

## **Private Policy**

### **1. Introduction to this Privacy Policy**

- 1.1 At Medcyto, we take your privacy seriously. We are committed to complying with all data protection/privacy laws which are applicable to us.
- 1.2 In the course of providing you with the service or access to the Platform (as defined in the terms of use), we will be collecting, using, disclosing and /or processing data, including your personal data.
- 1.3 This Privacy Policy exists to keep you in the know about how we collect, use, disclose and/or process the data we collect and receive during the course of providing the services or access to the Platform to you, our customer. We will only collect, use, disclose and/or process your personal data in accordance with this Privacy Policy.
- 1.4 It is important that you read this Privacy Policy together with any other applicable notices we may provide on specific occasions when we are collecting, using, disclosing and/or processing personal data about you, so that you are fully aware of how and why we are using your personal data.
- 1.5 We may update this Privacy Policy from time to time. Any changes we make to this Privacy Policy in the future will be posted on this page and, where appropriate, notified to you, whereupon your continued use of the services, access to the platform or use of the services, including placing orders on the platform, shall constitute your acknowledgment and acceptance of the changes we make to this Privacy Policy, as notified to you. Please check back frequently to see any updates or changes to this Privacy Policy.
- 1.6 This Privacy Policy applies in conjunction with other notices, contractual clauses and consent clauses that apply in relation to the collection, use, disclosure and/or processing of your personal data by us, and is not intended to override them unless we state expressly otherwise.

1.7 You can visit the platform and browse without having to provide personal details. However, you will be required to sign up for an account if you wish to use the services.

1.8 If you have any comments, suggestions or complaints in relation to your personal data, please contact us through our Contact Us page.

## **2. The Personal Data We Collect from You**

2.1 Personal Data means any information, whether recorded in a material form or not, from which the identity of an individual is apparent or can be reasonably and directly ascertained by the entity holding the information, or when put together with other information would directly and certainly identify an individual.

2.2 During the course of your use of the platform and the provision of the services, we may collect personal data from you, which includes but is not limited to:

- (a) Identity data, such as your name, gender, profile picture, and date of birth;
- (b) Contact data, such as billing address, delivery address, email address and phone numbers;
- (c) Account data, such as bank account and payment details;
- (d) Transaction data, such as details about payments to and from you, and other details of products and services you have purchased from us;
- (e) Technical data, such as internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and version, operating system and platform, and other technology on the devices you use to access the platform;
- (f) Profile data, such as your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses;

- (g) Location data, such as when you capture and share your location with us in the form of photographs or videos and upload such content to the platform;
- (h) Biometric data, such as voice files when you use our voice search function, and facial images when you upload videos of yourself to the Platform; and
- (i) Marketing and communications data, such as your preferences in receiving marketing from us and our third parties and your communication preferences.

2.3 During the course of your use of the platform and the provision of the services, we may receive personal data from you in the following situations:

- (a) When you create an account with us;
- (b) When you apply for any of the services or purchase any products available on the platform;
- (c) When you use any of the features or functions available on the platform or services, including the recording of any user-generated content to be uploaded on the platform;
- (d) When you subscribe to our publications or marketing collaterals;
- (e) When you enter a competition, promotion or survey;
- (f) When you participate in any activity or campaign on the platform;
- (g) When you log in to your account on the platform or otherwise interact with us via an external service or application, such as Facebook or Google;
- (h) When any other user of the platform posts any comments on the content you have uploaded on the platform or when you post any comments on other user's content uploaded to the platform;

- (i) When a third party lodges a complaint against you or the content you have posted on the platform;
- (j) When you access or use mobile games on the platform; and
- (k) When you interact with us offline, including when you interact with our outsourced customer service agents.

2.4 During the course of your use of the platform and the provision of the services, we may also receive your personal data from third parties for the purposes set out in this Privacy Policy or any other terms.

2.5 You must only submit personal data which is accurate and not misleading and you must keep it up to date and inform us of any changes to the personal data you have provided to us. We shall have the right to request for documentation to verify the personal data provided by you as part of our customer verification processes.

2.6 We will only be able to collect your personal data if you voluntarily submit the personal data to us or as otherwise provided for under this Privacy Policy. Unfortunately, if you choose not to submit your personal data to us or subsequently withdraw your consent to our use of your personal data, we may not be able to provide you with the services or access to the platform.

