

## **Website Notice Relating to Personal Data Protection Act 2010**

### **1) Protection and Use of Personal Data**

Penang Adventist Hospital (“PAH”) values your Personal Data and strives to protect it in compliance with the laws of Malaysia. This Personal Data Protection Notice (“Notice”) is issued by us pursuant to the requirements of the Malaysian Personal Data Protection Act 2010 (“the Act”) to all our patients or customers or any other individuals whose data is required to be collected by us by reason of, or incidental to, the provision of any services to our customers or patients. For the avoidance of doubt, please note that this Notice is applicable only if you are an individual and in the event of any conflict between the English and other language versions of this Notice, the English version shall prevail.

In the course of your dealings with PAH, we may collect a variety of your Personal Data including but not limited to your name, address, gender, marital status, contact details, email address, nationality, race and religious beliefs, education background, occupation, information about your organisation and your designation within the organisation, salary range, medical information (such as blood type, finger prints, DNA and laboratory reports), insurance information, bank account information, credit profile and other information deemed necessary.

PAH may collect your Personal Data directly from you or indirectly from third parties including but not limited to your family members, next-of-kin, independent consultants, regulatory and enforcement agencies, financial institutions and employer.

PAH may use and process your Personal Data for the purposes relating to the business and activities of PAH which shall include, without limitation:-

- (a) to process your requested medical services;
- (b) to communicate and inform you of your medical condition;
- (c) to inform you of our services or products and keep you posted on PAH’s latest product announcements and upcoming events;
- (d) to process any payments relevant to you and for insurance purposes;
- (e) to conduct market research, statistical analysis and analysis of patient case studies to improve PAH's services and products;
- (f) for internal administrative purpose such as auditing, data analysis, record keeping use and customer communications; and
- (g) for any other purpose that is required or permitted by any law, regulations, guidelines, medical practice and/or relevant regulatory authorities.

### **2) Collection of Non-Personal Information**

Where PAH collects information through our website, we automatically collect certain non-personal information regarding website use that does not identify you including but not limited to Internet Protocol (IP) address of your computer, the IP address of your Internet Service Provider, the date and time of your access to the website, the operating system you are using, the sections

of the website you visit, the content you download from website and the internet address of the website from which you linked directly to PAH website. PAH may use non-personal information to compile tracking information reports regarding site user demographics and site traffic patterns. None of the tracking information in the reports can be connected to your identities.

### 3) Links to Third-Party Websites

The PAH website may contain links to third parties operated and owned websites that are not under our control. These websites may have their own policies regarding Personal Data Protection and hence PAH shall not be held responsible for the collection, use, maintenance, sharing or disclosure of data and information by such third parties. If you provide information directly to such sites, the Personal Data Protection Policy and terms of service on those sites are applicable and PAH is not responsible for the information processing practices or privacy policies of such sites.

### 4) Cookies

Cookies on PAH website may be used to allow you to set your individual preferences and to help PAH provide a better experience. Certain cookies may collect your Personal Data. Cookies are small text files which a website may put on your computer or mobile device when you first visit a page to help the website to recognise your device, remember your user name and preferences. If your browser permits, you may choose to accept or decline cookies. However, please take note that your ability to access certain features or your usage of the facilities at PAH website may be affected if you choose to decline cookies.

### 5) Website-specific purpose

If you are not customers or patients of PAH, but you have submitted enquiries via PAH website, PAH may process your Personal Data for the following purposes:-

- (a) responding to your enquiries;
- (b) internal record keeping and administrative purposes;
- (c) development and enhancement of PAH products and services;
- (d) to inform you of our services or products and keep you posted on PAH's latest product announcements and upcoming events; and
- (e) for any other purpose that is required or permitted by any law, regulations, guidelines, medical practice and/or relevant regulatory authorities.

### 6) Storage and Use of Personal Data

PAH store your Personal Data either in hard copies or soft copies in our servers located in Malaysia. Control and access of your Personal Data are personally managed by PAH. PAH will only retain your Personal Data for the period necessary to fulfill the many different purposes outlined in this Notice unless a longer retention period is permitted or required by law.

Your Personal Data provided to PAH will be kept confidential. PAH takes the necessary precautions, both administrative and technical to safeguard your Personal Data against loss, theft,

misuse and unauthorized access, disclosure, usage, alternation or destruction. PAH will ensure that access to your Personal Data is restricted to staff who are required to process your Personal Data in accordance with their respective job requirements. As a part of providing you with our products and services and for the purposes of our business, we may be required or need to disclose information about your Personal Data with us to third parties including but not limited to our professional advisors, including our legal advisors and expert consultants, regulatory and governmental authorities including the Ministry of Health and other relevant government departments or agencies, third party service or product providers within or outside the country, relevant accreditation bodies such as the Malaysian Society for Quality in Health (MSQH), Joint Commission International (JCI), independent consultants, insurers and other parties deemed necessary.

#### 7) Right of Access, Amendment and Withdrawal

PAH respects your right of access to your Personal Data and right to request correction of the Personal Data that is inaccurate, incomplete, misleading or not up-to-date. However, PAH reserves the right to charge you a reasonable fee for the processing of any data access request or delay your request pending further details from you. You may also amend your Personal Data or withdraw your consent to process Personal Data at any time.

#### 8) Compliance Officer

If you have any enquiries regarding this Notice or if you have any concerns about the manner in which your Personal Data has been collected or handled by PAH or if you wish to request access to your Personal Data or if you wish to amend your Personal Data or if you wish to withdraw your consent to PAH for the processing of your Personal Data or for the transfer of your Personal Data to other parties, you may send your written request at the following address:-

Address : 465 Jalan Burma, 10350 Penang

Compliance Officer : Mr Jayce Gooi

Email : legal@pah.com.my

#### 9) Changes to Notice

PAH reserves the right to amend this notice from time to time to reflect changes in legal and regulatory requirements, technological advancements and best medical practices without further written notification but such amendments will be notified via our website. You are advised to check the notice on our website on a regular basis.

#### 10) Obligations under Law

PAH will only use your Personal Data only with your consent. During process of your Personal Data, PAH is subjected to our industry-specific laws such as the Medical Act 1971 and Private Healthcare Facilities and Services Act 1998 as well as guidelines from Ministry of Health and Malaysian Medical Association.

### 11) Personal Data Involving Minor and Disabled Persons

Without prejudice to the clauses in this Notice, the Personal Data collected in relation to the following individuals:

- (a) individual under the age of majority of eighteen (18); and/or
- (b) individual who lacks the capacity to give consent due to mental or physical disability

will be collected by PAH in accordance with our rules, policies and medical practices.

### 12) Your Consent

By using this website and /or submitting Personal Data to PAH, you hereby agree to the terms of this Policy and consent to the collecting, using and storing of your information as explained by this Policy. If you do not agree with the terms of this Policy, please do not use this website or provide PAH with any of your Personal Data.