



PRIVACY POLICY

Ancora Imparo or **Quality Education** and its affiliates are committed to the protection of your personal information and privacy. This Privacy Notice explains how we collect and handle your personal information in accordance with the Malaysian Personal Data Protection Act 2010 (“PDPA”).

By sending a message to our page and/or providing your personal information to us, you are consenting to this Privacy Notice. This Privacy Notice may be reviewed and amended from time to time. The updated version of the Privacy Notice shall apply and supersedes any and all previous versions, including but not limited to, leaflets or hard copy versions.

1. Personal information

1.1 Type of personal information

Personal information means any information which relates to you and which was collected or provided to **Ancora Imparo** or **Quality Education** for the purposes stated in Section 2 below. Your personal information may include your name, NRIC number, contact details, financial and banking account details, medical history and information, information in audio and/or video format (including voice, video recording), images (including photographs), biometric information and location tracking/GPS information.

1.2 Source of personal information

- (i) Patient or customer: **Ancora Imparo** or **Quality Education** collects your personal information directly from you or indirectly from your legal representatives (family members, next of kin), agents (e.g. medical tourism agents) and/or employer when you, your legal representatives, agents and/or employers send us completed enquiry, application and/or registration forms via various means, including online and physical hardcopies at public venues or in our premises. Your personal information may also be collected from cookies through the use of our website.
- (ii) Independent consultants or potential independent consultants: **Ancora Imparo** or **Quality Education** collects your personal information directly from you or indirectly from headhunters when you and/or our headhunters send us completed enquiry and/or application forms or curriculum vitae via various means, including online and physical hardcopies. Your personal information may also be collected from cookies through the use of our website.
- (iii) Vendor, supplier or service provider: **Ancora Imparo** or **Quality Education** collects your personal information directly from you or indirectly from your employer or credit reference agencies when tendering for projects, when you send us completed enquiry and/or credit application forms via various means, including online and physical hardcopies. Your personal information may also be collected from cookies through the use of our website.



1.3 Obligatory personal information

All information requested for in the relevant forms is obligatory to be provided by you unless stated otherwise. Should you fail to provide the obligatory information, we may be unable to provide you with the relevant services or continue our relationship with you. You are responsible to provide correct and complete information to us and any other person whose personal information you provide us and to update this personal information from time to time when so required.

2. Purposes of collecting and further processing (including disclosing) your personal information

Your personal information is collected and further processed by **Ancora Imparo** or **Quality Education** as required or permitted by law and to give effect to your requested commercial transaction, including the following:

For patients or potential patients/customers

- to process your requested medical services;
- to facilitate your participation in any contests, events or membership programmes;
- to administer and communicate with you in relation to our services and/or events;
- to monitor utilisation of membership/patient benefits;
- for purposes related to insurance, appointed third party administrators and/or managed care organizations appointed by your insurers or employers;
- to respond to inquiries from you;
- to conduct internal statistical analysis and analysis of patient case studies; and
- to contact you regarding **Ancora Imparo** or **Quality Education** products, services, upcoming events, promotions, advertising, marketing and commercial materials which we may feel interest you.

For independent consultants, potential independent consultants

- to facilitate your medical practice within **Ancora Imparo**, or **Quality Education**, including sharing your personal data with other independent consultants within **Ancora Imparo** or **Quality Education** for purposes of peer review;
- to respond to inquiries from you;
- to administer and communicate with you in relation to your medical practice; and
- to conduct internal statistical analysis and analysis of patient case studies.

For vendors, suppliers or service providers

- to commence a business relationship with us (for example, as a vendor, service provider or a business partner);
- to process your credit account application;
- to assess your credit-worthiness;
- to administer and give effect to your commercial transaction (tender award, contract for service, consignment agreement); and
- to process any payments relevant to you.



For all individuals

- to operate our premises in a manner which is physically safe, secure and befitting of health and safety requirements;
- for internal investigations, audit or security purposes;
- to comply with **Ancora Imparo** or **Quality Education**'s legal and regulatory obligations in the conduct of its business;
- to ensure that the content from our website is presented in the most effective manner for your and for your computer and/or device through passive tracking via cookies and other similar tools; and
- for **Ancora Imparo** or **Quality Education**'s internal record keeping/management.

Where you have indicated your consent to receiving marketing or promotional updates from **Ancora Imparo** or **Quality Education**, you may opt-out from receiving such marketing or promotional material at any time. You may also contact **Ancora Imparo** or **Quality Education** directly at the details provided in Section (6) below.

3. Disclosure and transfer of personal information (within or outside of Malaysia)

3.1 Within Ancora Imparo or Quality Education

Your personal information provided to us may be processed by entities (within or outside of Malaysia) within **Ancora Imparo** or **Quality Education** (including related companies, subsidiaries, holding companies and associated companies), especially when you are an employee of any company within **Ancora Imparo** or **Quality Education**.