2.7 You may access and update your personal information submitted to us at any time as described below.

2.8 If you provide personal data of any third party to us, you represent and warrant that you have obtained the necessary consent from that third party to share and transfer his/her personal data to us, and for us to collect, use and disclose that data in accordance with this Privacy Policy.

### **3. Use and Disclosure of Personal Data**

3.1 The personal data we collect from you or via third parties may be used by us, or shared with or transferred to third parties (including related companies, third party service providers and their service providers and related companies, third party sellers, and companies

located both inside and outside your home country), for certain purposes, which include but are not limited to the following:

- (a) To facilitate your use of the services or access to the platform, including responding to your queries, feedback, claims or disputes through our outsourced customer service agents;
- (b) To process orders, you submit through the platform;
- (c) Payment that you make through the platform for products, whether sold by us or a third party seller, will be processed by our agent;
- (d) To deliver the products you have purchased through the platform, whether sold by us or a third party seller. We may pass your personal information on to a third party in order to make delivery of the product to you (for example to our courier or supplier), whether the product is sold through the platform by us or a third party seller;
- (e) To update you on the delivery of the products, whether sold through the platform by us or a third party seller, and for customer support purposes;
- (f) To compare information, and verify with third parties in order to ensure that the information is accurate;
- (g) To administer your account (if any) with us;
- (h) To verify and carry out financial transactions in relation to payments you make online;
- (i) To audit the downloading of data from the platform;
- (j) To improve the layout or content of the pages of the platform and customize them for users;
- (k) To identify visitors on the platform;
- (l) To carry out research on our user's demographics and behavior;

- (m) To provide you with information we think you may find useful or which you have requested from us, including information about our or third party seller's products and services, provided you have indicated that you have not objected to being contacted for these purposes;
- (n) To allow other users to identify you via the "Find my friend" (or similar function) as a user of the service, to allow you to find other users and to connect with them on the platform, and to support the socializing function of the service;
- (o) To promote the services and use information that you give to us, such as user-generated content (including video content) that you can choose to broadcast on our platform, as part of our advertising and marketing campaigns to promote the platform;
- (p) To process any complaints, feedback, enforcement action and take-down request in relation to any content you have uploaded to the platform;
- (q) To display on scoreboards on the platform in relation to campaigns, mobile games or any other activity;
- (r) To derive further attributes relating to you based on personal data provided by you (whether to us or third parties), in order to provide you with more targeted and/or relevant information;
- (s) We may also use your personal information to send you marketing or promotional materials about our or third party seller's products and services from time to time, unless you choose to opt-out from receiving these materials; and
- (t) We may also conduct automated-decision making processes in accordance with any of these purposes.

3.2 You may unsubscribe from receiving marketing information at any time by using the unsubscribe function within the electronic marketing material. We may use your contact information to send newsletters from us and from our related companies.

- 3.3 In exceptional circumstances, we may be required to disclose personal information, such as when there are grounds to believe that the disclosure is necessary to prevent a threat to life or health, or for law enforcement purposes, or for fulfilment of legal and regulatory requirements and requests.
- 3.4 We may share and permit the sharing of your personal data with third parties and our affiliates for any of the above mentioned purposes, including but not limited to, facilitating your use of the services, completing a transaction with you, managing your account and our relationship with you, marketing and fulfilling any legal or regulatory requirements and requests as deemed necessary by us. In sharing your personal data with them, we endeavor to ensure that the third parties and our affiliates keep your personal data secure from unauthorized access, collection, use, disclosure, processing or similar risks and retain your personal data to achieve the abovementioned purposes.
- 3.5 If you are located in Malaysia, we may transfer or permit the transfer of your personal data outside of Malaysia for any of the purposes set out in this Privacy Policy.

#### **4. Withdraw of Consent to Continued Use, Disclosure and/or Processing of Personal Data**

- 4.1 You may communicate the withdraw of your consent to the continued use, disclosure and/or processing of your personal data including personal data relating to others who may be identified from that personal data for any of the purposes and in the manner as stated above at any time, by contacting our Data Protection Officer through the Contact Us page.
- 4.2 Please note that if you communicate your withdrawal of your consent to our use, disclosure or processing of your personal data for the purposes and in the manner as stated above, we may not be in a position to continue to provide the services to you or perform on any contract we have with you, and we will not be liable in the event that we do not continue to provide the services to, or perform our contract with you. Our legal rights and remedies are expressly reserved in such an event.

