

# PRIVACY NOTICE

## MERANTI TEGUH HOLDINGS SDN BHD

### AND ITS GROUP OF COMPANIES

*Issued pursuant to the Personal Data Protection Act 2010 (Act 709)  
as amended by Act A1727 (effective 17 October 2024)*

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#### 1. INTRODUCTION

Meranti Teguh Holdings Group ("MTH Group", "MTHG", "we", "us", or "our") is committed to protecting the personal data of all individuals with whom we interact. This Privacy Notice describes how MTHG and its group of companies collect, use, disclose, store, and protect personal data in accordance with the Personal Data Protection Act 2010 (Act 709), as amended by Act A1727 which came into force on 17 October 2024 ("PDPA"). This Notice also explains your rights under the PDPA, including rights of access, correction, and withdrawal of consent.

This Notice is issued on behalf of the following entities within the MTH Group:

Entity	Principal Activity
Meranti Teguh Holdings Sdn Bhd (MTH)	Group Corporate Services — Holding Company
The Thinking Space (TTS)	Learning & Development
MTH Catering Services (MTHCS): 323 Café	Food & Beverage (Commercial & Events)
MyPhysio Sdn Bhd (MPSB)	Healthcare — Physiotherapy
PRIMO Facilities Management Sdn Bhd (PFM)	Real Estate & Building Management
Haseenah Foundation	Charitable & Corporate Social Responsibility (CSR)

Each entity within the MTH Group acts as a Data Controller in respect of personal data it collects and processes in its own right. MTH is the primary Data Controller for group-level processing activities. Individual entities may issue supplementary privacy notices specific to their operations; such supplementary notices should be read together with this Notice.

References in this Notice to "PDPA" include all subsidiary legislation, codes of practice, and guidelines issued thereunder, including those reflecting the amendments introduced by Act A1727.

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#### 2. SCOPE OF THIS NOTICE

This Notice applies to all personal data collected, processed, stored, used, or disclosed by any entity within the MTH Group, whether collected directly from you or obtained from third-party sources. Where personal data is transferred outside Malaysia (e.g., cloud hosting or overseas service providers), such transfers will only occur subject to contractual safeguards ensuring PDPA compliance and, where applicable, to jurisdictions with adequate data protection standards.

This Notice applies to the following categories of individuals ("Data Subjects"):

- Employees and Job Applicants
- Customers, Clients and Programme Participants
- Patients
- Tenants, Occupants and Building Users
- Vendors, Suppliers and Contractors
- Agents and Professional Referrers
- Beneficiaries and Contributors
- Prospects
- Visitors and Members of the Public

This Notice does not apply to personal data processed solely for personal or domestic purposes, nor to anonymised data that cannot reasonably be used to identify an individual.

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### 3. DATA CONTROLLER AND DATA PROTECTION OFFICERS

MTH is the primary Data Controller for the MTH Group. Each subsidiary entity is also a Data Controller in respect of personal data it independently collects and processes.

In compliance with Section 12a of the PDPA (as introduced by Act A1727), the MTH Group has formally appointed the following Data Protection Officers ("DPOs").

Name	Designation	Contact
Mohamad Bin Mamdouh	Enterprise Architect	dpo@mthgroup.com.my
Arikki Aris	Admin & Corporate Affairs	dpo@mthgroup.com.my

You may contact our DPOs at any time for enquiries, requests, or complaints relating to the handling of your personal data. The appointed DPOs are responsible for overseeing compliance with applicable data protection obligations and may be contacted regarding any matter relating to personal data protection.

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### 4. CATEGORIES OF DATA SUBJECTS

The MTH Group interacts with the following categories of individuals whose personal data may be collected and processed. The applicable entity or entities for each category are indicated below.

#	Data Subject Category	Applicable Entity / Entities
1	Employees & Job Applicants	All MTH Group entities
2	Customers, Clients & Programme Participants, Membership/Loyalty Programs	TTS, MTHCS
3	Patients	MPSB
4	Tenants, Occupants & Building Users	PFM
5	Vendors, Suppliers & Contractors	All MTH Group entities
6	Agents & Professional Referrers	PFM; MPSB
7	Beneficiaries & Contributors	Haseenah Foundation
8	Prospects	All MTH Group entities
9	Visitors & Members of the Public	All MTH Group premises

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### 5. PERSONAL DATA WE COLLECT

The table below sets out the categories of personal data we collect for each Data Subject group, whether provision is mandatory or voluntary, and the consequences of not providing the data. We collect only the minimum data necessary for the stated purposes.

#### Group 1 — Employees & Job Applicants

Sensitive Personal Data: Health/medical records and biometric data (where used for access/attendance) are Sensitive Personal Data under Section 40 PDPA and require express consent unless a statutory exception applies (see Sections 10.2 and 10.3). Race data may be collected where reasonably necessary for employment administration, diversity reporting, statutory reporting requirements, or other lawful operational purposes. Data regarding religion may be collected where reasonably necessary for the administration of religious leave entitlements, employee welfare arrangements, or other lawful employment-related purposes.

