

Roczen Universal

PRIVACY POLICY

Effective Date: 19 February 2026

This Privacy Policy describes how Reset Health Malaysia Sdn. Bhd. ("us", "we", or "our") collects, uses, maintains, and discloses information collected from users ("you" or "your") of the Roczen Universal website (the "Service"). This Privacy Policy applies to the Service and all products and services offered by Reset Health Malaysia Sdn. Bhd..

We are committed to protecting your privacy and personal data in accordance with the Personal Data Protection Act 2010 ("PDPA") of Malaysia. By using our Service, you consent to the data practices described in this Privacy Policy.

1. Collection of Personal Data

We may collect personal data from you in a variety of ways, including, but not limited to, when you visit our Service, register on the Service, place an order, fill out a form, subscribe to a newsletter, respond to a survey, and in connection with other activities, services, features, or resources we make available on our Service.

The types of Personal Data we may collect include:

- **Identity Data:** Name, NRIC/Passport number, date of birth, nationality.
- **Contact Data:** Email address, postal address, telephone number, mobile number.
- **Profile Data:** Username and password (if you create an account),
- **Usage Data:** Information about how you use our website, products, and services.
- **Technical Data:** Internet Protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website.
- **Sensitive Personal Data (if applicable and with explicit consent):** We generally do not collect sensitive personal data unless it is strictly necessary for a specific service or function and with your explicit consent (e.g., health information for specific wellness programs, if offered). If we collect sensitive personal data, we will clearly state the purpose and obtain your explicit consent.

For participants enrolled in specific health or programme evaluation initiatives (including the Roczen Universal Programme Evaluation Group (PEG)), we may collect health and biometric data such as body weight, height, Body Mass Index (BMI), blood pressure readings, waist circumference measurements, and laboratory test results (including HbA1c). Such data is collected strictly with your explicit consent and for clearly defined programme and evaluation purposes.

We may also collect non-personal identification information whenever you interact with our Service. Non-personal identification information may include the browser name, the type of computer, and technical information about your means of connection to our Service, such as the operating system and the Internet service providers utilized and other similar

information.

2. How We Collect Personal Data

We collect personal data from you when you:

- Register an account on our Service.
- Fill in forms on our Service.
- Subscribe to marketing communications.
- Participate in physical events and health screenings
- Contact us directly (e.g., via email, chat, or phone).
- Interact with our Service through cookies and similar technologies (see Section 9).

We generally process your data under legitimate interests or to provide you contracted services, other than when processing your health or marketing data (which is only done under your consent).

3. Purposes of Processing Personal Data

We process your Personal Data for the following purposes:

- **To Provide and Maintain the Service:** To operate our website, deliver the services you request, and ensure the proper functioning of our platforms.
- **To Personalize User Experience:** We may use information in the aggregate to understand how our users as a group use the services and resources provided on our Service, allowing us to personalize your experience.
- **To Improve Our Service:** We may use feedback you provide to improve our products and services.
- **To Send Periodic Emails/Communications:** We may use the email address and phone number provided to send you information and updates pertaining to your order, as well as to respond to your inquiries, questions, and/or other requests.
- **For Marketing and Promotional Purposes:** To send you marketing communications about our products, services, offers, and promotions that we believe may be of interest to you, where you have provided explicit consent for such purposes.
- **To Comply with Legal Obligations:** To meet our legal, regulatory, and compliance requirements, including record-keeping and reporting obligations.
- **For Security and Fraud Prevention:** To protect our Service, users, and business from fraud and unauthorized access.
- **To Administer Contests, Promotions, Surveys, or Other Site Features:** To manage and facilitate your participation in these activities.
- **For PEG Purposes:** Where you voluntarily participate in PEG initiatives, we may analyse your health and biometric data to assess the effectiveness,

outcomes, and overall impact of our programmes. Such analysis may include aggregated and anonymised data to evaluate programme performance and improve future service offerings.

4. Consent

We will obtain your consent before collecting and processing your personal data, unless otherwise permitted by law. Your consent may be expressed (e.g., ticking a box) or implied through your continued use of the Service after we have provided you with this Privacy Policy.

You have the right to withdraw your consent at any time by contacting us using the contact details provided in Section 12. Please note that withdrawing consent may affect our ability to provide certain services to you.

5. Disclosure to Third Parties

We may share your personal data with the following categories of third parties:

- **Service Providers:** Third-party companies and individuals that assist us in providing our Service (e.g., hosting providers, analytics providers, customer support, marketing services). These third parties are contractually obligated to protect your data and only use it for the purposes for which it was provided.
- **Business Partners:** With your consent, we may share your information with business partners for joint marketing activities or to offer you complementary products and services.
- **Legal and Regulatory Authorities:** When required by law or to respond to valid requests by public authorities (e.g., a court or government agency).
- **Professional Advisors:** Such as lawyers, auditors, and insurers who provide professional services to us.
- **In case of Business Transfer:** In connection with, or during negotiations of, any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company.
- **For PEG purposes:** We may share relevant health data with appointed service providers, laboratories, data analysts, or research partners strictly on a need-to-know basis and subject to appropriate contractual safeguards to ensure confidentiality and compliance with the PDPA. Where possible, data will be anonymised or aggregated prior to analysis.

