

**AB PLUS**  
**ASIAN BARIATRICS PRIVATE LIMITED**

# Privacy Policy

*Draft for client approval and website publication*

|                |                                                                               |
|----------------|-------------------------------------------------------------------------------|
| Effective Date | [TO BE INSERTED BEFORE PUBLICATION]                                           |
| Website        | <a href="https://www.asianbariatric.com/">https://www.asianbariatric.com/</a> |
| Status         | DRAFT - NOT TO BE HOSTED UNTIL<br>PLACEHOLDERS ARE FINALISED                  |

This document should be read with the other website policies of the Company.

## 1. Introduction and Scope

Asian Bariatrics Private Limited respects patient privacy and recognises that health information requires a high degree of confidentiality. This Privacy Policy explains how we collect, use, store, share and protect personal data when you use <https://www.asianbariatric.com/>, submit a form, request an appointment, participate in an online consultation, make an online payment, communicate with us or otherwise use our digital services.

This Policy applies to information handled by the Company through the Website and connected digital services. A third-party appointment, teleconsultation, analytics, communication or payment provider may also process information under its own privacy notice and its contractual arrangements with the Company.

## 2. Who Is Responsible for Your Data

The entity responsible for determining the purposes and means of processing covered by this Policy is Asian Bariatrics Private Limited, CIN U85110GJ2008PTC054446, at House/Block V, Mondeal Business Park, Near Gurudwara, S.G. Highway, Thaltej, Ahmedabad - 380054, Gujarat, India. References to “we”, “us” or “our” mean the Company.

## 3. Categories of Information We May Collect

Depending on the service used, we may collect the following categories:

- **Identity and contact data:** name, age/date of birth, gender where relevant, address, mobile number, email address, identification details and details of a parent, guardian or caregiver.
- **Appointment and account data:** preferred clinician, location, date and time, appointment history, login or platform identifiers, communications and consent records.
- **Health and clinical data:** symptoms, medical history, allergies, medications, diagnoses, reports, images, laboratory results, prior prescriptions, treatment history, clinical notes and information voluntarily disclosed during a consultation.
- **Payment and transaction data:** amount, service selected, transaction status, gateway or bank reference, refund status, invoice details and limited payment metadata. We do not store actual card numbers, CVV, PIN, UPI PIN or internet-banking credentials.
- **Technical and usage data:** IP address, browser and device information, operating system, referring URL, pages viewed, date/time logs, cookie identifiers, security logs and interaction data.
- **Feedback and media data:** queries, complaints, feedback and, only with separate express consent, testimonials, photographs, audio, video or case information.
- **Other information:** any information that you voluntarily provide or that is lawfully received from a clinician, hospital, insurer, TPA, caregiver or service provider in connection with your request.

## 4. How We Collect Information

Information may be collected directly from you through website forms, telephone, email, SMS, messaging applications, appointment or teleconsultation platforms and payment pages; from a parent, guardian, caregiver or authorised representative; from clinicians and care teams; from insurers or TPAs where you request their involvement; and automatically through cookies, logs, analytics and security technologies.

## 5. Purposes of Processing

We may process information for the following purposes:

- to respond to enquiries and provide information requested by you;
- to verify identity, obtain consent and schedule, confirm, conduct, reschedule or cancel appointments;
- to facilitate medical advice, follow-up discussions and preliminary clinical assessment through online consultation, where appropriate;

- to assess whether an in-person examination or other healthcare service is required;
- to maintain clinical, appointment, billing, consent and communication records;
- to process payments, issue receipts, reconcile transactions, prevent fraud and administer refunds or chargeback enquiries;
- to communicate service notices, reminders, follow-up instructions and patient-support messages;
- to improve website functionality, security, accessibility and service quality;
- to comply with professional, legal, regulatory, tax, accounting, audit, insurance, accreditation and dispute-resolution obligations;
- to protect patients, clinicians, staff, systems and the public against fraud, abuse, security threats or unlawful activity; and
- to send marketing or publish testimonials only where a valid and separate consent exists and subject to available withdrawal or opt-out rights.

## 6. Consent and Other Lawful Grounds

Where consent is required, we will seek consent through a clear affirmative action and provide information reasonably necessary to make the consent informed. You may withdraw consent through the contact details stated below. Withdrawal will not affect processing already undertaken lawfully and may not require deletion of records that must be retained for clinical, legal, accounting, defence-of-claims or public-interest reasons.

We may also process information where necessary to provide a service requested by you, comply with law, respond to a medical emergency, fulfil professional duties, protect against fraud or security incidents, establish or defend legal claims, or for another lawful purpose recognised by applicable law.

## 7. Online Consultation and Health Information

Online consultation is offered only after an appointment request and appropriate consent. The Company's current operating policy is that online consultation is limited to medical advice, follow-up discussion and preliminary clinical assessment. No medical prescription, medication advice or treatment prescription is issued during an online consultation. Where a prescription or change in treatment is required, the patient is advised to attend in person.

Health records and other relevant patient information are treated as confidential and are not used for advertising, publicity or an unrelated purpose without separate express consent. Access is limited to personnel and service providers who require the information for authorised functions.