Data Category	Data Fields	Mandatory / Voluntary	Consequence of Non-Consent
Personal	Full name; National Registration Identity Card (NRIC); passport number; date and place of birth; gender; race; religion; nationality; marital status; dependent information	Mandatory	Employment application, onboarding, payroll processing, statutory submissions, and continued administration of the employment relationship may not be possible
Contact	Residential address; personal email address; mobile number; emergency contact and next-of-kin details	Mandatory	The Company may be unable to communicate with the employee regarding employment matters, emergencies, workplace safety matters, or statutory obligations
Employment	Job title; department; employment history and references; performance appraisals; disciplinary records; attendance and leave records	Mandatory	The Company may be unable to properly administer, evaluate, supervise, or continue the employment relationship
Financial	Bank account details; salary, bonuses and allowances; Employees Provident Fund (EPF) reference number; Social Security Organisation (SOCSO) reference number; Employment Insurance System (EIS) reference number; <i>Lembaga Hasil Dalam Negeri</i> (LHDN) reference number	Mandatory	Salary payments, statutory contributions, reimbursements, and employment-related financial processing cannot be administered
Sensitive Health —	Health and medical records (pre-employment screening, sick leave certificates, occupational health); insurance information	Mandatory where required by law or employment terms	The Company may be unable to comply with occupational safety obligations, administer medical or insurance-related matters, assess fitness for work where relevant, or fulfil employment obligations required by law
Qualifications	Educational qualifications and certificates; professional certifications	Mandatory for regulated roles	Professional standing cannot be verified
Technical & Access	System login credentials and usage logs; access card records; biometric data where used for attendance or access control (see Section 10.2 — express consent required before collection)	Mandatory for system and premises access	Access to Company systems, networks, devices, applications, or premises may be denied, restricted, suspended, or revoked where such data is necessary for security, operational, or compliance purposes
Visual	Closed-Circuit Television (CCTV) recordings within Company premises	Mandatory (premises security)	Collected automatically upon entry to premises
Visual (Marketing)	Photographs and video recordings captured during MTH Group events, marketing activities, or professional engagements where the employee is identifiable	Voluntary — employees may express a preference not to be included in external marketing content by notifying their line manager or the DPO at <a href="mailto:dpo@nthgroup.com.my">dpo@nthgroup.com.my</a> in advance of the relevant activity	Employee's image will not be used in external marketing materials; where incidental capture has already occurred prior to notification, reasonable steps will be taken to exclude the image before publication

## Group 2 — Customers, Clients, Programme Participants & Membership/Loyalty Programs

Data Category	Data Fields	Mandatory / Voluntary	Consequence of Non-Consent
Personal	Full name; NRIC or passport number (where required for registration or certification); date of birth (for age verification where applicable); gender	Mandatory for registration	Programme registration, membership registration, participation, attendance tracking, certification issuance, and related administrative processes may not be possible
Contact	Email address; mobile number; residential or mailing address	Mandatory	The Company may be unable to provide programme updates, scheduling information, attendance confirmations, certificates, or service-related communications
Programme	Programme, workshop or event enrolled; attendance records; assessment or evaluation records; certifications issued	Mandatory for service delivery	Participation history, attendance verification, assessments, certifications, and programme administration may not be properly maintained
Financial	Payment details; billing address; transaction records	Mandatory for paid programmes	Payments, refunds, invoicing, or programme access for paid services may not be processed
Marketing	Communication preferences; marketing consent records	Voluntary	Marketing communications will not be sent
Visual (Marketing)	Photographs and video recordings taken during MTH Group events, programmes, or marketing activities where the individual is identifiable	Voluntary — for direct registrants, consent is collected through the registration or booking form. For unregistered participants attending as part of an organiser-booked group, a dedicated standalone consent form is issued by TTS staff or the event organiser prior to any photography or video recording taking place. Entry-point signage is displayed at all events where photography is in progress as a secondary notice mechanism.	Individual's image will not be used in MTH Group marketing materials. Where consent has been provided via the standalone form and the data subject wishes to withdraw, withdrawal must be submitted in writing to dpo@mthgroup.com.my. Where incidental capture has occurred prior to consent or notification, reasonable steps will be taken to exclude the image before publication.

## Group 3 — Patients

Sensitive Personal Data: Health and medical data is Sensitive Personal Data under Section 40 PDPA. Processing for treatment purposes is permitted under the healthcare professional exception (Section 40(1)(b)). Where required under applicable law, express consent will be obtained for processing patient data for purposes beyond direct treatment, including certain insurance, referral, analytics, or research activities.

Data Category	Data Fields	Mandatory / Voluntary	Consequence of Non-Consent
Personal	Full name; NRIC or passport number; date of birth; gender; nationality	Mandatory	Patient registration, identity verification, medical record management, and safe treatment administration may not be possible
Contact	Mobile number; email address; residential address; emergency contact	Mandatory	The Company may be unable to communicate regarding appointments, treatment plans, emergencies, follow-up care, or medical-related matters
Medical	Medical history; current conditions and diagnoses; medications; allergies; treatment records; session notes; progress and outcome records; referral letters from doctors	Mandatory for treatment	Assessment, treatment planning, continuity of care, patient safety management, and clinical decision-making may be adversely affected or may not be possible
Insurance	Insurance provider name; policy number; panel membership details; claims records	Mandatory if claiming under insurance panel	Insurance verification, panel approvals, claims processing, or reimbursement arrangements may not be possible
Financial	Payment details; billing records; outstanding balance	Mandatory	Billing, invoicing, payment processing, or outstanding account management may not be possible
Referral	Referring doctor name and contact details; referring clinic or hospital	Mandatory where referral is involved	Referral verification, treatment coordination, or continuity of care with external healthcare providers may not be possible

#### Group 4 – Tenants, Occupants & Building Users

Data Category	Data Fields	Mandatory / Voluntary	Consequence of Non-Consent
Personal	Full name and signature; NRIC or passport number; gender	Mandatory	The Company may be unable to verify identity, approve tenancy arrangements, issue access privileges, or proceed with tenancy or licence arrangements
Contact	Contact number; email address; residential or correspondence address	Mandatory	The Company may be unable to deliver notices, maintenance updates, emergency communications, billing notices, or tenancy-related communications
Business	Company or business name; <i>Suruhanjaya Syarikat Malaysia</i> (SSM) registration number (corporate tenants); job title (for corporate representatives)	Mandatory for corporate tenants	Corporate tenancy verification, due diligence, onboarding, and tenancy administration may not proceed
Tenancy	Tenancy or licence details and terms; names and identification of authorised occupants and representatives	Mandatory	Building access control, occupancy administration, tenancy management, and security records may not be properly maintained
Financial	Rental payment history; banking and payment details	Mandatory	Rental collection, invoicing, deposits, refunds, or other financial transactions may not be processed
Visual	CCTV recordings within managed premises	Mandatory (premises security)	Collected automatically upon entry to premises
Communications	Correspondence and communications	Mandatory where relevant	Tenancy matters cannot be administered

