

PRIVACY NOTICE

Tzu Chi Foundation Malaysia is committed to ensuring that personal data is protected and managed in accordance with the relevant Malaysia laws. We collect and use personal data to provide individuals with information about our programs and initiatives, as well as to oversee the administration of our activities.

Privacy and Personal Data Protection Notice

The Personal Data Protection Act 2010, as amended by the Personal Data Protection (Amendment) Act 2024 ("PDPA") regulates the processing of personal data in commercial transactions.

We recognize the importance of privacy and the sensitivity of your personal data and information about yourself ("Personal Data"). We are committed to treating all Personal Data with due confidentiality and in accordance with the PDPA.

The purpose of this Privacy Notice is to inform you of how we manage Personal Data in accordance with the PDPA.

Consent to Privacy Notice

By engaging with us and sharing your Personal Data, you consent to the processing of your Personal Data, including sensitive personal data, by us, in accordance with our Privacy Notice.

1. Collection of Personal Data

Personal Data collected by us may include but not limited to the following:

- a) Your name, salutation/ title, date of birth, correspondence/ residential address, age, gender, nationality, country of origin, particulars of identity documents (individual or corporate entity);
- b) Your employment status, company name, job title, income range, work experience, information regarding eligibility status under the Malaysia B40 or M40 category, medical condition;
- c) Your academic qualification, academic results;
- d) Your marital status, details of spouse, details of children, next of kin, any family members;
- e) Your contact details such as telephone number, mobile number, e-mail address;
- f) Your financial data, credit card/debit card information, bank account information for donation and/or sponsorship purposes; and
- g) Your preferred language, communication channel and activities you wish to participate/support;
- h) Your images, videos and voice recordings ;
- i) Information collected through your use of our website, mobile application or digital platforms ("Platforms"), including device, system and access log information, IP address, cookies or similar technologies, usage and behavioural patterns, and any information voluntarily submitted through online forms, fields, inputs or interactions on such Platforms; and
- j) Any other personal data of yourself or your family members, provided by you or collected in

the course of your dealings with us.

2. Source of Personal Data

We may obtain your Personal Data directly from a variety of sources including but not limited to the sources mentioned below:

2.1 Information we collect from you directly via:

- a) Official request for information forms provided to you, either physically or virtually;
- b) Any forms for donation, seminar, newsletter subscription, promotional events and/or activities, volunteering work, surveys, interview, feedback, either physically or virtually;
- c) Any queries, emails or any correspondences that we have received from you requesting information or making enquiries;
- d) Business cards that were dropped or given to us;
- e) Job or volunteer applications through submission of resume or application forms;
- f) Any telephone conversations between you and us;
- g) Any voice and/or image recordings;
- h) Your use of Platforms, including information submitted through in app forms, inputs, interactions or features; and
- i) Collection of Personal Data by any other lawful means.

2.2 Information we collect about you from other sources without your direct involvement, where permitted by law:

- a) From any government agency and/or registry;
- b) From any charitable institutions/organisations and/or foundations including the non-governmental organisations (“NGOs”);
- c) From any referrals that we may have obtained; and
- d) Through any of your family members and/or any other person duly authorized by you in writing or verbal (“Authorised Person”) for any purpose. For avoidance of doubt, you represent and warrant that you consent for the disclosure of these Personal Data to us and the subsequent processing thereof by us, and you shall at all times indemnify us from any liability in relation to and/or arising from the processing of such Personal Data by us.

2.3 We generally do not collect sensitive Personal Data, except with your explicit consent or where such processing is otherwise permitted or required under Malaysian law. However, should you voluntarily provide us with sensitive Personal Data, including but not limited to your religious beliefs and/or other beliefs of a similar nature, you will be deemed to have given us your explicit consent to collect, use and disclose such information for the purpose for which it was provided, and in accordance with the PDPA.

