#### Our commitment to privacy

- 1. CARETURN MY Sdn. Bhd. ("CARETURN MY") knows that protecting the privacy and confidentiality of your personal information is important. CARETURN MY shall therefore only use your name and other information that relates to you in the manner set out in this Privacy Policy. CARETURN MY will only collect information where it is necessary for CARETURN MY to do so and if it is relevant to CARETURN MY's dealings with you, in the manner set out in this Privacy Policy. CARETURN MY will only keep your information for as long as CARETURN MY is either required to by law or as is relevant for the purposes for which it was collected.
- 2. The collection, use and disclosure of personal information (see Clause 2.1 for a definition) by CARETURN MY are governed by the Personal Data Protection Act 2012 (the "Act"). This Privacy Policy explains what personal information is collected from users of CARETURN MY's website and/or other online platforms (collectively, the "Platforms") and services and how such personal information is used and disclosed to other parties. It also explains how you can ask questions, make suggestions, and complain about CARETURN MY's privacy practices.
- 3. This Privacy Policy applies to personal information collected by CARETURN MY. Note that CARETURN MY may contain links to other websites provided and maintained exclusively by third parties not subject to this Privacy Policy. Please review the privacy policies on any third party websites to determine their information handling practices. CARETURN MY will not be liable under any circumstances for any damages whatsoever, direct or indirect, resulting from any use of CARETURN MY or any other third party website linked to CARETURN MY, whether or not CARETURN MY is advised of the possibility of such damages. If you have any additional concerns or questions, you are encouraged to contact CARETURN MY and CARETURN MY will address your concerns to the best of its ability. Please read this Privacy Policy carefully and check back periodically as CARETURN MY updates it from time to time.
- 4. By submitting your personal information to CARETURN MY and by visiting CARETURN MY, you signify your agreement to the terms and conditions of this Privacy Policy, and expressly consent to the collection, use and disclosure of your personal information in the manner and for the purposes set out in this Privacy Policy.

### What is personal information?

1. "Personal information" refers to data, whether true or not, about an individual who can be identified (a) from that data; or (b) from that data and other information to which the organisation has or is likely to have access, whether stored in electronic or non-electronic form. "Personal information" does not include the name, title, business address or telephone number of an employee of an organisation. Information used solely for journalistic purposes is exempted from the Act.

## What personal information does CARETURN MY collect, and why?

- 1. CARETURN MY collects your personal information for specific, limited purposes, as set out in this Clause 3. Information is collected by fair and lawful means.
  - CARETURN MY collects contact information (for example, name, address, email address, and telephone numbers) when you register at any of the Platforms. This information is used to complete your CARETURN MY bookings and respond to your inquiries.
  - 2. CARETURN MY also collects credit card and bank account information as needed to process payments for CARETURN MY's services. CARETURN MY does not permanently store your credit card and bank account information.
  - 3. If you enter a contest or other promotion, CARETURN MY collects your personal contact information to administer the contest or promotion, including for the purposes of contacting, announcing and promoting prize winners.
  - 4. CARETURN MY collects booking history and a list of promotions offered to you ("**History**") in order to gain a better understanding of your interests so that CARETURN MY may develop better services and to determine eligibility for CARETURN MY's services.
  - 5. CARETURN MY collects and stores your location history to establish your location, improve your experience and from time to time to send you information, such as promotional offers, that are most relevant to your geographic location.
  - 6. CARETURN MY keeps notes and special instructions in respect of your personal information on file to help CARETURN MY fulfil your care service requirements and care bookings, and provide customer service.
  - 7. CARETURN MY also collects your personal information to help CARETURN MY improve the services provided by CARETURN MY (including the types of services offered by CARETURN MY, the quality of the care professionals used to provide the services, CARETURN MY's internal care operations, customer service and support, and outreach services).
  - 8. If you wish to apply for a job on any of the Platforms, CARETURN MY will collect personal information such as your name, email address, phone number and additional information such as resume and gender. CARETURN MY uses the information, collected through the Platforms to register and process your application, to determine your qualifications for the position for which you have applied and to contact you.
  - 9. If you choose to opt out of any use of your personal information in accordance with Clause 6, CARETURN MY keeps your contact information on a list so that your request can be honoured.
  - 10. If you complain to any of CARETURN MY's departments for any reason, CARETURN MY collects your contact information and the nature of your complaint for the purpose of investigating your complaint and responding to you.
  - 11. If you are a service provider, CARETURN MY collects your personal and/or business identification details for tax reporting purposes and your contact information in order to pay you through CARETURN MY's third-party payment agent. CARETURN MY may also collect financial information (for example, banking details and credit history) from CARETURN MY's service providers to assess credit risk, sales data to prepare commission reports and other information to help CARETURN MY evaluate its services.
  - 12. Additional purposes for the collection, use or disclosure of personal information, which are not set out in this Privacy Policy, will be set out at the time of collection. CARETURN MY will obtain your consent to such additional purposes no later than at the time of such collection.
  - 13. Collection of Computer Data: CARETURN MY may use cookies, web beacons, and other similar technologies for storing information to help provide you with a