**Group 5 — Vendors, Suppliers & Contractors**

<b>Data Category</b>	<b>Data Fields</b>	<b>Mandatory / Voluntary</b>	<b>Consequence of Non-Consent</b>
Personal	Full name; NRIC or passport number; gender	Mandatory	Vendor onboarding, due diligence, contract administration, site access approval, or engagement may not proceed
Contact	Contact number; email address; residential or business address	Mandatory	Operational coordination, procurement communications, notices, or contract-related communications may not be possible
Business	Company or business name; SSM or company registration number; business nature and services provided; job title and department	Mandatory	Vendor verification, procurement processes, compliance checks, onboarding, or contract administration may not proceed
Financial	Banking and payment details; contract value and payment records	Mandatory	Invoices, reimbursements, contract payments, or financial processing may not be possible
Qualifications	Professional qualifications; licences and certifications relevant to services provided	Mandatory for regulated services	Regulatory compliance, competency verification, safety approvals, or engagement for regulated services may not proceed
Visual	CCTV recordings when on Company premises	Mandatory (premises security)	Unable to use any of our premise - collected automatically upon entry to premises

**Group 6 — Agents & Professional Referrers**

<b>Data Category</b>	<b>Data Fields</b>	<b>Mandatory / Voluntary</b>	<b>Consequence of Non-Consent</b>
Personal	Full name; NRIC or passport number; gender	Mandatory	Professional engagement, appointment, onboarding, or verification processes may not proceed
Contact	Contact number; email address; business address	Mandatory	Operational coordination, referrals, notices, or business communications may not be possible
Professional	Professional registration number and licence (real estate: Real Estate Negotiator (REN) / Real Estate Agent (REA); doctors: Malaysian Medical Council (MMC) registration); affiliated agency or clinic/hospital	Mandatory	Regulatory verification, licensing validation, compliance checks, or professional engagement may not proceed
Financial	Bank account details; commission or referral records	Mandatory	Commission payments, referral arrangements, or financial settlements may not be processed

### Group 7 – Beneficiaries & Contributors

Sensitive Personal Data: Health information of beneficiaries (where relevant to programme eligibility) is Sensitive Personal Data under Section 40 PDPA and requires express consent.

Data Category	Data Fields	Mandatory / Voluntary	Consequence of Non-Consent
Personal	Full name; NRIC or passport number; date of birth; gender	Mandatory	Programme eligibility assessment, beneficiary verification, or benefit disbursement may not proceed
Contact	Mobile number; email address; residential address	Mandatory	Programme-related communications, updates, support arrangements, or disbursement notifications may not be possible
Demographic (Beneficiaries)	Age; marital status; household size	Mandatory for eligibility	Programme eligibility assessment cannot be completed
Financial (Beneficiaries)	Household income; bank account details (for benefit disbursement)	Mandatory for disbursement	Benefit disbursement, reimbursement, or financial assistance administration may not be possible
Health (Beneficiaries)	Health conditions relevant to programme eligibility	Voluntary; express consent required. Non-Consent means health-related eligibility criteria cannot be assessed.	Eligibility for programmes involving health-related criteria or specialised assistance may not be properly assessed
Donation (Contributors)	Donation amount and frequency; payment details; tax exemption reference	Mandatory for contributions	Donation processing, acknowledgement issuance, tax receipt generation, or contribution administration may not be possible

### Group 8 – Prospects

*Applies to: All MTH Group entities.*

Data Category	Data Fields	Mandatory / Voluntary	Consequence of Non-Consent
Personal	Full name	Mandatory to respond to enquiry	The Company may be unable to respond to enquiries, provide requested information, or follow up regarding products or services
Contact	Email address; mobile number	Mandatory to respond to enquiry	Unable to communicate in response to enquiry
Enquiry	Nature of enquiry; programme or service of interest; preferred contact method	Voluntary	Enquiry response may be less tailored

### Group 9 – Visitors & Members of the Public

*Applies to: All MTH Group premises.*

Sensitive Personal Data: Biometric data (where facial recognition or biometric access control is used) is Sensitive Personal Data under Act A1727 and requires express consent.

Data Category	Data Fields	Mandatory / Voluntary	Consequence of Non-Consent
Personal	Full name; NRIC or passport number	Mandatory for entry	The Company may deny or restrict access to premises for security, safety, or operational reasons
Contact	Contact number (where provided)	Voluntary	The Company may be unable to communicate regarding visitor verification, emergency situations, security matters, or premises-related issues
Visit	Reason for visit; host name; date and time of visit and departure	Mandatory for entry	Visitor access, security verification, emergency response coordination, or premises management may not be possible
Visual	CCTV recordings; biometric data where used for access control	Mandatory (premises security)	Collected automatically upon entry to premises
Visual (Marketing)	Photographs and video recordings captured at MTH Group public events, open days, or community activities where the visitor is identifiable	Voluntary — notice provided at point of entry; individuals may opt out by notifying the photographer or MTH Group representative present	Individual's image will not be used in MTH Group marketing materials; where incidental capture has already occurred prior to notification, reasonable steps will be taken to exclude the image before publication

*Note on Biometric Data and Voluntary Consent (Section 16 PDPA): Where biometric data (including facial recognition) is used for access control at any MTH Group premises, MTH Group will offer an alternative non-biometric entry process (such as manual sign-in with NRIC verification) for individuals who do not consent to biometric collection. Denial of entry solely on the basis of refusal to provide biometric data will not occur where an alternative entry method is available. This ensures that consent to biometric processing remains genuinely voluntary in accordance with Section 16 of the PDPA.*

