



Privacy Policy

What Is This About?

Privacy and personal rights are particularly important to MH2Connect Sdn. Bhd. (Flex Care). This also applies to how personal data is handled. The following provides detailed information about the collection and further processing of personal data.

"Processing" personal data refers to any handling of data, such as collecting, storing, retaining, using, modifying, disclosing, archiving, deleting, or destroying it. The term "personal data" refers to data relating to an identified or identifiable person – i.e., conclusions about a person's identity can be drawn from the data itself or with corresponding additional data.

"Flex Care as the controller" processes personal data when interested parties, customers, or other persons ("data subjects") order and/or use Flex Care's services or products and when they use Flex Care's online services. Below are general and specific details on the processing of personal data in the context of Flex Care's services or products. Here you will find information on the collection and processing of personal data, data categories, purposes, and the duration of storage. These privacy notices form the basis for processing personal data in connection with Flex Care's various business activities.

What Data Do We Use?

1. Master data and contract data

This includes:

- Personal information, e.g., date of birth, gender, nationality, language, marital status, and – if relevant to the contract – details of relatives or close persons, contact and identification data such as name, title, address, email address, telephone number, customer number, and login data such as username and password.
- Communications with Flex Care, such as information exchanged during contact or noted by our customer centre, or information you provide in customer surveys.
- Contract data such as type, start date, duration, and content of the contract.

2. Usage and connection data

This includes:

- Usage data: how and when you use our products or services, and which individual settings you make (language, functionalities, contact persons).
- Connection data: data from your use of the emergency call service (alarm logs), audio recordings related to alarms.

3. Technical data

This includes:

- Technical information (e.g., type, brand, software versions, device IDs, and settings of your Flex Care devices such as emergency call devices or help buttons).
- Information about your browser type and settings.
- Addressing elements such as phone numbers or IP addresses.

4. Financial data

This includes:

- Account information, payment history, creditworthiness, and turnover.

5. Location data

This includes:

- Information derived from Bluetooth, Wi-Fi, GPS signals, IP address, or mobile network that indicates where you or the device are located at a specific time (e.g., when an alarm is triggered).

6. Voice interaction and chat data

This includes:

- Conversations and chats such as recordings of conversations with contact persons in case of an alarm, with Flex Care customer centre, and with chatbots.
- Triggering an alarm by voice command during an alarm event.
- Transcriptions – machine-readable text of your voice commands.

Purpose of Use

We use your data for the following purposes:

- To conclude, fulfill, and terminate your contracts, to issue invoices, and to detect, prevent, and address misuse of our products or services.
- To procure third-party services billed to you.
- To further develop, expand, and improve services, products, user-friendliness, and support.
- To comply with legal obligations.
- To provide general or personalized offers for our services and products based on combined and analyzed data ("profiling").
- To communicate with customers, suppliers, service providers, and partners.
- To provide and operate infrastructure, websites, and apps.
- Marketing (e.g., mailings with opt-out option, events) and relationship management.
- Market analysis, planning, product and service development, and R&D.
- Compliance with laws, industry standards, and directives.
- Legal procedures, investigations, crime and fraud prevention.
- Training, instruction, and continuing education.

Sources of Data

In addition to information you provide directly (through what you tell us and do with us), we may obtain information from third parties, such as:

- Information about you from a customer or your employer (e.g., contact details).
- Credit checks, references, address update partners.
- Orders from third parties concerning you (e.g., deliveries or services performed for you).
- Documents concerning you, certificates, powers of attorney (e.g., direct debit authorizations).
- Extracts from public registers (e.g., commercial register).
- Recommendations or indications from third parties about you.
- Your social media or online activities.
- Publications in which you appear.

Data Recipients

We share data with:

- Group companies (see website).
- Service providers, distribution partners, and third parties involved in fulfilling our services, providing and maintaining our products, or handling sales and marketing. They may receive and use your data independently or jointly with us and may provide you with additional services.
- Federal and state law enforcement authorities and other authorities in Malaysia and abroad; we are required to transmit data regarding your use of the emergency service or alarm events upon official request.
- Business partners such as suppliers.
- Customers, marketing partners, and project partners.
- Credit agencies that store this data for credit checks.
- Third parties that collect data about you via our website/app.

Where Is Your Data Processed?

Your data may also be processed abroad, especially when third-party service providers or distribution partners are involved. Processing may occur worldwide, especially for online services, but primarily in Malaysia and Southeast Asia. If processing occurs in countries without adequate protection, safeguards ensure data security.

Duration of Data Storage

We store your data only as long as necessary to achieve the purposes, fulfill legal retention periods, or protect legitimate interests. Afterwards, data is deleted or anonymized.

Protection of Your Data

To protect your data against unauthorized or unlawful processing, as well as against loss, accidental alteration, unwanted disclosure, or unauthorized access, we implement technical and organizational measures, such as:

- encryption and pseudonymization of certain data;
- the creation of backup copies;
- logging access and implementing technical access restrictions;
- issuing binding instructions to our employees regarding data processing;
- entering into data protection and confidentiality agreements with our service providers, along with conducting appropriate controls.

The content of your communication with third parties is recorded only if we are required to do so by an order from a competent authority based on an applicable legal provision, or if such recording is part of the service you have requested (e.g., alarm events). We access your emergency device only with your explicit consent and only to the extent necessary to identify and resolve issues.

Unless a specific professional confidentiality obligation applies in an individual case (e.g., medical confidentiality) or banking secrecy is relevant, we are not subject to a professional duty of confidentiality. If you believe that certain data of yours is subject to a confidentiality obligation, please inform us so that we can review your request.

Processing of Data in Connection with Websites and Online Services

Flex Care, as the controller responsible for data processing, is accountable for websites and online services, as well as other offerings that are clearly recognizable as belonging to Flex Care, unless otherwise stated. In all other cases, specific data protection notices may take precedence over the general information provided here and may designate different controllers.

Flex Care processes data in connection with its websites, online services, and other offerings primarily for the purpose of handling inquiries received through contact channels. In addition, data is processed for improving and optimizing these services, for operational and security purposes, and for securing evidence. Data is also used to provide personalized offers, for marketing purposes, for market research, and for statistical evaluations – for example, in customer surveys following the use of online services.

The websites and online services of Flex Care may contain links to websites and online services of other providers (e.g., in the context of social plugins). These privacy notices do not apply to such external providers. Their own privacy policies apply.

Personal data is processed when it is provided during the use of online services (e.g., via a contact form, through a direct online order, in live chats, etc.).

Data exchanged over the internet is often routed through third countries. Content from websites may be delivered via servers distributed globally to optimize performance and security. As a result, data may, in exceptional cases, be transferred abroad even when both the sender and recipient are located in the same country.

Data transmitted to Flex Care via its websites is transferred in encrypted form. However, Flex Care assumes no liability for damages resulting from data loss or data manipulation. Visitors to the websites are responsible for ensuring that their own systems are adequately protected at all times (e.g., with antivirus software) and that their systems and browsers are kept up to date.

We use cookies and other tracking technologies on our websites. You can manage and change your settings at any time at www.flexcare.my.

Contact Information for Data Protection Matters

If you have any questions or concerns, you can contact the Data Protection Officer or Data Protection Advisor of Flex Care as follows:

- **By phone:** +60 3 7499 00 94
- **By email:** support@flexcare.my

Changes

Flex Care reserves the right to amend these privacy notices at any time and without prior notice. The version that is published at the time of use – or the version applicable for the relevant period – shall apply.

Further Information

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