## 8. Sharing and Disclosure

We do not sell personal data. We may share information, on a need-to-know basis, with:

- RMPs, nurses, dietitians, coordinators, administrative staff and other authorised care-team members;
- appointment and teleconsultation platform providers, including Your Practice Online or a replacement provider;
- HDFC Bank, authorised payment gateways, payment aggregators, acquiring banks, card networks, UPI and other payment-system participants for payment processing, reconciliation, fraud prevention and refunds;
- website hosting, cloud, cybersecurity, communications, analytics, captcha, IT support, document management and professional service providers bound by appropriate obligations;
- insurers, TPAs, hospitals, laboratories or other healthcare providers where requested by you, necessary for care or lawfully permitted;
- government, courts, regulators, law-enforcement agencies or statutory authorities where disclosure is required or permitted by law;
- professional advisers, auditors and insurers for compliance, risk management, claims and dispute resolution; and

- a successor or transferee in a lawful merger, restructuring or transfer of business, subject to continued protection of the information.

## 9. Payment Information

Online payments are processed through authorised banking and payment infrastructure. Payment pages may be hosted or controlled by a bank, gateway or payment service provider. The Company receives transaction confirmation and reference information needed for reconciliation, support and refund processing, but does not store actual card credentials or authentication secrets.

## 10. Cookies, Analytics and reCAPTCHA

The Website may use cookies and similar technologies for essential operation, security, user preferences, performance measurement and analytics. The Website currently uses Google Analytics to understand website usage and Google reCAPTCHA to protect forms against spam and automated abuse. These providers may receive device, browser, IP address, interaction and cookie information in accordance with their own privacy terms.

You may manage non-essential cookies through the cookie settings made available on the Website and through your browser. Blocking certain cookies may affect functionality. Consent for non-essential cookies should be obtained where required by applicable law.

## 11. Data Location and International Processing

Some technology providers may process or support data from locations outside India. Where cross-border processing occurs, the Company will use reasonable contractual, technical and organisational measures and comply with restrictions or requirements applicable at the relevant time. Payment and health data will be handled in accordance with sector-specific requirements applicable to the service provider and the Company.

## 12. Retention

We retain information only for as long as reasonably necessary for the purpose for which it was collected and for periods required by medical, professional, tax, accounting, consumer-protection, payment, insurance, accreditation and other applicable laws. Retention periods may differ by record type. Information may be retained longer where a complaint, investigation, claim, litigation, audit or legal hold is pending.

When information is no longer required, we will take reasonable steps to delete, anonymise or securely archive it, subject to legal and professional record-retention obligations.

## 13. Security

We use reasonable administrative, physical and technical safeguards designed to protect information against unauthorised access, alteration, disclosure, loss or misuse. These may include access controls, authentication, role-based permissions, encryption in transit where supported, secure backups, logging, vendor controls, staff confidentiality obligations and incident-response procedures.

No internet transmission or storage system is completely secure. You should protect your devices, passwords, one-time passwords and communication channels, and immediately inform us of suspected unauthorised access or fraudulent activity.

## 14. Children and Persons Requiring Assistance

A parent, legal guardian or authorised caregiver must provide the required consent and information for a minor or a person who cannot provide legally valid consent. We may request reasonable verification of age, identity, guardianship or authority before processing such information or providing a digital service.

## 15. Your Choices and Rights

Subject to applicable law and verification of identity, you may request information about processing, access to personal data, correction or updating of inaccurate data, deletion of data that is no longer required, withdrawal of consent, restriction of marketing communications, and grievance redressal. You may also nominate another person to exercise rights where applicable law provides such a right.

A request may be refused or limited where fulfilment would compromise another person's rights, patient safety, professional record integrity, an investigation, legal privilege, fraud prevention, statutory retention or the establishment or defence of legal claims. We will provide reasons where required by law.

## 16. Data Incidents

If a personal data incident occurs, we will investigate, contain and remediate it and provide notifications to affected individuals and competent authorities where required by applicable law. The nature and timing of notification will depend on legal requirements and the risk presented by the incident.

## 17. Testimonials, Photographs and Marketing

A patient's use of the Website or services does not authorise publication of the patient's name, image, testimonial, medical history, procedure, outcome or before-and-after material. Such use requires a separate, specific and informed consent. A patient may withdraw consent for future use, subject to reasonable steps and the practical limitations of material already lawfully published or distributed.

## 18. Third-Party Links

Links to external websites, social media and third-party platforms are provided for convenience. Their privacy practices are governed by their own notices. You should review those notices before providing information.

## 19. Updates to this Policy

We may update this Policy to reflect changes in law, technology, service providers or operations. The revised Policy will be posted with the effective date. Material changes may also be communicated through an appropriate channel where required.

## Contact and Grievance Redressal

Questions, complaints, payment issues, refund requests and privacy requests may be addressed to the Company using the details below. Consumer grievances will be acknowledged within 48 hours and will be redressed within one month from receipt, subject to the nature and complexity of the matter and applicable law.

|                                      |                                                                                                                 |
|--------------------------------------|-----------------------------------------------------------------------------------------------------------------|
| <b>Legal Name</b>                    | Asian Bariatrics Private Limited                                                                                |
| <b>CIN</b>                           | U85110GJ2008PTC054446                                                                                           |
| <b>Contact Address</b>               | House/Block V, Mondeal Business Park, Near Gurudwara, S.G. Highway, Thaltej, Ahmedabad - 380054, Gujarat, India |
| <b>Website</b>                       | <a href="https://www.asianbariatric.com/">https://www.asianbariatric.com/</a>                                   |
| <b>Customer Care / Support Email</b> | info@abplushospital.com                                                                                         |
| <b>Customer Care Telephone</b>       | +91 90999 03231                                                                                                 |
| <b>Grievance Officer</b>             | [NAME TO BE INSERTED BEFORE PUBLICATION]                                                                        |

|                        |                                                             |
|------------------------|-------------------------------------------------------------|
| <b>Designation</b>     | Grievance Officer / Consumer Grievance<br>Redressal Officer |
| <b>Grievance Email</b> | info@abplushospital.com                                     |