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# MSGAL Privacy Policy and Data Protection Policy

*Updated and effective 24 September 2021*

## **Introduction**

**When you use our initiatives, services, or platforms, you are trusting us with your information. We understand this is a big responsibility and work hard to protect your information and put you in control.**

This MSGAL Privacy Policy and Data Protection Policy (hereinafter referred as “this Privacy Policy”) outlines the preliminary principles and established precedents according to which the Malaysian Students’ Global Alliance, its directorate members and direct associates (“MSGAL”) is acknowledged to be governed and to which MSGAL uses your data.

Be that as it may, the policies stated in this Privacy Policy do not take priority over contradicting policies outlined in specific documents sent to the reader for the purposes of the events or services in question. An example would be an Informed Participant Consent Form for a research study conducted which would complement and prevail over the general policies stated in this Privacy Policy.

This Privacy Policy is meant to help you understand what information we collect, why we collect it; and how you can update, manage, export, and delete your information .

By using our services, platforms, projects, initiatives, and recruitment process in any way, you give consent to your data being collected and managed in accordance with the latest version of this Privacy Policy.

## **Information MSGAL Collects**

We collect information to better provide for you and our directorate members—from your email to your résumé.

These information include, but not limited to:

- a) Name;

- b) Contact details such as telephone number, WhatsApp number, emails, and mailing/redidential addresses;
- c) Malaysian NRIC number;
- d) Social media pages;
- e) Age and/or date of birth;
- f) Demographic or background information;
- g) Educational information such as course of study, year of study and university of study;
- h) History (medical and non-medical); and
- i) Personal opinions (political/socio-economic/religious/philosophical/et cetera).

We may also collect certain documents from you as you use our services like your résumé, Curriculum Vitae (CV) and other personal works. Any and all video or audio meetings including but not limited to interviews, flagship events, workshops, and meetings will be recorded and potentially shared to the public on social media.

In addition, our platforms and other third-party platforms we use may collect some technical information like your browser type and settings, IP address, MAC address, device type and settings, approximate location, operating system, mobile network information including carrier name and phone number, and application version number. These platforms often do not give a choice for us to exclude such information from being collected, and hence we may not be able to entertain your request should you ask that we do not collect this information.

### **Why we collect your data**

We use the collected data for the following purposes:

- a) Provide our initiatives
  - i) We use your information to deliver our initiatives, like sending materials for our advocacy campaigns and making a WhatsApp group for our Global Leadership Camp.
  - ii) In relation to this, MSGGA may use your personal information to screen you to:
    - select participants for its events;

- select organising committee and future directorate members; and
  - for communication until the data subject withdraws his/her consent to this.
- b) Maintain and improve our services
- i) We use your information such as your feedback to analyse what made you want to get involved with our initiatives and how we can improve on them in the future.
- c) Develop new projects and initiatives
- i) We use information we collect from existing projects and initiatives to help us develop new ones. For example, understanding the general consensus of the Malaysian population on social issues may allow us to craft specific initiatives to address those issues.
- d) Communicate with you
- i) We use information we collect, like your email address or WhatsApp number, to interact with you directly. For instance, to provide you with news, special offers and general information about other services and events which we offer that are similar to those that you have already signed-up, attended or enquired about unless you have opted not to receive such information
- e) Disclose and share insights and information with our stakeholders
- i) In this Privacy Policy, “stakeholders” means any person or entity seen as having an interest in MSGGA’s success which may include, but not limited to, the entire MSGGA directorate, Member Councils of MSGGA, the Government of Malaysia, the entire global Malaysian student population, our partners and sponsors, and other organisations we collaborate with.
  - ii) Certain information, like your résumé, will be forwarded to our stakeholders with interest in that information, particularly, our corporate sponsors for internship and recruitment screening, until the data subject withdraws. This information is then handled according to their privacy policies.
  - iii) A general list of our current sponsors is posted on our website and a more complete list would be stated in the documents given to you as part of the event e.g. the Information Pack for MSGGA Summit.

- iv) Some of these information may be sent to other countries outside of Malaysia where foreign jurisdictions apply.

MSGAL is not a commercial entity, and therefore personal data collected from its participants of its events are not used, shared, or sold for commercial transaction purposes. This means that the Personal Data Protection Act (PDPA) 2010 does not apply to MSGAL activity. Nonetheless in case the court decides otherwise, this Privacy Policy document will be relevant.

### **Future Research**

Your data may be used for the purpose of optional exploratory unspecified research or analysis on other current or future initiatives involving the same issue, same initiative, same policy area, or other relevant research within the scope of the initiative. As an example, we may use your feedback and demographic information to analyse the effectiveness of our campaigns along with ways we can improve our future projects. In a research study, your data may be used to create a more thorough analysis in connection with other data. For example, your opinions on a suicide legislation survey may be used anonymously in the draft of a policy recommendation paper regarding mental health.

By default, your data will not be used for any optional exploratory research and we will need your permission to use your data in those future research. You may express your choice to the MSGAL directorate in charge to not take part in any optional exploratory research. You may still take part in the main initiative in this scenario. In addition, your data may be used to support domestic or foreign regulatory filings.

### **Where we transfer your data**

As our directorate members are located globally, some of the information you gave may be sent to other countries outside of Malaysia where foreign jurisdictions apply.

However, no transfer of the collected data will take place unless there are adequate controls in place including the security of your data and other personal information. By providing us with your information, you agree to the transfer of your data when and where necessary.

