

# NOTICE UNDER THE PERSONAL DATA PROTECTION ACT 2010 (As Amended in 2024)

## 1. Introduction

This Personal Data Protection Notice (“Notice”) is issued by **OasisEye Specialists Sdn. Bhd.** (“OasisEye”, “we”, “our” or “us”) in accordance with Malaysia’s **Personal Data Protection Act 2010** and the 2024 amendments (“PDPA”). This Notice applies to all patients, employees, vendors, visitors, and other parties whose personal data we process in connection with our services.

## 2. Consent

By engaging with us or providing us your personal data, you consent to the processing of your data as described in this Notice.

### 3. Description of Personal Data Collected

Depending on your relationship with us, we may collect the following types of personal data, including sensitive personal data:

- Name, NRIC / Passport Number, Gender, Date of Birth
- Contact Details (Address, Phone, Email)
- Patient Medical Records, Diagnosis, Treatment History, Medication, Allergies
- Biometric data (if collected), photographs or CCTV footage from clinic premises
- Insurance or payment details
- Emergency contact information
- Employment or professional background (for vendors / partners)
- Consent forms and documentation relating to medical procedures or research

We may also collect physical documents handled by third-party processors such as laboratories.

### 4. Purpose of Data Processing

Your personal data will be processed for purposes including but not limited to:

- Providing medical consultations, diagnostics, treatment, and follow-up care
- Managing patient registration, billing, insurance claims, and record-keeping
- Verifying your identity and medical history
- Complying with MOH guidelines and LHDN e-Invoicing requirements
- Notifying and handling medical emergencies
- Responding to inquiries and feedback
- Securing our systems and premises (including visitor ID verification)
- Training and auditing for clinical and operational quality
- Marketing (with separate consent)

## 5. Legal Basis for Processing

We process your personal data based on one or more of the following legal grounds:

- Consent
  - a. When you submit a contact form or register for an appointment
- Contractual Necessity
  - a. When processing is required to fulfill a service that you've requested
- Legal Obligation
  - a. To comply with applicable laws (e.g. Ministry of Health (MoH), Inland Revenue Board (LHDN))
- Legitimate Interests
  - a. For website security, fraud prevention, or improving user experience, balanced against your rights and interests

## 6. Disclosure to Third Parties

We may disclose your data to:

- Government agencies (e.g. Ministry of Health (MoH), Inland Revenue Board (LHDN))
- Insurance companies and healthcare partners
- Blood testing vendors (e.g., Pathlab, Gribbles), subject to physical data custody obligations
- IT Service Providers, Cloud Storage, Cybersecurity Teams
- Legal, Regulatory, or Enforcement authorities
- Next of kin or emergency contacts (where necessary)

Third-party partners must comply with OasisEye's *Third-Party Data Handling Policy* including use of *ID badges with full name and NRIC*, and consent to *ID verification or scanning* before accessing sensitive zones.

## 7. Data Subject Rights

Under the PDPA 2024, you have the right to:

- Access and correct your personal data
- Withdraw or limit consent (subject to medical / legal implications)
- Object to certain processing activities, including direct marketing
- Lodge complaints via our appointed Data Protection Officer (DPO)

## 8. Security Measures

We adopt technical and organizational safeguards, including:

- Role-based access controls
- Encryption of data in transit and at rest
- Audit logs and breach monitoring
- Physical document handling protocols for labs and courier personnel
- Regular training on cyber hygiene and PDPA for all staff

## 9. Retention and Destruction

Personal data is retained only as long as necessary for medical, legal, or regulatory purposes.

## 10. Transfer of Data Outside Malaysia

Any transfer of personal data outside Malaysia will comply with applicable regulations, including data transfer agreements or safeguarding mechanisms.

## 11. Conflict

In the event of any conflict between the Bahasa Malaysia version and the English version of this Notice, the English version shall prevail.

## 12. Amendments

We may update and amend this Notice from time to time to reflect changes in law, regulatory guidance, or operational requirements. Any amendments will be communicated via notices on our official website, internal email, or other appropriate channels. By continuing to engage with us after such amendments, you will be deemed to have accepted the updated Notice.

## 13. DPO Contact Information

Questions or requests regarding your data may be directed to:

**Eugene Teow** | Group Data Protection Officer

**OasisEye Specialists Sdn. Bhd.**

Email: [oes-dpo@oasiseye.my](mailto:oes-dpo@oasiseye.my)

Phone: [+60 3 2730 7690](tel:+60327307690)