

PERSONAL DATA PROTECTION POLICY | AKTA PERLINDUNGAN DATA PERIBADI

1.0 INTRODUCTION

This Personal Data Protection Policy 2010 (“this Policy”) sets out personal data protection practices with respect to the personal data of individuals who deal with 1 Doc International Berhad (Registration No. 202301046813 (1540727-V)) and the following companies (collectively, “the Group”):

- (a) 1 Doc Holding Sdn Bhd (Registration No. 201901043019 (1352349-K));
- (b) 1 Doc Resources Sdn Bhd (Registration No. 201901043594 (1352924-A));
- (c) 1 Doc Trading Sdn Bhd (formerly known as 1 Doc Medical Group Sdn Bhd) (Registration No. 201601006451 (1177379-P));
- (d) 1 Doc Marketing Sdn Bhd (Registration No. 201701034706 (1248877-W));
- (e) 1 Doc Puchong Sdn Bhd ((Registration No. 201601012099 (1183030-W));
- (f) 1 Doc KL Sdn Bhd (Registration No. 201601025887 (1196826-T));
- (g) 1 Doc Austin Sdn Bhd (Registration No. 201701032500 (1246670-P));
- (h) 1 Doc KD Sdn Bhd (Registration No. 201701016915 (1231080-U));
- (i) 1 Doc Subang Sdn Bhd (Registration No. 201701026660 (1240826-X));
- (j) 1 Doc Cheras Sdn Bhd (Registration No. 201801008604 (1270618-X));
- (k) 1 Doc Ipoh Sdn Bhd (Registration No. 201901036067 (1345397-W));
- (l) 1 Doc Seremban Sdn Bhd (Registration No. 202001000443 (1356762-D));
- (m) 1 Doc Sutera Sdn Bhd (Registration No. 202001002945 (1359264-T));
- (n) Nano Pigmentation Sdn Bhd (Registration No. 201801023267 (1285286-D));
- (o) 1 Doc (Melaka) Sdn Bhd (Registration No. 201701005899 (1220064-V));
- (p) Hair Doc Group Sdn Bhd (Registration No. 202001026336 (1382656-T));
- (q) Perfect Facelift Sdn Bhd (Registration No. 202101026175 (1426475-H));
- (r) Slim Doc Sdn Bhd (Registration No.202101011505 (1411804-W)); and
- (s) Slim Doc SG Pte Ltd (Registration No. 202224653C).

This Policy has been established in accordance with the Malaysian Personal Data Protection Act (“ACT”).

This Policy is applicable to all our existing and/or potential customers, suppliers, and employees. By providing your Personal Data to us, you are consenting to the collection, use, access, transfer, storage and processing of your Personal Data as described in this Policy. If you do not consent to the collection and/or processing by us of your Personal Data for purposes we deem appropriate, we may not be able to provide our services that you require or to consider you for employment opportunities or appoint you as our supplier of services or goods. If you do not consent to our use of your Personal Data, please contact our Data Protection Officer whose details are documented in Section 11 of this Policy.

2.0 COLLECTION OF PERSONAL DATA

Personal Data is any information that relates directly and indirectly to you. This includes any information that can be used to distinguish, identify or contact you. For the avoidance of doubt, please note that this Policy is applicable to you only if you are an individual. Personal Data may include but is not limited to the following:

- Personal details such as name, identity card or passport number, gender, race, religion, education, nationality, date of birth or age, marital status, occupation, photo, banking account details etc;
- Contact details such as address, telephone number, mobile number, facsimile number, email address etc;
- Other information that are, have been or may be collected by us or which you provide to us, from time to time, in connection with any service, transaction, survey, questionnaire or communications with or provided by us; and
- Personal Data from credit reporting agencies, government agencies, credit bureau reports etc.

