

DATA PRIVACY POLICY

A. ABOUT THIS POLICY

We are committed to providing you with professional and valuable products and services whilst safeguarding your privacy.

This Data Privacy Policy (also “**Policy**”) outlines when, why and how we collect, use and otherwise handle (collectively “**process**”) personal information about our customers (including opticians), potential customers, consumers and users of our websites (“**Data Subjects**”). “**Personal Data**” is any information relating to you, which can be used to personally identify you, either directly or indirectly.

We will process your Personal Data, as described in this Policy and as described when we collect data from you. Our Policy must be read together with any other legal notices or terms and conditions provided or made available to you when we collect data from you (or at a later stage) or that are available on other pages of our websites.

In this Policy,

- references to “we”, “us” or “our” means CooperVision Contact Lens (Malaysia) Sdn. Bhd. and/or the Affiliates (defined below); and
- references to “you” and “your” are to the Data Subjects.

By providing your Personal Data to us, you acknowledge and agree that you have fully read and understood this Policy, and are consenting to the collection, use, processing and disclosure of your Personal Data as described in this Policy.

To the extent that you disclose to us any Personal Data of another individual, we shall assume, without independent verification, that you have obtained such individual's consent for the disclosure of such information and / or personal data as well as the processing of the same in accordance with the terms of this policy.

B. WHO IS RESPONSIBLE FOR YOUR PERSONAL DATA?

CooperVision Contact Lens (Malaysia) Sdn. Bhd. (company registration number: 200501034103 (716244-U)) (“**CooperVision**”) is the data user of your Personal Data.

Where CooperVision shares Personal Data with CooperVision Affiliates (“**Affiliates**”, which means our subsidiaries, our ultimate holding company and its subsidiaries), the Affiliates are also data users as explained in this Policy. Details of the Affiliates, including their locations, are listed [here](#).

C. WHAT PERSONAL DATA DO WE PROCESS AND WHY?

We set out below a table which provides a non-exhaustive list of the types of Personal Data that we may collect from you, depending on how you interact with us (e.g. your participation in any activities, campaigns, promotions, trainings or webinars or any other interactions with us (“**Activities**”)), the purposes of processing and the legal basis we rely upon to process such information, which include:

Data Subject category	Type of information	Purposes of processing	Legal basis of Processing
Customers (including opticians, retail store staff) and potential customers	<ul style="list-style-type: none"> • your name • national identification card / passport number • race, ethnic origin • your address (business and/or personal) • your e-mail address • your telephone numbers (business and/or personal) • your job title, role • your photos, audio-videos or voice recordings, if any • your purchasing records and requirements that relate to our products • any information made available on your social media profiles • any information made available to us (whether directly or indirectly) in the course of your participation in the Activities • bank account / payment details • any information we may request from you for the purposes of administering your participation in the Activities 	<ul style="list-style-type: none"> • To organise and administer your participation in any Activities • To manage your relationship with us • Offering benefits and privileges • To send you marketing communications (including our email newsletter) relating to our products or services, if you have requested them • To send you non-marketing commercial communications • Performance of an agreement with you, including processing and collecting payments, sending invoices, statements and payment reminders • To provide you our goods and services • To contact you or communicate with you via various modes of communication such as phone/voice call, social media / text and/or fax message, forms, email and/or postal mail in relation to the Activities and/or our products or services • To respond to your enquiries about the Activities and our products or services • For any advertising, publicity, marketing and communication 	<ul style="list-style-type: none"> • your consent (if requested and provided) • performance of your contract with us • taking steps at your request with a view to entering into a contract with us • compliance with any legal obligation • protect your vital interests • administration of justice • exercise of any functions conferred on any person by or under any law

		<p>in relation to the Activities</p> <ul style="list-style-type: none"> • To improve the products and services that we supply to you • To ensure the quality of the goods and services we provide to you • To carry out processes associated with the Activities, including identity verification • For our internal business records • To investigate any complaints you make • Research, benchmarking and statistical purposes • Conduct surveys relating to our customers and products • Discharging obligations imposed under applicable law, regulations, guidelines and/or relevant regulatory authorities • To fulfil any purpose directly related to the above purposes. 	
<p>Consumers (including participants in the Activities)</p>	<ul style="list-style-type: none"> • your name • national identification card / passport number • race, ethnic origin • your address (business and/or personal) • your e-mail address • your telephone numbers (business and/or personal) • your job title, role • your photos, audio-videos or voice recordings, if any 	<ul style="list-style-type: none"> • To organise and administer your participation in any Activities • To manage your relationship with us • Offering benefits and privileges • To send you marketing communications (including our email newsletter) relating to our products or 	<ul style="list-style-type: none"> • your consent (if requested and provided) • performance of your contract with us • taking steps at your request with a view to entering into a contract with us • compliance with any legal obligation • protect your vital interests