## 6. SOURCES OF PERSONAL DATA

We collect personal data from the following sources:

### 6.1 Directly from You

- When you submit an employment application, onboarding forms, or Human Resources (HR) documents;
- When you register for a programme, workshop, or event;
- When you seek treatment or consultation;
- When you enter into a tenancy, licence, or service agreement;
- When you engage with us as a vendor, supplier, contractor, or agent;
- When you make a donation or apply for beneficiary status;
- When you submit an enquiry, feedback, or complaint to any MTH Group entity;
- When you visit any of our premises.
- When you attend MTH Group events, programmes, or marketing activities at which photography or video recording is conducted by MTH Group personnel or contracted content producers on the day of the event or activity.

### 6.2 From Third Parties

- Referring doctors and healthcare professionals;
- Insurance panels and third-party administrators;
- Real estate agents and negotiators;

- Statutory bodies: EPF, SOCSO, LHDN, SSM, and other government agencies;
- Background check and reference verification service providers;
- Other entities within the MTH Group, where data sharing is necessary for operational purposes (see Section 9).

### 6.3 Automatically Collected

- CCTV and video surveillance systems at all MTH Group premises;
- Electronic access control and attendance management systems;
- Information Technology (IT) systems, portals, and platforms used in our operations.

## 7. PURPOSES OF PROCESSING AND LEGAL BASIS

We process personal data only for lawful purposes that are directly related to our activities. We process personal data in accordance with the Personal Data Protection Act 2010, including where processing is necessary for contractual purposes, compliance with legal obligations, administration of services, protection of vital interests, operational and security purposes, or where consent has been obtained from the relevant data subject. The table below sets out the primary purposes and applicable legal basis for each Data Subject group.

Data Subject Group	Purposes of Processing	Applicable Basis for Processing
Employees & Job Applicants	<ul style="list-style-type: none"> <li>• Managing and administering the employment relationship</li> <li>• Recruitment, selection, and onboarding</li> <li>• Payroll processing, statutory contributions, and benefits administration (EPF, SOCSO, EIS, LHDN)</li> <li>• Performance management and career development</li> <li>• Attendance and leave management</li> <li>• Workplace safety and security</li> <li>• Internal communications and operations</li> <li>• Compliance with legal, regulatory, and statutory obligations</li> <li>• Disciplinary proceedings and grievance management</li> </ul>	Contract performance; Legal obligation; Consent (for sensitive data)
Customers, Clients, Programme Participants & Membership/Loyalty Programs	<ul style="list-style-type: none"> <li>• Processing programme, workshop, and event registrations</li> <li>• Administering and delivering learning programmes</li> <li>• Issuing certificates and programme records</li> <li>• Payment processing and billing</li> <li>• Communicating about future programmes and relevant initiatives (with consent)</li> <li>• Marketing and promotional purposes related to educational and community activities (with consent)</li> <li>• Internal reporting and programme improvement</li> <li>• Coordinating with related MTH Group entities for facilities, catering, and event management</li> </ul>	Contract performance; Consent (marketing)
Patients	<ul style="list-style-type: none"> <li>• Providing assessment, treatment, and clinical management</li> <li>• Maintaining clinical records for continuity of care</li> <li>• Coordinating treatment with referring doctors (where relevant to treatment)</li> <li>• Processing insurance panel claims and billing</li> <li>• Scheduling appointments and managing patient communications</li> <li>• Compliance with Ministry of Health regulations and professional obligations</li> <li>• Internal accounts and invoicing</li> <li>• Payroll administration for MPSB employees</li> </ul>	Contract performance; Legal obligation; Consent (non-treatment purposes)
Tenants, Occupants & Building Users	<ul style="list-style-type: none"> <li>• Managing and administering tenancy and licence agreements</li> <li>• Facilitating property viewings, negotiations, and leasing transactions</li> <li>• Maintenance, repair, and facilities management</li> <li>• Health, safety, and security at managed premises</li> <li>• Invoicing, billing, and payment processing</li> <li>• Background checks and reference verification</li> <li>• Managing enquiries, requests, feedback, and complaints</li> <li>• Internal reporting and business planning</li> </ul>	Contract performance; Legal obligation

Data Subject Group	Purposes of Processing	Applicable Basis for Processing
Vendors, Suppliers & Contractors	<ul style="list-style-type: none"> <li>Administering vendor and contractor engagements</li> <li>Procurement and contract management</li> <li>Processing payments and maintaining financial records</li> <li>Verifying professional qualifications and licences</li> <li>Compliance with legal and regulatory requirements</li> <li>Internal reporting and operational planning</li> </ul>	Contract performance; Legal obligation
Agents & Professional Referrers	<ul style="list-style-type: none"> <li>Administering agent and referrer engagements</li> <li>Verifying professional licences and registration (REN/REA for real estate; MMC for doctors)</li> <li>Processing commission and referral payments</li> <li>Coordinating referral and leasing activities</li> </ul>	Contract performance
Beneficiaries & Contributors	<ul style="list-style-type: none"> <li>Assessing beneficiary eligibility for foundation programmes</li> <li>Administering benefit disbursements</li> <li>Maintaining contribution and donation records</li> <li>Issuing tax exemption receipts (where applicable)</li> <li>Preparing annual reports</li> <li>Complying with regulatory and reporting requirements</li> <li>Internal programme evaluation and impact assessment</li> </ul>	Consent; Legal obligation
Prospects	<ul style="list-style-type: none"> <li>Responding to enquiries about our products and services</li> <li>Providing information about programmes, properties, or opportunities</li> <li>Following up on expressions of interest</li> </ul>	Consent
Visitors & Members of the Public	<ul style="list-style-type: none"> <li>Managing visitor access and premises security</li> <li>CCTV surveillance for safety and loss prevention</li> <li>Investigating incidents and supporting law enforcement where required</li> <li>Operational management</li> </ul>	Consent by conduct

MTH Group additionally uses data from across the group for: accounts and financial management; marketing strategies (including menu and promotional materials); financial reporting; and operational planning. Marketing communications is done by the respective data controller and are sent only to individuals who have provided express consent to receive communications from MTH Group entities, given at the time their personal data was originally collected by the relevant subsidiary.