## **5. Updating Your Personal Data**

- 5.1 It is important that the personal data you provide to us is accurate and complete for you to continue using the platform and for us to provide the services. You are responsible for informing us of changes to your personal data, or in the event you believe that the personal data we have about you is inaccurate, incomplete, misleading or out of date.
- 5.2 You can update your personal data anytime by accessing your account on the platform. If you are unable to update your personal data through your account, you can do so by contacting our Data Protection Officer through our Contact Us page.
- 5.3 We take steps to share the updates to your personal data with third parties and our affiliates with whom we have shared your personal data if your personal data is still necessary for the above-stated purposes.

## **6. Accessing Your Personal Data**

- 6.1 If you would like to request information about your personal data which we have collected, or enquire about the ways in which your personal data may have been used, disclosed or processed by us within the past year, please contact our Data Protection Officer through our Contact Us page. In order to facilitate processing of your request, it may be necessary for us to request further information relating to your request.
- 6.2 We reserve the right to charge a reasonable administrative fee for retrieving your personal data records. If so, we will inform you of the fee before processing your request.
- 6.3 We will respond to your request as soon as reasonably possible. If we are unable to respond to your request within twenty-one (21) days from the date of your request, we will inform you in writing. If we are unable to provide you with any personal data or to make a correction requested by you, we shall generally inform you of the reason why we are unable to do so (except where we are not required to do so under the applicable data protection laws).

## **7. Security of Your Personal Data**



7.1 To safeguard your personal data from unauthorized access, collection, use, disclosure, processing, copying, modification, disposal, loss, misuse, modification or similar risk, we have introduced appropriate administrative, physical and technical measure such as;

(a) Restricting access to personal data to individuals who require access;

(b) Maintaining technology products to prevent unauthorized computer access; and

(c) Using 128-bit SSL (secure sockets layer) encryption technology when processing your financial details.

7.2 If you believe that your privacy has been breached by Medcyto, please contact our Data Protection Officer through our Contact Us page.

7.3 You should be aware, however, that no method of transmission over the internet or method of electronic storage is completely secure. While security cannot be guaranteed, we strive to protect the security of your information and are constantly reviewing and enhancing our information security measures.

7.4 Your password is the key to your account. Please use unique numbers, letters and special characters, and do not share your password to anyone. If you do share your password with others, you will be responsible for all actions taken in the name of your account and the consequences. If you lose control of your password, you may lose substantial control over your personal data and other data submitted. You could also be subject to legally binding actions taken on your behalf. Therefore, if your password has been compromised for any reason or if you have grounds to believe that your password has been compromised, you should immediately Contact Us and change your password. You are reminded to log out of your account and close the browser when you are finished with using a shared computer.

## **8. Retention of Personal Data**

8.1 We will only retain your personal data for as long as we are either required to by law or as is relevant for the purposes for which it was collected.

8.2 We will cease to retain your personal data, or remove the means by which the data can be associated with you, as soon as it is reasonable to assume that such retention no longer serves the purposes for which the personal data was collected, and is no longer necessary for any legal or business purposes.

## **9. Collection of Computer Data**

9.1 We or our authorized service providers may use cookies, web beacons, and other similar technologies for storing data to help provide you with a better, faster, safer and personalized experience when you use the services or access the platform.

9.2 When you visit the platform through your computer, mobile device, or any other device with internet connectivity, our company servers will automatically record data that your browser sends whenever you visit a website. This data may include:

(a) Your computer or device's IP address;

(b) Browser type;

(c) Webpage you were visiting before you came to the platform;

(d) The pages within the platform which you visit; and

(e) The time spent on those pages, item and data searched for on the platform, access times and dates, and other statistics.

9.3 This data is collected for analysis and evaluation in order to help us improve our website and the services and products we provide.

9.4 Cookies are small text file (typically made up of letters and numbers) placed in the memory of your browser or device when you visit a website or view a message. They allow us to recognize a particular device or browser and help us to personalize the content to match your preferred interests more quickly, and to make the services and the platform more convenient and useful to you.

9.5 You may be able to manage and delete cookies through your browser or device setting. For more information on how to do so, visit the help material of your browser or device.

9.6 Web beacons are small graphic images that may be included on our services and the platform. They allow us to count users who have viewed these pages so that we can better understand your preference and interests.