

1 March 2016

NOTICE PURSUANT

PERSONAL DATA PROTECTION ACT 2010

References in this Personal Data Protection Notice to 'our', 'us', 'we' and 'Roche' are to Roche Diagnostics (M) Sdn Bhd.

IMPORTANT: By submitting your personal data to us and/or by using our website, you agree that your Personal Data which you submit may be processed by us in the manner and for the purposes as explained in this Notice. However if you disagree with this Notice, kindly do not use this website or submit any of your personal data to Roche.

Our Promise to Your Privacy

This Personal Data Protection Notice is issued to all our customers, prospective customers, healthcare professionals, doctors, clinicians, patients, business partners and registered vendors pursuant to the requirements of the Personal Data Protection Act 2010 (hereinafter referred to as 'the Act') that was enforced effectively on 15.11.2013.

In the course of your dealings with Roche, as our healthcare professionals, doctors, valued customers/prospective customers, clinicians, patients, their employees, agents and authorized representatives, we will request that you provide data and information about yourself which includes sensitive personal information (*hereafter referred to as 'Personal Data'*). This is to enable us and to ensure that we manage diabetes patients efficiently with proper analysis and management of their glucose and to facilitate diagnosis and tracking and/or information about you that has been or may be collected, stored, used and processed by Roche Diagnostics (M) Sdn. Bhd. from time to time for the effective delivery of our services to you and/or client relationship management and quality improvement services to ensure holistic health care solutions, diagnostics and treatment options.

Your privacy is of paramount importance to us and we take pride to subject ourselves with the guidelines set in the Act by virtue of us having or would be having possession of personal data belonging to our healthcare professionals, doctors, customers, clinicians, patients, end users, hospitals under our supervision and care, their employees, agents and authorized representatives.

WHY DO WE USE YOUR PERSONAL INFORMATION?

1. This written notice and terms hereof ('Notice') serve to inform you that your personal data is being processed by or on behalf of Roche and your personal data was or may be collected in the future, from the information that you have provided to us in our Meter Warranty Card, QC Checklist Form, Personal data Form, online membership registration, and any other equivalent forms (*hereafter collectively referred to as 'the said Forms'*) that you have been asked to complete, together with other information we may obtain about you, including but not limited to your name, national identity card number, residential address, contact number(s), health details of treatment, and other equivalent sensitive data such as gender and other information that we have requested for in any of our forms that have been extended to you personally or through our registered and authorized vendors which you gave completed including but not limited to, information received through our corporate social responsibility (CSR) projects and all other personal information as defined under the Act as personal data or sensitive personal data.

2. We are processing your personal data, including any additional information you may subsequently provide to us, for the purpose of providing healthcare solutions, diagnosis and myriad treatment suggestions for clinicians and patients. Therefore, in order to provide a holistic health care solutions, diagnostics and treatment options, we may need, collect and process personal information from you to access, evaluate and generate statistical information to access the performance of our healthcare solutions and the cause and effect of the same on each identified patients depending on their personal information and lifestyle options to tailor medicines and better manage diseases to ensure that we continue to provide superior options for diagnosis and treatment for clinicians and ultimately the patients. Further and in addition to the above, we are also processing your personal data to enter into contract with you, for the delivery of our services, audit, legal matters, management of your accounts with us performing such other contractual covenants as may be entered into between you and us and such other purposes as may be related to the foregoing and the following ('Purposes').
 - a) We may also collect your personal data from a variety of sources, including when you submit or furnish your personal data either verbally or in the variety of forms that are extended to you during your personal data verbally or in the variety of forms that are extended to you such as the Meter Warranty Card, the QC Check List, the Accu-Chek Membership Registration or during your purchase of our Accu-Chek Meter,.
 - b) The provision of your Personal data is mandatory and we assure you that the collection and processing of your personal data is necessary to be fully appraised of all facts in relation to the progress and effectiveness of our products and treatments (if any) when you join the Accu-Chek membership. If you do not provide Roche with your Personal Data, we will not be able to process or record your progress and/or performance of the blood glucose meter for the proper assessment of your overall health. Further, failure to provide your Personal Data will result in you not being eligible to participate in various programmes either currently in place or would be initiated in the future as a value added to service to ensure you are given access to our products, drugs and treatments.
 - c) The provision of your Personal data is voluntary when you submit your reviews, suggestions, comments or opinions in any suggestion or comment cards, when you complete a patient survey or when using the Website.
 - d) To provide you with a better and more personalised level of service and content which may be of interest to you;
 - e) Roche's internal administrative purposes including auditing, accounting, data analysis, and to improve our services;
 - f) For Roche to comply with regulatory requirements and obligations under law;
 - g) And you agree and consent to Roche in using and processing your Personal Data in the manner as identified in this Notice.

HOW DO WE USE YOUR PERSONAL INFORMATION?

3. Product information upon request by Doctors/Healthcare Professionals/ Pharmacy

Roche may also use and process your Personal Data for other purposes such as to send you updates and news on the latest Treatments, Products, Programmes, Services, Educational update, Promotions and Events which may be of interest to you, by way of email- *Accu-Chek Newsletter*. Telephone call and/or by email either in progress now or may be created in the future to ensure that you are informed of your healthcare options for your best interest forming part of our healthcare awareness initiatives.

