unauthorised access, modification and disclosure. Some of the ways we achieve this are by:

- having confidentiality undertakings with all Pratyaya personnel and contractors
- having policies on document storage security
- having security measures for access to our buildings and systems
- only providing access to information once proper identification / authorisation has been given.

Only staff that have a need to access information are permitted to do so. Generally, personal and health information is retained for at least seven years after a claim has been finalised. Sometimes personal information is retained for longer periods, in case of a future claim.

Depending on the Pratyaya entity with which an individual deals, user identified, passwords and other access codes for our staff and third parties may be used to control access to personal information.

Keeping information up to date and accessing it

We take all reasonable steps to ensure that your personal information is accurate, complete, and up-to-date. You can gain access to correct or update your personal information at any time.

We will, on request, provide you with access to information we hold about you, unless there is an exception under the applicable privacy laws. Things that may affect a right to access information include:

- whether the access would pose a serious threat to the life or health of any individual
- whether the access would have an unreasonable impact on the privacy of others
- whether the request is frivolous or vexatious
- whether the information relates to a commercially sensitive decision making process
- whether access would be unlawful or denying access is required or authorised by law (e.g. we have a duty of confidentiality to our customers and will not provide access to personal information about you if it will breach that duty)
- whether access would prejudice enforcement activities relating to criminal matters and other breaches of law, public revenue, a security function, or negotiations with the individual, and
- whether legal dispute resolution proceedings are in progress.

Correcting or deleting the information we have about you

If at any time you wish to correct or delete your personal information we hold about you that is inaccurate, out-of-date, incomplete, irrelevant or misleading, please contact us by emailing Pratyaya at info@pratyaya.com and we will amend this record unless there is a reason why we cannot amend it.

If you wish to have your personal information deleted, please let us know using the e-mail address above and we will take all reasonable steps to delete it unless we need to keep it for legal, auditing or internal business reasons.

Opting out of receiving marketing information

We may contact you by phone, mail or email in order to provide you with updated information about our services, seminars we are running and our business operations.

If we send you promotion material, or information about services or products that you no longer wish to receive, you can opt out by emailing Pratyaya at info@pratyaya.com. Similarly, if you would like more information on Pratyaya's services and products available please contact us via any of the means listed below.

Dealing with us anonymously

Where lawful and practicable to do so, you can deal with us anonymously e.g. general inquiries about the services we can offer injured workers and customers.

However, if you do not provide any information requested, those involved in the provision of services may not be able to provide the service or the expected level of service.

Resolving your privacy issues

Individuals that believe Pratyaya has breached their privacy rights in any way or wish to discuss to discuss any issues about Pratyaya and privacy, please contact our Privacy Officer.

The Privacy Officer can be contacted by email to info@pratyaya.com. Pratyaya will respond to any issues or complaint as soon as it reasonably can.