



1. Introduction

1. This Personal Data Protection Notice (“Notice”) or Privacy Notice is published on 22nd September 2025 (“Effective Date”).
2. Durdans Group consisting of Durdans Hospital & Laboratories (“we”, “our”, “us”) also known as CEYLON HOSPITALS PLC and/or DURDANS MEDICAL & SURGICAL HOSPITAL (PVT) LTD both of No 03, Aldred Place, Colombo 03, Sri Lanka and affiliated companies, is committed to protecting Individuals (“your”, “you” and “yours”) personal data responsibly and in compliance with applicable data protection related laws. Where personal data is processed in Sri Lanka, only the Personal Data Protection Act No 09 of 2022 of Sri Lanka (“PDPA”) shall apply.
3. This Notice applies to the Processing of your personal data by us. It explains how we Process your personal data when you interact with us. You may be a patient, employee, contractor or a business partner of ours.
4. This Notice may be updated from time to time, with amendments to the PDPA or to provide you with additional information. We strongly encourage you to read this Notice.

2. Personal Data

1. For purposes of this Notice, Personal Data refers to any information that can identify a data subject directly or indirectly, by reference to– (a) an identifier such as a name, an identification number, financial data, location data or an online identifier; or (b) one or more factors specific to the physical, physiological, genetic, psychological, economic, cultural or social identity of that individual or natural person.
2. Depending on the nature of your interaction with us, the Personal Data we collect may include your personal identification information, health and medical information, account and profile information, network traffic and related data and/or any other information which have been provided to us or we may have access to, in the course of your interaction with us.
3. For more details on Personal Data which may be collected, please refer to Appendix 1.
4. Personal Data of Vulnerable Persons:
 1. It is, our intention and policy to comply with law when it requires parent, guardian or legal representative’s permission before collecting, using or disclosing Personal Data of Vulnerable Persons.
 2. If a parent, guardian or legal representative becomes aware that Personal Data of a child below 16 or ward has been provided by that child or ward without the consent of the relevant parent, guardian or legal representative, please contact us (contact details provided below). Such Personal Data will be reconciled or disposed of from our records.

3. How do we collect Personal Data?

During our interactions with you, we may obtain Personal Data about you to fulfill a statutory or contractual requirement, or is required to perform or enter into a contract with you. In this case, you are obliged to provide your Personal Data. If you do not provide your Personal Data to us, we may not be able to accomplish some of the purposes outlined in this Notice.

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In other cases, decision to provide us your Personal Data may be optional.

We collect Personal Data from you in the following ways:

1. directly:

1. when you admit, create an appointment, obtain a medical investigation or wellness examination/assessment, create an account, make a medicine purchase in our pharmacy, obtain a medical laboratory investigation, receive ambulatory care, register with us and/or submit any form to us or benefit from our services;
2. when you disclose Personal Data in face-to-face meetings, telephone conversations, emails and/or over any registration, communication or messaging platforms with our teams;
3. when you sign up for our marketing and promotional communications and/or any initiatives;
4. when you interact, communicate with us and/or leave comments on our websites, mobile applications or social media platforms;
5. when you enter into an agreement, partnership, collaboration and/or provide any other documentation or information in respect of your interactions, engagement and/or relationship with us;
6. when you visit and/or are within our premises and your images are captured by us via CCTV cameras, photographs or videos taken by us or our representatives, agents, services providers or affiliates when you attend any of our events;
7. when you submit application for employment, internship, attachment, education or accreditation;
8. when you make available your Personal Data to us for any other reason;

2. indirectly:

1. when we seek and receive your Personal Data in connection with your interaction, engagement and/or relationship with us (including, but not limited to, for our products and services or work, education and accreditation applications) from other data sources;
2. when we receive your Personal Data from other medical service providers (whether related or third party);
3. when we receive your Personal Data from third parties who wish to seek to confer a benefit on you (e.g., your employer, your agent or insurer);
4. if you act as an intermediary or are supplying us with Personal Data and information relating to a third-party/other individual (such as a Relative, friend, colleague, patient, employee, etc.), you undertake that you have obtained all necessary consents from such third-party/other individual for Processing of their Personal Data by us;
5. as we are collecting third-party/other individual's Personal Data from you, you undertake to make such third-party/other individual aware of all matters listed in this Notice by referring them to our website or informing them of the contents of this Notice; and/or
6. any other information which we may collect from other sources.