better, faster, safer and personalised experience when you use CARETURN MY's services and/or access any of the Platforms. When you visit CARETURN MY's website, CARETURN MY's servers will automatically record information that your browser sends whenever you visit a website. This data may include:

- your computer's IP address;
- browser type;
- webpage you were visiting before you came to CARETURN MY's website:
- the pages within CARETURN MY's website which you visit; and
- the time spent on those pages, items and information searched for on CARETURN MY's website, access times and dates, and other statistics.

This information is collected for analysis and evaluation in order to help CARETURN MY improve CARETURN MY's website and the services and products CARETURN MY provides.

- 14. Internet Cookies: An internet cookie is a small piece of information that a website stores on your internet browser. CARETURN MY uses cookies to better understand how you use CARETURN MY's website and to improve your experience. For example, a cookie may recall a set of preferences you have set for CARETURN MY's website. Storing cookies on your web browser allows CARETURN MY to present you with custom web pages and other content that are tuned with your preferences. These activities are invisible to you, and are generally intended to improve your internet surfing convenience. Unless you have set your preferences so that you will be alerted when a cookie is being stored on your computer, you will not know about it.
- 15. If you are concerned about cookies, you may disable them by adjusting the privacy and security settings of your mobile device or web browser. However, please be aware that by disabling cookies, you may not be able to use all portions of CARETURN MY's website and may not have the optimal experience.
- 16. If you sign up for CARETURN MY through your social media account or by linking your CARETURN MY account to your social media account, or use certain other CARETURN MY social media features, but in any case give CARETURN MY authorisation to access your personal information on your social media account, you expressly consent for CARETURN MY to collect, use and disclose such personal information from your social media account in accordance with the settings of your authorisations for the purposes set out in this Privacy Policy. CARETURN MY will manage the personal information which CARETURN MY has collected in accordance with this Privacy Policy. Please refer to the privacy settings of the social media website or application to determine how you may adjust your authorisations and manage the interactivity between CARETURN MY and your social media account or your mobile device.
- 17. CARETURN MY may place advertising or other links on any of the Platforms that originate from outside advertisers. If you view these ads, the advertisers may assign a cookie. CARETURN MY does not control these cookies, nor is it responsible for any marketing or other use of your name by these advertisers.

#### Market Research

 Occasionally, CARETURN MY asks its users to complete market research surveys. Survey results are aggregated and shared with CARETURN MY's advertisers, sponsors and related corporations in a manner that does not disclose personal information.

