

PRIVACY POLICY (ENGLISH)

20191017

1. WHAT IS PRIVACY POLICY ABOUT

The PDPA was introduced to regulate the processing of Personal Data in commercial transactions. The PDPA, which applies to all companies that are established in Malaysia, requires us to inform you of your rights in respect of your Personal Data that is being processed or that is to be collected and further processed by us and the purposes for the data processing. The PDPA also requires us to obtain your consent to the processing of your Personal Data.

Consequently, we want you to be clear how we are using your Personal Data and the ways in which you can protect your privacy. This Privacy Policy describes on what information is gathered, how this information is used and stored, who the information will be shared with, how you can opt out and how you can modify your Personal Data held by us and any other changes that have been made from time to time.

This Privacy Policy applies to our Property.

2. GLOSSARY

2.1 Definitions.

The following words are given the following definitions: -

“Account”	means an account you registered with us to access and/or use the Services.
“Affiliate”	means a person or an organisation controlling us, controlled by us, or under the common control of a person or an organisation controlling us. "Control" means the ownership of the equity shares carrying fifty percent (50%) or more of the votes exercisable at a general meeting (or its equivalent).
“Appropriate Authority”	means (i) the federal government of Malaysia, (ii) any state, province, regency, municipality or other political subdivision of Malaysia, (iii) any agency, authority or instrumentality of any of the foregoing, including any court, tribunal, department, bureau, commission or board, or (iv) the relevant authority in a foreign country, if applicable.
“Content”	means the content managed and/or provided by us and/or its content provider which includes without limitation all forms of text, graphics video, audio, files, data, images, photographs, pictures, logos, video clips, video streaming, news, live feeds and information on demand content.
“Contest”	means giveaway or contest organised by us, our Affiliate and/or our agent.
“e-KYC”	means the electronic process to validate the identity of user.

“Law”	means any law (whether domestic or international), statute, code, rule, guidelines, notices, ordinance, regulation, directive, order, judgment, writ, injunction or decree, and includes any changes in the application or interpretation thereof.
“Mobile App”	means any mobile application made available by us in a digital distribution service that allows user to access and/or use our Services made available by us from time to time.
“Other User”	means any person who uses the Service through your Account, whether or not you allow or authorise them to.
“Personal Data”	shall have the same meaning as in PDPA.
“PDPA”	means Personal Data Protection Act 2010.
“Property”	collectively means Services, Website, our Social Media and/or any other platforms (whether known now or in the future) owned and/or managed by us or our Affiliate.
“Post/Posted”	means to publish, display, submit and/or upload.
“Services”	collectively means any services and solutions relating to smart mobility, artificial intelligence, smart IoT, the services provided through Mobile App, Website, Contest, and/or any other services made available by us from time to time.
“Social Media”	means social media account such as Facebook, LinkedIn, Twitter, Instagram, Google, or any other social media.
“us, we, our”	means Atilze Digital Sdn Bhd (Company No. 1107060-M), and/or any of our Affiliate.
“user, you, yours”	means you, an individual, persons who is accessing and/or using our Property.
“User Generated Content”	means any uploaded material, data shared, or contribution made such as text, links, photographs, graphics, video, audio, other data or information Posted by you or a user.
“Website”	means any website owned and/or managed by us, and/or by our Affiliate, from time to time.

3. CHANGES

Our Privacy Policy may change from time to time without notice. As such, please look at our Privacy Policy periodically, and especially before you provide us any of your Personal Data. This Privacy Policy was last updated on the date indicated above. Your continued access and/or use of our Property after

any changes, revisions or modifications to this Privacy Policy shall indicate your agreement with the terms of such revised Privacy Policy.

4. PARENTAL ADVISORY

We decided to make this entire paragraph BOLD to draw your attention. We are not able to contract with you unless you are 18 years old and above. If you are a child, please annoy pester your parent or guardian to obtain permission from them before using our service.