4. Ensuring accuracy of Personal Data

1. We strive to maintain Personal Data in a manner that is accurate, complete and up-to-date. The Personal Data you provide to us must be accurate, complete and up-to-date, and you must inform us of any significant changes to such Personal Data provided by you.

2. Furthermore, if you act as an intermediary or are supplying us with Personal Data and information relating to a third-party/other individual, please note that you need to ensure that such Personal Data is collected in compliance with the PDPA. For example, you should inform such third-party/other individual about the contents of this Notice.

5. For which purpose is Personal Data collected, use, disclosed or processed?

Personal Data may be collected, used, transferred or otherwise Processed for one or more of the following purposes:

1. Provision of medical services purposes: For Processing necessary to provide you medical treatment and other reasonably related purposes.
2. Vital interests: For Processing necessary to protect your vital interests, for instance, situations that require us to protect your life or you from harm;
3. Business Purposes: These are legitimate purposes as appropriate to conduct our business. These include Processing necessary for the performance of contractual obligations, invoicing, billing and account management of Individuals, customer service and support, finance and accounting, research and development, internal management and control, and any other reasonably related activities.
4. Human resources management: This includes Processing necessary for the performance of an employment or other contract with an employee (or to take necessary steps at the request of an employee prior to entering into a contract), or for managing the employment-at-will relationship.
5. Health, safety and security: For Processing necessary to ensure occupational safety and health, the protection of our assets, your verification and your access rights and its status;
6. Compliance with legal and regulatory obligations: For Processing necessary for compliance with a legal or regulatory obligation to which we are subject;
7. Marketing and Promotion: We may, when Processing Personal Data for marketing communications and/or promotions, either:
 1. obtain your consent; and/or
 2. offer you opportunity to not proceed with the processing and/or to choose not to receive such communications.If you wish to withdraw consent to receive such materials, please contact us (contact details provided below).
8. Secondary Purposes: Processing of Personal Data (including previously collected data) for secondary purposes such as:
 1. transferring the Personal Data to an archive for Ministry of Health and Public Health needs if requested;
 2. conducting internal audits or investigations;
 3. implementing business controls;
 4. conducting statistical, historical or scientific research as required for our business operations;
 5. preparing or engaging in dispute resolution;
 6. using legal or business consulting services;
 7. managing insurance or other benefits related issues; and/or
 8. creating de-identified, aggregated and/or anonymised data from Personal Data from which you would not be identifiable, through removal of identifiable components, obfuscation, pseudonymisation, anonymisation, or any other means for purposes including, but not limited to (a) enhancing security; and/or (b) for further processing, aggregation, analysis (of the anonymised data that no longer

contains your Personal Data only), for optimisation of patient care and improvement of healthcare services, products and research and developments which may include transferring such anonymised data to our affiliates and business partners, for such purposes.

9. Any other reasonably related purposes.
10. For more details on purposes for which Personal Data is Processed, please refer to Appendix 2.
11. Exceptions: Some of our obligations under this Notice may be overridden if, under the specific circumstances at issue, a pressing legitimate need exists that outweighs your interest. Such a situation exists if there is a need to:
 1. protect our Business Interests including:
 1. the health, security or safety of individuals;
 2. our intellectual property rights, trade secrets or reputation;
 3. the continuity of our business operations;
 4. the preservation of confidentiality in a proposed sale;
 5. merger or acquisition of a business;
 6. the involvement of authorised advisors or consultants for business, legal, tax, or insurance purposes.
 2. prevent or investigate suspected or actual violations of
 1. law (including cooperating with law enforcement);
 2. contracts; and/or
 3. our policies.
 3. otherwise protect or defend us, our personnel's or other individual's rights or freedoms

6. Automated decision-making

1. Automated tools may be used by us to Process your Personal Data and/or make decisions about you. Some extent of human intervention may be involved in the automated decision-making.
2. Where permissible under law, we may undertake automated decision-making if:
 1. the decision is made by us for purposes of entering or performing a contract provided that the underlying request leading to a decision by us was made by you;
 2. you have provided explicit consent; and/or
 3. the use of automated tools is otherwise required.

