



PRIVACY STATEMENT (ENGLISH)

3rd May 2016

1. WHAT IS PRIVACY STATEMENT ABOUT

The Personal Data Protection Act 2010 (“Act”) was introduced by the Government to regulate the processing of Personal Data in commercial transactions. The Act, which applies to all companies and firms that are established in Malaysia, requires us to inform you of your rights in respect of your Personal Data (hereinafter defined) that is being processed or that is to be collected and further processed by us and the purposes for the data processing. The Act 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 Statement 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.

2. CHANGES

Our Privacy Statement may change from time to time. As a result, at times it may be necessary for us to make changes to this Privacy Statement and we will make such changes without any prior notice. Please review this Privacy Statement periodically, and especially before you provide us any of your Personal Data. This Privacy Statement was last updated on the date indicated above. Your continued use of our product and services (“Services”) after any changes, revisions or modifications to this Privacy Statement shall indicate your agreement with the terms of such revised Privacy Statement.

3. PARENTAL ADVISORY

ONE OR MORE OF OUR SERVICES ARE NOT CATERED TO USER UNDER THE AGE OF 18 AS OUR SERVICES MAY PROVIDE ACCESS TO CERTAIN CONTENT THAT CONTAINS EXPLICIT CONTENT INCLUDING USE OF PROFANE LANGUAGE AND/OR SEXUAL REFERENCES. IF YOU ARE UNDER THE AGE OF 18, PLEASE OBTAIN YOUR PARENT/GUARDIAN’S PERMISSION BEFORE USING OUR SERVICES. PLEASE DO NOT PROVIDE US WITH YOUR PERSONAL DATA UNLESS YOU HAVE OBTAINED PERMISSION FROM YOUR PARENT/GUARDIAN. PARENTAL DISCRETION IS ADVISED FOR ALL USERS BELOW 18. WE ENCOURAGE PARENT/GUARDIAN TO MONITOR THEIR CHILDREN’S INTERNET USAGE AND TO HELP ENFORCE OUR PRIVACY STATEMENT BY INSTRUCTING THEIR CHILDREN NEVER TO PROVIDE PERSONAL DATA THROUGH THE SERVICE WITHOUT YOUR PERMISSION. IF YOU HAVE REASON TO BELIEVE THAT A CHILD UNDER THE AGE OF 18 HAS PROVIDED PERSONAL DATA TO US THROUGH OUR SERVICES, PLEASE CONTACT US AND WE WILL ENDEAVOUR TO DELETE THAT INFORMATION FROM OUR DATABASE. OTHERWISE ALL PERSONAL DATA PROVIDED BY A USER SHALL BE DEEMED TO HAVE BEEN SUBMITTED BY A USER ABOVE 18 OR HAS OBTAINED THE RELEVANT PERMISSION FROM THEIR PARENT/GUARDIAN.

4. WHEN IS THIS PRIVACY STATEMENT APPLICABLE TO YOU

The Privacy Statement is applicable to you the moment you submit the application to subscribe to our Services, use our Services and continue using our Services.

5. IS IT NECESSARY FOR US TO COLLECT AND PROCESS YOUR PERSONAL DATA

Yes, we need to collect and process your Personal Data to enable us to provide the Services to you and we need your consent to collect and process such Personal Data of yours, failing which we are not able to provide you such Services.

6. THE INFORMATION WE COLLECT

We collect information in 2 ways:-

(a) **PERSONAL DATA THAT YOU PROVIDE TO US.** We collect information (such as name, gender, postal address, National Registration Identification Card, passport, student visa, working visa birthdate, telephone number, facsimile number, email address, credit/debit card information, photos etc.) when you voluntarily provide such information to us as and when required. The list is non-exhaustive and the above shall collectively be known as “Personal Data”.

(b) **INFORMATION WE GET FROM YOUR USE OF OUR SERVICES.** When you interact with us through the Services, 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, IP address.
- cookies that may uniquely identify your browser. This is described in detailed below.
- details of how you use our Services such as your search queries.
- total number of visitors using our Services, the number of visitors to each page of our Services.
- diagnostic and usage data that your device generates. This is described in detailed below.
- how our users use and interact with our Services.