If you have any reason to believe that a child has provided Personal Data to us, please contact us and we will endeavor to delete that information from our database. Otherwise, we will deem that you are 18 years and above or has obtained consent from your parent or guardian when you provide your Personal Data to us.

5. WHEN IS THIS PRIVACY POLICY APPLICABLE TO YOU

The Privacy Policy is applicable to you the moment you access and/or use the Property.

6. THE INFORMATION WE COLLECT

We collect information in (2) ways: -

- (a) **PERSONAL DATA THAT YOU / OR A THIRD PARTY PROVIDE TO US.** Depending on the type of Services you subscribe, we collect information, such as, name, gender, country of origin, National Registration Identification Card, passport, university ID, birthdate, driving licence, car plate number, telephone number, email address, credit/debit card information, photo, thumb print, etc. Other than Personal Data obtained from you directly, we may also obtain your Personal Data from third parties we deal with and from such other sources in which you have given your consent or authorised for the disclosure of such Personal Data.
- (b) **INFORMATION WE GET FROM YOUR USE OF THE PROPERTY.** When you interact with us through the Property, we may collect or receive and store certain personally non-identifiable information. Such information is collected passively using various technologies and cannot presently be used to specifically identify you. This information includes: -
- device-specific information such as hardware model, operating system version, unique device identifiers, mobile network information, memory, sound card data, Internet Protocol (IP) address.
 - cookies that may uniquely identify your browser. This is described in detailed below.
 - details of how you access and/or use the Property such as your search queries.
 - total number of visitors accessing and/or using the Property.
 - diagnostic and usage data that your device generates. This is described in detailed below.
 - how you and Other User use and interact with the Property.

The above is collectively known as “Information”. If we do combine non-personal information with Personal Data the combined information will be treated as Personal Data for as long as it remains combined.

As an ongoing effort to better understand and serve you better, we often conduct research on customer demographics, interests and behaviour based on the Personal Data and Information provided to us. This research may be compiled and analysed on an aggregate basis. We may share this non-identifiable and aggregate data with our Affiliate and/or Authorised Third Party (hereinafter defined) but this type of non-identifiable and aggregate does not identify you personally. We may also disclose aggregated user statistics in order to describe our Property to our Affiliate and/or the Authorised Third Party for other lawful purposes.

“Authorised Third Party” shall mean business partners, contractors, agents, auditors, advisers, any telecommunications provider which we have an arrangement with in connection with the Property and/or third-party service provider or supplier who engage us, or engaged by us, from time to time for the purposes of providing the Property to you. Authorised Third Party shall also include parties in which we propose to or have any existing business dealing with.

7. USE OF YOUR PERSONAL DATA AND INFORMATION

We use the Personal Data and Information you provide in a manner that is consistent with this Privacy Policy. If you provide Personal Data for certain reason, we may use the Personal Data in connection with the reason for which it was provided. Your Personal Data and Information may also be used by us, our Affiliate and/or Authorised Third Party for one or more of the following purposes: -

- (a) assessing your application,
- (b) to conduct e-KYC,
- (c) administer your participation of any Contest or any campaign or events,
- (d) to operate and provide the Property to you,
- (e) administrating your Account,
- (f) technical administration of the Property,
- (g) for internal administrative purposes, including accounting and tax,
- (h) to verify and process payment,
- (i) to communicate with you,
- (j) to respond to your inquiries,
- (k) for research and development,
- (l) for statistical analysis,
- (m) for quality assurance,
- (n) for the enhancement of the Property,
- (o) to detect and prevent fraudulent activity,
- (p) investigation of complaints and suspected suspicious transactions,
- (q) in compliance with any requirements by an Appropriate Authority and/or requirement of Law,
- (r) profiling Service preferences,
- (s) to conduct market research and analysis for our business plans,
- (t) for record keeping, report generation and management analysis purposes;
- (u) to provide you with information on our other product and services, of our Affiliate, and/or Authorised Third Party,
- (v) to send you information, promotions and updates including marketing and advertising materials in relation to the Property and those of our Affiliate, and/or Authorised Third Party,
- (w) our other legitimate business activities, and/or
- (x) any other activities which are ancillary to the Property.