7. Sharing your Personal Data with others

1. Your Personal Data may be shared with our employees, consultants and locum medical professionals, representatives and/or affiliates.
2. Access to Personal Data, will be limited to those who have a need to know the information for the purposes described in this Notice.
3. From time to time, we may need to share your Personal Data with external parties, which may include the following:
 1. service providers, vendors, suppliers: we contract with authorised external parties or companies that provide products and services to us necessary for our operations

2. business and collaboration partners: we work with accredited doctors and specialists including, but not limited to, their clinic personnel and administrators, our corporate clients and/or partners (and their appointed service providers and/or customers), education and research institutes;
 3. public and governmental authorities: when required by law, or as necessary to protect our rights, we may share your Personal Data to public and governmental authorities that regulate or have jurisdiction over us;
 4. professional advisors and others: we work with and receive support from certain professional advisors such as banks, insurance companies, auditors, lawyers, accountants, and payroll advisors, consultants; and/or
 5. other parties in connection with corporate transactions: we may also, from time to time, share your Personal Data in the course of corporate transactions, such as during a sale of a business or a part of a business to another company, or any reorganisation, merger, joint venture, or other disposition of our business, assets, or stock.
4. As appropriate, we will contractually protect and safeguard your interests at a similar level of protection as provided by us.

8. Cross-border transfer of Personal Data

1. Due to our affiliations with international standard institutions and other business ventures, your Personal Data may be accessed by or transferred to our affiliates and/or authorised external parties from various countries around the world in order for us fulfil the purposes described in this Notice.
2. As a result, we may transfer your Personal Data to jurisdictions located outside of Sri Lanka, which may have data protection related laws and rules that are different from the standards provided under the PDPA.
3. Personal Data may be transferred to an authorised external party, located internationally only if, we believe it is necessary or appropriate to:
 1. ensure compliance with applicable data protection related laws which may include responding to requests from public and government authorities, cooperation with law enforcement agencies or other legal reasons; and/or
 2. satisfy purposes for which Personal Data has been collected by us or to enforce our terms and conditions.

9. When do we retain your Personal Data?

1. We keep your Personal Data as long as we need to fulfil the purposes for which it has been collected. We retain Personal Data only:
 1. for the period required to serve applicable Health Service Purpose;
 2. to the extent necessary to comply with an applicable legal and/or regulatory requirement; and/or
 3. as advised by Sri Lankan health regulatory laws.
 4. Health information of a child until the child reached the age of 18
 5. When a dispute or any legal issue is likely to arise.
2. Promptly after applicable retention period has ended, your Personal Data will be appropriately:
 1. disposed; and/or
 2. de-identified

10. How do we protect your Personal Data?

1. We are committed to maintaining the security of the Personal Data processed and restrict the Processing of Personal Data to those data/information that are reasonable, adequate for, and/or relevant to the purposes described under this Notice.
2. To protect your Personal Data, we take appropriate measures, and we also require external parties to whom we disclose your Personal Data to, to protect the confidentiality and security of your Personal Data. Depending on the state, the costs of implementation and the nature of the data/information to be protected, we have put in place physical, technical and organisational measures to prevent risks such as unauthorised access, collection, use, disclosure, copying, modification, disposal or loss.
3. If you have any reason to believe that your interaction with us is no longer secure, please contact us (contact details provided below).

11. How can you contact us to execute your rights available to you?

1. With respect to Processing of your Personal Data, upon successful verification of your identity, you may:
 1. obtain information access on the Processing of your Personal Data subject to applicable time boundaries, subject to applicable fee(s) related to the costs of processing your access request; (As provided by Law) The right to access your own personal data processing does not give you a right obtain information of a third party, professional opinions, private information of the hospital and legally sensitive data which may be included in your health file.
 2. request to update or correct your Personal Data, provided we are satisfied on reasonable grounds that such a correction should be made; and/or
 3. withdraw your consent to process your Personal Data and object to certain types of processing or all processing and/or erase your personal data. Please note that your request may affect the products and services we are able to offer to you; and that such request may be implemented after the mandatory time period a private medical institution should retain all institutional records as prescribed by the ministry of health.
 4. In the event we make a decision about you solely using automated means without any human intervention, you may request us to review such decision with human intervention if you find such decision has created or is likely to create an irreversible and continuous impact on your rights.
2. If you have any inquiries, requests, feedback or complaints in relation to protecting your Personal Data, please contact the Data Protection Office via the following channels:
 1. Call: +94 112 140000 (Ext 2637)
 2. Email: dpo@durdans.com
 3. Written communication mailed to: Data Protection Officer, Durdans Hospital, No 03 Alfred Place, Colombo 03, Sri Lanka
3. We will do our best to respond to you within a reasonable time and no longer than 30 days from the date we receive your inquiry, request, feedback or complaint. Depending on the complexity we would seek extensions as provided in law.
4. You have the right of appeal against the feedback of the Durdans Hospital Group Management or its data protection officer, to the Data Protection Authority of Sri Lanka, BMICH, Colombo 07.
5. In the event of a personal data breach that is likely to result in a risk to your rights and freedoms, we will notify you and the relevant authorities in accordance with legal requirements