3.0 COLLECTION AND PROCESSING OF PERSONAL DATA

We collect your Personal Data directly or indirectly in the following ways for the following purposes:

a. From Existing and/or Potential Clients/Customers

In order for us to provide our services effectively and efficiently, we will collect and further process Personal Data, where required, in connection to the delivery of our service, including but not limited to the following:

- To process your request for proposal, understand your needs and offering services to meet these needs;
- To communicate with you in relation to our services;
- To respond to enquiries from clients/customers;
- For administration purposes including billings, payment and debt collection;
- For insurance purposes;
- To apply for relevant travel visas in the event of travel overseas;
- To protect our rights or property and that of our users and, where appropriate, to comply with legal and regulatory requirements;
- For risk management purposes;
- For internal investigations, audit or security purposes;
- To maintain records as required and permitted to be collected by law, professional standards, security, claims or other legal purposes;
- For such other purposes as permitted by applicable law or with your consent ; and
- For all other purposes incidental and associated with any of the above.

b. From Existing and/or Potential Vendor, Supplier and Service Providers

Personal Data is collected and further processed by us for the assessing, selection, administration, etc of vendor, supplier and service providers, and

PERSONAL DATA PROTECTION POLICY | AKTA PERLINDUNGAN DATA PERIBADI

to operate our premises in a manner which is physically safe, secure and befitting of health and safety requirements.

c. From Existing and/or Potential Employees

Personal Data is collected for purposes including for not limited to:

- Managing employee records, payroll processing, and statutory contributions.
- Administering employee benefits and insurance programs.
- Conducting performance reviews and career development planning.
- Ensuring workplace safety and compliance with labor laws.
- Investigating misconduct, disciplinary actions, or grievances.

d. From Third Parties

Personal Data may also be collected by us from third parties whom we deal with or are connected with our clients or employees and from such other sources where they have given your consent for the disclosure of Personal Data and/or where otherwise lawfully permitted.

4.0 DISCLOSURE OF PERSONAL DATA

- As part of our service to our clients, we may be required or need to disclose your Personal Data to third parties such as:
- Third parties appointed by us to provide services to us or on our behalf (such as auditors, lawyers, company secretary, consultants, contractors, professional advisors, etc);
- Law enforcement agencies, regulatory or other government agencies or to other third parties to comply with legal or regulatory obligations or request by relevant governmental authorities, statutory authorities, local council and industry regulations (such as Securities Commission, Bursa Malaysia Securities Berhad, Companies Commission of Malaysia etc);
- Companies and/or organisations that assist us in processing and/or otherwise fulfilling transactions and providing you or our clients with our services;
- Other parties who may jointly provide services requested for purposes that are related to our purpose of collecting and using the Personal Data, subject at all times to any laws (including regulations, guidelines and/or by-laws) applicable to us; and
- Personal Data may also be disclosed to other parties in respect of whom you have given your express or implied consent to such parties as may be required by law, court, regulator or legal process to disclose.

It may be necessary for us to transfer Personal Data outside of Malaysia if our clients or business associates involved in the provision of our services are located outside of Malaysia or if you are located outside of Malaysia and require our services, in order for us to perform our service. We shall take reasonable steps to ensure that and such transfers of Personal Data are adequately secure.

5.0 RIGHTS TO ACCESS AND CORRECT PERSONAL INFORMATION

In accordance with the Act, individuals have rights to access and correct their Personal Data held by us, if they are of the opinion that such Personal Data held by us is inaccurate, incomplete, misleading or not up-to-date. Accordingly, you may make a written request to us by contacting our PDPA Compliance Officer whose details are documented in Section 11 of this Policy.

Please provide us with proof of your identity, address and other sufficient information to enable us to identify you when submitting your request for accessing or correcting your Personal Data.

6.0 INTEGRITY OF PERSONAL DATA

We will take reasonable steps to make sure that Personal Data which we collect, use or disclose are accurate, complete, not misleading and up-to-date. We wish to encourage you to contact us in the event there is any change to the Personal Data you had furnished to us.

7.0 SECURITY OF PERSONAL DATA

We will take reasonable steps to protect the personal data it holds from loss, misuse, modification, unauthorized or accidental access or disclosure, alteration or destruction.

8.0 DATA BREACH

If there is reason to believe that a personal data breach has occurred, we will, as soon as practicable notify the relevant authorities. If such breach causes or is likely to cause any significant harm to you, we will notify you of the same without unnecessary delay.

9.0 RETENTION OF PERSONAL DATA

The Personal Data collected will only be retained for as long as it is required for the purposes for which it was collected or as required by law.

10.0 LANGUAGE

In the event of inconsistency between the Bahasa Malaysia and English language version of this Policy, the English language version of this Policy shall prevail.

11.0 CONTACT

The contact details of our Data Protection Officer are as follows:

- (a) Email : betsy.chan@onedocgroup.com
- (b) Address : A-3-38 IOI Boulevard
Jalan Kenari 5, Bandar Puchong
Jaya 47100 Puchong, Selangor
- (c) Telephone : 03-8080 9911

12.0 REVISION TO OUR POLICY

We may modify or amend this Policy from time to time at our discretion. The updated version shall apply and supersede any and all previous version. We will update the latest version on our website from time to time.

