

## SELangkah Privacy Statement

This Privacy Statement states out how Selangkah Ventures Sdn Bhd (Company No: 1379166-D an affiliate and subsidiary of **Selgate Healthcare Sdn Bhd**, a company under Selangor State Development Corporation (PKNS), (hereinafter, “**SELangkah**”, “**we**”, “**us**”, or “**our**”), shall obtain, how we may use and retain personal data, with whom we may share it, and how you may exercise your rights and choices with respect to our processing of that information. This Privacy Statement also describes the measures we take to safeguard the personal data we obtain and how you may contact us if you have questions about our privacy practices that are in accordance with the Personal Data Protection Act 2010 (“**PDPA**”).

This Privacy Statement must be read in conjunction with the Selangkah Terms of Use (the “**Terms**”). Unless otherwise stated, all other capitalized terms contained in this Privacy Statement shall have the meaning given to it in the Terms.

In the event of inconsistency or ambiguity between the terms stated in this English version and the Bahasa Malaysia version, this English version shall prevail.

1. This Privacy Statement describes our practices regarding the personal data we obtain, including but not limited to:
  - a) your download and use of Selangkah through any Registered Mobile Device, Selangkah Mobile, any automated registration system set up at any of the participating business premises to facilitate the contact-tracing process ;
  - b) your use of all other Selangkah content, products, services and functionality available through our Selangkah Website, social media pages and other digital platforms we operate and control, whether directly or indirectly via third parties that reference this Privacy Statement (the “**Site**”);
  - c) through third-party sources, including other government entities, business partners, advertising and social media companies, service providers, vendors (“**Third Party**”); and
  - d) through other data collection points that reference this Privacy Statement,

(collectively, the “**Channels**”)

2. Depending on the Channels you use, you agree to the terms of this Privacy Statement and you will be deemed to have consented to the collection, use and disclosure of your personal data in accordance with this Privacy Statement. For the purpose of this Privacy Statement, the terms "personal data" and "processing" shall have the meaning prescribed in PDPA.

### TYPE OF PERSONAL DATA

- a) 3. We collect personal data about you in different ways and from various sources including, without limitation, when you Use Selangkah and Selangkah Features, when you Use your Registered Mobile Device to scan a QR code belonging to Public Agencies or Approved Service Providers, an automated registration system set up at any of the participating business premises to facilitate the contact-tracing process, or contact us by email or phone. Depending on the Channels you use and the nature of your interactions with us, you may provide us with certain types of personal data, including but not limited to: relating to your Account, such as your Account number, Selangkah ID number;
- b) information about you from data source(s) approved by us, for example, Approved Service Providers;
- c) information from your Registered Mobile Device including but not limited to your location information, IP address, MAC address, network interfaces, device type and model, and other forms of data from your Device in connection with the Use of Selangkah or Selangkah Features;
- d) information relating to the version of Selangkah Mobile on your Device or your Use of Selangkah or Selangkah Features but not limited to information relating to the usage of various functionalities as well as Device permissions such as the permission to push notifications, use location services, use any connectivity services and other similar information;
- e) your health report and/or information resulting from Selangkah Screening;
- f) your contact information such as name, email address, phone number, postal address;
- g) your demographic information such as age, date of birth, marital status, race and sex;
- h) billing and financial information;
- i) your Login Credentials for Using Selangkah and Selangkah Features, any Generated Content, user account information such as username and password, time and location data;
- j) inferences drawn from any of the information identified above to create a profile about you reflecting your preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities and aptitudes; and
- k) any other personal data or information you provide through the Channels.

#### **HOW WE USE THE PERSONAL DATA**

4. Please read this Privacy Statement to understand how we use the personal information we may collect from you. By providing your personal data to us, you are consenting to this Privacy Statement and the collection, use, access, transfer, storage and processing of your personal information as described in this Privacy Statement. We use the personal data we obtain for various purposes (“Purposes”), including but not limited to:

- a) monitoring and enforcement purposes by Government authorities in dealing with the COVID-19 pandemic vide Selangkah and Selangkah Features;
- b) to assist, process and facilitate your Use of Selangkah and Selangkah Features, including registering and creating your Account, facilitating your login into your Account and your Use of any features or functionalities of Selangkah and Selangkah Features;
- c) to carry out your instructions or respond to any queries, feedback or complaints provided by you or on your behalf, or otherwise for the purposes of responding to or dealing with your interactions with us;
- d) for the purpose of storing or creating backups of your data for contingency or business continuity purposes;
- e) to populate your Profile Data for the use of Selangkah and Selangkah Materials;
- f) to pre-fill any e-form, user registration page or screen on any Approved Recipients Channels with your Profile Data;
- g) managing our responses and communications with you;
- h) to manage staff training and quality assurance;
- i) to produce data, reports and statistics which shall be anonymised or aggregated in a manner that does not identify you as an individual;
- j) to conduct marketing activities;
- k) to maintain records required for security, claims or other legal purposes;
- l) to detect and prevent fraudulent activity;
- m) to comply with legal and regulatory requirements;
- n) for any other purposes that is required or permitted by any law, regulations, guidelines and/or relevant regulatory authorities;
- o) to respond to your inquiries related to employment opportunities or other requests;
- p) to send offers and promotional materials related to our services and for other marketing purposes with your consent;
- q) to track user-specific information on what pages users access or visit;
- r) to improve and customize the quality of experience when you interact with Selangkah and Selangkah Features;
- s) for our day to day operations and administrative purposes including account management, billing and collection, audits, reporting and investigations;
- t) for the purposes of enforcing or defending our legal rights and/or obtaining legal advice;
- u) to assist in the prevention, detection or investigation of crime or possible criminal activities or for the administration of justice;
- v) for security and internal audit purposes;
- w) data analytics including to maintain and improve our products and services;
- x) for such other purposes as may be directed or consented to by you; and
- y) for all other purposes in relation to or incidental to the above.

5. In the course of your Use of Selangkah or Selangkah Features, we may collect personal data relating to other individuals from you, for example if you are an Organisation. Under these circumstances:

a) You shall, prior to disclosing to us such personal data relating to other individuals -

(i) notify these individuals (A) that you will be providing their personal data to us; and (B) of the Purposes for which we will be collecting, using, disclosing and processing their personal data, as set out in this Privacy Statement and as notified by us to you from time to time; and

(ii) obtain the consent from the individuals whose personal data are being disclosed, permitting (A) you to disclose the personal data to us; and (B) us to collect, use, disclose and process these individuals' personal data, for the Purposes.

b) You represent and warrant that -

- the personal data that you will be providing us or have provided us is, complete, accurate, true and correct; and
- you have the valid authority and consent from these individuals to act on their behalf and provide their personal data to us to collect, use, disclose and process for the Purposes.

### **CHOICE**

4. You have the choice, at any time, not to provide your personal data or to revoke your consent to Selangkah and Selangkah Features for processing your personal data (as provided by Section 38 of PDPA). However, failure to provide such personal data or revocation of your consent to process personal data may result in us being unable to effectively carry out the preventive and control measures effective for contact-tracing. We may not be able to contact you in the event that we have identified that somebody who is at risk of being infected with Covid-19 visited the same premises as you.

5. If you choose not to provide us with certain information or revoke your consent to the use and disclosure of personal data by us, we may also not be able to offer you certain products and services and you may not be able to Use Selangkah or Selangkah Features, or any part thereof.

### **COOKIES AND SIMILAR TECHNOLOGIES**

6. We may use cookies, web beacons and similar technologies on our Channel that collect certain information about you by automated means. A “cookie” is a small text file that websites send to a visitor’s computer or other Internet-connected device to identify the visitor’s browser or

to store information or settings in the browser. A “web beacon”, also known as an Internet tag, pixel tag or clear GIF, links web pages to web servers and their cookies and may be used to transmit information collected through cookies back to a web server. Depending on the Channel (such as advertising networks, digital advertising partners and social media platforms), we may collect information about your online activities, over time and across third-party websites. Such information may be used to provide you with advertising about products and services tailored to your interest or to provide you with enhanced products and services.

7. We may collect server logs. Server logs are files and records of activity created by the Device that you Use Selangkah or Selangkah Features from. For example, a web server log may record a history of page requests whereas other logs may record errors, access attempts or other information about your Device, such as your IP address or your Device’s cookie settings. We collect and retain such server logs for administrative, security and troubleshooting purposes.

