

PERSONAL DATA PROTECTION NOTICE

ALPHA IVF GROUP BERHAD and its related companies (collectively referred to as “Alpha IVF Group”, “we”, “us” or “our”) are committed to protecting your personal data in accordance with the **Personal Data Protection Act 2010 (“PDPA”)** and the **Personal Data Protection Standards 2015**, which came into effect on 15 November 2013.

This Personal Data Protection Notice (“Notice”) explains how we collect, use, disclose, safeguard, retain and transfer your personal data in the course of our commercial transactions.

For the purposes of this Notice, the terms “**personal data**”, “**sensitive personal data**”, “**processing**” and “**commercial transactions**” shall have the meanings ascribed to them under the PDPA.

1. Obligation to Provide Personal Data

The provision of your personal data is **mandatory** where such data is required for the purposes set out in this Notice.

Failure to provide the required personal data may result in Alpha IVF Group being unable to:

- Provide medical, fertility or healthcare services;
- Process employment or contractual matters; or
- Comply with legal, regulatory or professional obligations.

2. Source of Personal Data

Your personal data may be collected from, but is not limited to, the following sources:

1. Information provided directly by you;
2. Information obtained from authorised representatives, employers, insurers, family members or next of kin;
3. Information obtained from third parties lawfully authorised to disclose such data;
4. Information available in the public domain; and
5. Information generated or recorded in the course of providing medical, healthcare, corporate or related services.

3. Description of Personal Data

The personal data processed by Alpha IVF Group may include, **where relevant and necessary for the stated purposes**, the following:

Personal Data

- Name, date of birth, NRIC or passport number;
- Gender, nationality, marital status;
- Residential and correspondence addresses;
- Telephone numbers and email address;
- Employment details, occupation and employer information;
- Remuneration information;
- EPF number, SOCSO number, income tax number;
- Bank account and payment details;
- Education background, training and working experience;
- Photographs, images and recordings;
- Family and next-of-kin details;
- Insurance details; and
- Any other personal data required for the purposes stated in this Notice.

Sensitive Personal Data

Sensitive personal data processed by Alpha IVF Group may include, but is not limited to:

- Medical records, medical reports and diagnosis;
- Medical Record Number (MRN);
- Fertility, reproductive and obstetric information;
- Genetic data, laboratory and diagnostic test results;
- Medical check-up results and treatment history;
- Personal health information; and
- Any other sensitive personal data as defined under the PDPA.

All sensitive personal data is processed **only with your explicit consent**, except where otherwise permitted under the PDPA.

4. Purposes of Processing Personal Data

Your personal data may be processed for the following purposes, **where applicable**:

1. To provide medical, fertility, genetic, healthcare and related services;
2. To establish, manage and maintain medical records and medical reports;
3. To plan, deliver and monitor patient care and treatment;
4. To facilitate billing, payment, insurance claims and financial administration;
5. To manage appointments, patient support and related services;
6. To comply with applicable laws, regulations, professional standards and reporting requirements;
7. To share personal data within Alpha IVF Group and its related companies (as defined under the **Companies Act 2016**);
8. To conduct research, analysis, audit, quality assurance and service improvement (subject to applicable laws);
9. To administer and respond to enquiries, complaints, feedback and legal matters;
10. To conduct marketing, promotional and engagement activities, subject to consent requirements;
11. To manage recruitment, employment, payroll and human resource administration;

12. To submit, maintain and renew registrations, licences and approvals with relevant authorities;
13. To facilitate banking, legal, accounting and audit processes;
14. To manage procurement, outsourcing, vendors and service providers;
15. To provide education and training; and
16. Any other purpose incidental to or in furtherance of the above purposes.

5. Disclosure of Personal Data

Your personal data may be disclosed, **where necessary and lawful**, to the following parties:

1. Healthcare professionals and medical practitioners;
2. Alpha IVF Group Berhad and its related companies;
3. Government authorities, regulators and statutory bodies;
4. Insurance companies and payment service providers;
5. Financial institutions;
6. Legal advisors, auditors and professional consultants;
7. Vendors, contractors and service providers;
8. Other hospitals, clinics and healthcare providers;
9. Training and education providers;
10. Debt recovery agencies (where applicable);
11. Family members or next of kin (where appropriate);
12. Any party where disclosure is required or permitted by law, court order or regulatory authority.