## 8. DISCLOSURE TO THIRD PARTIES

We may disclose your personal data to the following categories of third parties, strictly for the purposes stated in Section 7 and subject to appropriate safeguards. All third-party technology service providers engaged as data processors are bound by written contractual terms requiring PDPA-compliant handling of personal data. Where third parties process personal data on behalf of MTH Group, such parties are required to process the data only in accordance with MTH Group's instructions and to implement appropriate technical and organizational security measures.

Category of Recipient	Applicable Data Subjects	Purpose
Government & Statutory Authorities (EPF, SOCSO, LHDN, Ministry of Health (MOH), SSM)	Employees; Patients; Vendors	Statutory contributions; regulatory compliance; licensing
Insurance Providers & Panel Administrators	Employees; Patients	Insurance claims; panel billing; benefits administration
Payroll & HR Service Providers	Employees	Payroll processing; HR administration
IT & Technology Service Providers	All groups	System hosting; platform management; technical support
Legal Advisors & Professional Consultants	All groups	Legal advice; compliance; dispute resolution
External Auditors	All groups	Financial audit; compliance review
Referring Doctors & Healthcare Professionals	Patients	Treatment coordination and continuity of care (where clinically relevant)

Category of Recipient	Applicable Data Subjects	Purpose
Real Estate Agents & Negotiators	Tenants & Prospects	Facilitating tenancy transactions
Financial Institutions & Payment Processors	All groups	Payment processing; banking transactions
Law Enforcement & Regulatory Authorities	All groups (where legally required)	Compliance with legal obligations; investigation of offences
Other MTH Group Entities	Relevant groups (see Section 9)	Intra-group operational, administrative, and financial purposes — see Section 9 for full details

We do not sell, rent, or trade your personal data to third parties for their own marketing purposes.

## 9. INTRA-GROUP DATA SHARING

The PDPA 2010 does not provide a blanket exemption for intra-group data transfers. All sharing of personal data between MTH Group entities is carried out on the basis of consent, contract performance, or another lawful basis under Sections 6 and 8 of the PDPA.

The following intra-group data flows are confirmed:

From	To	Data Shared	Purpose	Legal Basis
MyPhysio (MPSB)	MTH	Invoices containing patient information; employee payroll data	Accounts management; payroll processing	Contract performance
PRIMO (PFM)	MTH	Financial records; operational data	Accounts; marketing; legal; operational planning	Contract performance
TTS	MTH	Participant data; financial data	Accounts; marketing; operational planning	Consent; contract performance
TTS	MTHCS	Participant data (limited)	Catering and event coordination	Consent; contract performance
All entities	MTH	Employee data	Group payroll; HR; statutory submissions	Contract performance; statutory obligation
MTHCS	MTH	Sales transaction data, operational records, and limited customer information (where collected)	Financial reporting, operational planning, marketing analysis, and business administration	Consent; contract performance

Haseenah Foundation does not share beneficiary or contributor data with any external party. Data held by Haseenah Foundation may be accessible to MTHG Sdn Bhd at holding company level solely for consolidated governance and regulatory reporting purposes, in accordance with this section.

Where data is shared within the group, the receiving entity processes it solely for the stated purpose. All MTH Group entities that receive personal data pursuant to this section are required to handle such data in accordance with the PDPA 2010 and the data protection standards adopted by the group.

## 9A. TRANSFER OF PERSONAL DATA OUTSIDE MALAYSIA

In the course of our operations, certain personal data may be transferred to and processed on servers located outside Malaysia, where we utilise cloud-based platforms and technology services provided by third-party vendors. All such transfers are carried out in compliance with Section 129 of the Personal Data Protection Act 2010, as amended by Act A1727. Where personal data is transferred outside Malaysia (for example, to cloud hosting

providers or overseas service partners), such transfers will only occur subject to contractual safeguards ensuring PDPA compliance and, where applicable, to jurisdictions with adequate data protection standards.

#### **9A.1 Transfers to the United States of America**

Certain personal data may be transferred to and processed on servers located in the United States of America, where we utilise cloud-based productivity, communication, and Artificial Intelligence (AI)-assisted platforms provided by third-party technology vendors. The United States does not maintain a data protection framework that is substantially similar to the PDPA; such transfers may be carried out subject to contractual safeguards, consent where required, and other lawful mechanisms permitted under applicable law in accordance with Section 129 of the PDPA.

We take reasonable steps to ensure that any third-party vendors processing personal data on our behalf in the United States are bound by appropriate contractual obligations to protect your personal data to a standard consistent with the PDPA.

Where personal data constituting Sensitive Personal Data (including health and medical records) is transferred outside Malaysia, MTH Group will obtain express consent from the relevant individual via a dedicated consent mechanism at the point of collection — such as a patient intake form — prior to such transfer taking place.

#### **9A.2 Malaysia-Hosted and Local Systems**

Certain systems and platforms used by the MTH Group are hosted within Malaysia or operated by Malaysian-incorporated vendors. Personal data processed exclusively within such systems is not subject to cross-border transfer and remains within Malaysia.