## To whom does CARETURN MY disclose personal information, and why?

- 1. CARETURN MY may use or disclose your personal information under the following circumstances:
  - 1. CARETURN MY may use the contact information and History collected from you to send you promotional offers and information from CARETURN MY, its related corporations and from selected sponsors or advertisers ("Marketing Offers"). CARETURN MY may disclose your personal contact information to related corporations and selected sponsors and advertisers in order to provide you with Marketing Offers. If you do not wish to receive Marketing Offers, you may opt out at any time by following the procedure set out in Clause 6.
  - CARETURN MY may transfer your personal information to service providers
    acting on its behalf in order to perform processing and other specialised
    services, for example, prize fulfilment of CARETURN MY's contests, collection
    of overdue accounts, service delivery, credit card or bank transfer processing.
  - 3. CARETURN MY may disclose your personal information to any legal, regulatory, governmental, tax, law enforcement or other authorities or the relevant right owners pursuant to Clause 13.
  - 4. CARETURN MY may disclose your personal information to parties connected with the contemplated or actual financing, insuring, sale, assignment or other disposal of all or part of its business or assets, including for the purposes of determining whether to proceed or continue with such transaction or business relationship or fulfilling any records or other reporting requirements to such parties. CARETURN MY will require such parties to treat your personal information in accordance with this Privacy Policy and to use and disclose it only for the purposes for which it was collected.
- In disclosing or transferring your personal information to third parties and/or CARETURN MY's related corporations located overseas, CARETURN MY will ensure that the receiving jurisdiction has in place a standard of protection accorded to personal information that is comparable to the protection under or up to the standard of the Act.

# Withdrawal of Consent and Opting Out

- 1. CARETURN MY will obtain your express consent to collect, use and disclose your personal information for any additional purposes not set out in this Privacy Policy at or prior to the time of collection.
- 2. You may, at any time, withdraw your consent to and opt out of CARETURN MY's collection, use and/or disclosure of your personal information for any the purposes set out in Clauses 3, 4, and/or 5 by contacting CARETURN MY.
- Please note that if you opt out of allowing CARETURN MY to collect, use and/or disclose your personal information for any of the purposes set out in this Privacy Policy, CARETURN MY may not be in a position to continue to provide CARETURN MY's

- services to you or perform any contract CARETURN MY has with you. CARETURN MY's rights and remedies (legal or otherwise) are expressly reserved in such an event.
- 4. If you do not wish to receive Marketing Offers, you may opt out at any time by doing any of the following:
  - 1. follow the instructions at the bottom of any email Marketing Offer you receive;
  - 2. inform your telemarketer at the time you are called with a Marketing Offer; or

## **Security of Your Personal Information**

- 1. CARETURN MY maintains personal information in a combination of paper and electronic files. CARETURN MY takes technical, contractual, administrative and physical security measures to protect your personal information. Not all CARETURN MY interactions require that credit card and/or bank information be provided. If you provide credit card and/or bank account information to CARETURN MY, CARETURN MY works to help protect the security of your credit card and/or bank account information by using industry standard secure sockets layer (SSL) encryption technology.
- 2. Please be aware that email is not a secure medium, and any personal information you send to CARETURN MY by email could be intercepted. If your communication is very sensitive, or includes information such as your credit card number and/or bank account information, you should not send it electronically unless the email is encrypted or your browser indicates that the access to CARETURN MY's website is secure. Materials posted to online forums such as bulletin boards or chat rooms are public, not secure and may be viewed by anyone. Any personal information you post may be collected and used by anyone and may result in unsolicited messages from other internet users.
- 3. If you believe your privacy has been breached by CARETURN MY, please contact CARETURN MY.
- 4. Your password is the key to your account. Please use unique numbers, letters and special characters, and do not share your CARETURN MY password with anyone. If you do share your password with others, you will be responsible for all actions taken in the name of your account and the consequences. If you lose control of your password, you may lose substantial control over your personal information and other information submitted to CARETURN MY. You could also be subject to legally binding actions taken on your behalf.

## No Spam, Spyware, or Virus

1. No spam, spyware or virus is allowed on any of the Platforms. Please set and maintain your communication preferences so that CARETURN MY sends communications to you as you prefer. You are not licensed or otherwise allowed to add other users to your mailing list (email or physical mail) without their express consent. You should not send any messages which contain any spam, spyware or virus via CARETURN MY. If you would like to report any suspicious messages, please contact CARETURN MY.