2.4 Reference to the term ‘you’ and ‘your’ shall include your representatives and agents.

3. Transfer of Personal Data Outside of Malaysia

Our information technology storage facilities and servers may be located in jurisdictions outside of Malaysia. This includes, but is not limited to, situations where your Personal Data is stored on servers situated abroad. Additionally, your Personal Data may be disclosed or transferred to entities located outside Malaysia, particularly if you access our Platforms from outside the country. You hereby expressly consent to the transfer of your Personal Data outside of Malaysia for the purposes outlined in this Privacy Notice. We will take reasonable steps to ensure that any third parties located outside Malaysia to whom we disclose your Personal Data will use it solely for the purposes specified in this Privacy Notice, and that they implement adequate measures to safeguard the confidentiality and privacy of your Personal Data.

4. Refusal and/or failure to provide Personal Data

Depending on the purpose for which the Personal Data is collected, some Personal Data will be compulsory and will be indicated as such during the course of collection. If you choose not to provide any of the compulsory Personal Data, or if any of the compulsory Personal Data provided is insufficient or inaccurate or if you withdraw your consent for the collection, use, disclosure and/or processing of your Personal Data, we will not be able to:

- a) Provide and/or continue to provide the services needed and requested by you; or
- b) Perform the purpose for which the Personal Data was collected for; or
- c) Provide you with any notices, services and updates that you have requested; and
- d) The progress of the matter in which we have your instructions to conduct on your behalf may be affected.

5. Purpose of Us Collecting Your Personal Data

Your Personal Data will be/is being collected, stored, used, disclosed and/or processed by us (whether directly or indirectly), and in whatever form for, amongst others, the following purposes but not limited to:

- a) The immediate reason for which you have consented;
- b) To assess, evaluate and review any application for assistance by you, which includes financial, education and medical assistance;
- c) To facilitate, administer, deal with, maintain and/or provide necessary assistance and support in connection with our missions;
- d) For public sharing through our operated media and organized activities as motivational stories or training;
- e) To process, manage and/or verify your actual identity;
- f) To maintain, upgrade and/or improve our Platforms and/or our services to you from time to time;
- g) To record, track, manage, collect and solicit offline and online donations to support our

charitable missions;

- h) To enable us to process your requests (e.g. registration, subscription, change of details of your Personal Data, issuance of payment receipts);
- i) To contact you regarding any of our updates, activities, programs and volunteer opportunities;
- j) To respond to enquiries, enrolments / admissions to our programs;
- k) To respond to applications for job / aid / assistance;
- l) To send e-magazines which you have subscribed;
- m) To detect, investigate or prevent any fraudulent or illegal activities or misuse of the Platforms including the online donation system or portal for illegal purpose and/or purposes or intentions that violate the legislation or any governmental policies;
- n) To screen, check or investigate your identity in compliance with existing anti-money laundering and counter financing for terrorism legislations, guidelines and policies;
- o) To send seasonal or festive greetings or messages to you;
- p) To send invitation to you on events or activities organised or jointly organised by us that may be of interest to you;
- q) To transfer, assign and/or validate the rights, interests and/or obligations of parties under any contractual agreement entered between us;
- r) Maintenance and upkeep of internal records of donors, volunteers, administration, management, mission development, promotion, continuous professional development, education, research, internal operations, troubleshooting, data analysis, testing, statistical, physical and IT security measures, survey purposes, professional network, employment and social activities;
- s) Meeting any legal or regulatory requirements related to our services and making disclosures under the requirements of any applicable law, regulation, directive, guideline, by-law, code, circular, government authorities and/or court of competent jurisdiction;
- t) To display your name and picture on our Platforms, publications, newsletters, documents, alerts, notifications, and any other materials of similar nature;
- u) To operate, administer and manage our Platforms, including to enable functionality, process user inputs, personalise content, enhance user experience, monitor usage, analyse behavioural patterns, improve performance and security, and conduct internal analytics and reporting; and
- v) For any other purposes related to our services and works.

