

Privacy Policy

Effective from: 14th September 2021

This Privacy Policy describes how CLEA Technology Sdn Bhd, its respective subsidiaries, affiliates and/or associated companies (collectively "**CLEA**", "**we**", "**us**" or "**our**") manages Personal Data (as defined) which is subject to the Malaysia Personal Data Protection Act 2010 ("**the Act**").

By accessing and using CLEA's mobile applications, websites, platforms and/or its related software (collectively, "**CLEA Sites**"), as well as services provided by CLEA and/or our healthcare provider ("**Third Party Provider**") (collectively, "**Services**"), you agree and consent to CLEA, as well as its representatives and/or agents collecting, using, processing, and disclosing your Personal Data, and disclosing such Personal Data to our Third Party Provider and relevant third parties in the manner set forth in this Privacy Policy.

This Privacy Policy applies to our users, clients, agents, vendors, partners, contractors, healthcare providers and/or any other service providers (collectively "**you**", "**your**" or "**yours**").

1. PERSONAL DATA

- 1.1. "Personal Data" is any information which can be used to identify you or from which you are identifiable. This includes but is not limited to your name, nationality, telephone number, bank and credit card details, email address, your image, video capturing your image/motion undergoing virtual Covid screening service alongside with registered Covid RTK homes test kit, national registration identification card number, passport number, postal address, age, telephone number, mobile number, SOCSO details, employment details, biometric data, race, date of birth, marital status, religion, medical, health and other health related data.

2. COLLECTION OF PERSONAL DATA

- 2.1. We collect Personal Data about you in the ways listed below. We may also combine the collected Personal Data with other Personal Data in our possession.
- 2.2. Generally, we collect Personal Data in the following ways:
 - 2.2.1. when you complete a user profile or registration forms (including but not limited to your name, contact information and other identification information where needed);
 - 2.2.2. when you provide information to assess your eligibility to provide service as a healthcare provider (including but not limited to information related to your license, permit and/or approval as well as due diligence check results (as legally permissible));
 - 2.2.3. when you enter into any agreement or provide other documentation or information in respect of your interactions with us and/or when you use our Services and/or through operation of CLEA Sites;
 - 2.2.4. when you verify your identity through various means (including but not limited to submission of selfie images or independently verified payment card information);
 - 2.2.5. when you agree to undergo virtual Covid screening with in-app audio and/or video recording features whereby your Personal Data may be captured through your interaction with us and/or our healthcare provider through in-app audio and/or video recording during the virtual Covid screening (including but not limited to your image or voice or both);

- 2.2.6. when you interact with us via CLEA Sites and/or our social media pages and/or participate in events organised by us (including but not limited to the pictures, audio files, or videos you may submit, which may include images of yourself);
 - 2.2.7. 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; and/or
 - 2.2.8. when you submit your Personal Data to us for any other reasons.
- 2.3. Some of the Personal Data that we collect is sensitive in nature. This includes Personal Data pertaining to your race, national ID information, religious beliefs, background information (including financial and criminal records, where legally permissible), medical, health and other health related data, disability, and biometric data, as applicable. We collect this information only with your explicit consent and/or in strict compliance with applicable laws.
- 2.4. As a parent or legal guardian, please do not allow minors under your care to submit Personal Data to CLEA. In the event that such Personal Data of a minor is disclosed to CLEA, you hereby consent to the processing of the minor's Personal Data and accept and agree to be bound by this Privacy Policy and take responsibility for his/her actions.
- 2.5. If you provide us with any Personal Data relating to a third party (including but not limited to 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.
- 2.6. 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 Services you have requested and/or delays in providing you with Services you have requested.
- 2.7. For purposes such as detection and prevention of fraud, we may also collect your Personal Data without consent, by relying on exemptions provided by the applicable data privacy laws.
- 2.8. In certain circumstances, you may need to provide your Personal Data in order to comply with legal requirements or contractual obligations, or where it is necessary to conclude a contract. Failure to provide such Personal Data, under such circumstance, may constitute failure to comply with legal requirements or contractual obligations, or inability to conclude a contract with you, as the case may be.

3. USE OF PERSONAL DATA

- 3.1. CLEA may use, combine, and process your Personal Data for the following purposes ("**Purposes**"):
- 3.1.1. providing you with Services;
 - 3.1.2. engaging you to provide Services;
 - 3.1.3. creating, administering, and updating your user account;
 - 3.1.4. conducting due diligence checks and risk assessments / analysis;

