

POLICY ON PRIVACY AND DATA PROTECTION

Version	Approval by	Approval date	Effective Date	Next review
2.0	President, National Cancer Society of Malaysia	24 September 2025	24 September 2025	One year from effective date or upon legal updates
1. Introduction & Purpose				
Purpose	This Privacy & Data Protection Policy (“Policy”) sets out how the National Cancer Society Malaysia (NCSM) and its affiliated entities collect, use, disclose, store, transfer, and protect personal data in compliance with the Personal Data Protection Act 2010 (PDPA) and related regulations in Malaysia.			
Scope	This Policy applies to all processing of personal data undertaken by NCSM, whether in paper or electronic form, and to all staff, volunteers, subcontractors, third-party processors, and partners acting on behalf of NCSM.			
Accountability	NCSM is responsible for ensuring compliance with this Policy. A designated Data Protection Officer (DPO) shall oversee implementation, training, audits, and coordination of data subject requests.			
2. Key Definitions				
Data Subject	A living individual to whom the personal data relate.			
Personal Data	Any information about an individual from which he/she is identifiable, including sensitive personal data (such as health or medical condition).			
Processing	Collection, recording, use, storage, alteration, disclosure, deletion, or any operation on personal data.			
Data User	NCSM, as the entity determining the purpose and means of processing.			
Data Processor / Service Provider	A third-party processing personal data on behalf of NCSM.			
Third Party	Any entity other than the Data Subject, NCSM, or its Data Processors.			
3. Legal Basis & Consent				
Lawful Processing	NCSM shall process personal data only if there is a valid legal basis, including consent, contractual necessity, legal obligations, vital interests, public interest functions, or exemptions under PDPA.			

Consent	Consent must be voluntary, informed, specific, and unambiguous. It may be obtained in writing, electronically, or verbally. Consent may be withdrawn at any time without affecting processing lawfully carried out before withdrawal.
4. Purpose Limitation & Data Minimisation	
Personal data shall be collected for specified, explicit and legitimate purposes and not further processed in a manner incompatible with those purposes. Only data necessary, adequate, and relevant for the declared purpose shall be collected.	
5. Transparency & Privacy Notice	
At or before collection, NCSM shall provide a Privacy Notice containing: the identity of NCSM, purposes of processing, categories of data collected, recipients, retention period, rights of Data Subjects, contact details of the DPO, any cross-border transfers, and available complaint mechanisms.	
6. Disclosure & Third-Party Transfers	
Personal data may be disclosed only for consented purposes, to explicitly stated third parties, where required by law, or for safety and regulatory investigations. Cross-Border Transfers: Appropriate safeguards must be in place if data is transferred outside Malaysia. Data Processors: Contracts with processors must include strict obligations for security, confidentiality, and compliance.	
7. Data Security & Integrity	
NCSM will implement robust technical and organisational measures, such as access controls, encryption, secure backups, intrusion detection, and physical security for paper records. Reasonable steps will be taken to ensure data accuracy and that information remains current.	
8. Retention & Disposal	
Data shall be retained only as long as necessary for the declared purpose or as required by law. Upon expiry, data shall be securely destroyed or anonymised.	
9. Data Subject Rights & Requests	
Data Subjects have the right to access their data, request correction or deletion, withdraw consent, object to processing, and lodge complaints with the regulator. Requests must be made in writing or via designated channels. NCSM shall respond within 21 days, subject to identity verification.	
10. Data Breach Response & Notification	
NCSM maintains a breach response plan to detect, contain, assess, notify, and remediate incidents. If a breach poses risk of harm, NCSM shall notify the Personal Data Protection Commissioner	

(PDPC) and affected individuals promptly.
11. Accountability, Audit & Governance
<p>The DPO shall oversee compliance, training, record-keeping, and periodic reviews. Annual or ad-hoc audits will be conducted to ensure compliance. The Policy will be reviewed annually or upon legislative updates.</p> <p>All NCSM staff, contractors, and volunteers must undergo awareness training on data protection.</p>
12. Enforcement & Sanctions
Non-compliance with this Policy by employees, contractors, or volunteers may result in disciplinary action, termination, or legal proceedings.
13. Contact & Complaints
<p>For any queries, requests, or complaints, Data Subjects may contact:</p> <p>Data Protection Officer National Cancer Society Malaysia (NCSM) Email: contact@cancer.org.my Address: 66, Jalan Raja Muda Abdul Aziz, 50300 Kuala Lumpur, Wilayah Persekutuan Kuala Lumpur</p>
14. Versioning & Revision History
Effective Date: 24 September 2025