# **IPHall Privacy Policy**

### Overview

This Privacy Notice sets out how **IP Hall Sdn. Bhd.** ("the **Company**") and its wholly owned subsidiaries will handle personal information in accordance with the Personal Data Protection Act 2010 ("PDPA") and the laws of Malaysia.

Our Company and our subsidiaries, value the trust of our users and the public. We are committed to protecting your personal information and ensuring that your personal information is used only for the purposes stated herein and/or as otherwise provided for in law.

#### **Definition of Personal Information**

Personal information refers to any information which relates directly or indirectly to you. This includes any information that can be used to distinguish, identify or contact you. For the purposes of this Privacy Notice, personal information encompasses sensitive personal information which relates to information relating to your health, political opinions, religious beliefs, etc.

# **Collection and Use of Personal Information**

We collect personal information to personally identify you when you visit our website. This is to ensure a smoother and more efficient user experience. We may also collect information that personally identifies you if you choose to submit your personal information for the various purposes made available on our website. This information may include but not limited to data relating to your contact information such as your name, address(es), telephone number(s), email address(es) and other contact information, profession, date of birth, country of residence and gender. We will then serve you with a personal data protection notice ("Notice") to confirm your consent and notify you on our processing of your personal information. The processing of your personal information will be done in accordance with all applicable laws. Our Company and/or its subsidiaries may collect personal information from you in one or more of the following methods:

- Use of our website
- The filling in of forms, surveys, competitions etc.
- By responding to any marketing materials we send out
- By application and/or registration with any of our subsidiaries
- By providing feedback to us (for example via our websites or in hard copy)

Other than personal information obtained from you directly (as laid out above), we may also obtain your personal information from third parties we deal with and from such other sources in respect of which you have given your consent to disclose information relating to you and/or where otherwise lawfully permitted.

The Company and/or its subsidiaries may collect personal information from you or from the category of third parties identified above which is to be utilised for one or more of the following purposes:

- To properly identify you
- To assess your application(s) /request(s) for our services and/or products
- To keep in contact with you and provide you with any information you have requested

• To establish and better manage any relationship we may have with you

• To process any communications you send us (for example, answering any queries and dealing with any complaints and feedbacks)

• To improve our services and products and to develop new services and products

• To produce data, reports and statistics which may be used by the Company for commercial purposes

• To investigate, respond to a defend claims made against, or involving the Company and/or its subsidiaries

- To conduct marketing activities
- To comply with legal and regulatory requirements

• For any other purposes that is required or permitted by any law, regulations, guidelines and/or relevant regulatory authorities

#### **Incomplete provision of Personal Information**

Where indicated (for example in application forms), it is obligatory to provide your personal information to us to enable us to process your application for our services and/or products. Should you decline to provide such obligatory personal information, we may not be able to process your application or provide you with our services or products.

#### **Disclosure of Personal Information**

As a part of providing you with our services and/or products and the management and/or operation of the same, the Company and/or its subsidiaries may be required or need to disclose information about you to the following third parties:

- Law enforcement and government agencies
- The Company and/or its subsidiaries, business partners, clients and relevant business parties

• Companies and/or organizations that act as our agents, contractors, service providers and/or professional advisers

• Companies and/or organizations that assist us in processing and/or otherwise fulfilling transactions that you have requested

• Our business associates and other parties for purposes that are related to the purpose of collecting your personal information

• Other parties in respect of whom you have given your express or implied consent subjected at all times to any laws (including regulations, guidelines and/or obligations) applicable to the Company and/or its subsidiaries.

• Any agent, contractor or third party service provider who provides administrative, marketing and research, training, distribution, data processing, telecommunications, computer, payment or other services to the Company And/or its subsidiaries

• Any person, who is under a duty of confidentiality who has undertaken the responsibility to keep such information confidential.

We do not disclose your personal information to unaffiliated third parties without your consent.

However, we may disclose your personal information if required by law or in good faith, if such

action is necessary to comply with any law enforcement agency requirements, court orders or

legal processes.

# **Right to Access and Correct Personal Information**

We can assist you to access and correct your personal information held by us.

Where you wish to have access to your personal information in the Company and/or its subsidiaries possession, or where you are of the opinion that such personal information held by us is inaccurate, incomplete, misleading or where relevant, not up-to-date, you may make a request to by sending us an e-mail at the address detailed at the end of this Privacy Notice.

We will use reasonable efforts to comply with your request to access or correct your personal information within 21 days of receiving your duly completed Data Access Request Form/Data Correction Request Form and the relevant processing fee (if any).

Please note that the Company and/or its subsidiaries may have to withhold access to your personal information in certain situations, for example when we are unable to confirm your identity or where information requested for is of a confidential commercial nature or in the event we receive repeated requests for the same information. Nevertheless, we will notify you of the reasons for not being able to accede to your request.

#### Online Dealings and Use of Cookies

The Company and its subsidiaries collect information about your use of our website from Cookies or other methods. Cookies are packets of information stored in your computer which assist your website navigation by customizing site information tailored to your needs. Cookies in themselves do not identify the individual user, just the computer used.

You are not obliged to accept cookies. If you are concerned, you can set your computer either to accept all cookies, to notify you when a cookie is issued, or not to receive cookies at any time. However, rejection of cookies may affect your use of the website as we will be unable to personalize aspects of your use of the website.

#### Third-Party Links and Direct and Indirect Marketing

In an attempt to provide increased value to our users, the Company and/or its subsidiaries may use your personal information to provide you with information about our and third party services and/or products, which may or may not be of interest to or benefit you.

In certain instances, we may disclose your personal information to our preferred merchants and strategic partners. However, please note that we will only disclose your personal information to our merchants and strategic partners where your prior consent has been obtained and subject at all times to any laws (including regulations, guidelines and/or obligations) applicable to the Company and its subsidiaries.

We take reasonable steps to ensure that our agreements with our merchants and/or strategic partners include appropriate privacy and confidentiality obligations.

If you do not wish your personal information to be utilised for the purposes of marketing or should you change your mind in relation to your previous decision, please contact us via e-mail at the address detailed at the end of this Privacy Notice. Your latest written instructions to us will prevail.

Please be informed that this Privacy Notice applies solely to our website and does not apply to any third party websites you may access from our websites. To determine how they deal with your Personal Information, you should ensure that you read their respective privacy policies.

# **Notification of Changes**

If we decide to change our privacy policy, we will post those changes on its website so the users are always aware of what information we collect, how we use it, and under what circumstances, if any, we disclose it. If, at any point, we decide to use personally identifiable information in a manner different from that stated at the time it was collected, we will notify users by way of an e-mail. Users will have a choice as to whether or not we use their information in this different manner. We will use information in accordance with the privacy policy under which the information was collected.

Please check our website <u>http://www.iphall.com</u> on an ongoing basis for information on our most up-to-date practices

# **Contact Information**

If you wish to access or correct your personal information, or limit our processing of your personal information, or if you have questions or concerns related to this Privacy Statement, you may contact us by email at <u>post-office@iphall.com</u> or by writing to us at:

Attn: IPHall Customer Support IP Hall Sdn. Bhd. 501, Level 5, Block A, Pusat Perdagangan Phileo Damansara 1, 46350 Petaling Jaya, Selangor, Malaysia. Tel No.: +6012-7975077