4. Disclosure to Third Party

Your Personal data may be disclose, share and process to third party for the purposes outlined in Column 1 above. Further, Roche may engage other companies, service providers or individuals to perform functions on Roche's behalf, and consequently may provide access or disclose to your Personal Data to such service providers or third parties. The third parties referred to in this Column 5 include (without limitation):-

- a) Information technology service providers;
- b) Professional advisors and external auditors; and
- c) Law enforcement, regulatory and governmental authorities in order to comply with statutory and government requirements

Your Personal data may also be shared in connection with a corporate transaction, such as a sale of a subsidiary or a division, merger, consolidation, or asset sale, or in the unlikely event of winding-up.

Further your personal data may be transferred to locations outside Malaysia for the above Purposes.

5. Personal Information from Minors

Roche do not knowingly collect Personal data from individuals under 18 years of age without the consent from the minor's parent or legal guardian. As a parent or legal guardian, please do not allow minor under your care to submit Personal data to us. In the event that's such Personal Data is submitted to us, you hereby consent to the processing of the minor's Personal Data and personally accept and agree to be bound by this Notice and take responsibility for his or her actions.

6. Links to third-Party Websites

The Website may contain links to third parties' websites. Please note that we are not responsible for collection, use, maintenance, sharing, or disclosure of data and information by such third parties. If you provide information directly to such sites, the privacy policy and terms of services on those sites are applicable and we are not responsible for the information processing practices or privacy policies of such sites.

7. Customer Consent/ Unsubscribe

If you had failed or failed to supply us the above personal data or had failed or failed to supply the personal information accurately, we may not be able to process your personal data for any of the purposes (*as stated above*). Please take note that it is not our intention for advertising our services or products, unless the information is requested and required for legitimate purposes.

In addition, if you subsequently withdraw your consent to us to process your personal data, we may not be able to process your personal data for all the purposes below which would have a negative impact in the proper fulfilment of the terms and conditions of our mutual contractual obligations, our services to you for the following purpose as stated above.

If you do not consent to Roche processing your Personal Data for the purposes listed above please notify us by using the contact details stated in the *Contact List* below. Should you have any further inquiries please do not hesitate to contact us on the same as stated in the *Contact List* below.

Data Access and Corrections

8. You are responsible for ensuring that the personal data you provide us is accurate, complete and not misleading and that your personal data is kept up to date. Subject to any exceptions under applicable laws, you may access and request for correction of your personal data and/or limit the processing of your personal data, or make enquiries or complaints in respect of your personal data, by contacting the authorized personnel in charge of PDPA. Please refer to the *Contacting List* below.
9. Further to the above, In respect of your right to access and/or correct your Personal Data, Roche has the right to refuse your request to access and/or make any correction to your Personal Data for the reasons permitted under law, such as where the expense of providing access to you is disproportionate to the risks to your or another person's privacy. Hence we may refuse to comply with your request for access or correction to your personal data under the Act and if we refuse to comply with such a request, we will inform you of our refusal and reason for or refusal in writing.

How we Protect/Secure your Personal Information?

10. In Roche, we use technology and security precautions, rules and other procedures to protect your personal information from unauthorized access, improper use, disclosure, loss or destruction. We use various methods to ensure the confidentiality of your information such as implementing the industry standard firewalls and password protection.
11. While we cannot guarantee the misuse, loss or alteration of information, please be assured that Roche makes reasonable steps and efforts to mitigate and prevent such mishaps.
12. It is, however, your personal responsibility to ensure that the computer you are using is adequately secured and protected against malicious software, such as trojans, computer viruses and worm programs. You are aware of the fact that without adequate security measures (e.g. secure web browser configuration, up-to-date antivirus software, personal firewall software, no usage of software from dubious sources) there is a risk that the data and passwords you use to protect access to your data, could be disclose, share and process to unauthorized third parties.

Contact List

Contact Details of PDPA Person-in-Charge	Compliance Manager
Email Address:	my.accu-chek@roche.com
Tel No.:	1-800-88-1313
Fax No.:	+6-03-7955 5418
Company's Address	Roche Diagnostics (M) Sdn Bhd 2 A, Jalan 13/1, 46200 Petaling Jaya Selangor Darul Ehsan, Malaysia

Effective Date

This Privacy Policy is effective as of 15.11.2013

In the event of any inconsistency between the English version and the Bahasa Malaysia version of this notice, the English version shall prevail over the Bahasa Malaysia version. Roche (M) Sdn Bhd shall have the right to modify, update or amend the terms of this Notice at any time by placing the update Notice on Diabetes Care of Roche Diagnostic(M) Sdn Bhd. website: <http://www.accu-chek.com.my> ("Website").

Should you continue our services after the modified, updated or amended of this Notice, you will be bound by those changes. Please be assured that the changes to our Notice will be prospective and will not modify how we handle your information.

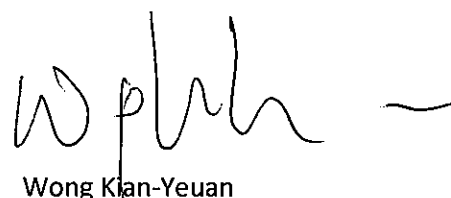
Yours Sincerely,

Roche Diagnostics (M) Sdn Bhd



Yip Siew Ping

(Diabetes Care Manager)



Wong Kian-Yeuan

(Compliance Manager)