

Personal Data Protection Policy (PDPA) for Bio X Healthcare Sdn Bhd (“Notice”)

At Bio X Healthcare Sdn Bhd (also known as Brighton Healthcare) (Company no. 982791-M), we are committed to protect your privacy, confidentiality and security of all personal data and health information in accordance with the Personal Data Act 2010 of Malaysia (PDPA). Brighton Healthcare may from time to time update this Personal Data Protection Policy to ensure that this policy is consistent with our future developments, industry trends or any changes in legal or regulatory requirements.

1. Personal Information

1.1 Personal information means any information which relates to you and which was collected or provided to Brighton Healthcare for the purposes stated in Section 2 below.

1.2 Examples of such personal data you may provide to us include (depending on the nature of your interaction with us) your name, NRIC, passport or other identification number, date of birth, gender, age, race, religion, occupation, telephone number(s), mailing address, email address, personal health information, next of kin details and any other information relating to any individuals which you have provided us in any forms you may have submitted to us, or via other forms of interaction with you.

2. Collection of Personal Data

2.1 Generally, we collect personal data either from you, from your authorized representatives, from third parties, or from publicity available sources which may include (but is not limited to) in the following ways:

- a. When you interact with our staff, including customer service officers, for example, via telephone calls (which may be recorded), letters, fax, face-to-face meetings, text messages, social media platforms and emails.
- b. When you enter into any agreement or provide other documentation or information in respect of your interactions with us, or when you use our services.
- c. When you participate in any surveys, questionnaires, competitions, contests, offers or promotions done internally or via an appointed third party.
- d. When you attend any of our corporate exhibitions, events, roadshow or third party open day.
- e. When you respond to our promotions, initiatives or to any request for additional personal data.
- f. When your images are captured by us via CCTV cameras while you are within our premises, or via photographs or videos taken by us or our representatives when you attend our events.
- g. When you submit an employment application or when you provide documents or information including your resume or CVs in connection with any appointment as an officer, director, representative or any other position.
- h. From other sources where you have given your consent for the disclosure of personal data relating to you, and/or where otherwise lawfully permitted.

2.2 If you provide us with any personal data relating to a third party (e.g. information of your spouse, children, parents, and/or employees), by submitting such information to us, you represent to us that you have obtained the consent of the third party to provide us with their personal data for the respective purposes.

2.3 You should ensure that all personal data submitted to us is complete, accurate, true and correct. Failure on your part to do so may result in our inability to provide you with the products and services you have requested, or delays in providing you with products and services you have requested, or processing your applications.

3. Purposes for the Collection, Use and Disclosure of Your Personal Data

3.1 You are agreeing that we may use your personal data where permitted by applicable law and for the following purposes:

- a. For medical and healthcare services.
- b. To respond, process and handle your queries, feedback, complaints and requests.
- c. To establish and manage medical records and medical reports.
- d. To facilitate payment process relating to the patients
- e. Requesting feedback or participation in surveys, as well as conducting market research, develop and improve the quality of our products and services.
- f. To share the personal data with Bio X Healthcare Sdn Bhd and its related companies as defined in the Companies Act 1965.
- g. For marketing promotions of our facilities, services, doctors, packages, promotion, etc.
- h. To manage the safety and security of our premises and services (including but not limited to carrying out CCTV surveillance and conducting security clearances.
- i. To conduct any form of investigations including but not related to those relating to disputes, billing, fraud, offences, prosecutions etc.
- j. For submission and registration of relevant forms, licenses to the relevant authorities and/or third parties under the governing laws relevant to the healthcare industries.
- k. For any other purpose that is incidental or in furtherance to the above purposes.

3.2 Your personal data may be disclosed to the following parties, where relevant

- a. Bio X Healthcare Sdn Bhd and its related companies.
- b. Amongst Bio X Healthcare Sdn Bhd members and affiliates (including staff and medical practitioners)
- c. Third party doctors, clinics, laboratories, hospitals and/or medical institutions.
- d. Government agencies, local authorities, non government agencies.
- e. Companies providing services relating to insurance to Bio X Healthcare Sdn Bhd.
- f. Our professional advisers such as consultants, auditors and lawyers.
- g. Training providers.
- h. Family and next of kin.
- i. The employer or HR of your company (for pre-employment/executive health screening).
- j. To such parties as may be required by law, court, regulator or legal process to disclose.
- k. To such parties as may be permitted under the laws of Malaysia.
- l. Any other party to whom you authorise us to disclose your personal data to.

4. Contacting Us - Withdrawal of Consent, Access and Correction of your Personal Data

4.1 Brighton Healthcare has procedures in place in order to receive and respond to enquiries about our policies and practices relating to its handling of personal information. Any complaint or enquiry should be made in writing and addressed as shown below. If there are any questions or concerns regarding this privacy policy or the data collection practices outlined herein, please contact us as follows:

- a) By Email: info@brightonhealthcare.my
- b) By Mail: BIO X HEALTHCARE SDN. BHD.
Suite G-2, Ground Floor, Bio X Center,
Persiaran Cyberpoint Selatan, Cyber 8,
63000, Cyberjaya, Selangor.

4.2 You are reminded not to send via unencrypted means (such as email) sensitive information such as passwords, credit card information etc.

4.3 Please note that if your personal data has been provided to us by a third party (e.g. a general practitioner or your employer), you should contact that organization or individual to make such queries, complaints, and access and correction requests to Brighton Healthcare on your behalf.

4.4 If you withdraw your consent to any or all use of your personal data, depending on the nature of your request, Brighton Healthcare may not be in a position to continue to provide its products and services to you, or administer any contractual relationship in place, which in turn may also result in the termination of any agreements with us, and your being in breach of your contractual obligations or undertakings. Brighton Healthcare's legal rights and remedies in such event are expressly reserved.