

TOPVISION®

EYE SPECIALIST CENTRE

明亮眼科专科中心

Top Vision Is Our Mission, 视界因我们天天明亮®

PERSONAL DATA PROTECTION NOTICE

DATE REVISED BY THE COMPANY:	1 April 2024
VERSION:	2.0
DATE LAST REVIEWED:	6 August 2020

1. INTRODUCTION

1.1 **TOPVISION Eye Specialist Berhad and its subsidiaries (“TOPVISION”)** are subject to the personal data protection principles under the Personal Data Protection Act 2010 (“PDPA 2010”) with effect from 15 November 2013, which regulates the processing of personal data in commercial transactions.

1.2 This Personal Data Protection Notice (“PDP Notice”) applies to any person whose personal data is being processed by TOPVISION. Your personal data is collected from various sources, including information you have provided us, information from third parties and information in the public domain. It is obligatory that you supply us with your personal data. If you fail to supply us with such personal data, we may not be able to process and/or disclose your data for the purposes as provided in the provision below.

2. COLLECTION OF PERSONAL DATA

2.1 Your personal data processed by TOPVISION may include: name, date of birth, identity card or passport number, name of employer/company, home and office address, telephone/handphone number, facsimile number, email address, occupation, age, gender, marital status, weight, height, photos, race, nationality, religion, family and/or next of kin information, medical check-up result, medical record, medical report, registration number, diagnosis, personal health information, criminal history, investigation result, insurance details and any other personal data required to facilitate the processing of medical treatment, consultation or screening at TOPVISION and may be disclosed to a third party, where relevant, based on the provisions under this PDP Notice.

3. SOURCE OF PERSONAL DATA COLLECTION

3.1 TOPVISION collects this information when you visit TOPVISION, when you telephone, chat online or when you enquire via TOPVISION email accessible from our website (www.tvesc.com). By providing your personal information to TOPVISION and signing the consent form, you have agreed for TOPVISION to process your personal information for the lawful purposes mentioned in this PDP Notice.

4. REASON FOR PERSONAL DATA COLLECTION

4.1 Your personal information may be processed for the following purposes, whether on physical paper or digitally/ online, where relevant:-

- i. To provide medical treatment and healthcare services;

- ii. To share the personal data within **TOPVISION** ;
- iii. To facilitate the patients personal needs (i.e. prescription-related/ taxi/Grab/ other types of external booking/etc.);
- iv. To establish and manage medical records and medical reports;
- v. To facilitate communication and payment process relating to patients/ employees/ suppliers/ any other stakeholders/ third party;
- vi. To institute debt recovery proceedings against defaulters;
- vii. To report the personal data to the relevant authorities and/or third parties under the governing laws relevant to the healthcare industry;
- viii. To conduct research, analysis and improvement initiatives;
- ix. To disseminate information about TOPVISION's products, services, upcoming events, promotions, advertising, marketing and commercial materials that could be of interest;
- x. To administer and respond to request, queries, complaints and legal issues;
- xi. To facilitate human resource management activities relating to employees;
- xii. To share personal data for the purpose of banking facilities, signing of legal and accounting documents;
- xiii. For submission and registration of relevant forms, licenses to the relevant authorities and/or third parties under the governing laws relevant to the healthcare industries;
- xiv. For purchasing of medical-related items, outsourced services, new medical developmental tools/ services and others;
- xv. For education and training; and
- xvi. For any other purpose that is incidental or in furtherance to the above purposes.

5. PERSONAL DATA OF MINORS AND OTHERS

5.1 For children who is under 18 years of age ("Minor"), please note that consent is required from the Minor's parent or guardian or person who has parental responsibility over the Minor.

5.2 For an individual who is having a disability or deemed incapable of managing his/ her own affairs ("Special Person"), please note that a consent is sought from a person who has been legally or validly authorised to act on the Special Person's behalf or a person who has been appointed by a court to manage the Special Person's affairs.

5.3 In the event the consent is obtained on behalf of a Minor or Special Person, the person signing is deemed to have also given the consent to the processing of his/ her Personal Data in accordance with this PDP Notice.

6. PROCESSING OF PERSONAL DATA

6.1 TOPVISION shall not process your personal information unless you have given written consent to the processing of your personal data. "Processing" means collecting, recording, holding and/ or storing your personal information or carrying out any operation or set of operations on your personal information in accordance with the provisions of this PDP Notice.

6.2 TOPVISION will only process your personal data within Malaysia.

6.3 In the event there is a need, and as permitted under law, TOPVISION may transfer your Personal Data to a place outside of Malaysia and you hereby give consent to the transfer.

7. DISCLOSURE OF PERSONAL DATA

7.1 Your personal data may be disclosed to the following parties, where relevant:-

- Healthcare professionals (as defined in PDPA 2010);
- Government agencies, local authorities, non-government agencies;
- Insurance agents;
- Online platform providers;
- Debt collection authorities and agencies;
- Financial institutions;
- Legal firms;
- Auditors;
- Vendor/Contractor;
- Other private and public hospitals;
- Other Healthcare providers;
- Training providers;
- Family members and next of kin;
- Commissioned/ affiliated service providers
- To such parties as may be required by law, court and/ or enforcement agencies/ regulator to facilitate legal or regulatory process; and
- Any other person or entity which TOPVISION may deem necessary.