Ancora Imparo or **Quality Education** will ensure that:

- (i) access to your personal information is restricted to staff who are contractually required to process your personal information in accordance with their respective job requirements; and
- (ii) only necessary information is released to the relevant employees.

3.2 Classes of third parties

Your personal information may be disclosed or transferred to relevant third parties (within or outside of Malaysia) as required under the law, pursuant to relevant contractual relationship (for example, where we appoint third party service providers) or for the purposes stated in Section 2 above (or directly related to those purposes).

In the event of a potential, proposed or actual sale of business, disposal, acquisition, merger or re-organisation ("Transaction"), your personal information may be required to be disclosed or transferred to a third party as a result of the Transaction. You hereby acknowledge that such disclosure and transfer may occur and permit **Ancora Imparo** or **Quality Education** to release your personal information (only as required) to the other party and its advisers/representatives.



Your personal information may be disclosed to the following classes of third parties:

The Ministry of Health or any other statutory or non-statutory authorities or bodies having authority or jurisdiction established by the MOH and other relevant government departments or agencies; Relevant accreditation bodies such as the Malaysian Society for Quality in Health (MSQH); Our independent consultants and specialists within the company you have provided your personal information to; Third party private healthcare institutions or government healthcare institutions; Your insurers, the appointed third party administrators and managed care organisations by your insurers or employers; In the case of pre-employment health screenings, to the patient's employer / prospective employer; Third parties appointed by us to provide services to us or on our behalf (such as auditors, lawyers, company secretary, printing companies, consignment vendors, medical devices maintenance providers, information system vendors, contractors, conference/event organisers and other advisers); The respective foreign embassies of foreign patients who received treatment in Ancora Imparo and Quality Education; and Law enforcement agencies, including the local police.

4. Websites

4.1 Links to other sites

Content in Ancora Imparo and Quality Education's website may include links to third party websites. Ancora Imparo and Quality Education are not responsible for the content on such linked third party websites and users should observe the separate privacy policies applicable to the respective third parties website.

4.2 Cookies

Ancora Imparo and Quality Education may use cookies and similar tools across our websites to improve their performance and enhance your user experience. Cookies are small text files which a website may put on your computer or mobile device when you first visit a site or page. The cookie will help the website, or another website, to recognise your device the next time you visit. Cookies can function to remember your username and preferences or to analyse how Ancora Imparo and Quality Education website is performing.

Certain cookies contain personal data – for example, if you click to “remember me” when logging in, a cookie will store your username. Most cookies won't collect information that identifies you, and will instead collect more general information such as how users arrive at and use our websites, or a user's general location. Where personal data is collected, such personal data will only be used for its intended purposes only, i.e. to respond to your message or deliver the requested services.

5. Right to access and correct personal information

Right to access and correct personal information You have the right to access and correct your personal information held by us (subject always to certain exemptions). We will make every endeavour to ensure your personal information is accurate and up to date therefore we ask that if there are changes to your information you should notify us directly. If you would like to access or



correct your personal information, you may contact Ancora Imparo and Quality Education at the details provided in Item 6 below. For each data access request, prescribed fees may be levied and we may reject such a request should the request fall under any exceptions in the PDPA or any other applicable law.

6. Private Healthcare Facilities and Services Act 1998

Please note that the manner in which Ancora Imparo and Quality Education process your personal data will be subject to other industry-specific laws and guidelines including the Private Healthcare Facilities and Services Act 1998 (“PHFSA”) and Ministry of Health guidelines.

For example, access to medical records will be in accordance with the PHFSA.

7. Limiting the processing of personal information, further enquiries and complaints

If you wish to limit our use of your personal information, or you have any queries and concerns about the Privacy Notice or complaints in respect of your personal information, you may contact:

Email: enquiry@ancoraimparo.training

8. Deletion of Personal Data.

Upon termination of the Services (for any reason) and if requested by Customer in writing, Ancora Imparo shall as soon as reasonably practicable delete the Personal Data, PROVIDED that Ancora Imparo may:

(a) retain one copy of the Personal Data as necessary to comply with any legal, regulatory, judicial, audit or internal compliance requirements; and/or

(b) defer the deletion of the Personal Data to the extent and for the duration that any Personal Data or copies thereof cannot reasonably and practically be expunged from Ancora Imparo' systems; and for such retention or deferral periods as referred to in subparagraphs (a) or (b) of this clause, the provisions of this DPA shall continue to apply to such Personal Data.

Ancora Imparo reserves the right to charge Customer for any reasonable costs and expenses incurred by Ancora Imparo in deleting the Personal Data pursuant to this clause.

