

## PRIVACY POLICY

SmileBay Academy 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 SmileBay Academy for the purposes stated in Section 2 below. Your personal information may include your name, NRIC number or passport number, date of birth, address, contact details, information of your educational institution, professional positions, financial and banking account details. SmileBay Academy may also collect information about your use of the Website, including:

1. technical information, such as the date and time you accessed the Website, your internet protocol address, browser name, computing device type, and
2. service usage information, such as records and history about your interactions with our Website, demographic, geographic, and psychographic information, and any other feedback you choose to provide to us (“Browsing Information”).

#### 1.2 Source of personal information

(i) Customer: SmileBay Academy 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: SmileBay Academy 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: SmileBay Academy 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. Use of Information

Any of the information we collect from you may be used in one of the following ways:

1. To personalise your experience (Your information helps us to better respond to your individual needs.) We use the Personal Information you provide us to respond to your inquiries, to complete your SmileBay Academy membership application, administer SmileBay Academy membership benefits and access to member-only pages on our Website.
2. To improve our Sites (We continually strive to improve our offerings based on the information and feedback we receive from you.)
3. To improve customer service (Your information helps us to more effectively respond to your customer service requests and support needs.)
4. To process transactions. We use payment card information you provide us in conjunction with your membership enrolment and any other online transactions through our website to process payments for the applicable fees or dues.
5. To administer contests, promotions, surveys and / or other features of the Sites
6. To send periodic emails (The email address you provide may be used to send you information and updates on SmileBay Academy's conferences, seminars or events. If you would like to unsubscribe from receiving future emails on the particular SmileBay Academy event, you may opt-out on any promotional material anytime.)
7. We may also contact you by any means of communication for which you have given us contact details, including email, telephone, and post, for the purpose of getting your feedback or for providing you with information which we believe could be of interest to you or your organisation.
8. On occasion, we may use third-party agents and service providers to assist us in the use of your data as outlined above. SmileBay Academy shares Personal Information and Browsing Information we collect about you with third parties who perform services for us as part of the services we provide you through our Website. We use third parties to host our Website and data, send emails, print and send documents and mailings, process payment card transactions, and to analyse Website usage. We share Browsing Information with select third parties, including our Website analytics provider through internet cookies. SmileBay Academy does not have any control over the content, opinions, or information contained on a third party website.
9. On rare occasions, we may be required to disclose your Personal Information and/or Browsing Information to government authorities if we are forced to as required by law

and as necessary to comply with a judicial proceeding, court order, or other legal process served on us.

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

#### Within SmileBay Academy

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

SmileBay Academy 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.

### 4. Websites

#### 4.1 Links to other sites

Content in SmileBay Academy's website may include links to third party websites. SmileBay Academy 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

SmileBay Academy 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 SmileBay Academy 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

You have the right to access and correct your personal information held by us (subject always to certain exemptions). We will make every endeavor 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 SmileBay Academy 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. 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: (insert email address)

7. Deletion of Personal Data

Upon termination of the Services (for any reason) and if requested by Customer in writing, SmileBay Academy shall as soon as reasonably practicable delete the Personal Data, **provided** that SmileBay Academy 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 SmileBay Academy's 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.

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