PERSONAL DATA PROTECTION NOTICE

KPJ HEALTHCARE UNIVERSITY SDN BHD (199201022199)
LOT PT 17010 PERSIARAN SERIEMAS
KOTA SERIEMAS,
71800 NILAI
NEGERI SEMBILAN

Document

Document Name	Personal Data Protection Notice
Brief Description	This Notice explains how KPJ Healthcare University Sdn Bhd collects, uses, stores, discloses and protects personal data. It also informs individuals of the purpose of data processing, parties to whom the data may be disclosed and their rights regarding their personal data in accordance with the Personal Data Protection Act 2010 (Act 709).
Initial Issue Date	17th SEPTEMBER 2026
Authorising Body	Executive Management Meeting

Version control

Date	Version No.	Summary changes	Reviewer
17/09/2026	00	New- Personal Data Protection Notice	Executive Management Committee (EMC)

CONTENTS

1.0 Introduction 4

2.0 Personal Data 4

3.0 Purposes of Collecting, Processing and Disclosing Personal Data 7

4.0 Disclosure and Transfer of Personal Data 10

5.0 Websites, Mobile Applications and Cookies 12

6.0 Data Security 13

7.0 Retention of Personal Data 13

8.0 Data Subject's Obligations 14

9.0 The Right of Data Subject 14

10. Changes to Privacy Policy 15

11. Acknowledgement and Consent 15

12. Inquires and Complaints 15

13. Language and Prevailing Version 16

1.0 Introduction

KPJ Healthcare University Sdn Bhd (“KPJUSB”), which operates KPJ Healthcare University (“KPJU”), KPJ Healthcare College Johor Bahru (“KPJCJB”), and KPJ Healthcare College Penang (“KPJCP”), is the data controller responsible for processing your personal data and is committed to protecting your personal information and your privacy. In this Personal Data Protection Notice, "we", "us" and "our" refer to KPJU, KPJCJB and KPJCP collectively and "you" and “your" include any individual or third party whose personal data has been provided to KPJU, KPJCJB or KPJCP.

This Notice explains how we collect, use, process, store, disclose and otherwise handle your personal data, including sensitive personal data, in accordance with the provisions of the Personal Data Protection Act 2010 (Act 709), as amended by the Personal Data Protection (Amendment) Act 2024, together with applicable regulations, standards, guidelines and circulars ("PDPA"). We reserve the right to amend, update or revise this Notice from time to time without prior notice. Any such amendments will be published on our website or communicated through appropriate channels, including email where applicable.

We may collect and process personal data relating to individuals under the age of 18 years. If you are below 18 years of age, you are required to obtain the consent of your parent or legal guardian before providing your personal data to KPJU/KPJCJB/KPJCP.

Sensitive personal data, including but not limited to information relating to your physical or mental health condition, medical information (such as medical history, diagnostic records, treatment details and allergies) and biometric data (such as fingerprints or facial recognition), will be treated with the highest level of confidentiality and processed strictly in accordance with applicable data protection laws. Such information will not be disclosed to any third party except where:

a) you have provided your explicit written consent;

b) disclosure is required or permitted by law; or

c) disclosure is necessary for purposes directly related to the provision of healthcare, educational, administrative, regulatory or other legitimate services, in accordance with applicable laws and regulations.

2.0 Personal Data

2.1 Types of Personal Data

"Personal Data" refers to any information relating to you or any other individual connected to you that has been collected, provided or made available to KPJ Healthcare University (“KPJU”), KPJ Healthcare College Johor Bahru (“KPJCJB”) and KPJ Healthcare College Penang (“KPJCP”) for the purposes set out in Section 3 of this Notice.