We will **not** sell, trade, or rent your Personal Data to others for their independent marketing purposes without your explicit consent.

6. Cross-Border Data Transfer

Your personal data may be stored and processed in any country where we have facilities or where we engage third-party service providers. This may include transfers of personal data outside Malaysia.

We will only transfer your personal data out of Malaysia if:

- The recipient country has laws that are substantially similar to the PDPA, or provides an adequate level of protection for personal data.
- You have given your explicit consent to the transfer after being informed of the class of third parties and the purpose of the transfer.
- The transfer is necessary for the performance of a contract between you and us, or for the conclusion or performance of a contract between us and a third party at your request or in your interest.
- The transfer is for legal proceedings, legal advice, or the establishment, exercise, or defense of legal rights.
- We have taken all reasonable precautions and exercised due diligence to ensure that the personal data will not be processed in a manner contrary to the PDPA (e.g., through Binding Corporate Rules or Standard Contractual Clauses).

7. Data Security

We adopt appropriate data collection, storage, and processing practices and security measures to protect against unauthorized access, alteration, disclosure, or destruction of your personal data, username, password, transaction information, and data stored on our Service.

While we strive to use commercially acceptable means to protect your Personal Data, we cannot guarantee its absolute security. No method of transmission over the Internet or method of electronic storage is 100% secure.

8. Data Retention

We will retain your personal data only for as long as necessary to fulfill the purposes for which it was collected, including for the purposes of satisfying any legal, accounting, regulatory or reporting requirements. When we no longer need your personal data, we will securely dispose of it.

9. Your Rights as a Data Subject

Under the PDPA, you have the following rights concerning your personal data:

- **Right to Access:** You have the right to request access to your personal data held by us. We may charge a prescribed fee for such requests.
- **Right to Correction:** You have the right to request the correction of any inaccurate, incomplete, misleading, or outdated personal data held by us.
- **Right to Withdraw Consent:** You have the right to withdraw your consent to the processing of your personal data at any time. This withdrawal will not affect the lawfulness of processing based on consent before its withdrawal.
- **Right to Prevent Processing for Direct Marketing:** You have the right to object to the processing of your personal data for direct marketing purposes.
- **Right to Data Portability (Effective June 1, 2025):** You have the right to request a copy of your personal data in a structured, commonly used, and machine-readable format and to transmit that data to another data controller, where technically feasible

and compatible with the data format.

- **Right to Lodge a Complaint:** You have the right to lodge a complaint with the Personal Data Protection Commissioner if you believe your rights under the PDPA have been violated.

To exercise any of these rights, please contact us using the contact details provided in Section 12. We will respond to your request within the timeframes stipulated by the PDPA.

10. Cookies Policy

Our Service may use "cookies" to enhance your user experience. Your web browser places cookies on your hard drive for record-keeping purposes and sometimes to track information about them.

- **What are Cookies?** Cookies are small text files that are placed on your computer or mobile device when you visit a website. They are widely used to make websites work more efficiently and to provide information to the owners of the site.
- **How We Use Cookies:**
 - **Essential Cookies:** Necessary for the operation of our Service, enabling core functionalities like security, network management, and accessibility.
 - **Analytical/Performance Cookies:** Allow us to recognize and count the number of visitors and to see how visitors move around our Service when they are using it. This helps us to improve the way our Service works.
 - **Functionality Cookies:** Used to recognize you when you return to our Service. This enables us to personalize our content for you and remember your preferences.
 - **Advertising/Targeting Cookies:** These cookies record your visit to our Service, the pages you have visited, and the links you have followed. We will use this information to make our Service and the advertising displayed on it more relevant to your interests.
- **Managing Cookies:** You may choose to set your web browser to refuse cookies or to alert you when cookies are being sent. However, note that some parts of the Service may not function properly if you do so.

11. Changes to This Privacy Policy

Reset Health Malaysia Sdn. Bhd. has the discretion to update this Privacy Policy at any time. When we do, we will revise the "Effective Date" at the top of this page. We encourage users to frequently check this page for any changes to stay informed about how we are helping to protect the personal data we collect. You acknowledge and agree that it is your responsibility to review this Privacy Policy periodically and become aware of modifications.

12. Contact Information

If you have any questions about this Privacy Policy, the practices of this Service, or your dealings with this Service, please contact us at:

Reset Health Malaysia Sdn. Bhd.

Suite 8.8, 8th Floor, Heritage House 33, Jalan Yap Ah Shak 50300 Kuala Lumpur Email: dataprotection@resethealth.clinic