12. Updates to Notice

1. We may revise this Notice from time to time. Any changes will become effective as on the Effective Date, when we post the revised Notice on our website. You are strongly advised to review this Notice periodically for any changes

Appendix 1: Personal Data which may be collected

- 1.1 Basic Personal information of our patients such as name, date of birth, gender, nationality, identification numbers such as national identity card numbers, passport numbers.
- 1.2 Contact information such as address, phone numbers and email addresses.
- 1.3 Digital data such as IP addresses, browsing behaviour, and online identifiers collected via cookies.
- 1.4 Financial data such as payment details (bank account numbers and credit/debit card numbers etc.), billing records and insurance claims.
- 1.5 Health data such as medical history, symptoms, conditions, medical records, diagnosis reports, prescriptions, investigation results, treatment history, biometric data, scans, photos, your allergies, meal preferences and special needs, and information related to insurance claims.
- 1.6 Personal data of Children through legal guardian
- 1.7 Information related to employment such as Job applications, travel, education, Data resulting from internal or external communications, work history, salary details, tax details, information of next of kin, spouse and children, onboarding and exit interview records, and performance records.
- 1.8 CCTV footages and call recordings, comments on social media including audio and video testimonials.
- 1.9 Facial images, fingerprints and iris related data.

Appendix 2: Purposes for which Personal Data is Processed

Purposes for Processing Personal Data	Examples
Provision of Medical Services Purpose	<u>Assessment for provision of medical treatment and other related services:</u> If you have previously attended any Durdans Labs or the Hospital, we may use the personal data (such as your address and contact details) we hold from your previous registration or admission to streamline the referral process in our system to assess you for your medical treatment. Such previous registration or admission is regardless of whether the assessment is conducted by our or a third party medical professional and entered into our system. We may collect your personal data for the purpose of assessing your suitability for medical services at a Durdans facility, via our teleconsult services or via our homecare services. Where personal data is collected and you do not become a patient of ours, your personal data may be stored for a limited period before destruction. Where your assessment has been conducted at the request of a medical professional, we may report the outcome of the assessment to that medical professional as it may be relevant to any treatment or care that may be provided to you by them. Where you undergo assessment by a third-party provider (e.g., your doctor or specialist medical services providers not under our employment)

	during your admission to a Durdans facility, via our teleconsult services or via our homecare services for the purpose of transferring your care to that third party, we may disclose your personal data to the third-party provider for that purpose. <u>Provision of medical treatment and related services:</u> Your personal data may be collected, used, disclosed or Processed by us or between us and the healthcare professionals (including third parties who may not be employed by Durdans) who is providing care or treatment to you or who has submitted a referral for you to receive medical treatment and related services at a Durdans facility, via our teleconsult services or via our homecare services. Medical treatment and related services include pharmacy services and allied health professional services. If you are being treated by a medical practitioner or healthcare facility outside Durdans that needs to have access to the health record of your treatment at a Durdans facility, we may require an authorisation from you to provide a copy of your record to that medical practitioner or healthcare facility. When providing medical treatment and related services to you, we may refer you for further tests (e.g., diagnostics tests, such as radiology) and our staff may consult with medical experts (whether under Durdans or not, and whether located remotely or in Sri Lanka) in relation to your diagnosis or treatment, including by sending health information and clinical images. We may also refer you to other health service providers (external or affiliated) for further treatment during and following your registration or admission (for example, to a physiotherapist or outpatient or related health services). We may disclose your personal data to the relevant provider to the extent required for any such referral (including disclosing that data electronically). Your personal data will only be disclosed to those healthcare professionals involved in, or consulted in relation to, your treatment and associated administration and to the extent required to meet that purpose (including participation in multi-disciplinary team meetings). In some cases, this information may be made available electronically including by way of secure portal or application. These health professionals will use and/or disclose your personal data as part of the process of providing your treatment. We will only do this while maintaining confidentiality of all this data and protecting your privacy in accordance with the law. If you require prosthesis or a medical implantable product as part of your treatment, we may in some cases disclose your personal data to the manufacturer or supplier of that product to ensure appropriate supply of that product and to enable appropriate follow-up. <u>Providing or facilitating access to your medical records by Authorised Doctor:</u> You might be treated by a medical practitioner (e.g., a medical specialist or general practitioner) with whom you have established a patient-care / doctor-patient relationship, including any such medical practitioner who is outside Durdans (an “Authorised Doctor”). Such relationship covers pre- and post-admission and may be established upon any of these circumstances: (i) upon the Authorised Doctor's first referral of you to a Durdans facilities for medical and other related services; (ii) upon the
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processing of an authorisation form from you requesting access to the Authorised Doctor; or (iii) upon the sharing of Your Personal Data initiated by the Authorised Doctor to another medical practitioner.