The personal data processed by KPJU/KPJCJB/KPJCP may include, but is not limited to:

- Personal identification information, such as your name, NRIC/passport number, date of birth, gender, nationality and contact details;
- Academic and educational information, including academic records, qualifications, examination results, student identification details and related records;
- Employment and professional information, such as employment records, disciplinary information, criminal or alleged-offence information and biometric information, where applicable where applicable;
- Financial information, including banking details, sponsorship information, payment records and other financial data;
- Health and medical information, including medical history, health declarations, disability information and other relevant records;
- Information relating to your family members, guardians, emergency contacts, referees, sponsors or other third parties provided by you;
- Religious beliefs, where required or permitted by law;
- Audio, visual and electronic information, including photographs, CCTV recordings, security recordings, voice recordings and video recordings;
- Location and access information, including GPS or location-tracking data where applicable;
- Preferences, feedback and information relating to the products, services, programmes or activities provided by KPJU/KPJCJB/KPJCP; and
- Any other personal data that may be required for educational, administrative, regulatory, operational, healthcare, research, accommodation, alumni or related purposes.

KPJU/KPJCJB/KPJCP may collect personal data directly from you or through various channels, including but not limited to:

- KPJU/KPJCJB/KPJCP website and affiliated online platforms;
- mobile applications and digital systems operated by KPJU/KPJCJB/KPJCP;
- electronic forms and online submissions;
- physical forms and written documentation;
- email communications;
- telephone calls and other communication channels; and/or
- social media platforms, messaging applications and other digital communication platforms.

2.2 Sources of Personal Data

KPJ Healthcare University (“KPJU”), KPJ Healthcare College Johor Bahru (“KPJCJB”) and KPJ Healthcare College Penang (“KPJCP”) may collect personal data directly from you or indirectly from authorised third parties, depending on the nature of your relationship with us.

i. Students and Prospective Students
   a. KPJU/KPJCJB/KPJCP may collect your personal data directly from you or indirectly through your parents, guardians, sponsors, authorised representatives or recruitment agents when you submit enquiries, applications, registrations or other related forms through various channels, including online platforms, physical submissions, education fairs, exhibitions, school visits, seminars, campus visits and other engagement activities.
   b. We may also collect certain information automatically through cookies and similar technologies when you access or use our website and digital platforms.

ii. Parents or Guardians of Students and Prospective Students
   a. KPJU/KPJCJB/KPJCP may collect your personal data directly from you or indirectly through your child, recruitment agents, sponsors or authorised representatives when enquiries, applications, registrations or other related forms are submitted through various channels, including online platforms, physical submissions, education fairs, school visits, seminars, campus visits and recruitment agents.

iii. Clients, Customers, Participants and Prospective Clients or Customers
   a. KPJU/KPJCJB/KPJCP may collect your personal data when you express interest in, register for, attend or participate in our programmes, services, events, conferences, seminars, training programmes, promotional activities or other initiatives organised by KPJU/KPJCJB/KPJCP.
   b. Personal data may be collected directly from you, through business card exchanges, event registrations, referrals, networking activities, publicly available sources, professional directories or other lawful sources.

iv. Scholarship Applicants and Recipients
   a. KPJU/KPJCJB/KPJCP may collect your personal data directly from you through scholarship applications, supporting documents, interviews, assessments and related processes conducted either online or through physical submissions.
   b. Where necessary, personal data may also be obtained from your parents, guardians, sponsors, educational institutions, referees or other authorised third parties.

v. Vendors, Suppliers and Service Providers
   a. KPJU/KPJCJB/KPJCP may collect personal data directly from you or indirectly through your employer, business representatives, professional references, credit reporting agencies, regulatory authorities or other authorised sources in connection with procurement activities, tender submissions, contractual arrangements, due diligence processes and ongoing business transactions.

vi. Employees, Job Applicants, Former Employees, Visiting Academics and Other Personnel.

a. The University may collect personal data directly from you through job applications, curriculum vitae (CVs), resumes, background check authorisations, employment contracts, onboarding forms and statutory declarations submitted physically or via our digital recruitment portals.

b. Personal data may be collected indirectly from third-party sources, including recruitment agencies, professional networking platforms (such as LinkedIn), academic institutions, professional bodies, former employers (for reference checks) and credit or criminal background reporting agencies where permitted by law.

vii. Personal data may also be collected through cookies and similar technologies when you access our website and digital platforms.