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 the users of the Services, 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, 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 Services to the Authorised Third Party and prospective business partners and to other third parties 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 Services and/or third party supplier engaged by us from time to time for the purposes of providing certain Services.

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 Statement. 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) credit checking,
- (c) to operate and provide Services to you,
- (d) administrating your account,
- (e) profiling Services preferences,
- (f) technical administration of the Services,
- (g) to verify and process payment when you use the Services;
- (h) to verify and record your personal particulars including comparing it with information from other sources and using the information to communicate with you,
- (i) to respond to your inquiries,
- (j) for research and development,
- (k) finance and marketing operations and activities and/or as required in the provision of our Services including but not limited to credit control services,
- (l) to detect and prevent fraudulent activity,
- (m) investigation of complaints and suspected suspicious transactions,
- (n) in compliance with any regulatory, statutory or legal obligation imposed on us by any relevant authority,
- (o) to conduct market research including the number of users, the frequency of use, profile of users and using such analysis for our business plans, the enhancement of Services, targeted advertisements and conveying such information in broad aggregate terms to Authorised Third Party, third parties who have or propose to have business dealings with us,
- (p) statistical analysis,
- (q) to provide you with information on our other product and services, of our affiliate, Authorised Third Party, business partners, and/or parties designated by you and matters ancillary thereto,
- (r) to send you information, promotions and updates including marketing and advertising materials in relation to our Services and those of our affiliate, business partners, or third party organizations selected by us,
- (s) our other legitimate business activities, and/or
- (t) any other activities which are ancillary to the Services.

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



You represent and warrant that the consent of third parties (e.g. family member/friend) 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 Statement, 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 Statement.

Legal Requirements. 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.

Credit Rating Agency. We will disclose your Personal Data and information with respect to the conduct of your account or business account to any credit reporting agency at any time. Such Personal Data and information provided to any credit reporting agency may in turn be provided to their subscribers of their service.

THE FOLLOWING STATEMENTS ARE NOT RELATED TO PERSONAL DATA PROTECTION ACT 2010 BUT WE WOULD LIKE TO INFORM YOU OF THE FOLLOWING:-

9. THIRD PARTY SERVICES

Our Services 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 Statement applies solely to Personal Data and Information collected by our Services.

10. COOKIES

What is a Cookie?

When you use our Services, 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 use of our Services.

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

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

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 our Services and you may be required to re-enter your password more frequently during a session.

Third Party Cookies:

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

WE HAVE NO ACCESS TO OR CONTROL OVER THIRD-PARTY COOKIES AND THEY ARE NOT SUBJECT TO OUR PRIVACY STATEMENT. PLEASE REVIEW THE PRIVACY POLICY OF THESE THIRD-PARTY WEBSITES RESPECTIVELY FOR DETAILS. If you want to prevent one of these third-party companies 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 our Service. 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 our Services 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 our Services 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 Services.

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 under paragraph 7(r) above, you may request us by written notice not to process your Personal Data.

You can write to us via the email address provided in this Privacy Statement 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 are a subscriber to our Services or when you continue using and/or accessing to our Services. We also maintain this information for a period of time after you are no longer a subscriber or when you discontinue using or accessing our Services if the information is necessary for the Purposes for which it was collected or to satisfy legal requirements.

13. SECURITY

The Services we provide may not be a secure medium, and communications over our Services 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 our Services and/or close the browser window after use so that no unauthorized party can have access to your information. 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 other group companies or Services providers located in countries outside Malaysia. This may happen where the Authorised Third Party is based outside Malaysia or where you use and/or access our Services from countries outside Malaysia. By continuing usage of our Service and access to our Services, you hereby consented to such transfer.

15. CONTACTING THE WEBSITE

If you have any questions about your dealings with the Services, please contact us at

Name: Personal Data Officer
Address: webe digital sdn bhd (Formerly known as Packet One Networks (Malaysia) Sdn
Bhd
159 Jalan Templer
46050 Petaling Jaya, Selangor, Malaysia
Email: careline@p1.com.my

16. LANGUAGE

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