Our websites may have links to websites maintained by third parties. This Policy applies solely to our websites and does not apply to any third party websites. We are not responsible for the privacy practices of such third party websites. We strongly recommend that you read their respective Personal Data Protection Policies applicable to them and their websites.

PERSONAL DATA PROTECTION POLICY | AKTA PERLINDUNGAN DATA PERIBADI

1.0 PENGENALAN

Polisi Perlindungan Data Peribadi 2010 (“Polisi ini”) menetapkan amalan perlindungan data peribadi berkenaan dengan data peribadi individu yang berurusan dengan 1 Doc International Berhad (No. Pendaftaran 202301046813 (1540727-V)) dan syarikat-syarikat berikut (secara kolektif dirujuk sebagai “Kumpulan”):

- (a) 1 Doc Holding Sdn Bhd (Registration No. 201901043019 (1352349-K));
- (b) 1 Doc Resources Sdn Bhd (Registration No. 201901043594 (1352924-A));
- (c) 1 Doc Trading Sdn Bhd (formerly known as 1 Doc Medical Group Sdn Bhd) (Registration No. 201601006451 (1177379-P));
- (d) 1 Doc Marketing Sdn Bhd (Registration No. 201701034706 (1248877-W));
- (e) 1 Doc Puchong Sdn Bhd ((Registration No. 201601012099 (1183030-W));
- (f) 1 Doc KL Sdn Bhd (Registration No. 201601025887 (1196826-T));
- (g) 1 Doc Austin Sdn Bhd (Registration No. 201701032500 (1246670-P));
- (h) 1 Doc KD Sdn Bhd (Registration No. 201701016915 (1231080-U));
- (i) 1 Doc Subang Sdn Bhd (Registration No. 201701026660 (1240826-X));
- (j) 1 Doc Cheras Sdn Bhd (Registration No. 201801008604 (1270618-X));
- (k) 1 Doc Ipoh Sdn Bhd (Registration No. 201901036067 (1345397-W));
- (l) 1 Doc Seremban Sdn Bhd (Registration No. 202001000443 (1356762-D));
- (m) 1 Doc Sutera Sdn Bhd (Registration No. 202001002945 (1359264-T));
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- (o) 1 Doc (Melaka) Sdn Bhd (Registration No. 201701005899 (1220064-V));
- (p) Hair Doc Group Sdn Bhd (Registration No. 202001026336 (1382656-T));
- (q) Perfect Facelift Sdn Bhd (Registration No. 202101026175 (1426475-H));
- (r) Slim Doc Sdn Bhd (Registration No.202101011505 (1411804-W)); and
- (s) Slim Doc SG Pte Ltd (Registration No. 202224653C).

Polisi ini telah ditetapkan selaras dengan Akta Perlindungan Data Peribadi Malaysia (“AKTA”).

Polisi ini terpakai kepada semua pelanggan, pembekal dan pekerja kami yang sedia ada dan/atau berpotensi. Dengan memberikan Data Peribadi anda kepada kami, anda memberikan persetujuan terhadap pengumpulan, penggunaan, akses, pemindahan, penyimpanan dan pemprosesan Data Peribadi anda seperti yang dinyatakan dalam Polisi ini. Sekiranya anda tidak bersetuju dengan pengumpulan dan/atau pemprosesan Data Peribadi anda oleh kami untuk tujuan-tujuan yang kami anggap sesuai, kami mungkin tidak dapat menyediakan perkhidmatan yang anda perlukan atau mempertimbangkan anda untuk peluang pekerjaan atau melantik anda sebagai pembekal perkhidmatan atau barangan kami. Jika anda tidak bersetuju dengan penggunaan Data Peribadi anda oleh kami, sila hubungi Pegawai Perlindungan

PERSONAL DATA PROTECTION POLICY | AKTA PERLINDUNGAN DATA PERIBADI

Data kami seperti yang dinyatakan dalam Seksyen 11 Polisi ini.

