

## **PERSONAL DATA PROTECTION POLICY**

This Personal Data Protection Policy is issued to all our existing, immediate and/or prospective customers pursuant to the Personal Data Protection Act 2010 ("the Act") which came into force on 15 November 2013.

### **1. Personal Data Collection**

In the course of your dealings with Pathology & Clinical Laboratory (M) Sdn Bhd and its subsidiaries (Pathlab"), we will require you to voluntarily provide data and information about yourself ("Personal Data") to enable us to deliver notices, services and/or products in connection with our future products, new product launches and promotional events with business partners & associates.

### **2. Personal Data Scope**

The Personal Data may include but not limited to information concerning your name, date of birth, Identity card number, passport number, address, gender, race, nationality, contact information, e-mail address, education, occupation, telephone or fax number, your previous addresses and preferred mode of communication, religion, credit card details, bank name and other information where permitted by applicable law.

### **3. Purpose**

The Personal Data will be collected, processed and used for the following purposes:

- a. to send you information by e-mail, telephone calls, SMS or social network applications or internet social media about products and services offered by Pathlab and selected third parties that we think may interest you while we maintain control over your Personal Data ;
- b. the delivery of notices, services or products and the marketing of such services or products whether present or future, to you;
- c. marketing and client profiling activities regarding our latest promotion, products and/or services;
- d. our internal record keeping and maintenance of customer records;
- e. meeting any legal or regulatory requirements ;
- f. any subsequent commercial transaction in relation to any promotion, products and/or services;

#### **4. Source**

The Personal Data will be legitimately and transparently obtained in the following manner:

- a. official registration forms (either electronic or printed) or any other promotional events;
- b. official Request for Information forms that are provided to you by our employees or agents;
- c. any email or any correspondence that we have received from you requesting for information or making any inquiries;
- d. any form that you have submitted on our website or any websites contracted by us;
- e. any referral from a person which have included their verifiable personal contact details;
- f. Business cards that were dropped or given to our employees, clinic and hospitals or associates; or
- g. any document (including but not limited to statutory forms and returns) that were submitted to us for processing.

#### **5. Rights of Access**

You have the right to request access to and if required, correction of your Personal Data in our records. You have the right to:

- a. request access to your Personal Data in our records for verification purposes. You may access and review all of your Personal Data held by us in person at our corporate offices located at the address given in (g) below;
- b. request the correction of your Personal Data in our records in the event the information is inaccurate, misleading, out-of-date or incomplete upon validation and verification of the new information provided in person at our corporate offices located at the address given in (g) below;
- c. request that your Personal Data shall only be kept for the fulfilment of the purpose of the collection of such information;
- d. request for proof of policy and procedure in relation to the safeguarding and guarantee of your Personal Data in our records;
- e. request that we specify or explain its policies and procedures in relation to data and types of Personal Data handled by us;
- f. communicate in writing to us your objection to the use of your Personal Data for marketing purposes whereupon we will not use your Personal Data for these purposes at our corporate offices located at the address given in (g) below and
- g. If you wish to make a request to access, review, amend and correct your Personal Data through:

Database Department  
Pathology & Clinical Laboratory (M) Sdn Bhd  
Wisma KAM, 87-91, Jalan SS 25/2  
Taman Bukit Emas,  
47301 Petaling Jaya,  
Selangor

Tel : 03-78098171/8172  
Fax : 03-78805687  
Email : database@pathlab.com.my

## **6. Disclosure**

The information we gather maybe used by the following:

- a. any related companies and/or subsidiaries of Pathlab, including those incorporated in the future;
- b. our business partners and affiliates that provide related services or products in connection with our business;
- c. our auditors, consultants, lawyers, accountants or other financial or professional advisers appointed in connection with our business;
- d. our third party service providers, third party management companies, sub-contractors or other parties as may be deemed necessary by us to facilitate your dealings with us; and
- e. our appointed service providers in relation of our loyalty programmes, for the purpose of delivery gift redemption and services.

Third parties are legally tasked with processing your Personal Data in line with principles specified by Pathlab. Third parties are also held legally responsible for securing your Personal Data at an appropriate level of security in relation to applicable data protection laws and widely accepted industry standards.

You may at any time withdraw, in full or in part, your disclosure consent given previously, in each case subject to any applicable legal restrictions, contractual conditions and a reasonable time period in person at our corporate offices located at the address given in 5(g) above.

## **7. Limit Processing of Personal Data**

The Personal Data provided to us undergoes processing as and when required or upon scheduled maintenance. The definition of processing defines it as "any operation or set of operations which is performed upon Personal Data, whether or not by automatic means, such as collection, recording, organization, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, blocking, erasure or destruction;"

You have the right to limit in part or wholly any of the processes by which your data is subjected to in terms of the operations allowed to be performed upon it, the period of time allowed or alternatively the date line of the consent given.

Pathlab is responsible to determine the purposes and means of the processing of Personal Data.

You may at any time withdraw or amend, in full or in part, your processing consent given previously, in each case subject to any applicable legal restrictions, contractual conditions and a reasonable time period in writing to our corporate offices located at the address given in 5(g) above.

## **8. Failure/Refusal**

The Personal Data provided to us are wholly voluntary in nature and you are not under any obligation or under any duress to do so. The failure to provide the Personal Data may result in the following which we shall not be held liable for any of the consequences arising therefrom:

- a. the inability for us to provide you with the test results, notices, services and/or products requested;
- b. the inability for us to update you with the latest product and/or launches; and
- c. the inability to comply with any applicable law, regulation, direction, court order, by laws, guidelines and/or codes applicable to us.

## **9. Protection**

Your Personal Data will be kept and processed in a secured manner. The appropriate administrative and security safeguards, policies and procedures will be implemented, as far as practicable, in accordance to the applicable laws and regulations. We will, as far as practicable, aim to prevent any unauthorized and/or unlawful processing of, and the accidental loss, destruction or damage to your Personal Data.

Pathlab is committed to taking appropriate technical, physical and organisational measures to protect your Private Data against unauthorised access, unlawful processing, accidental loss or damage, and unauthorised destruction of your Private Data.

Compliance with these provisions will be required of all third-party administrators who may access your Private Data, as described in the 'Disclosure of Personal Data' in Section 6 above.

## **10. Language**

In accordance to Section 7(3) Personal Data Protection Act 2010, this Policy is issued in Bahasa Malaysia, English and Chinese languages. In the event of any inconsistency, the English language version of this Policy shall prevail.

## **11. Changes to this Policy**

Pathlab may need to modify this Personal Data Policy as needed, for example, to comply with changes in business operations or laws and regulations. Pathlab will post all changes to this policy.