8. SECURITY MEASURE

8.1 TOPVISION is committed and will use TOPVISION's best endeavour to ensure that your personal data information is kept and stored securely, as required by PDPA 2010.

9. PERSONAL DATA RETENTION PERIOD

9.1 All your personal information collected by TOPVISION will be retained within TOPVISION where your personal information shall not be kept not longer than 7 years (from the last activity date) or as long as you remain our customer or patient.

9.2 Collection and retention of personal data will be for the fulfilment of the lawful purposes to which it was obtained for.

9.3 If you are no longer a patient/ customer/ employee/ stakeholder/ other appointed directly or indirectly third party of TOPVISION, your personal data will be permanently deleted from our database accordingly.

10. YOUR RIGHTS

10.1 You have the rights to:

- i) Correct/ update/ withdraw your personal data (the form is available in **Appendix A**);
- ii) Access your personal data which we process and keep with us;
- iii) Stop any of our new promotional products or messages sent to you; and
- iv) Withdraw your consent for us to process your personal data. We wish to advise you that if you decide to withdraw your consent, we may not be able to proceed with the proposed treatment, consultation, or service.

10.2 To access your personal data, please contact us. We recommend that your request for access to your personal data held by TOPVISION be made in writing. We may also take steps to verify your identity before fulfilling your request for access to your personal data.

10.3 TOPVISION may refuse to comply with your request to access or make a correction in accordance with PDPA 2010 subject to other operating laws or valid reasons.

11. CHANGES TO PDP NOTICE

11.1 TOPVISION may amend this PDP Notice from time to time by posting the changes on our website. Please visit TOPVISION website at www.tvesc.com from time to time to ensure that you are kept up to date on the latest requirements or provisions relating to personal data protection.

12. CONTACT US

12.1 Please contact us by using any of the following modes if you have any queries or complaints with respect to your personal data:-

- 1) Via telephone at +603-5037 1675/ 1678
- 2) Email us at enquiry@tvesc.com
- 3) Write to us. Please address the letter to:

Unit 11-2 & 11-3, No 2, Block 2, Jalan Setia Prima (S) U13/S Setia Alam, Seksyen U13, 40170 Shah Alam, Selangor Darul Ehsan.

13. Conflict

13.1 In the event of any conflict between this English language Personal Data Protection Notice and its corresponding Bahasa Malaysia Personal Data Protection Notice, the terms in this English language Notice shall prevail.

Appendix A: Personal Data Access Request Form

Guide to submit a Personal Data Access Request (“DAR”)

1. Definitions

“**Data Subject**” is an individual who is requesting access to his/ her personal data.

“**Data User**” a person or entity, TOPVISION, who either alone or jointly processes any personal data or has control over or authorises the processing of any personal data.

“**Data Processor**” any person, who processes the personal data solely on behalf of the data user, and does not process the personal data for any of his own purpose.

2. Supporting documents required to be submitted

- a) For Data Subject – Copy of the National Registration Identification Card (NRIC) or passport bearing signature of the Data Subject.
- b) For Relevant Person (if request is made on behalf of the Data Subject) – Please attach proof/ authorisation letter of your lawful authorization to submit this request on behalf of the Data Subject and to receive information in response of the request.

3. Processing fee

Subject to provisions of the PDPA 2010, you may, upon payment of a prescribed fee, make a data access request in writing to us by completing this DAR Form and returning the same to TOPVISION.

Kindly remit the prescribed fee either via

- a) Cash; or
- b) Bank transfer (Hong Leong Bank – please request from us the account number)

4. Completed form

Please send in the completed form to the following address:

TOPVISION Eye Specialist Centre

Unit 11-2 & 11-3, No 2, Block 2, Jalan Setia Prima (S) U13/S Setia Alam, Seksyen U13, 40170 Shah Alam, Selangor Darul Ehsan.

5. Contact us

Should you require any advice or guidance to complete this form, please contact our Customer Service Department at 03-3343 9911 or walk-in at any of our branches.

PERSONAL DATA ACCESS REQUEST (“DAR”)

Please choose (“X”) one of the following:

- I am an existing/ former customer/ employee/ stakeholder of TOPVISION and I would like to access my personal data (Kindly proceed to fill up section 1 of this form)
- I have previously visited/ attached to a branch or dealt with TOPVISION and I would like to access my personal data (Kindly proceed to fill up Section 1 of this form)
- I am submitting a request for the personal data of another person (Kindly proceed to fill up Section 2 of this form)

Section 1 – To be filled in by Data Subject

Full Name (as in NRIC/ Passport)

NRIC/ Passport (Please attach a copy)

Contact Number

Email Address

Access of Personal Data [Please provide a description of the personal data to be accessed]

Reference Number: _____
[Medical Record No/ Employment No/ Others]

Charges:
(In accordance with Personal Data Protection Regulations (Fee) 2013)

A Processing fee is imposed on a Data Access Request (DAR) submitted either via walk-in or online.
[Please tick or mark “X” in the relevant box]

<input type="checkbox"/> Yes, I would like a copy.		<input type="checkbox"/> No, I don't need a copy.	
General Personal Data Fee: RM10.00	<input type="checkbox"/>	General Personal Data Fee: RM2.00	<input type="checkbox"/>
Sensitive Personal Data Fee: RM30.00	<input type="checkbox"/>	Sensitive Personal Data Fee: RM5.00	<input type="checkbox"/>

*Additional courier charge will be imposed if the copy is requested to be delivered to a designated address.