Based on the aforesaid, we may provide or allow your medical record (including your biodata and clinical scans/results) to be accessible by the Authorised Doctor. This is intended to facilitate the provision of care or treatment by the Authorised Doctor to you.

If you do not want us to provide a copy of your medical information to the Authorised Doctor, you must let us know.

In the event of an emergency where your life or health is at risk and you are unable to provide consent or as authorised by law, we may provide information about your health records to another medical practitioner or healthcare facility outside Durdans without your consent.

Providing your documents digitally available to you: To enhance our service to you, we may avail selected documents to you via web portal, emails or mobile applications and in this regard we may use, collect, disclose, or Process your personal data including transmitting your personal data to the relevant databases for such purpose. We may notify you by call, text message or email to the number or email address which you have provided to us as and when such document is available for you.

Providing information about you to your legal representatives or next of kin: We may provide information about your condition to your legal representative, unless you tell us that you do not wish to disclose your personal data to any such person. The legal representative will be the guardian signing at the time of admission or any other member nominated by you .

Sharing of Personal Data with other Durdans entities: We may share your personal data among our facilities or affiliates for any of the purposes listed in this Notice including:

- i. Processing your Personal Data that is collected by other Durdans entities in order to deliver shared services (e.g., HR, IT, Finance and internal audit functions) within Durdans;
- ii. Where a Durdans entity performs group management function collects and uses the Personal Data collected by other affiliates for its reporting purposes (e.g., Board reporting or to compile statistics for the necessary reporting);
- iii. Where a Durdans entity uses the same IT systems and database to process its data (including your Personal Data) (e.g., SAP system or any applicable medical records systems); and
- iv. consolidating your Personal Data collected from a Durdans facility or entity into one database for use by another Durdans facility or entity in order to facilitate the delivery of medical services to you.

	<u>Contracted services with government agencies:</u> We may provide health services to groups such as individuals under contracts with government. Where you receive services from us under such arrangements, we will provide your Personal Data (which in some cases may include a copy of your medical record for the relevant admission) to those government agencies as required under those contracts. <u>Sale or transfer of our facility to a third party:</u> If we sell or transfer management or ownership of one of our facilities to a third party, we may transfer your personal data (e.g., your medical records) to the new operator. We will take reasonable steps to notify you in the event your personal data will be disclosed to a third party under this paragraph. <u>Clinical trial invitation and participation:</u> At times, we may become aware of clinical trials which may be relevant to your medical attention. Any participation in such trials is voluntary and we will seek your consent before enrolling you into such trials. We may use your personal data to assess your suitability for participation in the clinical trial in order to provide you with initial information about such clinical trial. <u>Other common uses:</u> We may also collect, use, disclose or Process your personal data where necessary for: i. Liaising with third party administrators (TPAs), insurance companies or parties authorising the payment of medical services for review and management of your case and claims of medical fees in relation to any medical services recommended or provided to you; ii. Liaising with your medical saving scheme administrator and, where required, provide information to your medical saving scheme administrator to verify treatment provided to you, as applicable and as necessary; iii. The purpose of contacting you or your appointed primary contact person in relation to billing updates, post-discharge updates/follow-ups, emergency contact or other medical related purposes, and readiness of your medical reports or other documents, by call, text message or email to the number or mailing address which you have provided to us; and iv. Communicating important information to you regarding your medical saving scheme and any financial or management implications in relation to your care at our facility. v. The use of complaints made verbally/via email or on social media. Use of data during processing the complaints while in ward vi. Letter used to authorize travel, 'fit to fly' letters, medical reports etc shared with a foreign medical service /company. Where personal data is transferred outside of Sri Lanka, we ensure that appropriate safeguards are in place to protect your data in accordance with applicable data protection laws. Cross boarder data transfers will be informed to you. vi. The purpose training of nurses, administrative staff etc
Business Purpose	Processing necessary for the performance of contractual obligations, invoicing, billing and account management of Individuals, customer service and support, finance and accounting, research and development, internal management and control, and any other reasonably related activities.
Contractual obligations and necessity	Providing and administering medical care, health and wellness services including, but not limited to, ordering and providing medication, medical tests, scans, reports, reviews, consultations, therapy, procedures; liaising with third-party service providers, vendors, suppliers and business and collaboration partners for the provisions of such, and related, products and services; and maintaining related documentations and records.