2.0 PENGUMPULAN DATA PERIBADI

Data Peribadi ialah sebarang maklumat yang berkaitan secara langsung atau tidak langsung dengan anda. Ini termasuk maklumat yang boleh digunakan untuk mengenal pasti atau menghubungi anda. Untuk mengelakkan keraguan, sila ambil perhatian bahawa Polisi ini hanya terpakai sekiranya anda adalah seorang individu. Data Peribadi mungkin termasuk tetapi tidak terhad kepada perkara berikut:

Maklumat peribadi seperti nama, nombor kad pengenalan atau pasport, jantina, bangsa, agama, pendidikan, kewarganegaraan, tarikh lahir atau umur, status perkahwinan, pekerjaan, gambar, maklumat akaun bank dan lain-lain;

Maklumat untuk dihubungi seperti alamat, nombor telefon, nombor telefon bimbit, nombor faks, alamat e-mel dan lain-lain;

Maklumat lain yang dikumpul atau mungkin dikumpul oleh *1 DOC International Berhad* atau yang anda berikan kepada kami dari semasa ke semasa berkaitan dengan sebarang perkhidmatan, transaksi, soal selidik, borang soal jawab atau komunikasi dengan *1 DOC International Berhad*; dan

Data Peribadi daripada agensi pelaporan kredit, agensi kerajaan, laporan biro kredit dan sebagainya.

3.0 PENGUMPULAN DAN PEMROSESAN DATA PERIBADI

1 DOC International Berhad mengumpul Data Peribadi anda secara langsung atau tidak langsung bagi tujuan berikut:

a. Daripada Pelanggan Sedia Ada dan/atau Berpotensi

Untuk membolehkan kami menyediakan perkhidmatan secara efektif dan efisien, *1 DOC International Berhad* akan mengumpul dan memproses Data Peribadi berkaitan termasuk tetapi tidak terhad kepada:

- Memproses permintaan anda, memahami keperluan anda dan menawarkan perkhidmatan yang bersesuaian;
- Berkomunikasi dengan anda berkaitan perkhidmatan kami;
- Menjawab pertanyaan daripada pelanggan;
- Tujuan pentadbiran termasuk pengebilan, pembayaran dan kutipan hutang;
- Tujuan insurans;
- Memohon visa perjalanan jika perlu untuk urusan luar negara;
- Melindungi hak atau harta kami dan pengguna kami, dan mematuhi keperluan undang-undang atau peraturan;
- Tujuan pengurusan risiko;
- Siasatan dalaman, audit atau keselamatan;
- Menyimpan rekod seperti yang dibenarkan oleh undang-undang dan standard profesional;
- Tujuan lain yang dibenarkan oleh undang-undang yang berkenaan atau dengan kebenaran anda; dan
- Tujuan berkaitan lain yang berkait dengan mana-mana perkara di atas.

PERSONAL DATA PROTECTION POLICY | AKTA PERLINDUNGAN DATA PERIBADI

b. Daripada Vendor, Pembekal dan Penyedia Perkhidmatan Sedia Ada dan/atau Berpotensi

Data Peribadi dikumpul dan diproses oleh *1 DOC International Berhad* bagi tujuan penilaian, pemilihan, pentadbiran dan untuk mengurus premis kami secara selamat, terjamin dan menepati piawaian kesihatan dan keselamatan.

c. Daripada Pekerja Sedia Ada dan/atau Berpotensi

Data Peribadi dikumpulkan bagi tujuan termasuk tetapi tidak terhad kepada:

- Pengurusan rekod pekerja, pemprosesan gaji, dan caruman statutori.
- Pentadbiran faedah pekerja dan program insurans.
- Pelaksanaan penilaian prestasi dan perancangan pembangunan kerjaya.
- Memastikan keselamatan di tempat kerja dan pematuhan terhadap undang-undang buruh.
- Menyiasat salah laku, tindakan tatatertib, atau aduan.

d. Daripada Pihak Ketiga

Data Peribadi juga boleh dikumpul daripada pihak ketiga yang berkaitan dengan pelanggan atau pekerja kami serta daripada sumber lain yang telah memberikan kebenaran untuk mendedahkan Data Peribadi anda dan/atau yang dibenarkan secara sah oleh undang-undang.