- 3.1.5. verifying your identity and age (where necessary);
 - 3.1.6. validating your payments and virtual Covid screening process;
 - 3.1.7. offering, obtaining, providing, facilitating, maintaining and/or financing solutions;
 - 3.1.8. protecting the security or integrity of the Services and any facilities or equipment used to make the Services available;
 - 3.1.9. enabling communications between user, other user and/or healthcare provider;
 - 3.1.10. enabling our healthcare provider to manage and allocate virtual Covid screening resources;
 - 3.1.11. responding to, processing, and handling your queries, feedback, complaints, and requests;
 - 3.1.12. facilitating business asset transactions (which may extend to any mergers, acquisitions, and/or asset sales)
 - 3.1.13. matching any Personal Data held which relates to you for any of the purposes listed herein;
 - 3.1.14. monitoring or recording in-app screening and user-facing interactions for quality assurance, employee training and performance evaluation and identity verification purposes;
 - 3.1.15. in connection with any claims, actions, or proceedings (including but not limited to drafting and reviewing documents, transaction documentation, obtaining legal advice, and facilitating dispute resolution), and/or protecting and enforcing our contractual and legal rights and obligations;
 - 3.1.16. preventing, detecting, and investigating crime and analysing and managing commercial risks;
 - 3.1.17. conducting any form of investigations including but not related to those relating to crime and prosecutions;
 - 3.1.18. meeting or complying with any applicable rules, laws, regulations, codes of practice or guidelines issued by any legal or regulatory bodies which are binding on CLEA (including but not limited to responding to regulatory complaints, disclosing to regulatory bodies, and conducting audit checks, due diligence, and investigations); and/or
 - 3.1.19. purposes which are reasonably related to the aforesaid.
- 3.2. Furthermore, where permitted under the Act, CLEA may also collect, use, and disclose your Personal Data for the following "Additional Purposes":
- 3.2.1. taking or filming photographs and videos for corporate publicity or marketing purposes, and featuring your photographs and/or testimonials in our articles and publicity materials;
 - 3.2.2. providing or marketing services and benefits to you, including promotions and/or service upgrades;

- 3.2.3. organising roadshows and/or campaigns (including health talks and vaccination campaigns);
 - 3.2.4. matching Personal Data with other data collected for other purposes and from other sources (including third parties) in connection with the provision or offering of Services;
 - 3.2.5. sending you details of Services, health-related updates and information, either to our user generally, or which we have identified may be of interest to you;
 - 3.2.6. conducting market research, aggregating, and analysing user profiles and data to determine health-related patterns and trends, understanding, and analysing user behaviour, preferences, and demographics for us to offer you other products and services as well as special offers and marketing programmes which may be relevant to your preferences and profile; and/or
 - 3.2.7. purposes which are reasonably related to the aforesaid.
- 3.3. If you have provided us with your contact details and have indicated that you consent to receiving marketing or promotional information, we may use your Personal Data to market the Services, events and/or promotions. For instance, we may send you alerts, newsletters, updates, mailers, promotional materials, special privileges, festive greetings; and notify, invite, and manage your participation in our events or activities.
- 3.4. You have a choice to withdraw your consent for receiving marketing or promotional materials/communication. You may contact us using the contact details found below.
- 3.5. Please note that even if you withdraw your consent for the receipt of marketing or promotional materials, we may still contact you for other purposes in relation to the services that you have requested or purchased from CLEA.

4. DISCLOSURE OF PERSONAL DATA

- 4.1. CLEA will take reasonable steps to protect your Personal Data against unauthorised disclosure. Subject to the provisions of any applicable law, your Personal Data may be disclosed, for the Purposes listed above (where applicable) to the following entities or parties:
- 4.1.1. CLEA's subsidiaries, associated companies, jointly controlled entities, and affiliates;
 - 4.1.2. third party clinics, hospitals, medical institutions, doctors, nurses and/or other medical assistant;
 - 4.1.3. owner of CLEA accounts that you may use (including but not limited to your employer when you use your employer's CLEA corporate user account);
 - 4.1.4. external banks, credit card companies, other financial institutions, and their respective service providers;
 - 4.1.5. our professional advisers such as consultants, auditors, and lawyers;
 - 4.1.6. marketing partners and other service providers or business partners (including but not limited to cloud storage providers, data analytics providers, marketing

partners and marketing platform providers, due diligence, and anti-money laundering service providers; service providers who perform identity verification services, research firms, including those performing surveys or research projects in partnership with CLEA or on CLEA's behalf)

4.1.7. relevant government ministries, regulators, statutory boards or authorities or law enforcement agencies to comply with any laws, rules, guidelines and regulations or schemes imposed by any governmental authority (including but not limited to Ministry of Health); and/or

4.1.8. any other party to whom you authorise us to disclose your Personal Data to.

5. RETENTION OF PERSONAL DATA

5.1. We retain your Personal Data for the period necessary to fulfil the Purposes outlined in this Privacy Policy unless a longer retention period is required or allowed by law. Once your Personal Data is no longer necessary for the Services or Purposes, or we no longer have a legal or business purpose for retaining your Personal Data, we take steps to erase, destroy, anonymise, or prevent access or use of such Personal Data for any purpose other than compliance with this Privacy Policy, or for purposes of safety, security, fraud prevention and detection, in accordance with the requirements of applicable laws.

6. COOKIES AND THIRD PARTY SITES

6.1. When you visit or interact with CLEA Sites and/or use of Services, we and/or third parties may use cookies, web beacons, and other similar technologies for collecting and storing information to help provide you with a better, faster, and safer web experience.

