



PRIVACY POLICY AND PERSONAL DATA PROTECTION POLICY

No. Policy : SYRIACARE/GOVERNANCE/POLICY/2026/0002

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PRIVACY POLICY AND PERSONAL DATA PROTECTION

SYRIA CARE (Registration No.: PPM-035-10-11022014)

INTRODUCTION

- A. SYRIA CARE [Registration No. PPM-035-10-11022014] (“**SC**”, “**we**”, “**us**” or “**our**”) respects the privacy of individuals who interact with us and is committed to protecting personal data entrusted to us.
- B. This Privacy Policy and Personal Data Protection Notice (“**Privacy Policy**”) explains how SC collects, uses, processes, stores, discloses and otherwise handles personal data in connection with our humanitarian, charitable, fundraising and related activities, including through our website, online donation facilities and third-party payment gateways.
- C. This Privacy Policy is issued in accordance with the **Personal Data Protection Act 2010 [Act 709]**, as amended from time to time (“**PDPA**”), and other applicable laws, regulations, standards and guidelines relating to personal data protection in Malaysia.
- D. This Privacy Policy applies to any individual whose personal data is collected or processed by SC, including donors, prospective donors, supporters, volunteers, participants in SC programmes or events, website visitors, persons communicating with SC and, where applicable, beneficiaries and their representatives (“**Data Subject**”, “**you**” or “**your**”).
- E. By providing your personal data to SC, accessing or using our website, making a donation, registering for our programmes or otherwise interacting with SC, you acknowledge that you have read and understood this Privacy Policy.



1. PERSONAL DATA WE MAY COLLECT

Depending on the nature of your interaction with SC, we may collect and process personal data including:

- a. your name;
- b. identification details, such as National Registration Identity Card or passport details, where reasonably required;
- c. contact information, including address, telephone number and email address;
- d. information relating to donations made to SC, including donation amount, date, campaign or programme selected and transaction reference;
- e. information necessary for issuing receipts, acknowledgements, tax-related documentation or other records;
- f. payment-related information to the extent made available to SC by the relevant bank, payment gateway or payment service provider;
- g. information provided in correspondence, enquiries, complaints, refund requests or other communications with SC;
- h. information relating to your participation in SC's programmes, campaigns, events or volunteer activities;
- i. technical information arising from your use of our website, which may include Internet Protocol (IP) address, browser type, device information, cookies and website usage information; and
- j. any other personal data that you voluntarily provide to SC or which SC is permitted or required to collect under applicable law.

SC does not generally collect or retain your complete credit card, debit card, online banking password, PIN or other confidential banking credentials where payment is processed directly by a bank, payment gateway or other third-party payment service provider.

Such payment information may be collected and processed directly by the relevant payment service provider in accordance with its own terms, privacy policy and security requirements.

2. SOURCES OF PERSONAL DATA

SC may collect personal data:

- a. directly from you when you make a donation, complete a form, register for a programme, contact us or otherwise provide information to SC;
- b. through SC's website or online platforms;
- c. through payment gateways, banks and payment service providers;
- d. from authorised representatives acting on your behalf;
- e. from third parties involved in SC's humanitarian, charitable or fundraising activities;
- f. through cookies and similar technologies when you access SC's website; and



- g. from publicly available sources or such other lawful sources where permitted under applicable law.

3. PURPOSES FOR PROCESSING PERSONAL DATA

SC may collect, use and process your personal data for purposes including:

- a. processing and recording donations and contributions;
- b. identifying and verifying donors and transactions where reasonably required;
- c. administering SC's fundraising campaigns, humanitarian programmes and charitable activities;
- d. issuing receipts, acknowledgements, tax-related documentation and other records relating to donations;
- e. processing enquiries, requests, complaints or refund requests;
- f. administering recurring donations and related instructions;
- g. communicating with you regarding your donation, transaction, programme participation or other interaction with SC;
- h. providing information and updates regarding SC's humanitarian activities, campaigns, programmes, appeals and events, subject to your applicable communication preferences;
- i. managing volunteers, participants, supporters and other persons involved in SC activities;
- j. maintaining SC's financial, accounting, audit and governance records;
- k. preventing, detecting and investigating fraud, unauthorised transactions, misuse of SC's platforms or other unlawful activities;
- l. operating, maintaining, securing and improving SC's website, online platforms and donation systems;
- m. complying with applicable laws, regulations, court orders, regulatory requirements and lawful requests from governmental or enforcement authorities;
- n. establishing, exercising or defending SC's legal rights;
- o. fulfilling SC's internal governance, risk management, audit and compliance requirements; and
- p. such other purposes which are directly related or incidental to the purposes stated above.