#### **HOW WE SHARE PERSONAL DATA**

8. We may share your personal information with certain third parties, including as indicated below:

- a) Selangor State Government’s Task Force for Covid19 (“STFC”);
- b) enforcement regulatory and governmental agencies as permitted or required by law, authorised by any order of court or to meet obligations to regulatory authorities;
- c) Our affiliates and subsidiaries to carry out the purposes set out in this Privacy Statement;
- d) Approved Service Providers and relevant third party service providers in connection with your Use of Selangkah and Selangkah Features, unless such sharing is prohibited by written law;
- e) Service providers, suppliers, agents and other business partners to help us provide our products and services and to perform services on our behalf such as maintenance, IT services and support, analysis and analytics, audit, payments, marketing and security

9. We may disclose your personal data under the following circumstances:

- a) when we believe disclosure is necessary to prevent physical harm or financial loss to Selangkah and Selangkah Features;
- b) to establish, exercise, or defend our legal rights;
- c) in connection with an investigation of suspected or actual fraud, illegal activity, security, or technical issues;

- d) In addition, we reserve the right to transfer to relevant third parties the personal information we have about you in the event of a potential or actual sale or transfer of all or a portion of our business or assets (including in the event of a merger, acquisition, joint venture, reorganization, divestiture, dissolution, or liquidation), or other business transaction;
- e) We also may share the information in other ways for which we provide specific notice at the time of collection and obtain your consent to the extent required by applicable law.

### **DATA TRANSFERS**

- 10. We may transfer the personal information we collect about you to other countries outside of Malaysia, including countries in which our Approved Service Providers, subsidiaries or other service providers operate. By agreeing to this Privacy Statement, you consent to us transferring your personal data outside of Malaysia for the purposes stated herein. When we transfer your information to other countries, we will implement appropriate safeguards to help ensure that we protect your personal data as described in this Privacy Statement and in accordance with PDPA.

### **CONTROL**

- 11. To reassure you further on our obligation to protect data as a state-owned entity, Section 203A of the Penal Code provides that any person who discloses any information which has been obtained by him in the performance of his duties under any written law shall be punished with a fine of not more than RM 1,000,000.00 or with imprisonment for a term which may extend to one year, or with both.

### **SECURITY: HOW WE PROTECT YOUR PERSONAL DATA**

- 12. Selangkah uses a secure web browser and our database is encrypted. Amongst other security implementations, we assure you that we have taken the relevant appropriate technical and organizational measures to protect and secure the personal information provided to us on Selangkah and Selangkah Features.
- 13. **Disclaimer:** No method of transmission over the Internet, or method of electronic storage, is 100% secure. Therefore, while we use reasonable efforts to protect your personal data, we cannot guarantee its absolute security.

### **STORAGE**

14. Your personal data may be stored in servers, systems or devices owned, operated or managed by us, a relevant Third Party or any third party service provider engaged by us or a relevant Third Party, or on your Device, and may be used by us (or our third party service providers) and Approved Service Providers to facilitate your Use of Selangkah or Selangkah Features.
15. To the extent permitted by applicable law, we typically retain personal data we obtain about you for as long as it is needed:
  - a) For the purposes for which we obtained it and in accordance with the terms of this Privacy Statement, which generally means that we will keep your personal data for the duration of (i) the Covid19 pandemic exists as a public health to our community; and (ii) our relationship in the provision of products and services on Selangkah and Selangkah Features;
  - b) To take into account applicable statute of limitation periods and comply with applicable laws;
  - c) For legitimate business purposes to the extent permitted by applicable law.

To the extent provided by law, you may request that we delete your personal data or restrict the processing of such information by contacting us indicated below.

#### **ACCESS AND CORRECTIONS**

16. You may request to access, amend, or correct the information submitted to us by emailing [info@selangkah.my](mailto:info@selangkah.my) with your name and mobile number you used to submit to Selangkah.
17. Once we have received your email, we shall take the necessary actions to amend or correct your information (name, mobile number and date and time of visit of the premise) from our centralized server accordingly.
18. On how to manage cookies and opt out of online advertising, your opt-out will be specific to the web browser or Device you use at the time you exercise your opt-out rights; if you use multiple web browsers or devices, you will need to opt-out from each browser and Device.

#### **CHANGES TO THIS PRIVACY STATEMENT**

19. We may review and update this Privacy Statement from time to time to reflect changes and modification in Selangkah and Selangkah Features, the law, changes in the contact-tracing initiative and the community's changing privacy expectations. Your continued Use of Selangkah or Selangkah Features following the posting of any changes or modification will constitute your acceptance of such change or modification. If you do not agree to any change or modification to this Privacy Statement, please do not use Selangkah and Selangkah Features.
20. You are advised to check this Privacy Statement occasionally to ensure that you are aware of

the most recent version which apply each time you access. You may also contact Selangkah at [info@selangkah.my](mailto:info@selangkah.my) to obtain the latest version of this Privacy Statement at any time.