## **When we share your information**

We do not share or disclose your personal information with companies, organisations, or individuals outside of MSGA except in the following cases:

- a) With your consent
  - i) We will share personal un-anonymised information outside of MSGA when we have your consent. For example, before we publish your personal background information with an external research agency, we will ask your consent first.
  - ii) Note that in all cases, unless stated otherwise, your résumé and your Curriculum Vitae (CV) will be sent to our partners and sponsors as they are.
- b) For legal reasons
  - i) We will share personal information outside of MSGA if we have a good-faith belief that access, use, preservation, or disclosure of the information is reasonably necessary to:
    - 1) Meet any applicable law, regulation, legal process, or enforceable governmental request;
    - 2) Enforce applicable Terms of Service, including investigation of potential violations;
    - 3) Detect, prevent, or otherwise address fraud, security, or technical issues; and
    - 4) Protect against harm to the rights, property or safety of MSGA, our partners and sponsors, or the public as required or permitted by law.

We may share, but not sell, non-personally identifiable information publicly and with our partners—like publishers, corporate sponsors, developers, Member Councils or rights holders. For example, we share information publicly to show trends about a survey we conducted.

If MSGA is involved in a merger, acquisition, or sale of assets, we will continue to ensure the confidentiality of your personal information and give affected users notice before personal information is transferred or becomes subject to a different privacy policy.

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## **Confidentiality and Data Protection / Authorisation for Use and Disclosure of Personal Information**

Where applicable, personal information will be obtained from you and held in confidential records in designated servers and devices. Your personal information is an umbrella term of personal data that is private and/or important to you. Personal data only includes information relating to natural persons who can be identified or who are identifiable, directly from the information in question or who can be indirectly identified from that information in combination with other information.

Your personal health information includes information obtained from your medical records, history, physical examinations or other procedures and information that is created or collected from you during your participation. MSGA directorate members may see information that may identify you, such as: your address, telephone number, NRIC number, year of birth, age, gender, race, ethnicity, or dates relating to various personal events, or other identifying information. This information will be removed and replaced with an anonymous number before your information leaves MSGA. Your personal information will be recorded in your records and protected with restricted access to only essential personnel in secure locations or in password-protected directories.

By agreeing to this Privacy Policy, you agree to permit your personal information, which may be sensitive, to be used and disclosed for research purposes in connection with the project. Your authorisation for the use and disclosure of your personal information does not expire unless you withdraw your authorisation in writing. Your personal data is protected according to the Personal Data Protection Act (PDPA) 2010 of Malaysia, in addition to the laws of your residency when you are taking part in the project, which may include but not limited to the European Union General Data Protection Regulation (GDPR) and the California Consumer Privacy Act (CCPA). There is no expiration of this authorisation except for persons in regions where the laws say otherwise. If these data are used in a study, the results will be published, though you will not be identified in any report or publication.

### **What are my rights with respect to my personal health information?**

In any case where we ask you for your personal health information, e.g., for a research study, you have the right to refuse to authorise use and disclosure of your personal health information like mental health history for purposes of the project. However, if you do not authorise such use and disclosure by refusing to sign the study's consent forms, you may not be able to participate in said project.

You have the right to access your personal health information and request the correction of any errors. In certain circumstances, you have the additional rights to object to how your personal health information is being handled, request deletion of your personal health information, restrict certain uses of it or ask for a copy of your personal health information to be provided to you. However, to ensure proper evaluation of study results some of these rights may not be available until after the project has been completed.

In addition, if you are of the opinion that your personal health information is being used in violation of applicable data protection laws, you have the right to bring a complaint to the principal investigator, relevant MSGA directorate members, or regulatory authorities.

### **Right to withdraw consent and authorisation**

You have the right to withdraw your consent to participate in any part of any of our initiatives, projects, or research studies, including your authorisation for use and disclosure of your personal information, at any time by sending a written notice to the person or committee in charge. Additionally, you may request to modify, update, delete, and view your personal data. You can discuss this further with the person or committee in charge, who will be your primary contact person for your rights or for further information. For a research study, this will be the principal investigator. In any case you are not able to find the person or committee in charge, please forward your inquiry to, bringing attention to the MSGA Research Division, at [enquiries@msga.my](mailto:enquiries@msga.my).

### **Effects of withdrawing authorisation**

If you withdraw your authorisation to use and disclose your personal information, you may lose the ability to participate in our initiatives. No new personal information will be collected. The information that has already been

collected from you for the related project will be destroyed in accordance with applicable data protection law. Any published datasets will remain as it is. If you stop your participation in our projects but do not withdraw your authorisation to use and disclose your personal information, all the personal information compiled to date will be used and handled as dictated by this Privacy Policy. No additional personal information will be compiled, except for follow-up activities in which you have the choice to participate or not. However, we may contact you to obtain some more information about yourself if necessary at the time you decide to withdraw the project.

Your decision to withdraw your authorisation or not to participate will not involve any penalty or loss of access to treatment or other benefits to which you are otherwise entitled.

### **Retention of Data**

MSGAL (and other relevant partners and sponsors) reserve the right to retain your data indefinitely in accordance with privacy laws, applicable human subject research guidelines and other relevant data protection laws as outlined in this Privacy Policy. MSGAL keeps your data until you request for their destruction. But we will retain some data for longer periods of time when necessary for legitimate business or legal purposes, such as security, fraud and abuse prevention, or financial record-keeping.

### **Changes to this Privacy Policy**

We reserve the right to amend this Privacy Policy from time to time. We may also regularly review this Privacy Policy. We always indicate the date the last changes were published. If changes are significant, we will provide a more prominent notice.