3.0 Purposes of Collecting, Processing and Disclosing Personal Data

KPJ Healthcare University ("KPJU"), KPJ Healthcare College Johor Bahru ("KPJCJB") and KPJ Healthcare College Penang ("KPJCP") collects, uses, processes, stores and discloses personal data as required or permitted by law and for purposes related to the administration, operation and delivery of our educational, commercial and support services. Personal data of students aged 18 years and above will only be disclosed to parents, guardians or sponsors with the student's consent or where otherwise required or permitted by law.

3.1 Students and Prospective Students

Your personal data may be processed for the following purposes:

i To process applications, admissions, enrolment, registration, academic progression, assessment, graduation and alumni-related activities;

ii To provide educational, training, research, healthcare, accommodation, library, student support, counselling, visa, insurance, internship, industrial placement and other related services;

iii To administer fees, sponsorships, financial assistance and other related payments;

iv To communicate with you regarding academic, administrative, operational, safety and emergency matters;

v To manage access to and use of campus facilities, systems, events and services;

vi To maintain campus safety, security and compliance with health, safety and regulatory requirements;

vii To conduct research, statistical analysis, service improvement, quality assurance and institutional planning;

viii To comply with legal, regulatory, accreditation, reporting and governmental requirements;

ix To maintain records and documentation for operational, administrative and audit purposes; and
x Subject to your consent where required, to provide information on programmes, services, events, promotions and other activities that may be of interest to you.

Religious information may be processed where required for regulatory reporting purposes, while medical information may be processed to support your wellbeing, safety, accessibility and educational needs.

3.2. Parents or Guardians of Students and Prospective Students

Your personal data may be processed:

i. To facilitate student admissions, enrolment and educational administration;
ii. To communicate with you regarding academic progress, fees, welfare, safety, disciplinary matters, emergencies and other student-related matters;
iii. To provide support services, including visa, insurance, accommodation and student welfare services;
iv. To comply with legal, regulatory and reporting requirements;
v. To maintain records for administrative, operational and audit purposes; and
vi. Subject to your consent where required, to provide information on programmes, services, events, promotions and other activities offered by KPJU/KPJCJB/KPJCP.

3.3. Clients, Customers, Event Participants and Prospective Clients or Customers

Your personal data may be processed:

i. To provide products, services, training programmes, conferences, seminars, events, consultations and related activities;
ii. To manage registrations, enquiries, payments and participation in our programmes and events;
iii. To improve our products, services, customer experience and operational effectiveness;
iv. To conduct research, analytics, marketing analysis and service enhancement activities;
v. To comply with legal, regulatory and contractual obligations;
vi. To maintain records for administrative, operational and audit purposes; and
vii. Subject to your consent where required to provide information on products, services, events, promotions and marketing activities.

3.4. Scholarship Applicants and Recipients

Your personal data may be processed:

i. To assess, administer, manage and monitor scholarship applications, awards, sponsorships and related programmes;
ii. To communicate with applicants, recipients, sponsors and relevant stakeholders;
iii. To comply with legal, regulatory, reporting and audit requirements; and

iv. To maintain records for administrative and operational purposes.

3.5. Vendors, Suppliers and Service Providers

Your personal data may be processed:

i. To evaluate, engage, manage and administer procurement activities, tenders, contracts and business transactions;
ii. To process payments, invoices and financial transactions;
iii. To conduct due diligence, audits, investigations, risk assessments and security reviews;
iv. To communicate regarding contractual, operational and business matters;
v. To comply with legal, regulatory and contractual obligations; and
vi. To maintain records for administrative, operational, financial and audit purposes

3.6 Employees, job applicants and former employees

Purposes for Processing Personal Data of Employees, Job Applicants and Former Employees. The University processes personal data relating to job applicants, current employees, former employees, visiting academics and other personnel for specific human resources, administrative and legal purposes, which include but are not limited to:

i. Recruitment and Onboarding (Job Applicants)
- Evaluating applications, resumes and curriculum vitae (CVs) for suitability, qualifications and employment fit.
- Conducting background checks, credential verifications and professional reference reviews.
- Communicating with applicants regarding the status of their application, interviews and potential employment offers.