6. Security of Personal Data

Alpha IVF Group implements **reasonable and appropriate technical, physical and organisational security measures** to protect personal data against loss, misuse, unauthorised access, disclosure, alteration or destruction.

These measures include access controls, confidentiality obligations, secure information systems, restricted access to sensitive data, and internal data protection policies and procedures.

7. Retention of Personal Data

Personal data will be retained **only for as long as necessary** to fulfil the purposes stated in this Notice or as required by applicable laws and regulatory requirements.

Upon expiry of the applicable retention period, personal data will be **securely destroyed, deleted or permanently anonymised**.

8. Data Accuracy and Integrity

Alpha IVF Group takes reasonable steps to ensure that personal data is accurate, complete, not misleading and kept up to date.

You are encouraged to notify us promptly of any changes or corrections to your personal data.

9. Access and Correction of Personal Data

You have the right to:

- Request access to your personal data; and
- Request correction of inaccurate, incomplete or outdated personal data.

Requests should be made **in writing**, and we may take reasonable steps to verify your identity before processing such requests.

In accordance with the PDPA:

- A fee may be charged under the Personal Data Protection (Fees) Regulations 2013; and
- We may refuse access or correction where permitted by law.

10. Withdrawal of Consent

Where processing is based on your consent, you may **withdraw your consent** at any time by providing written notice to Alpha IVF Group.

Please note that withdrawal of consent may affect our ability to provide certain services or continue existing arrangements.

11. Marketing Communications

If you do not wish to receive marketing or promotional communications, you may notify us by emailing ir@alphaivfgroup.com, and we will cease such communications within a reasonable timeframe.

12. Cross-Border Transfer and Overseas Processing of Personal Data

Alpha IVF Group Berhad is a company incorporated in Malaysia and governed by the **Personal Data Protection Act 2010** and the **Personal Data Protection Standards 2015**.

In the course of providing medical, fertility, genetic, healthcare, corporate, administrative and related services, your personal data, including **sensitive personal data, may be transferred to, accessed from, stored or processed outside Malaysia.**

Purposes of Cross-Border Transfer

Cross-border transfers may occur for purposes including but not limited to:

- Continuity of patient care and treatment;
- Specialist consultation, laboratory testing and genetic analysis;
- Medical tourism and patient coordination;
- Group reporting, clinical governance and quality assurance;
- Information technology systems, cloud services and data hosting; and
- Compliance with professional, regulatory and contractual obligations.

Safeguards

Where personal data is transferred outside Malaysia, Alpha IVF Group shall take **reasonable and practicable steps** to ensure that:

1. Appropriate legal, contractual or organisational safeguards are in place;
2. Access is restricted on a need-to-know basis;
3. Adequate technical, physical and administrative security measures are implemented; and
4. The transfer is limited to what is necessary for the stated purposes.

Consent

By providing your personal data and/or engaging Alpha IVF Group's services, you **expressly consent** to:

- The transfer of your personal data outside Malaysia; and
- The processing of your personal data in foreign jurisdictions,

subject to the safeguards described above and applicable laws.

Where required, **separate or additional consent** may be obtained for the processing of sensitive personal data, including medical, fertility and genetic information.

13. Data Protection Officer (DPO)

Alpha IVF Group Berhad has appointed a **Data Protection Officer ("DPO")** to oversee compliance with the **Personal Data Protection Act 2010** and the **Personal Data Protection Standards 2015**, and to ensure that personal data is processed in accordance with this Notice.

The DPO's responsibilities include:

- Monitoring PDPA compliance and internal data protection policies;
- Advising on data protection obligations and best practices;
- Handling personal data enquiries, access, correction and consent withdrawal requests;
- Coordinating cross-border data protection matters; and
- Acting as the primary contact point with regulators and auditors on data protection issues.

Contact Details of the Data Protection Officer

Data Protection Officer (DPO)

Alpha IVF Group Berhad

Address:

G01, Ground Floor, Encorp Strand Mall
Jalan PJU 5/22, Kota Damansara
47810 Petaling Jaya, Selangor Darul Ehsan
Malaysia

Telephone:

(603) 6141 6166

Email:

ir@alphaivfgroup.com