	<ul style="list-style-type: none"> • your purchasing records, your preferences and requirements that relate to our products • any information made available on your social media profiles • any information made available to us (whether directly or indirectly) in the course of your participation in the Activities • bank account / payment details • any information we may request from you for the purposes of administering your participation in the Activities 	<p>services, if you have requested them</p> <ul style="list-style-type: none"> • To send you non-marketing commercial communications • Performance of an agreement with you, including processing and collecting payments, sending invoices, statements and payment reminders • To provide you our goods and services • To contact you or communicate with you via various modes of communication such as phone/voice call, social media / text and/or fax message, forms, email and/or postal mail in relation to the Activities and/or our products or services • To respond to your enquiries about the Activities and our products or services • For any advertising, publicity, marketing and communication in relation to the Activities • To improve the products and services that we supply to you • To ensure the quality of the goods and services we provide to you • To carry out processes associated with the Activities, including identity verification • For our internal business records 	<ul style="list-style-type: none"> • administration of justice • exercise of any functions conferred on any person by or under any law
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		<ul style="list-style-type: none"> • To investigate any complaints you make • Research, benchmarking and statistical purposes • Conduct surveys relating to our customers and products • Discharging obligations imposed under applicable law, regulations, guidelines and/or relevant regulatory authorities • To fulfil any purpose directly related to the above purposes. 	
Users of our websites	<ul style="list-style-type: none"> • cookies • IP address • geographical location • browser type and version • operating system • information about your visits to and use of our websites 	<ul style="list-style-type: none"> • administering our websites • personalising our websites • enabling your use of the services available on our websites 	<ul style="list-style-type: none"> • your consent (if requested and provided) • performance of your contract with us • taking steps at your request with a view to entering into a contract with us • compliance with any legal obligation • protect your vital interests • administration of justice • exercise of any functions conferred on any person by or under any law

It is obligatory for you to provide the Personal Data which we request from you. If you choose not to provide the Personal Data requested by us, we may not be able to fulfil the purpose(s) for which we have asked for the Personal Data.

Our business purposes – we will also use your Personal Data for our internal business purposes (our legitimate interests) such as:

- record keeping, statistical analysis, internal reporting and research purposes;
- to investigate any complaints you make;

- to provide evidence in any disputes or anticipated disputes between you and us;
- for the detection and prevention of fraud, manual (non-automated) credit checking, other criminal offences and for risk management purposes;
- for business and disaster recovery (e.g. to create back-ups);
- to ensure network and information security;
- to host, maintain and otherwise support the operation of our websites, including to customise various aspects of our websites to improve your experience;
- for document and data retention/storage;
- to protect the rights, property, and/or safety of CooperVision, any of its Affiliates, its personnel and others; and
- to ensure the quality of the services we provide to our clients and other Data Subjects.

We believe the risk to your data protection rights in connection with Personal Data that we process on the basis of our legitimate interests is not excessive or overly intrusive.

We may be required to process your personal information to comply with our legal requirements, to enable us to fulfil the terms of any contract that we have with or in preparation of us entering into a contract with you.

D. WHEN DO WE COLLECT YOUR PERSONAL DATA

We may receive information about you provided or submitted by you in the course of your participation in the Activities, through social media or publicly available or publicly accessible information (e.g. from third parties if you use any websites or social media platforms operated by third parties). Additionally, we usually collect Personal Data when you:

- (a) submit information to us, including via text messages and/or social media messages or CooperVision's official website;
- (b) register for email subscriptions, or publications through social media or CooperVision's official website;
- (c) request services from us;
- (d) use our social media platforms or CooperVision's official website; and
- (e) contact us, through social media or CooperVision's official website, or by email or phone, or request that we contact you.

E. HOW AND WHEN DO WE SHARE PERSONAL DATA WITH THIRD PARTIES?

This section describes with whom we may share your Personal Data.

Some products and/or services that we provide require the involvement of third parties. We do not sell, rent, distribute or otherwise make Personal Data commercially available to any third party, except that we may share information within our group of companies, with our service providers and other third parties for the purposes set out in this Policy:

a) Data sharing within CooperVision group

CooperVision may share your Personal Data with its Affiliates overseas (details of the Affiliates, including their locations, are listed [here](#)).

- where we need to do so in order to provide the products and/or services or information that you have requested; for example, we may transfer your Personal Data to CooperVision Limited in the UK for central support services; or
- for the purposes of IT support and maintenance; or
- internal governance and administration; or
- if you consent to us doing so (e.g. when you give us consent for marketing communications with Affiliates); or
- to comply with our legal or regulatory obligations; for example, we may transfer your personal data to CooperVision Inc. in US which hosts our database of product and patient regulatory information.

b) Data sharing with service providers

We also share your Personal Data with our third party service providers, whom we engage to provide various services, which include but are not limited to:

- delivery of our products (e.g. couriers);
- marketing and advertising services (e.g. marketing agencies, interactive agencies, e-mailing solution providers);
- our websites (e.g. hosting and maintaining our websites); and
- IT services and solutions (e.g. providing data storage, assisting us with database management).

c) Data sharing with other recipients

We may also share your Personal Data with:

- our accountants, auditors, lawyers or other professional advisers when we ask them to provide us with professional advice;
- any other third party if we are under a duty to disclose or share your Personal Data in order to comply with any legal obligation, or to protect the rights, property and/or safety of CooperVision, any of its Affiliates, its personnel and others;
- any other third party for the purposes of acting in accordance with the requirements of a court, regulator or government agency, for example, complying with a court order or acting in accordance with an applicable law or regulation;
- police and other law enforcement agencies in connection with the prevention and detection of crime;
- investors and other relevant third parties in the event of a potential sale or other corporate transaction related to CooperVision and/or any of its Affiliates; or
- our customers (such as the opticians and/or the store staffs) for the purposes of collecting our products. Note that our customers (such as the opticians and/or the store staffs) may collect additional Personal Data from you directly. The customers shall comply with the data privacy requirements under Malaysian laws. You should remain alert and read their privacy statements. We have no control over personal data that you submit to or receive from the customers and we shall not be liable for any incompliance by the customers in relation to any data privacy requirements under Malaysian laws.

F. INTERNATIONAL TRANSFERS OF PERSONAL DATA

The transfer of your Personal Data to and between the Affiliates, service providers or other recipients may involve your Personal Data being sent outside of Malaysia. Where we transfer personal data outside of Malaysia we will implement appropriate and suitable safeguards to ensure that such Personal Data will be protected as required by Malaysian Personal Data Protection Act 2010.

You can request further details about the safeguards that we implement via the contact details set out in Section K (How to Contact Us).

G. HOW LONG DO WE STORE PERSONAL DATA?

It is our policy to retain your Personal Data for the length of time required for the specific purpose or purposes for which it was collected (e.g., for the fulfilment of an agreement with you). However, we may be obliged to store some Personal Data for a longer time, taking into account factors including:

- legal obligation(s) under applicable law to retain data for a certain period of time (e.g. compliance with tax and accountancy requirements);
- the establishment, exercise or defence of legal claims (e.g., for the purposes of a potential dispute).

If you would like to find out how long we keep your Personal Data for a particular purpose, you can contact us via the contact details set out in Section K (How to Contact Us).

H. HOW DO WE PROTECT YOUR PERSONAL DATA?

We implement technical and organisational security measures to protect your Personal Data against the risk of loss, misuse, or unauthorised alteration or destruction. Such measures may include the use of firewalls, encryption (where appropriate), access rights management processes, careful selection of processors and other technically and commercially reasonable measures to provide appropriate protection for your Personal Data. Where appropriate, we may also make backup copies and use other such means to prevent accidental damage to or destruction of your Personal Data.

Please note however that where you are transmitting information to us over the internet this can never be guaranteed to be 100% secure. For any payments which we take from you online we will use a recognised online secure payment system.

I. YOUR RIGHTS

The following section explains your data protection rights that you can exercise. The rights may only apply in certain circumstances and are subject to certain exemptions. Please see the table below for a summary of your rights. You can exercise these rights using the contact details set out in Section K (How to Contact Us).

- **The right to be informed** – you have the right to be provided with clear, transparent and easily understandable information about how we use your Personal Data. This is why we are providing you with the information in this Policy and in any legal notices or terms and conditions provided to you.
- **The right of access** – you have the right to obtain from us confirmation as to whether or not your Personal Data is being processed by us, and about certain other information (similar to that provided in this Policy) about how it is used. You also have the right to access your Personal Data, by requesting a copy of the Personal Data concerning you. This is so you are aware and can check that we are using your information in accordance with data protection law. We can refuse to provide information where to do so may reveal personal data about another person or would otherwise negatively impact another person's rights.

- **The right to rectification** – you can ask us to take measures to correct your Personal Data if it is inaccurate or incomplete (e.g., if we have the wrong name or address for you).
- **The right to erasure** – this is also known as the ‘right to be forgotten’ and, in simple terms, enables you to request the deletion or removal of your Personal Data where, for example, there is no compelling reason for us to keep using it or its use is unlawful. This is however not a general right to erasure and there are some exceptions, e.g. where we need to use the information in defence of a legal claim or to be able to comply with a legal obligation.
- **The right to restrict processing** – you have the right to ‘block’ or suppress the further use of your Personal Data when we are assessing a request for rectification or as an alternative to erasure. When processing is restricted, we can still store your Personal Data as long as necessary for the fulfilment of the purposes for which it was collected, but may not use it further.
- **The right to withdraw consent** – where we process your Personal Data on the basis of your consent, you have the right to withdraw your consent at any time. However, such withdrawal does not affect the lawfulness of the processing that occurred prior to such withdrawal. Specifically, you have the right to ask us not to use your personal data for marketing purpose. If you no longer wish to receive marketing messages from us, you may request to withdraw your consent by contacting us via the contact details set out in Section K (How to Contact Us), or if applicable, using the unsubscribe facility contained in the marketing message.

J. THIRD PARTY LINKS

Our websites may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for how they handle your Personal Data. When you leave one of our websites, we encourage you to read the privacy notice of every website you visit.

K. HOW TO CONTACT US

If you wish to request further information regarding this Policy or the way we use your Personal Data or if you wish to exercise any of the above rights set out in Section I, you can contact our Customer Service Officer at:

Phone number: (603) 2080 8488

E-mail address: dpo@coopervision.com