I, hereby certify that the information given in this form and any documents submitted are true and accurate.

Signature:

Name:

Date:

Section 2 – To be filled by Relevant Person (if the request is made on behalf of the Data Subject)							
A) Particulars of Data Subject							
Full Name (as in NRIC/ Passport)							
NRIC/ Passport Number (Please attach a copy)							
B) Particulars of Relevant Person							
Full Name (as in NRIC/ Passport)							
NRIC/ Passport Number (Please attach a copy)							
Contact Number							
Email Address							
C) Relationship with Data Subject:							
Access of Personal Data	[Please provide a description of the personal data to be accessed]						
Charges: (In accordance with Personal Data Protection Regulations (Fee) 2013)	<p>A Processing fee is imposed on a Data Access Request (DAR) submitted either via walk-in or online. [Please tick or mark "X" in the relevant box]</p> <table border="1"> <thead> <tr> <th><input type="checkbox"/> Yes, I would like a copy.</th> <th><input type="checkbox"/> No, I don't need a copy.</th> </tr> </thead> <tbody> <tr> <td>General Personal Data <input type="checkbox"/> Fee: RM10.00</td> <td>General Personal Data <input type="checkbox"/> Fee: RM2.00</td> </tr> <tr> <td>Sensitive Personal Data <input type="checkbox"/> Fee: RM30.00</td> <td>Sensitive Personal Data <input type="checkbox"/> Fee: RM5.00</td> </tr> </tbody> </table> <p>*Additional courier charge will be imposed if the copy is requested to be delivered to a designated address.</p>	<input type="checkbox"/> Yes, I would like a copy.	<input type="checkbox"/> No, I don't need a copy.	General Personal Data <input type="checkbox"/> Fee: RM10.00	General Personal Data <input type="checkbox"/> Fee: RM2.00	Sensitive Personal Data <input type="checkbox"/> Fee: RM30.00	Sensitive Personal Data <input type="checkbox"/> Fee: RM5.00
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Sensitive Personal Data <input type="checkbox"/> Fee: RM30.00	Sensitive Personal Data <input type="checkbox"/> Fee: RM5.00						
<input type="checkbox"/> I, hereby certify that the information given in this form and any documents submitted are true and accurate. <input type="checkbox"/> I, hereby agreed that you may contact the Data Subject to verify my identity.							
Signature: Name: Date:							

For Office Use Only:									
DAR received by:	<p>.....</p> <p>Signature</p> <p>Name:</p> <p>Date:</p>								
Completeness of submission	<p><input type="checkbox"/> Yes, submission is complete and to proceed with processing.</p> <p><input type="checkbox"/> No, to request supporting document/ information/ processing fee. Date: of complete submission received: _____</p>								
Processing Time:	<p>Type of DAR (completion of DAR may take up to 21 days):</p> <p><input type="checkbox"/> Change/ Update of Personal Data</p> <p><input type="checkbox"/> Stop marketing and promotional news/ messages</p> <p><input type="checkbox"/> Withdrawal of selected Personal Data</p> <p><input type="checkbox"/> Full withdrawal and deletion of Personal Data</p>								
Status of DAR	<p><input type="checkbox"/> Approved and Completed</p> <p><input type="checkbox"/> Reason for rejection: _____</p>								
Date DAR completed:	<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 60%;">Implementation Check</th> <th style="width: 40%;">Date</th> </tr> </thead> <tbody> <tr> <td>System updated based on DAR:</td> <td></td> </tr> <tr> <td>Response sent to Data Subject / Relevant person on the completion of DAR:</td> <td></td> </tr> <tr> <td>Copy given to Data Subject/ Relevant Person: (where applicable)</td> <td> <p>_____</p> <p><input type="checkbox"/> By hand</p> <p><input type="checkbox"/> Courier (please attach the courier slip).</p> </td> </tr> </tbody> </table>	Implementation Check	Date	System updated based on DAR:		Response sent to Data Subject / Relevant person on the completion of DAR:		Copy given to Data Subject/ Relevant Person: (where applicable)	<p>_____</p> <p><input type="checkbox"/> By hand</p> <p><input type="checkbox"/> Courier (please attach the courier slip).</p>
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Checked by: (Data Protection Officer/ Supervisor)	<p>.....</p> <p>Name:</p> <p>Date:</p>								