ii. Employment Administration and Management (Current Employees & Personnel)
- Administering payroll, banking details, discretionary bonuses and expense claims.
- Processing statutory contributions and tax requirements, including EPF (KWSP), SOCSO (PERKESO), EIS and the Inland Revenue Board (LHDN).
- Managing employee benefits, including group medical insurance, parental leave, annual leave and wellness programs.
- Conducting annual performance appraisals, career development tracking, promotions and disciplinary processes.
- Facilitating academic staff registrations, research grants and reporting requirements mandated by the Ministry of Higher Education (MOHE) and the Malaysian Qualifications Agency (MQA).

iii. Operations, Security and Safety

- Provisioning and managing university IT infrastructure, corporate email accounts and access controls to digital networks.
- Ensuring workplace security and institutional safety through CCTV monitoring, access card logs and biometric authentication systems (processed in compliance with stricter sensitive data requirements).
- Maintaining emergency contact information to contact designated family members or guardians in the event of a medical emergency or workplace incident.

iv. Separation and Post-Employment (Former Employees)

- Managing termination, resignation, or retirement processes, including final salary payouts, tax clearances and service certificates.
- Maintaining necessary employment archives to verify past employment details for external reference checks or regulatory audit.

v. Legal and Regulatory Compliance

- Complying with obligations under the Employment Act 1955, Industrial Relations Act 1967 and other applicable Malaysian labor laws.
- Defending, pursuing, or responding to any official legal claims, dispute resolutions, industrial court matters or law enforcement inquiries.

3.7 Marketing Communications

Where you have provided your consent, KPJU/KPJCJB/KPJCP may contact you regarding programmes, services, events, promotions, publications, surveys, fundraising initiatives and other marketing or engagement activities.

You may withdraw your consent or opt out of receiving marketing communications at any time by selecting the "unsubscribe" option in our communications or by contacting KPJU/KPJCJB/KPJCP using the contact details provided in this Notice.

4.0 Disclosure and Transfer of Personal Data

4.1. Disclosure Within KPJ Group

Your personal data may be processed, shared or disclosed within KPJU/KPJCJB/KPJCP, including other entities within the KPJ Healthcare Group, where necessary for the purposes stated in Section 3 of this Notice.

4.2. Disclosure to Third Parties

KPJU/KPJCJB/KPJCP may disclose your personal data to third parties, whether within or outside Malaysia, where required or permitted by law, where necessary for the fulfilment of contractual or operational obligations, or for purposes directly related to those stated in Section 3 of this Notice.

Such third parties may include:

i. Government ministries, departments, agencies, statutory bodies, regulators, accreditation bodies and professional organisations;
ii. Law enforcement agencies and authorities;
iii. Educational institutions, academic partners, professional bodies, examination boards and accreditation agencies;
iv. Immigration authorities, embassies, visa processing agencies and international education partners where applicable;
v. Sponsors, parents, guardians, scholarship providers and authorised representatives;
vi. Internship, industrial training, clinical placement and employment partners;
vii. Banks, insurance providers, financial institutions and payment service providers;
viii. Auditors, legal advisers, company secretaries, consultants and other professional advisers;
ix. Information technology service providers, cloud service providers, telecommunications providers and system vendors;
x. Event organisers, training providers, contractors, recruitment agencies, travel agencies and other service providers appointed by KPJU/KPJCJB/KPJCP; and
xi. Any other party to whom disclosure is required or permitted under applicable laws or regulations.

Where you have provided consent, your personal data may also be disclosed to selected business partners or third parties for educational, promotional, marketing, alumni engagement, fundraising, research or other related activities.

4.3. Alumni Records

Upon graduation, KPJU/KPJCJB/KPJCP may retain relevant academic and personal records for administrative, historical, legal, regulatory and alumni engagement purposes. Your contact details may be included in KPJU/KPJCJB/KPJCP's alumni database to facilitate communication regarding alumni activities, networking opportunities, professional development programmes, fundraising initiatives, university and college updates and other related matters. You may opt out of such communications at any time by following the unsubscribe instructions provided or by contacting KPJU/KPJCJB/KPJCP.

4.4. Business Transactions

In the event of a proposed or actual merger, acquisition, restructuring, business transfer, joint venture, financing exercise or other corporate transaction, your personal data may be disclosed or transferred to relevant parties, advisers or service providers involved in the transaction, subject to appropriate confidentiality and data protection requirements.

