

# Privacy Notice

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DOCUMENT

# MEDIEXPRESS (M) SDN BHD

## PRIVACY POLICY

Effective Date: DD MM, 2026

### 1. Introduction

#### 1.1 Who We Are

This Privacy Policy describes how MediExpress (Malaysia) Sdn. Bhd. and/or Health Connect Sdn. Bhd. (“Company”, “we”, “us”, “our”) collects, uses, processes and discloses Personal Data in accordance with the Personal Data Protection Act 2010 (PDPA) of Malaysia.

By accessing or using our mobile application, website, or services (“Platform”), you expressly consent to the collection, use, processing and disclosure of your Personal Data, including sensitive personal data, in accordance with this Privacy Policy and applicable laws.

#### 1.2 Medix Role as Third-Party Administrator (TPA)

Medix acts as a Third-Party Administrator and facilitates medical claims, benefit management, and related healthcare support services through Medix mobile application, web portals, and related services.

Medix acts on behalf of insurers and employer-sponsored benefit programs. Medix does not provide insurance underwriting or medical treatment services.

#### 1.3 Compliance with PDPA 2010

“**Personal Data**” shall have the meaning assigned under the PDPA and includes any information that relates directly or indirectly to an individual who is identified or identifiable.

##### 1.3.1 Data Controller and Data Processor Roles

In the course of providing Medix services as a Third-Party Administrator (TPA), Medix role in relation to personal data may vary depending on the context of processing:

- Where Medix processes personal data on behalf of insurers or employer-sponsored benefit programs, Medix acts as a data processor, processing personal data strictly in accordance with the instructions of the relevant insurer or employer (who acts as the data controller).

- Where Medix collects and process personal data directly in connection with the operation of Medix platforms, systems, and services (including user account management, system security, and service delivery), Medix may act as a data user/controller under applicable data protection laws.

In all cases, Medix processes personal data in accordance with applicable data protection laws, contractual obligations, and industry standards, and Medix implements appropriate safeguards to protect such data.

## 1.4 Scope of This Policy

This Policy applies to all personal data processed by Medix in connection with:

- Medix mobile application (App’)
- Web-based portals
- Claims and benefits administration systems
- Customer service and communication channels
- Employer and insurer administration services

## 2. Personal Data We Collect

Depending on your relationship with Medix (policyholder, dependent, employer representative, insurer representative, healthcare provider, or platform user), Medix may collect and process:

- **Identification Information**  
Name, NRIC/Passport, DOB, gender, nationality, employee or policy ID
- **Contact Information**  
Email, mobile/telephone number, mailing address
- **Policy / Employment Information**  
Employer, insurer, policy number, coverage details, eligibility data, dependent information
- **Sensitive Personal Data**  
Medical history, diagnosis s treatment, medical reports s certificate, claims Documentation
- **Financial / Banking Information**  
Bank account details, payment and reimbursement information
- **Technical Information**  
IP address, device/browser type, login records, activity logs, app usage data

### 3. Sources of Personal Data

Medix may collect and process the following personal data from the following sources, as permitted by law:

- Personal identification details (name, NRIC/passport, contact details)
- Health-related information (claims, treatment details, medical history)
- Employment / membership details
- Transaction and usage of data You directly (e.g., registration, claims submission, enquiries)
- Insurers
- Employers (where benefits are employer-sponsored)
- Panel hospitals, clinics, and healthcare providers
- Third parties authorized by you
- Other legally permissible data sources

Where health-related information is collected, such data shall be treated as sensitive personal data under the PDPA.

### 4. Purpose of Processing

Medix will process personal data for the following purposes:

- Claims intake, assessment, and administration
- Eligibility verification and pre-authorization
- Payment and reimbursement processing
- Fraud detection, audit, and risk management
- Regulatory compliance and lawful requests
- System security and service improvement
- Verifying eligibility and coverage
- Facilitating access to panel providers
- Customer support and communication
- Compliance with legal and regulatory requirements

Internal analytics using anonymized and aggregated data only Medix shall not process your Personal Data for purposes other than those stated above without your consent, unless permitted under applicable laws.

## 5. Legal Basis for Processing

Medix processes personal data based on one or more of the following legal grounds:

- Your consent (particularly for sensitive medical data where required)
- Contractual necessity under insurance or benefit programs
- Legal and regulatory obligations
- Legitimate business purposes consistent with applicable laws and not overriding your rights

## 6. Disclosure of Personal Data

Medix does not sell, rent or trade personal data. However, personal data may be disclosed to:

- Insurers for claims and policy administration
- Employers (where applicable under the benefits programs)
- Panel hospitals, clinics, and healthcare providers
- Financial institutions for reimbursement processing
- Regulatory bodies or authorities, where legally required
- IT vendors and authorized service providers
- Policyholders
- Insurance providers
- Third-party service providers (IT, hosting, analytics)

All such disclosures are made strictly on a need-to-know basis and subject to confidentiality obligations. All third parties are required to protect your personal data in accordance with applicable data protection laws.

## 7. Cross-Border Transfer

While providing Medix services, personal data may be transferred to, stored in, or accessed from locations outside Malaysia including jurisdictions approved under applicable data protection regulations or where adequate safeguards are implemented in accordance with PDPA requirements.