#### **9A.3 Your Rights**

You have the right to withdraw your consent to the transfer of your personal data outside Malaysia at any time by contacting our DPOs at [dpo@methgroup.com.my](mailto:dpo@methgroup.com.my). Please note that withdrawal of consent may affect our ability to deliver certain services that rely on the platforms referenced above. Withdrawal does not affect the lawfulness of any transfer carried out prior to withdrawal.

#### **9A.4 Artificial Intelligence Tools**

MTH Group may utilise AI-assisted tools and platforms to support operational, administrative, communication, or productivity functions. Appropriate safeguards are implemented to minimise unauthorised disclosure of personal data. MTH Group does not use solely automated decision-making systems that produce legal or similarly significant effects on individuals without meaningful human involvement. MTH Group does not use facial recognition or automated biometric analysis in its own marketing photography workflows. Images published on third-party social media platforms may be subject to those platforms' automated processing capabilities — data subjects are encouraged to review the relevant platform privacy policies for further information.

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## **10. SENSITIVE PERSONAL DATA**

The following categories of personal data are classified as Sensitive Personal Data under Section 40 of the PDPA, as expanded by Act A1727, and require express consent before processing (unless a statutory exception applies):

- Physical or mental health or condition;
- Political opinions;
- Religious beliefs or similar beliefs;
- Race (as defined in Section 40 PDPA);
- Commission or alleged commission of any offence;
- Biometric data — any personal data resulting from technical processing relating to the physical, physiological or behavioural characteristics of a person (added by Act A1727).

Note: The categories of Sensitive Personal Data listed above reflect the definition under the PDPA 2010 as amended by Act A1727. The Minister may, by order published in the Gazette, add further categories to this list. MTH Group will update its practices and this Notice accordingly upon the coming into force of any such order.

### **10.1 Healthcare Exception — MyPhysio**

Under Section 40(1)(b) PDPA, express consent is not required where health data is processed by a healthcare professional (including registered physiotherapists) for the purposes of providing medical care or treatment, or

managing healthcare services. MyPhysio physiotherapists and clinical staff qualify as healthcare professionals under this exception.

Express consent is required where patient health data is processed for purposes beyond direct treatment, including insurance claims, referrals to external parties, analytics, or research.

This exception applies to registered clinical professionals in the exercise of their clinical duties. Administrative staff accessing patient data for billing, scheduling, or operational purposes do so on the basis of contract performance as part of the delivery of healthcare services.

### **10.2 Biometric Data**

Where biometric systems are implemented, MTH Group will ensure such processing is proportionate, secure, and limited to legitimate attendance management or access control purposes. Express consent will be obtained where required under applicable law. Where biometric collection is used for premises access, an alternative non-biometric entry process will be made available to individuals who do not consent, in accordance with Section 16 of the PDPA.

### **10.3 Employment Exception**

Health data processed in connection with statutory employment obligations (e.g., sick leave, occupational health, SOCSO claims) may be processed without express consent where required by law or necessary to fulfil employment rights and obligations. Race and religion data may be collected where reasonably necessary for employment administration, diversity reporting, statutory reporting requirements, administration of religious leave entitlements, employee welfare arrangements, or other lawful employment-related purposes.

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## **11. DATA STORAGE AND SECURITY**

We are committed to protecting your personal data against loss, misuse, modification, unauthorised or accidental access or disclosure, alteration, and destruction. We implement appropriate technical and organizational security measures proportionate to the nature and sensitivity of the data processed, including:

- Access controls and authentication requirements for all systems containing personal data;
- Encryption of personal data in transit and at rest where technically feasible;
- Regular security reviews and vulnerability assessments;
- Staff training on data protection obligations;
- Data minimisation and need-to-know access principles;
- Physical security controls at all premises.

Where personal data constitutes Sensitive Personal Data as defined under the PDPA 2010 (as amended), MTH Group applies additional technical and organizational safeguards proportionate to the sensitivity of the data, including but not limited to: restricted access controls, encryption at rest and in transit, audit logging of access events, and enhanced staff training for personnel handling such data.

Employees should not expect absolute privacy when using company-owned systems, devices, premises, networks, or communication platforms, subject always to applicable law and proportionality requirements.

### **11.1 Data Breach Notification**

Upon becoming aware of a reportable personal data breach:

- The appointed Data Protection Officers will coordinate breach assessment and notification obligations on behalf of MTH Group.
- MTH Group will notify the Personal Data Protection Commissioner within 72 hours of becoming aware of the breach, where and when required, in accordance with the notification requirements prescribed under the PDPA; and
- MTH Group will notify affected data subjects without unnecessary delay where a breach is likely to cause, or has caused, material harm, significant harm, or other thresholds prescribed under applicable law to those individuals.

"Personal data breach" means any breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data. Notifications to data subjects will include the nature of the breach, data affected, likely consequences, and steps taken or proposed to address the breach.

## 12. DATA RETENTION

We retain personal data only for as long as is necessary for the purposes for which it was collected, or as required by applicable law, regulation, or professional obligation. The retention periods applied by the MTH Group are confirmed in the table below.

Actual retention periods may vary depending on operational, contractual, regulatory, legal, insurance, dispute resolution, or evidential requirements.