4. PROVISION OF PERSONAL DATA

- a. The provision of certain personal data may be necessary for SC to process your donation, issue a receipt, respond to your request or provide the relevant facility or service.
- b. Where personal data requested by SC is mandatory, failure to provide such information may result in SC being unable to process the relevant transaction, request or activity.
- c. Where the provision of personal data is optional, you may choose whether to provide such information.

5. DISCLOSURE OF PERSONAL DATA

SC will not sell or trade your personal data to third parties. SC may, however, disclose or make available your personal data, where reasonably necessary, to:

- a. banks, financial institutions, payment gateways and payment service providers;
- b. information technology, cloud hosting, website, database and other service providers engaged by SC;
- c. auditors, accountants, legal advisers and other professional advisers;
- d. contractors, agents and service providers supporting SC's activities;
- e. humanitarian or implementation partners where disclosure is reasonably necessary for carrying out the relevant programme or activity;
- f. governmental, regulatory, enforcement, judicial or other competent authorities where required or permitted by law;
- g. any person to whom SC is required to make disclosure pursuant to legal process or applicable law; and
- h. any other party where you have consented to the disclosure or where the disclosure is otherwise permitted under applicable law.

SC shall endeavour to limit any disclosure to personal data reasonably necessary for the relevant purpose.

6. THIRD-PARTY PAYMENT GATEWAYS

- a. Online donations to SC may be processed through third-party payment gateways, banks or payment service providers.
- b. When you use such payment facilities, certain personal and payment information may be provided directly to the relevant third-party service provider and may not be collected, controlled or retained by SC.
- c. The collection and processing of personal data by such third parties may be subject to their respective privacy policies, terms and security practices.



- d. SC encourages you to review the applicable privacy policy and terms of the relevant payment service provider before submitting payment information.

7. FUNDRAISING AND COMMUNICATIONS

- a. SC may use your contact information to communicate with you concerning your donation, including donation confirmations, receipts, transaction enquiries and other administrative communications.
- b. Subject to applicable law and your communication preferences, SC may also communicate with you regarding humanitarian appeals, fundraising campaigns, programme updates, events and other activities undertaken by SC.
- c. You may request to stop receiving promotional or fundraising communications at any time by using any unsubscribe facility provided in the relevant communication or by contacting SC using the details set out in this Privacy Policy.
- d. A request to stop receiving promotional or fundraising communications will not prevent SC from sending communications that are reasonably necessary for administering your donation, transaction or other existing relationship with SC.

8. COOKIES AND WEBSITE TECHNOLOGIES

- a. SC's website may use cookies and similar technologies to enable the website to function properly, improve website performance, understand website usage and enhance the user experience.
- b. Certain cookies may be necessary for the operation and security of the website, while others may relate to analytics or other functionality.
- c. You may adjust your browser settings to refuse or manage cookies. However, disabling certain cookies may affect the functionality of SC's website or online donation facilities.

9. SECURITY OF PERSONAL DATA

- a. SC will take reasonable and practicable steps to protect personal data under its possession or control against loss, misuse, modification, unauthorised or accidental access or disclosure, alteration or destruction.
- b. Such measures may include appropriate administrative, organisational, technical and physical safeguards having regard to the nature of the personal data and the circumstances of processing.
- c. Where SC engages a third-party service provider to process personal data on its behalf, SC will take reasonable steps to ensure that appropriate data protection and security arrangements are in place as required under applicable law.
- d. Notwithstanding the security measures implemented by SC, no transmission or storage of information through the Internet can be guaranteed to be completely secure.



10. RETENTION OF PERSONAL DATA

- a. SC will retain personal data only for as long as reasonably necessary to fulfil the purposes for which it was collected or processed, or as required for legal, regulatory, accounting, audit, taxation, governance or other legitimate purposes.
- b. Where personal data is no longer required for such purposes, SC will take reasonable steps to permanently delete, destroy or anonymise the personal data in accordance with applicable requirements.