Such transfers will only occur where:

- Permitted under Malaysian law; and
- Appropriate safeguards or contractual protections are in place; or
- Consent is obtained where required.

Medix takes reasonable steps to ensure transferred data remains protected.

Healthcare providers available on the Platform are independent third parties. The Company does not:

- Provide medical advice;
- Control or guarantee medical services; or
- Assume liability for treatment outcomes.

## 8. Data Security

Medix implements appropriate technical and organizational security measures to protect personal data against unauthorized access, loss, misuse, modification, or disclosure. These measures include:

- Encryption and secure infrastructure
- Firewalls and intrusion detection systems
- Role-based access controls
- Multi-factor authentication where applicable
- Staff training and awareness programs
- Confidentiality obligations for employees and contractors

However, Medix acknowledges that no system or method of transmission is fully guaranteed secure.

Medix implements reasonable administrative, technical and physical safeguards to protect Personal Data. However, we do not guarantee absolute security and shall not be liable for unauthorized access beyond our reasonable control except where such access is directly attributable to Medix's negligence or breach of applicable law.

## 9. Data Retention

Personal data shall be retained only for as long as it is necessary including retention periods required under applicable insurance, healthcare, tax, and regulatory frameworks.:

- In accordance with laws, regulations, and insurance industry standards
- For as long as necessary to fulfil the purposes described in this Policy
- No longer than operationally necessary including regulatory, audit, and claims-related retention requirements
- Fulfilment of purposes;
- Legal and regulatory requirements; and
- Dispute resolution.

Data will be securely deleted or anonymized when retention is no longer required.

## 10. Data Breach Management

In the event of a data breach, Medix will:

- Take immediate steps to contain and mitigate the breach
- Assess the nature, scope, and potential impact of the incident
- Notify relevant regulatory authorities where required under applicable laws or regulatory requirements
- Inform affected individuals where mandated or appropriate; and
- Implement appropriate corrective and preventive measures to reduce the risk of recurrence

## 11. Your Rights

Subject to the PDPA and applicable laws, you have the right to:

- Request access to your personal data
- Request correction of inaccurate, incomplete, or outdated personal data
- Withdraw consent (where processing is based on consent)
- Request restriction or limitation of processing, where applicable

Requests must be submitted in writing to Medix using the contact details below. Withdrawal of consent may result in the inability to continue providing services.

## 12. Cookies s Tracking Technologies

Medix app and portal may use cookies or similar technologies to:

- Maintain secure sessions
- Improve user experience
- Analyze usage patterns
- Enhance system security

You may adjust your browser settings, although certain features may be affected.

## 13. Third-Party Links Disclaimers

Medix Platform may contain links to third-party websites. Medix are not responsible for the privacy practices or content of such external sites. Users should review those privacy policies separately.

## 14. Health Kit Data Usage

Medix application integrates with Apple HealthKit to access certain health-related data (such as step count) for the purpose of supporting wellness and activity tracking features within the App.

### 14.1 Data Access and Usage

Medix only access HealthKit data that you have explicitly authorized through your device permissions. This may include step count and other selected wellness metrics made available by Apple HealthKit.

The data is used solely to:

- Display activity and wellness information within the App;
- Track progress against user-defined goals; and
- Provide visual indicators such as achievements or activity summaries.

### 14.2 Data Collection and Storage

Medix does not collect, store, transmit, or upload your HealthKit data to Medix servers or any external systems. All HealthKit data accessed by the App is processed locally on your device and remains under your control.

### 14.3 Data Sharing

Medix does not share HealthKit data with any third parties, including insurers, employers, healthcare providers, analytics providers, or advertisers.

### 14.4 User Control

You may manage, restrict, or revoke access to HealthKit data at any time through your device settings:

Settings → Privacy & Security → Health → (App Name)

### 14.5 Disclaimer

The HealthKit-related features within the App are intended solely for general wellness and activity tracking purposes. They are not intended for medical diagnosis, treatment, or clinical decision-making. Users should consult qualified healthcare professionals for any medical concerns.

## 15. Consequences of Not Providing Data

Where personal data is necessary for Medix to provide TPA services. Failure to provide required personal data may result in:

- Inability to register or access Medix systems.
- Inability to verify benefit eligibility.
- Delays, suspension, or rejection of claims.
- Inability to process reimbursements.
- Termination or limitation of services.

## 16. Anonymized Data Use

### Data Usage and Consent (PDPA Compliance)

- Consent language (express consent, including for processing and disclosure)
- Clarification that anonymized / aggregated data may be used for analytics and service improvement.
- Cross -border data transfer safeguards (if applicable)

## 17. Amendments

Medix reserves the right to amend this Privacy Policy from time to time to reflect changes in law, regulation, or operational requirements. Any updates will be published on Medix App and portal. Continued use of the Platform constitutes acceptance of such updates and acceptance of the revised Policy.

## 18. Governing Law

This Privacy Policy shall be governed by the laws of Malaysia.

## 19. Contact Us

For any enquiries regarding this Privacy Policy, please contact us at:

Email Address: [security\\_privacy@medix.com.my](mailto:security_privacy@medix.com.my)