4.5. Transfer of Personal Data Outside Malaysia

Where necessary for the purposes described in this Notice, the University may transfer your personal data to parties located outside Malaysia, including external service providers, international business partners, overseas educational institutions, global accreditation bodies and other authorised entities.

The University ensures that all overseas transfers of personal data will comply with Section 129 of the Personal Data Protection Act (PDPA) and the applicable statutory conditions and safeguards. To guarantee the security and integrity of your information, the University will only transfer personal data across borders if the recipient jurisdiction provides an equivalent level of data protection or if robust institutional safeguards including executed data transfer agreements with approved contractual standards are fully implemented. Any third-party recipient will be contractually required to maintain strict confidentiality, data security and compliance with these statutory requirements.

5.0 Websites, Mobile Applications and Cookies

5.1. Links to Third-Party Websites

The KPJU/KPJCJB/KPJCP website and digital platforms may contain links to third-party websites for your convenience and information. These third-party websites operate independently and may have their own privacy notices and data protection practices.

KPJU/KPJCJB/KPJCP is not responsible for the privacy practices, content, security or policies of any third-party websites. We encourage you to review the privacy notices of such websites before providing any personal data.

5.2. Location-Based Services and Mobile Applications

Certain KPJU/KPJCJB/KPJCP websites, systems, mobile applications or digital services may utilise location-based features to provide services, enhance user experience, improve security or support operational requirements.

KPJU/KPJCJB/KPJCP may also use analytics tools, such as Google Analytics or similar technologies, to understand how users interact with our websites, applications and digital services. The information collected is generally aggregated and anonymised and may include device information, browser type, operating system, language preferences, usage patterns and general geographic location. Such information is used solely to improve the functionality, performance, security and user experience of our digital platforms.

5.3. Cookies and Similar Technologies

KPJU/KPJCJB/KPJCP may use cookies and similar technologies on its websites and digital platforms to enhance functionality, improve user experience, analyse website traffic and support security and operational requirements.

Cookies are small text files stored on your computer, mobile device or browser when you visit a website. They enable us to recognise your device, remember your preferences and improve the performance of our online services.

When you access our websites or digital platforms, we may automatically collect certain information, including:

i. Internet Protocol (IP) address;
ii. Date and time of access;
iii. Browser type and device information;
iv. Pages visited and navigation patterns;
v. Referring website or source from which you accessed our website; and
vi. Other technical information relating to the use of our websites and digital platforms.

Some online services may require you to provide personal data, such as login credentials, email addresses, contact information or other relevant details. Such information will be collected, used and processed solely for the purposes of providing the requested services, facilitating communication, maintaining security and improving user experience.

You may choose to disable cookies through your browser settings. However, doing so may affect the functionality and availability of certain features or services on our websites and digital platforms.

Data breaches will be assessed, managed and notified to the Personal Data Protection Commissioner and affected data subjects where required by law.

6.0 Data Security

KPJ Healthcare University ("KPJU"), KPJ Healthcare College Johor Bahru ("KPJCJB") and KPJ Healthcare College Penang ("KPJCP") is committed to protecting your personal data and has implemented appropriate physical, technical and organisational security measures to safeguard personal data against unauthorised access, disclosure, alteration, loss, misuse or destruction.

Access to personal data is restricted to authorised personnel who require such access to perform their duties and responsibilities. KPJU/KPJCJB/KPJCP also requires its employees, contractors and service providers to maintain the confidentiality and security of personal data.

While we take reasonable steps to protect your personal data, no method of electronic transmission or storage is completely secure. Therefore, KPJU/KPJCJB/KPJCP cannot guarantee the absolute security of any personal data transmitted through the internet or electronic systems.

7.0 Retention of Personal Data

KPJ Healthcare University ("KPJU"), KPJ Healthcare College Johor Bahru ("KPJCJB") and KPJ Healthcare College Penang ("KPJCP") will retain your personal data only for as long as

necessary to fulfil the purposes for which it was collected, to comply with legal, regulatory, contractual or operational requirements, and to protect the legitimate interests of KPJU/KPJCJB/KPJCP.