The above shall collectively be referred to as “Purposes” in this Privacy Policy.

You represent and warrant that the consent of any Other User whose Personal Data you have provided in any application and/or disclosed to us has been obtained to allow us to process the same for the Purposes set out above.

If we intend on using any Personal Data in any manner that is not consistent with this Privacy Policy, you will be informed of such anticipated use prior to or at the time at which the Personal Data is collected.

8. DISCLOSURE OF YOUR PERSONAL DATA

We are not in the business of selling your Personal Data. We consider this information to be a vital part of our relationship with you. As such we will not sell or rent your Personal Data save and except as provided herein. There are, however, certain circumstances in which we may share your Personal Data with certain third parties without further notice to you, as set forth below.

Business Transfer. As we develop our business, we might sell or buy businesses or assets. In the event of a corporate sale, merger, reorganization, dissolution or similar event, Personal Data may be part of the transferred assets.

Affiliate. We may also share your Personal Data with our Affiliate for purposes consistent with this Privacy Policy.

Appropriate Authority. To comply with any order of court or directive from authorities investigating any alleged offence, misdeed and/or abuse or to enforce any of the terms and conditions applicable to you, or where such action is necessary to protect and defend our rights or property.

Authorised Third Party. Where services from such Authorised Third Party is required, we will share your Personal Data on a strictly confidential basis. Authorised Third Party will not be allowed to use your personal information disclosed to them except for the limited purpose of providing the particular service.

Public. If you disclose any personal data through any User Generated Content on any Platform, note that such Personal Data will be available to all other users of the Platform.

Other Parties. We may disclose your Personal Data to any other party in respect of whom you have consented to the disclosure of your data.

9. THIRD PARTY SERVICES

Our Property may provide a link or a platform to third party applications, website and/or services to make available certain services to you (“Third Party Services”). This Third-Party Services may contain, from time to time, links to other web sites. We are not responsible for the privacy practices or the content of such websites or of any third party. You should review the privacy policies of such Third-Party Services. This Privacy Policy applies solely to Personal Data and Information collected by us.

10. COOKIES

What is a Cookie?

When you access and/or use the Property, your device will automatically be issued with a cookie. Cookies are small files containing string of characters that are placed in your device's hard drive to identify your device to our server. Generally, cookies themselves only record those areas of the site that have been visited by the device in question, and the duration. Many websites and/or software application do this whenever a user visits their site in order to track traffic flow.

Depending upon the type of device you are using, you may set your device to accept all cookies, to notify you when a cookie is issued, or not to receive cookies at any time. The last of these, of course, means that certain personalised services cannot then be provided to you.

Our Cookies: -

We use "cookies" to store and track information about you and your access and/or use of the Property.

Our cookie and information retrieved from our cookie is used in line with the uses set out in in this Privacy Policy and more specifically:

- to help save and retrieve passwords used on the Property. This way, you will not have to re-enter information upon every new visit to the Property.
- to track information such as the frequency and duration of your access and/or use of the Property, your click-stream as you go through the Property and help us determine whether you came to the Property from a particular internet link or banner advertisement.
- to analyse the profile of visitors and users to helps us in providing you with better access and/or use of the Property and to enhance the Property.
- to personalize the content, banners and promotions that you will see on the Property.

Most cookies are "session cookies," meaning that they are automatically deleted from your device at the end of a session. You are always free to decline cookies if your device permits, although in that case you may not be able to use certain features of the Property and you may be required to re-enter your password more frequently during a session.

Third Party Cookies:

We may allow other third party to serve ads when you access and/or use the Property. In the course of serving advertisements, the third-party may place or recognize a unique cookie in your device. Such third party may use information retrieved from their cookies to provide advertisements on the Property and other product and services that may be of interest to you.