4.0 PENDEDAHAN DATA PERIBADI

Sebagai sebahagian daripada perkhidmatan kami, kami mungkin perlu mendedahkan Data Peribadi anda kepada pihak ketiga seperti:

- Pihak ketiga yang dilantik oleh kami untuk menyediakan perkhidmatan kepada kami atau bagi pihak kami (seperti juruaudit, peguam, setiausaha syarikat, perunding, kontraktor, penasihat profesional, dan sebagainya);
- Agensi penguatkuasaan undang-undang, badan pengawalseliaan atau agensi kerajaan untuk mematuhi kewajipan perundangan atau permintaan pihak berkuasa berkaitan (seperti Suruhanjaya Sekuriti, Bursa Malaysia, SSM, dll);
- Syarikat atau organisasi yang membantu kami dalam memproses dan/atau menyempurnakan transaksi atau penyampaian perkhidmatan;
- Pihak lain yang secara bersama menyediakan perkhidmatan bagi tujuan yang berkaitan;
- Dan pihak lain yang anda telah memberi keizinan secara nyata atau tersirat, atau yang dikehendaki oleh undang-undang.

Jika perlu, Data Peribadi anda mungkin dipindahkan ke luar negara sekiranya pelanggan atau rakan perniagaan kami berada di luar Malaysia atau anda sendiri berada di luar Malaysia. Kami akan mengambil langkah munasabah bagi memastikan pemindahan ini adalah selamat dan terjamin.

5.0 HAK UNTUK MENGAKSES DAN MEMBETULKAN MAKLUMAT PERIBADI

Selaras dengan Akta, anda berhak untuk mengakses dan membetulkan Data

PERSONAL DATA PROTECTION POLICY | AKTA PERLINDUNGAN DATA PERIBADI

Peribadi anda sekiranya anda percaya bahawa maklumat tersebut adalah tidak tepat, tidak lengkap, mengelirukan atau tidak terkini. Anda boleh membuat permintaan bertulis dengan menghubungi Pegawai Pematuhan PDPA kami seperti dalam Seksyen 11.

Sila sertakan bukti pengenalan, alamat dan maklumat mencukupi untuk membolehkan kami mengenal pasti anda.

6.0 KETEPATAN DATA PERIBADI

1 DOC International Berhad akan mengambil langkah munasabah untuk memastikan Data Peribadi yang dikumpul, digunakan atau didedahkan adalah tepat, lengkap dan terkini. Kami menggalakkan anda untuk menghubungi kami sekiranya terdapat perubahan pada Data Peribadi anda.

7.0 KESELAMATAN DATA PERIBADI

1 DOC International Berhad akan mengambil langkah-langkah munasabah untuk melindungi Data Peribadi daripada kehilangan, penyalahgunaan, pengubahsuaian, akses atau pendedahan tanpa kebenaran, perubahan atau kemusnahan secara tidak sengaja.

8.0 PENCEROBOHAN DATA

Jika terdapat sebab untuk mempercayai bahawa berlaku pencerobohan data peribadi, kami akan memaklumkan pihak berkuasa yang berkaitan secepat mungkin. Jika pencerobohan tersebut menyebabkan atau berkemungkinan menyebabkan sebarang kemudaratan yang ketara kepada anda, kami akan memaklumkan perkara ini kepada anda tanpa sebarang kelewatan yang tidak wajar.

9.0 TEMPOH PENYIMPANAN DATA PERIBADI

Data Peribadi yang dikumpul hanya akan disimpan selama mana ia diperlukan bagi tujuan ia dikumpul atau seperti yang dikehendaki oleh undang-undang.

10.0 BAHASA

Sekiranya terdapat ketidakselarasan antara versi Bahasa Malaysia dan versi Bahasa Inggeris Polisi ini, versi Bahasa Inggeris akan diguna pakai.

11.0 HUBUNGI

Butiran Pegawai Perlindungan Data kami adalah seperti berikut:

(a) Emel: betsy.chan@onedocgroup.com

(b) Alamat: A-3-38 IOI Boulevard, Jalan Kenari 5, Bandar Puchong Jaya, 47100 Puchong, Selangor

(b) Telefon: 03-8080 9911

12.0 PENAMBAHBAIKAN POLISI

Kami berhak untuk meminda atau mengemaskini Polisi ini dari semasa ke semasa. Versi terkini akan menggantikan versi sebelumnya dan akan dikemaskini di laman web rasmi kami.

Laman web kami mungkin mengandungi pautan ke laman pihak ketiga. Polisi ini hanya terpakai kepada laman web *1 DOC International Berhad* dan bukan kepada laman pihak ketiga. Kami mengesyorkan anda untuk membaca Polisi Perlindungan Data Peribadi laman web pihak ketiga tersebut.