11. CROSS-BORDER TRANSFER OF PERSONAL DATA

- a. Due to the nature of SC's humanitarian activities and the use of technology and service providers, personal data may, where necessary, be transferred to, stored in or processed in a country or territory outside Malaysia.
- b. Such circumstances may include the use of overseas cloud or technology service providers or collaboration with humanitarian or implementation partners outside Malaysia.
- c. Where SC transfers personal data outside Malaysia, SC will take reasonable steps to ensure that the transfer is undertaken in accordance with the PDPA and applicable requirements relating to cross-border transfers of personal data.
- d. Where required, SC may obtain your consent or implement appropriate contractual, organisational or other safeguards in connection with such transfer.

12. PERSONAL DATA RELATING TO OTHER PERSONS

- a. Where you provide SC with personal data relating to another individual, you represent that you are authorised to provide such information to SC and, where required, have obtained the relevant individual's consent for SC to process the personal data for the purposes stated in this Privacy Policy.
- b. This may include information relating to family members, representatives, beneficiaries, emergency contacts or other individuals provided by you in connection with SC's activities.

13. CHILDREN AND VULNERABLE PERSONS

- a. SC's humanitarian and charitable activities may involve children and other vulnerable persons.
- b. Where SC collects or processes personal data relating to a child or other person who is unable to provide valid consent under applicable law, SC will take reasonable steps to obtain consent or authorisation from the person's parent, legal guardian or other person lawfully authorised to act on their behalf, where required.
- c. SC will endeavour to exercise particular care when processing personal data relating to children and vulnerable persons, taking into consideration their privacy, dignity, safety and welfare.



14. YOUR RIGHTS

Subject to the PDPA and any applicable exceptions, you may have the right to:

- a. request access to personal data held by SC concerning you;
- b. request correction of personal data that is inaccurate, incomplete, misleading or not up to date;
- c. withdraw consent previously given for the processing of personal data, where applicable and subject to any legal or contractual consequences;
- d. request that SC cease or not begin processing your personal data for direct marketing purposes;
- e. exercise any right to data portability available to you under applicable law; and
- f. exercise such other rights as may be provided under the PDPA from time to time.

SC may require sufficient information to verify your identity before acting upon any request concerning your personal data.

Certain rights may be subject to limitations or exceptions under applicable law, including where SC is required to retain or process information for legal, regulatory, accounting, audit or other lawful purposes.

15. PERSONAL DATA BREACH

- a. SC will maintain appropriate procedures for responding to any suspected or actual loss, misuse, unauthorised access, disclosure or other breach involving personal data.
- b. Where a personal data breach occurs, SC will assess the nature and impact of the breach and take such remedial, containment, notification and other measures as may be required under the PDPA and applicable regulatory requirements.

16. THIRD-PARTY WEBSITES

- a. SC's website or communications may contain links to websites, platforms or services operated by third parties.
- b. SC is not responsible for the privacy practices, content or security of websites or platforms that are not operated or controlled by SC.
- c. You are encouraged to review the privacy policies of such third parties before providing personal data to them.



17. CHANGES TO THIS PRIVACY POLICY

- a. SC may review and amend this Privacy Policy from time to time to reflect changes in its activities, technology, operational requirements, legal or regulatory requirements or personal data protection practices.
- b. The latest version of this Privacy Policy will be made available through SC's website or such other appropriate channel.
- c. The date on which this Privacy Policy was last updated will be stated below.

18. CONTACT AND PERSONAL DATA ENQUIRIES

If you have any questions concerning this Privacy Policy, wish to exercise your rights concerning your personal data, or wish to make a complaint or request relating to the processing of your personal data, you may contact:

SYRIA CARE (Registration No.: PPM-035-10-11022014)

Address : No 43, Jalan Bola Jaring 13/15, Seksyen 13, 40100 Shah Alam, Selangor Darul Ehsan

Email : info@syriacare.org.my

Telephone : 011-37030900

SC may require a request relating to personal data to be made in writing and may require reasonable information or documentation to verify the identity and authority of the person making the request.

Effective Date: 1st September 2026

Last Updated: 1st September 2026