We will not use your Personal Data for purposes other than what we have informed you or which are permitted under local laws and regulations. Additionally, Personal Data shall not be kept longer than necessary for the fulfilment of the above purposes.

In certain circumstances, Personal Data we collected may be stored or processed outside of Malaysia and therefore will subject to the legal jurisdiction of those countries respectively.

6. Disclosing your Personal Data

We endeavour to ensure that your Personal Data is kept confidential at all times. Subject to existing data protection legislation, we may disclose your Personal Data without your prior consent in certain

situations, including where required by law, or where it is necessary for law enforcement or legal processes.

Further, you hereby consent and authorise us to disclose your Personal Data to the following categories of parties for the purposes outlined above:-

- a) Any persons, government agencies, statutory authorities where we are compelled and/or in our opinion should disclose Personal Data pursuant to any law or regulation;
- b) Our affiliates, partners, third parties, service providers, representatives and agents, who may be located within or outside Malaysia, to implement and/or support our mission-related activities;
- c) Your immediate family members and/or emergency contact person as may be notified to us or requested by us from time to time for emergency communication or health and safety matters;
- d) Any person within our organization for the purposes of promoting our missions, continuous professional development, education, research, data analysis, testing, statistical and survey purposes, professional network, and activities related to or arising from our missions;
- e) Our auditors, consultants, accountants or any relevant financial institutions or professional advisers for purposes relating to audit, compliance, risk management, or legal proceedings; and
- f) The person or entity who is providing you sponsorship, monetary donation, or any form of aid/assistance under any of our mission-related and/or volunteer programmes.

7. Limitation in Processing of Personal Data

The term “processing” in relation to Personal data comprises the collection, recording, holding, storing, disposing, organising, adapting, altering, retrieving, consulting, using, disclosing through transmitting, transferring, disseminating or otherwise making available; aligning, combining, erasing or destroying, as well as correcting the Personal Data.

You have the right to limit in part or wholly the processing of your Personal Data and to withdraw consent at any time. When consent is withdrawn and communicated to us in writing, we will stop processing your Personal Data; or where you have requested that we limit the processing of your Personal Data in any way, we will comply with your request.

8. Withdrawal of Consent, Access and Correction of your Personal Data

You are required to email us at info@tzuchi.my or write to us at **Tzu Chi Foundation Malaysia located at KL Tzu-Chi Jing Si Hall, No. 359, Jalan Kepong, 52000 Kuala Lumpur**, either personally or through your Authorised Person, if you wish to:

- a) Access and Correct your Personal Data
 - i. You may request to access your Personal Data by submitting your request in writing or via email. We aim to provide access to your Personal Data within twenty-one (21) days. In the event we require further time, we will notify you within 21 days of receiving the request. We may also ask for proof of identity to process your request.
 - ii. You may request to correct your Personal Data by submitting your request in writing or via email and we will make the necessary amendments, within twenty-one (21) days upon the date of receipt of the request, unless we believe there are permissible grounds not to do so under the applicable laws.

It may be necessary for us to request further information relating to your request. Where permissible

under law, we may refuse such correction requests under certain circumstances.

- b) Withdraw your Consent for the Use, Disclosure, Collection and/or Processing of Personal Data
 - i. You may withdraw your consent for the use, disclosure, collection and/or processing of your data at any time by submitting your request in writing or via email to us. Upon receiving your request, we will process it within twenty-one (21) days. Thereafter, we will cease collecting, using, or disclosing your Personal Data as per your instructions but this does not affect our right to continue to process Personal Data where such processing is permitted or required under the applicable laws;
 - ii. Depending on the extent of the withdrawal, such withdrawal of consent may result in our inability to provide services to you and may be considered as a termination by you of the relevant agreement between us and you. It may also result in the cessation of any services provided by us to you. Nevertheless, all our legal rights and remedies are expressly reserved in such event.
- c) Withdraw your Consent for Direct Marketing
 - i. You can request to be removed from our mailing list to stop receiving direct marketing materials from us at any time by submitting your request in writing or via email to us. We will act upon this information within twenty-one (21) days upon receipt of such request, or shall otherwise inform you of the time frame by which the withdrawal consent will take place. Thereafter, we will cease communicating directly with you for the purpose of promoting our events, updates, activities, programmes, volunteer opportunities, and/or publishing materials such as e-magazine.