6.2. The use of cookies (including but not limited to session cookies and persistent cookies), web beacons, and/or similar technologies (including but not limited to HTML5) (collectively, "**Cookies**") by us on CLEA Sites has different functions. They are either necessary for the functioning of our Services, help us improve our performance, or serve to provide you with extra functionalities. They may also be used to deliver content that is more relevant to you and your interests, or to target advertising to you on or off CLEA Sites.

6.3. Cookies may transmit Personal Data about you and your use of the Service, such as your browser type, search preferences, IP address, data relating to advertisements that have been displayed to you or that you have clicked on, and the date and time of your use.

6.4. You may deactivate cookies by adjusting your internet browser settings to disable, block or deactivate cookies, by deleting your browsing history and clearing the cache from your internet browser. However, if you decline cookies or other similar technologies, you may not be able to take advantage of certain site features or services tools. For more information on how you can block, delete, or disable these technologies, please review your browser settings.

6.5. CLEA Sites may contain links to other websites operated by third parties. We are not responsible for the data protection practices of websites operated by third parties that are linked to CLEA Sites. We encourage you to learn about the data protection practices of such third party websites. Some of these third party websites may be co-branded with our logo or trade mark, even though they are not operated or maintained by us. Once you have left CLEA Sites, you should check the applicable Privacy Policy of the third party website to determine how they will handle any information they collect from you.

7. SECURITY OF PERSONAL DATA

- 7.1. We protect Personal Data against loss or theft, as well as unauthorized access, disclosure, copying, use or modification with security safeguards appropriate to the sensitivity of the Personal Data, regardless of the format in which it is held. We use various methods to safeguard Personal Data, including physical measures, technical tools, and/or organizational controls.
- 7.2. Online security is also a priority. CLEA incorporates security measures such as encryption and authentication tools to protect your Personal Data from unauthorized use. Firewalls are utilized to protect our servers and network from unauthorized users accessing and tampering with files and other information that we store.
- 7.3. We limit access to your Personal Data to our employees on a need to know basis. Those processing your Personal Data will only do so in an authorised manner and are required to treat your Personal Data with confidentiality.
- 7.4. Nevertheless, please understand that the transmission of information via the internet is not completely secure. Although we will do our best to protect your Personal Data, we cannot guarantee the security of your Personal Data transmitted through any online means, therefore, any transmission remains at your own risk.

8. YOUR RIGHTS WITH RESPECT TO YOUR PERSONAL DATA

- 8.1. In accordance with applicable laws and regulations, you may be entitled to:
 - 8.1.1. ask us about the processing of your Personal Data, including to be provided with a copy of your Personal Data;
 - 8.1.2. request the correction and/or deletion of your Personal Data;
 - 8.1.3. request the restriction of the processing of your Personal Data and/or object to that processing;
 - 8.1.4. withdraw your consent to the processing of your Personal Data (where we are processing your Personal Data based on your consent);
 - 8.1.5. request receipt or transmission to another organisation, in a machine-readable form, of the Personal Data that you have provided to us where we are using your Personal Data based on consent or performance of a contract; and/or
 - 8.1.6. complain to the relevant data privacy authority if your personal data privacy rights are violated, or if you have suffered as a result of unlawful processing of your Personal Data.
- 8.2. Where you are given the option to share your Personal Data with us, you can always choose not to do so. If we have requested your consent to processing and you later choose to withdraw it, we will respect that choice in accordance with our legal obligations.
- 8.3. However, choosing not to share your Personal Data with us or withdrawing your consent to our use of it could mean that we are unable to perform the actions necessary to achieve the Purposes or that you are unable to make use of the Services. After you have chosen to withdraw your consent, we may be able to continue to process your Personal Data to the extent required or otherwise permitted by applicable laws and regulations.

9. AMENDMENTS AND UPDATES

- 9.1. CLEA may modify, update, and/or amend the terms in this Privacy Policy at any time. Such amendments shall be posted on the website <https://www.cleacovid.com/privacy>. It is your responsibility to review the Privacy Notice regularly. Your continued use of CLEA Sites and/or Services from CLEA or continuing to communicate or engage with CLEA following the modifications, updates, or amendments to this Privacy Policy, whether or not reviewed by you, shall constitute your agreement to be bound by such amendments.

10. CONTACT US

- 10.1. CLEA has procedures in place in order to receive and respond to enquiries about our policies and practices relating to its handling of Personal Data. 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:

CLEA Data Protection Officer

c/o CLEA Technology Sdn Bhd
B-5-19, Block B, Ativo Plaza, No.1, Jalan PJU 9/1,
Damansara Avenue, Bandar Sri Damansara,
Wilayah Persekutuan Kuala Lumpur, Malaysia.
Email: support@cleacovid.com

- 10.2. You are reminded not to send via unencrypted means (such as email) sensitive information (including but not limited to passwords and credit card information)
- 10.3. Please note that if your Personal Data has been provided to us by a third party (including but not limited to your employer), you should contact that organisation or individual to make such queries, complaints, and access and correction requests to CLEA on your behalf.