Data Category	Retention Period	Basis
Employee records	7 years post-employment	EPF/SOCSO/LHDN statutory requirements
Patient records	7 years post-last treatment	Ministry of Health regulations
Customer/participant records	6 years post-last transaction	Limitation Act 1953 Section 6 (6-year limitation period)
CCTV footage	90 days (extended if incident)	Operational and security purposes
Vendor/contractor records	Duration of contract + 7 years	Limitation Act 1953; tax obligations
Tenancy records	Duration of tenancy + 7 years	Limitation Act 1953
Beneficiary & contributor records	Duration of programme/relationship + 7 years	Companies Act 2016 s.248 (7-year accounting records obligation); annual report obligations
Marketing consent records	Until withdrawal of consent + 3 years	Evidential purposes
Prospect records	3 years from last enquiry	Default retention period (no applicable statute)
Patient-linked financial records (MyPhysio invoices -- MTH Group Corporate Services (GCS))	7 years from invoice date	Income Tax Act 1967; Companies Act 2016 Section 248
TTS participant data held by MTHCS (catering coordination only)	Duration of event + 30 days (identifiable); Indefinitely if fully anonymised	PDPA Section 6 (Purpose Limitation); Section 10 (Retention)
Marketing photography and video content (identifiable individuals)	3 years from date of capture, or earlier upon valid withdrawal of consent or removal request	Default retention period; PDPA Section 10 (Retention Principle)

## 13. YOUR RIGHTS AS A DATA SUBJECT

Subject to the PDPA and applicable exceptions, you have the following rights:

Right	Description	How to Exercise	Response Timeline
Right to be Informed	To receive this Notice describing how your personal data is collected and processed	This Notice fulfils this obligation	At point of data collection
Right of Access (Sections 30-33)	To request access to the personal data we hold about you and information on how it is being processed	Submit a written Data Access Request to <a href="mailto:dpo@mthgroup.com.my">dpo@mthgroup.com.my</a>	21 days, or within such extended period as may be permitted under the PDPA
Right to Correction (Sections 34-37)	To request correction of inaccurate, incomplete, misleading, or outdated personal data	Submit a written Data Correction Request to <a href="mailto:dpo@mthgroup.com.my">dpo@mthgroup.com.my</a>	21 days, or within such extended period as may be permitted under the PDPA; third parties who received the data in the preceding 12 months will be notified

Right	Description	How to Exercise	Response Timeline
Right to Withdraw Consent (Section 38)	To withdraw consent to the processing of your personal data at any time	Submit written notice to <a href="mailto:dpo@mthgroup.com.my">dpo@mthgroup.com.my</a> . Withdrawal of consent will result in the cessation of processing carried out solely on the basis of your consent. Processing carried out on other lawful grounds (such as contract performance or legal obligation) will continue unaffected	Within a reasonable period after receipt and verification of the request
Right to Object (Section 42)	To object to processing that causes or is likely to cause substantial damage or distress	Submit written notice to <a href="mailto:dpo@mthgroup.com.my">dpo@mthgroup.com.my</a>	21 days
Right to Opt-Out of Direct Marketing (Section 43)	To opt out of receiving marketing communications at any time	Reply STOP or UNSUBSCRIBE to any marketing communication, or write to <a href="mailto:dpo@mthgroup.com.my">dpo@mthgroup.com.my</a>	Within a reasonable time of receipt
Right to Data Portability (where applicable under the PDPA and any regulations issued thereunder)	To request that your personal data be transmitted in electronic form to another Data Controller of your choice, subject to technical feasibility	Submit a written Data Portability Request to <a href="mailto:dpo@mthgroup.com.my">dpo@mthgroup.com.my</a> , specifying the receiving Data Controller	Subject to timelines prescribed under regulations issued pursuant to Act A1727. Pending finalisation of such regulations, we will endeavour to respond within 21 days
Right to Complain to the Personal Data Protection Commissioner	If you are dissatisfied with how MTH Group has handled your personal data or responded to a data subject rights request, you have the right to lodge a complaint with the Personal Data Protection Commissioner (PDPC) of Malaysia.	Lodge a complaint directly with the PDPC via the official portal by contacting the Department of Personal Data Protection (JPDP). You are encouraged to contact us first at <a href="mailto:dpo@mthgroup.com.my">dpo@mthgroup.com.my</a> to allow us the opportunity to resolve your concern.	Subject to the PDPC's own timelines and procedures

We reserve the right to charge any fee permitted or prescribed under the PDPA and applicable regulations. We will not process requests that are unreasonable, repetitive, abusive, or otherwise permitted to be refused under applicable law.

## 14. DIRECT MARKETING

We will only send you marketing communications where you have given your consent to receive them, or where you are an existing customer and the communication relates to our similar products or services, in accordance with applicable law.

Marketing communications may be sent via:

- Email
- Short Message Service (SMS) or WhatsApp
- Social media platforms (including Instagram, Facebook, LinkedIn, TikTok, and others)
- Printed materials

You may withdraw your consent to receive marketing communications at any time by replying STOP or UNSUBSCRIBE to any marketing message, or by contacting us at dpo@mthgroup.com.my. Withdrawal of marketing consent does not affect the lawfulness of processing carried out before withdrawal, nor does it affect processing necessary for the delivery of contracted services.

Where WhatsApp or social media platforms are used to send marketing communications, personal data may be processed on servers located outside Malaysia. Please refer to Section 9A for further information.

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#### **14A. PHOTOGRAPHY AND VIDEOGRAPHY FOR MARKETING PURPOSES**

Marketing activities conducted by MTH Group entities may involve photography and video recording at events, programmes, premises, and activities operated or hosted by the MTH Group. Images and recordings of identifiable individuals captured during such activities constitute personal data under the PDPA and are processed in accordance with this Notice.

##### **14A.1 When Photography Occurs**

Photography and video recording may be conducted by MTH Group personnel or contracted content producers on the day of the event or activity at:

- TTS programmes, workshops, events, and training sessions;
- 323 Café and MTHCS catering events and promotional activities;
- PRIMO-managed premises during marketing or promotional activities;
- MTH Group corporate events, open days, and community activities;
- Any other MTH Group premises or events where marketing content is being produced.

##### **14A.2 How Images May Be Used**

Images and video recordings captured during marketing activities may be used in:

- Social media platforms (including Instagram, Facebook, LinkedIn, TikTok, and others);
- MTH Group websites and digital platforms;
- Printed promotional and marketing materials;
- Video content and presentations;
- Internal communications, reports, and publications.

Publication of identifiable images on social media platforms may involve the transfer of personal data outside Malaysia. Please refer to Section 9A for further information.