Account management of Individuals	Creating and maintaining account profiles and information including, but not limited to, health, medical, benefits entitlement, accreditation, transaction (enquiries and feedback, appointments, admissions, bills, purchases and/or payments, insurance claims, etc.) records; to enable the processing of requests including, but not limited to, subscriptions, registrations, applications, execution and conclusion of contracts, and providing customer service and support
Customer service and support	Handling enquiries, feedback and complaints; arranging and facilitating bookings, registrations, applications; providing notifications and reminders; and providing support to deliver contractual obligations and other reasonably related account and relationship management requests and matters.
Finance and accounting	Facilitate payments to, and receive payments from, Individuals, service providers, vendors, suppliers and business and collaboration partners; administering debt recovery and management; and other reasonably related matters
Research and development	Review, study, analyse, perform analytics and/or aggregate information on product and service consumption, patterns and trends; Individual behavioural patterns, preferences; to improve operations, services, product offerings, personalise experiences; and other reasonably related activities and objectives.
Internal management and control	Internal communications, scheduling work, recording time, managing and allocating company and employee assets and human resources, ensuring business continuity and crisis management; managing projects and costs, investor relations, alliances, ventures, mergers, acquisitions, divestitures, re-organisations or disposals and integration with purchaser; compilation of audit trails and other reporting tools, maintaining records relating to business activities, budgeting, financial management and reporting; intellectual property and standards management.
Human resources and personnel management	Performing workforce analysis and planning including, but not limited to, internal surveys, performance evaluations, talent and career development, courses and trainings; grievances, disciplinary matters and terminations; maintaining internal employee directories and emergency contacts; management and administration of outplacement, eligibility for employment, initial hiring or rehiring; providing and verifying employment references and background checks; management of leave and other absences, compensation and benefits, taxes, loans, grants, business expenses and reimbursements, travel arrangements.
Health, safety and security	Deploying and maintaining technical and organisational security measures, conducting internal audits and investigations, conducting assessments to verify conflict of interests, identifying and authenticating employees, managing network security and preventing data loss using automated technologies to identify malicious data on equipment or networks and to detect confidential information from leaving our perimeters or from unauthorised access to that information. Recording of your Personal Data through video or other digital, electronic, or wireless surveillance system or device to secure and maintain IT infrastructure, office equipment, facilities and other property, and to maintain the safety and security of our staff, patients, visitors and other attendees to our facilities.
Compliance with legal and regulatory obligations	Disclosing Personal Data to government institutions or supervisory authorities as required by law or judicial authorisation for complying with tax, record-keeping and reporting obligations, conducting audits and investigations to prevent or detect fraud or corruption, compliance with government inspections and other requests from government or other public authorities, responding to legal process conducting investigations including employee reporting of allegations of wrongdoing, policy violations, fraud, or financial reporting concerns, complying with internal policies and procedures. Please also keep in mind that we may also use your data for security reasons and/or to protect our legitimate business interests or to prevent or investigate suspected or actual violations of law, breaches of the terms of employment or non-compliance with our policies.

Defence of legal claims	Establishment, exercise or defence of legal claims to which we are subject, such as responding to legal processes such as court summons or orders, pursuing legal rights and remedies, defending litigation and managing any internal complaints or claims (including any whistle-blower/ethics hotlines).
Enhanced security and further processing for improved services	Creation of de-identified and/or anonymised data from your Personal Data (by removal of identifiable components, obfuscation, anonymisation, or any other means) to enhance security and for further processing, aggregation, analysis for optimisation of patient care and improvement of healthcare services, products, research and development which may include transferring anonymised data to our affiliates and business partners in foreign countries.

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