9. Retention of Personal Data

We will retain your Personal Data for as long as necessary to fulfil the purpose(s) for which it was collected, and following the fulfilment of those purpose(s), we will continue to retain your Personal Data, for a further period of up to seven (7) years to comply with legal or regulatory requirements, to protect our legitimate interests, or for any other lawful purpose.

Upon the expiry of the retention period, we will take reasonable steps to ensure that your Personal Data is securely deleted or permanently removed from our records, in accordance with the requirements of applicable laws

10. Request to Transmit Personal Data to Another Data Controller

You may request the data controller to transmit your Personal Data to another data controller of your choice, subject to technical feasibility and compatibility of the data format.

11. Security

- a) We always take reasonable care to prevent unauthorised access, collection, use, disclosure, copying, modification, disposal or similar risks to Personal Data in our possession. These security measures include data encryption, anonymisation of information, roles-based access, and the use of 2FA during login process.
- b) While we will take all reasonable care to protect your Personal Data, no system can be entirely free from risk. We will continuously review and enhance our security measures to mitigate potential threats and safeguard your data to the extent reasonably possible. You should be

aware that some information that you upload to our social media pages or Platforms may be available to be viewed by the public. You should use discretion in deciding what information to upload to such sites. We are not responsible in any way for the security and/or management of Personal Data shared by individuals with third party websites accessible via links on our Platforms.

12. Update on Privacy Notice

We reserve the right, at our sole discretion, to amend, modify, update, add and/or remove any parts of our Privacy Notice, at all times. You are required to check the Privacy Notice periodically for any updates and/or changes.

By using or continuing to use any services we provide or having or continuing to have a relationship or dealings with Tzu Chi Foundation Malaysia, you shall be deemed to have agreed and accepted the Privacy Notice as amended and be bound by the prevailing terms as updated from time to time.

13. Personal Data From Minors and Other Individuals

To the extent that you have provided the Personal Data about your family, spouse, dependents, employees or any other persons for any purpose, you represent and warrant that you have explained to them that their Personal Data will be provided to, and processed by us and the necessary consent for the processing (including disclosure and transfer) of their Personal Data in accordance with this Privacy Notice, has been obtained. In respect of minors or individuals not legally competent to give consent, you confirm that they have appointed you to act for them, to consent on their behalf to the processing (including disclosure and transfer) of their Personal Data in accordance with this Privacy Notice.

We endeavour to treat photographs, pictures, visual images, videos and recordings of minors/children who participate in any of our programmes, events and/or activities with special care and shall not disclose such photographs, pictures, visual images, videos and recordings of minors/children without consent from parent or guardian.

14. Complaints

If you have any complaints or concerns regarding our handling of your Personal Data or if you would like to reach us, please contact us via email to us at info@tzuchi.my or by submitting your request in writing at **Tzu Chi Foundation Malaysia, KL Tzu-Chi Jing Si Hall, No. 359, Jalan Kepong, 52000 Kuala Lumpur**. We take such concerns seriously and will address them promptly.

When submitting a complaint, please provide sufficient details about your concern, including the nature of the complaint, the Personal Data involved, and any relevant information that may help us investigate your issue.

15. Language

The Malay version of this Privacy Notice is available [here](#).

In the event of any inconsistencies, errors, mistakes or discrepancies between the English version and other translated versions of this Privacy Notice, the English version shall prevail.