WE HAVE NO ACCESS TO OR CONTROL OVER THE THIRD-PARTY COOKIES AND THEY ARE NOT SUBJECT TO OUR PRIVACY POLICY. PLEASE REVIEW THEIR PRIVACY POLICY FOR DETAILS. If you want to prevent such third party from sending and reading cookies on your device, you will need to visit each of their websites individually to request that you be removed from that system.

11. DIAGNOSTIC AND USAGE DATA

We would like you to help improving the quality and performance of the Property. We can automatically collect diagnostic and usage information from the device you are using and send it to us for analysis. The information is submitted anonymously to us. None of the information submitted identifies you personally, nor do we include images or any of your text. If you allow us to collect diagnostic and usage data, it may include details about app crashes and details about which features

of the Property you use and how often. This data would also indicate the kind of device you're using and which version of the operating system it's running. Automatic reporting of diagnostic and usage information is on by default.

12. OPTING-OUT, CHANGE, UPDATE OF AND ACCESS TO YOUR PERSONAL DATA

You may be able to access and/or use the Property without providing us any Personal Data. If you choose not to provide any Personal Data, you may not be able to access and/or use certain the Property.

However, when you choose to provide us with such Personal Data, we may also use your Personal Data to contact you in the future to tell you about our services we believe will be of interest to you.

In relation to direct marketing, unless there is an Opt-In and/or Opt-Out function on the Mobile Application, you may request us by written notice not to process your Personal Data.

You can write to us vide the email address provided in this Privacy Policy at any time to obtain details of the Personal Data we hold about you. Please quote your name, NRIC and mobile number. It would be helpful if you also provide brief details of what information you want a copy of. We may charge a reasonable sum permitted by existing laws to cover our administration costs.

We reserve the right to refuse to provide you with a copy of your Personal Data, but will give reasons for our refusal.

We maintain your Personal Data in our business records while you accessing and/or use the Property. We also maintain this information for a period of time after you are no longer a subscriber or when you discontinue accessing and/or using the Property if the information is necessary for the Purposes for which it was collected or to satisfy legal requirements.

13. SECURITY

The Property may not be a secure medium, and communications over the Property may be subject to third-party interception. We cannot accept responsibility for any unauthorised access or loss of Personal Data.

We have implemented security policies, rules and technical measures to protect your Personal Data from unauthorised access, improper use or disclosure, unauthorised modification, unlawful destruction or accidental loss. All our employees and data processors, who have access to and are associated with the processing of Personal Data, are obliged to respect the confidentiality of your information.

While we cannot guarantee that loss, misuse or alteration of Personal Data will not occur; we make reasonable efforts to prevent such unfortunate occurrences.

Personal Data that we collect from you will be stored and backed up securely in an environmentally-controlled location. Only authorized people with user ID and password from our company have access to the information.

You must remember to log off from our system after accessing and/or using the Property so that no unauthorized party can have access to your Personal Data. You must not, at any time, divulge your Personal Data to any third party.

14. TRANSFERRING YOUR PERSONAL DATA AND INFORMATION OUTSIDE OF MALAYSIA

It may be necessary to transfer your Personal Data and Information to our Affiliate, and/or Authorised Third Party located in countries outside Malaysia. This may happen where our Affiliate and/or the Authorised Third Party is based outside Malaysia or where you access and/or use the Property from countries outside Malaysia. By continuing accessing and/or using the Property, you consented to such transfer.

15. CONTACTING THE WEBSITE

If you have any questions relating to the Property or your Personal Data, please contact us at

Name: Personal Data Officer
Address: Atilze Digital Sdn Bhd
B-23A-3A, The Ascent Paradigm
Jalan SS7/26A, Kelana Jaya
47301 Petaling Jaya, Selangor, Malaysia
Phone number: +60 3 2714 6118
Email: hello@atilze.com

16. LANGUAGE

In the event of conflict on the use of the words and/or meanings of this Privacy Policy in the English and Malay language, the use of words and/or meanings given to it in the English language shall prevail.

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