MTH Group may engage contracted content producers, marketing agencies, or digital platform operators in connection with the publication of marketing photography and video content. Such parties receive personal data only to the extent necessary for the performance of their contracted services and are bound by appropriate data protection obligations in accordance with Section 8 of this Notice.

##### **14A.3 Notice, Consent, and Opt-Out**

Participation in MTH Group photography and video recording activities is voluntary.

Where photography or video recording is taking place at MTH Group events or premises, prominent notice will be displayed at the point of entry informing individuals that such activities are in progress. Individuals who do not wish to be photographed or recorded should notify the photographer or the MTH Group representative present, and reasonable steps will be taken to accommodate such requests. Where an individual is captured in an image prior to communicating their preference, MTH Group will, upon request, take reasonable steps to exclude or obscure that individual's image from content prior to publication.

In accordance with Section 16 of the PDPA, MTH Group will not deny access to events or services solely on the basis of an individual's refusal to be photographed or recorded.

For TTS programmes, workshops, and events where participants attend as part of a group booked by an event organiser and have not individually completed a registration or booking form, MTH Group will provide a dedicated standalone consent form for marketing photography and video recording. This form is separate from and independent of any attendance record. The consent form may be distributed to participants by a TTS staff member or by the event organiser, both acting as authorised channels on behalf of MTH Group. Participation is voluntary and consent given through this form may be withdrawn at any time, without detriment, by contacting the DPO at dpo@mthgroup.com.my.

The standalone consent form will state the nature of the personal data being collected, the purposes for which it will be used, the planned publication channels, and the data subject's right to withdraw consent.

#### **14A.4 Express Consent for Identified Marketing Content**

Where an individual is to be the primary or prominently identified subject of marketing photography or video content — including testimonials, profile features, or named promotional campaigns — MTH Group will obtain express written consent from that individual prior to capturing or publishing such content. Such consent will state the nature of the content, intended use, and planned publication channels.

Where the identified subject is a minor under 18 years of age, express written consent must be obtained from a parent or legal guardian — see Section 16 (Children's Personal Data) of this Notice.

MTH Group does not use marketing photography or video content for biometric identification purposes. Marketing images are used solely for the promotional and communication purposes described in this section.

#### **14A.5 Employee Participation in Marketing Content**

Where employees appear in marketing content in a professional capacity — including staff profile photographs, event photographs, or promotional materials — this is processed on the basis of the employment relationship and the reasonable expectations of professional conduct within a marketing-active organisation. Employees who do not wish to be included in external marketing content should notify their line manager or the DPO at [dpo@mthgroup.com.my](mailto:dpo@mthgroup.com.my) in advance of the relevant activity. Where an employee's preference is not technically feasible to accommodate — for example, where they appear incidentally in a group photograph already published — the DPO will assess the request on a case-by-case basis.

#### **14A.6 Retention and Removal Requests**

Retention periods applicable to marketing photography and video content are set out in Section 12 of this Notice. Individuals whose image appears in MTH Group marketing materials may submit a removal request to [dpo@mthgroup.com.my](mailto:dpo@mthgroup.com.my). MTH Group will take reasonable steps to honour such requests, subject to technical feasibility, operational constraints, and content that has already been widely distributed or archived on third-party platforms.

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## **15. YOUR OBLIGATIONS**

By providing personal data to us, you represent and agree that:

- All personal data you provide is accurate, complete, and not misleading, and you will promptly notify us of any changes to your personal data;
- Where you provide personal data relating to another individual (such as an emergency contact, dependent, or next of kin), you confirm that you have informed that individual that their personal data will be provided to MTH Group, the purposes for which it will be used, and that they may contact [dpo@mthgroup.com.my](mailto:dpo@mthgroup.com.my) to exercise their rights; and that where required under applicable law, you have obtained the necessary authority or consent to provide such data.

## **16. CHILDREN'S PERSONAL DATA**

We do not knowingly collect personal data from individuals under the age of 18 without the prior consent of a parent or legal guardian. If we become aware that we have collected personal data from a child without appropriate consent, we will take prompt steps to delete such data.

Where a programme, service, or benefit involves children (including programmes involving participants under 18, MyPhysio treatment of minors, or Haseenah Foundation beneficiary programmes), a parent or legal guardian must provide consent on behalf of the child and will be the primary point of contact for data subject rights requests.

Sensitive personal data of children (including health information) is subject to additional safeguards and will only be collected and processed where strictly necessary and with express parental or guardian consent.

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## 17. AMENDMENTS TO THIS NOTICE AND CONTACT DETAILS

### 17.1 Amendments

We reserve the right to amend, update, or revise this Notice at any time to reflect changes in law, regulation, our business practices, or the services we offer. The updated Notice will be made available on our official communication channels and, where required by the PDPA, you will be notified of material changes.

Where amendments materially affect the basis on which we process your personal data or the rights available to you, we will seek your renewed consent before such amendments take effect. Your continued engagement constitutes acknowledgement of administrative or non-material amendments only.

### 17.2 How to Contact Us

For any enquiries, requests, or complaints relating to this Notice or the handling of your personal data, please contact our Data Protection Officers:

Contact	Details
DPO Email	dpo@mthgroup.com.my
DPO Names	Mohamad Bin Mamdouh / Arikki Aris
Organisation	Meranti Teguh Holdings Sdn Bhd
Postal Address	322, Jalan Bandar Melawati, Pusat Bandar Melawati, Kuala Lumpur, W.P. Kuala Lumpur, 53100, Malaysia

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*This Privacy Notice is issued by Meranti Teguh Holdings Sdn Bhd on behalf of the MTH Group of Companies. Version 1.7.3 | June 2026 | Pursuant to the Personal Data Protection Act 2010 (Act 709) as amended by Act A1727*