When personal data is no longer required, KPJU/KPJCJB/KPJCP will take reasonable steps to securely delete, destroy, anonymize or dispose of the personal data in accordance with applicable laws, regulations, and internal record retention policies.

8.0 Data Subject's Obligations

It is necessary for KPJ Healthcare University ("KPJU"), KPJ Healthcare College Johor Bahru ("KPJCJB") and KPJ Healthcare College Penang ("KPJCP") to collect and to retain your personal data. Therefore, it is also obligatory for you to supply personal data to us in the most accurate manner. If you do not provide us with personal data, KPJU/KPJCJB/KPJCP are unable to process personal data on your behalf, for the purpose stated in this notice or effectively render our services to you and where mandatory personal data is not provided, we may be unable to process your application, administer the relevant relationship or provide certain services.

9.0 The Right of Data Subject

If you would like to make any inquiries or complaints, request access to or correction of personal data in our possession, withdraw your consent for the collection, use and/or disclosure of your personal data, or elect to limit the University's right to process your personal data, you may do so by submitting your request through email at pdpa@kpju.edu.my.

i. To request access to personal data
   - You have the right to request for access to personal data processed by us on with reasonable notice. Access, requests can be made through online via email.

ii. To request correction of personal data
   - You have the rights to request for correction and/or update of your personal data that is inaccurate, incomplete, or outdated. Correction requests can be made through online via email.

iii. To withdraw consent for processing personal data
   - You have the right to withdraw your consent (in full or in part) given to us for the collection, processing, or disclosure of your personal data at any time by issuing a written notice via email. Upon receipt of your notice, we will cease processing your personal data, subject to any legal obligations, contractual conditions, or legal retention requirements. Please note that withdrawing consent may affect our ability to continue providing services or maintaining your relationship with KPJU/KPJCJB/KPJCP.

iv. To limit processing of your personal data

- You are entitled to limit our processing of your personal data, including for direct marketing purposes, subject to any applicable legal restrictions, contractual conditions, and within a reasonable timeframe.

10. Changes to Privacy Policy

Please note that KPJ Healthcare University ("KPJU"), KPJ Healthcare College Johor Bahru ("KPJCJB") and KPJ Healthcare College Penang ("KPJCP") shall have the right to modify, update or amend the terms this Personal Data Protection Notice at any time without prior notice by placing the updated Notice of the Website. An updated version is available on the website https://www.kpju.edu.my for periodical review.

11. Acknowledgement and Consent

By signing this form or interacting with KPJ Healthcare University ("KPJU"), KPJ Healthcare College Johor Bahru ("KPJCJB"), and KPJ Healthcare College Penang ("KPJCP"), you acknowledge that you have been provided with this Personal Data Protection Notice and have read, understood, and accepted the statements contained herein. Your consent for KPJU, KPJCJB, and KPJCP to process standard personal data for core educational, employment, and administrative purposes is separate from the explicit consent required for sensitive personal data (including biometric and medical records) or direct marketing activities, which must be obtained through distinct opt-in authorizations.

If you provide the personal data of third parties to KPJU, KPJCJB, or KPJCP, you warrant and represent that you have obtained the prior, specific consent of those third parties for the processing of their relevant personal data in the manner set out herein. If you are under the age of 18 years, you must obtain your parent or guardian's explicit consent before providing your personal data to KPJU, KPJCJB, or KPJCP.

12. Inquires and Complaints

Should you require further information about the personal data we hold or the way in which your information is being collected or used which are not answered by this Privacy Notice, please contact or write to us at:

Data Protection Officer
KPJ Healthcare University Sdn Bhd
Lot PT 17010 Persiaran Seriemas
Kota Seriemas, Nilai
Negeri Sembilan, Malaysia

Email: pdpa@kpju.edu.my

13. Language and Prevailing Version

In accordance with Section 7(3) of the Personal Data Protection Act 2010 (Act 709), this Personal Data Protection Notice is issued in both English and Bahasa Malaysia. Both language versions are equally valid and binding. In the event of any inconsistency, conflict or ambiguity

between the English version and the Bahasa Malaysia version, the English version shall prevail to the extent of such inconsistency or ambiguity.

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