

Malaysian Privacy Policy

ComPsych through its partner in Malaysia, Effective Living Sdn. Bhd., are committed to the protection of your Personal Data. We will not disclose or use any of your information for any other purpose except those outlined below.

- **Collection and Processing of Personal Data**

We have or will collect, record, hold, store, use, disclose and/or process (collectively referred to as “Process”) one, or all of the following categories of personal information about you:

- master data: name, date of birth;
- contact details: home address, correspondence address, home phone number and mobile number, e-mail address;
- Mental Health information
- Any information deemed necessary or appropriate in connection with the EAP services you are receiving.

- **Sources of Information**

Your Personal Data has and / or will be obtained from the following sources, where applicable, or such other sources which we may see fit from time to time:

- information provided or submitted by you
- such other written or verbal communications or documents delivered to us prior to and during the course of providing services to you. Please inform us as soon as practicable if there are any errors in your Personal Data or if there have been any changes to your Personal Data.

- **Purpose of Processing Personal Data**

We will Process the Personal Data that you have provided to us for the following purposes, including but not limited to (“Purpose”):

- To manage the delivery of services to you;
- To manage and verify your identity;
- To enable us to provide our services to you;
- To notify you about benefits and changes to the services offered;
- To protect the safety and well-being of yourself and/or other customers;
- To improve our service;
- To maintain records required for security, claims or other legal purposes;
- To respond to any enquiries, complaints, comments or feedback that you submit to us;
- To comply with any regulatory, statutory or legal obligation imposed on us by any relevant authority;
- To contact you for customer satisfaction surveys;
- To conduct statistical analysis to improve our services to you;
- To produce data, reports and statistics which have been anonymized or aggregated in a manner that does not identify you as an individual;
- To third parties with whom we have contracted to provide services to us for any of the purposes described above. Where we disclose your personal data to third parties we shall ensure that such data is used only to provide services to us;
- For any other purposes that is required or permitted by any law, regulations, guidelines and/or relevant regulatory authorities.

- For meeting any legal or regulatory requirements relating to our provision of services and to make disclosure under the requirements of any applicable law, regulation, direction, court order, by-law, guideline, circular, code applicable to us; and / or
 - In order to fulfil any purpose directly related to the above purposes.
- **Disclosure**
 Personal Data provided to us will, generally, be kept confidential but you hereby consent and authorize us to provide and / or disclose your Personal Data to the following categories of parties, who may be based/located inside or outside of Malaysia:
 - any person to whom we are compelled or required to do so under law or in response to a legitimate instruction from a competent or government agency;
 - pursuant to an order of a court of competent jurisdiction;
 - where applicable, third parties who provide related services in connection with our business such as our vendors, business partners, and any party assisting us in carrying out the purposes laid out above;
 - any person to whom we are, in our belief in good faith, under an obligation to make disclosure as required by any applicable law;
 - government agencies, statutory authorities and industry regulators;
 - our auditors, consultants, accountants, lawyers or other financial or professional advisers; and / or
 - our sub-contractors or third party service providers as necessary or appropriate. In addition, your personal information may also be disclosed under the following circumstances:
 - Under discretion, if it is decided that disclosure of information is necessary as there is a threat to your health, safety or life, or that of other individuals. In the case of minors, under the Child Act (2001), we are mandated to report individuals who are:
 - suspected to be physically or emotionally injured as a result of ill-treatment;
 - suspected to be subject to neglect or abandonment.
- **Impact resulting from failure to supply and consent to the Processing of Personal Data**
 - Failure to supply and consent to the Processing of the Personal Data in relation to the Purpose will result in us being unable to provide you with the information, notices, and services requested
- **Your Rights of Access and Correction**
 You have the right to request access to and/or correct your Personal Data and/or limit the Processing thereof. In this respect, you may:
 - check whether we hold or use your Personal Data and request access to such data;
 - request that we correct any of your Personal Data that is inaccurate, incomplete or out-of-date;
 - withdraw, in full or in part, your consent given previously, in each case subject to any applicable legal restrictions, contractual conditions and a reasonable time period. Depending on the information requested and where permitted by law, a nominal administrative fee may be charged. We will endeavor to provide the information back to you as soon as practicable; however we also reserve the right to validate all requests for the authenticity of the request. We may refuse to comply with data access request in circumstances as provided by the law.
 - We have the right to deny access to personal information and data at our discretion:

- that access to this information will pose a serious threat to the life, health or safety of the individual involved or any other individual;
- the request for information is frivolous or vexatious; in which case the individual will be asked for a reason for the need to access this information.

- **Data Retention Policy**

We will retain your Personal Data for only as long as necessary to serve the purposes set out in this Privacy Policy in compliance with all statutory and regulatory requirements in Malaysia concerning the retention of Personal Data. We will take reasonable steps to destroy or permanently anonymize Personal Data if it is no longer needed for such purposes.

- **Consent**

By submitting your personal data, you consent to the use of that personal data as set out in this Policy. If we change our Policy, we will publish the amended version on this page and notify you of any changes. Continued use of the service will signify that you agree to any such changes.

- **Notification of Changes**

Please note that this Policy may be amended from time to time in accordance to applicable laws and regulations and such variations may be applicable to you. In the case of any changes, you will be notified, and the latest version of this Policy will be made available to all customers.

- **Contact**

We are committed to protecting your personal data. If you have any questions (including your rights of access and correction), comments or suggestions regarding this Privacy Policy or your Personal Data please contact admin_info@liveingeffectively.com.my.