#### How to access and correct your personal information

- CARETURN MY provides you with the means to access, update, edit or delete certain subscriber and registration information you have provided at any time by going to the appropriate location at any of the Platforms, and changing or deleting such information as desired
- 2. You undertake to treat your CARETURN MY username, password and order details as confidential information and undertake not to make them available to unauthorised third parties. CARETURN MY cannot assume any liability for misuse of your CARETURN MY username, password or order details, except as stated in the Terms of Use.
- 3. If you would like to view the personal information CARETURN MY has on you or inquire about the ways in which your personal information has been or may have been used or disclosed by CARETURN MY within the past year, please contact CARETURN MY. CARETURN MY reserves the right to charge a reasonable administrative fee for retrieving your personal information records.
- 4. If you want to close your account or have other questions or requests, please contact CARETURN MY. While CARETURN MY is ready to assist you in closing your account, and removing your active profile, CARETURN MY cannot always delete records of past interactions and transactions. For example, CARETURN MY is required to retain records relating to previous bookings on its website for financial reporting and compliance reasons.
- 5. CARETURN MY will give you access to the information CARETURN MY retains about you within a reasonable time, upon written request, satisfactory identification and proof of entitlement. In some cases, CARETURN MY may not provide access to personal information in CARETURN MY's possession or control. If CARETURN MY denies your request, CARETURN MY will advise you in writing of the reason for the refusal and you may challenge CARETURN MY's decision.

### **Do-Not-Call Privacy Statement**

- 1. CARETURN MY takes its responsibility to protect the information you provide to CARETURN MY very seriously.
- 2. From time to time, CARETURN MY and its partners may call or SMS its users to inform them about its latest services or promotional offers.
- 3. CARETURN MY will only call or SMS you after having obtained your clear and unambiguous consent for CARETURN MY and/or its partners to call or SMS you about its latest services or promotional offers (including Marketing Offers)
- 4. If you no longer wish to receive marketing calls or messages, you may withdraw your consent by contacting CARETURN MY.

#### **General Provisions**

- 1. You must only submit to CARETURN MY, or CARETURN MY's authorised agent, information which is accurate and not misleading and you must keep up to date and inform CARETURN MY of any changes to such information. CARETURN MY reserves the right to request for documentation to verify the information provided by you.
- 2. By sharing the personal information of any third party with CARETURN MY, you expressly represent and warrant to CARETURN MY that you have obtained all

- required consents from the relevant third party to disclose and transfer his/her personal information to CARETURN MY and for CARETURN MY to collect, use and disclose such personal information for the purposes set out in this Privacy Policy. You agree to indemnify CARETURN MY against any and all claims, losses, and damages arising from or in connection with any third party claims as a result of CARETURN MY's collection, use or disclosure of such personal information.
- 3. CARETURN MY may disclose or share non-personally identifiable information with partners, advertisers, current in-home personal care businesses and/or prospective in-home personal care businesses to help explain its business and the effectiveness of CARETURN MY's business or for promotional purposes. For example, CARETURN MY may disclose aggregated demographic information which does not include any personally identifiable information.

## **Changes to the Privacy Policy**

1. CARETURN MY shall regularly review the sufficiency of this Privacy Policy. CARETURN MY reserves the right to modify and change the Privacy Policy at any time.

## **CARETURN MY's Right**

1. You acknowledge and agree that CARETURN MY has the right to disclose your personal information to any legal, regulatory, governmental, tax, law enforcement or other authorities or the relevant right owners, if CARETURN MY has reasonable grounds to believe that disclosure of your personal information is necessary for the purpose of meeting any obligations, requirements or arrangements, whether voluntary or mandatory, as a result of cooperating with an order, an investigation and/or a request of any nature by such parties. To the extent permissible by applicable law, you agree not to take any action and/or you hereby waive your rights to take any action against CARETURN MY for the disclosure of your personal information in these circumstances.

## How to challenge CARETURN MY's privacy practices

- 1. CARETURN MY encourages you to contact CARETURN MY with any questions or concerns you have about CARETURN MY's privacy practices or this Privacy Policy..
- If you wish to withdraw your consent to CARETURN MY's use of your personal information, wish to request access and/or correction of your personal information, have any queries, comments or concerns, or require any help on technical or cookierelated matters in relation to CARETURN MY's website, please feel free to contact CARETURN MY.