

# **PRIVACY POLICY**

SHOPPER360 SDN BHD and its group of companies ("Shopper360") respects and upholds your rights to privacy protection in respect of the collection, use, disclosure and handling of personal information. This Privacy Policy details the practices we have adopted to protect your privacy, so that you can feel confident about how we manage the personal information you entrust to us. By using our Shopper360 website(s) or otherwise providing Shopper360 with personal information, you are consenting to Shopper360 collecting, using, disclosing and/or transferring (including cross-border transfer) your personal information in accordance with this Privacy Policy is issued pursuant to the Personal Data Protection Act 2010 ("Act") and for the purpose of this Policy, "Personal Data" shall have the meaning as ascribed to it under the Act.

This Policy applies to the persons governed under the Act and serves to inform you how your Personal Data is controlled, processed and/or used by Shopper360.

For the purpose of this Policy, Personal Data includes data collected and to be collected before and after issuance of this Policy.

Please also note that from time to time, Shopper360 may request for new Personal Data from you. By providing us with your Personal Data or continuing to communicate with us, Shopper360 shall regard that you have consented to the processing of such data.

Shopper 360 shall have the right to modify, update or amend the terms of this Policy at any time by placing the updated Policy on our website. By continuing to communicate with us or by continuing to use our services following the modifications, updates or amendments to this Policy, it shall signify your acceptance of such modifications, updates or amendments.

This Policy is provided in both English and Bahasa Malaysia. In case of any inconsistencies between these two versions, the English version shall prevail.

#### **COLLECTION OF PERSONAL DATA**

1. The Personal Data which is controlled, processed and/or used by us including but not limited to your name, age, date of birth, identity card number, contact details, occupation, preferences, interests, information about your company and/or other information relevant to the purposes as listed below, Shopper360 may also collect Personal Data which is of sensitive in nature such as physical or mental health or medical condition, religious beliefs or other beliefs of a similar nature, the commission or alleged commission by him of any offence.

- 2. Your Personal Data is collected directly from information and/or documents which you have provided to us and where necessary, from third parties and from the public domain or online platforms.
- 3. Shopper360 may also collect your Personal Data from a variety of sources, including without limitation at any events, training programmes, conferences, seminars, workshops or talks organised or sponsored by us, and/or from the cookies used on our official website.

#### **PURPOSES OF PROCESSING**

- 4. Your Personal Data may be controlled, processed and/or used by us for the following purposes:
  - (a) for communicating with you and responding any enquiries from you in relation to us through any legitimate modes of communication;
  - (b) for internal administrative purposes;
  - (c) for processing your job application;
  - (d) for performance of our professional development functions/operations including but not limited to matters relating to events, training programmes, conferences, seminars, workshops or talks organised or sponsored by us;
  - (e) for compliance of any obligations and/or regulatory requirements applicable to our nature of operation under any laws, rules, regulations, by-laws, national policies or court orders including by providing information to the enforcement agencies, regulatory/statutory bodies and other government agencies for any lawful purposes such as enforcement or preparation of any statistic;
  - (f) for pursuing any legitimate interest of us which includes recovery of any sums due to us (if applicable); and
  - (g) for any other purposes that are incidental or ancillary to any of the above purposes.

## OTHER PURPOSES OF PROCESSING

- 5. Shopper360 may also use and process your data for communicating or disseminating to you:
  - (a) information on events, training programmes, seminars, conferences, workshops and talks which may be of interest to you; and
  - (b) publications such as newsletters, journals, booklets, articles and other updates which may be of interest to you.
- 6. If hereafter you do not wish to provide your consent to us for the processing of your Personal Data in relation to the purposes listed above or hereafter wish to opt out, you may do so by notify us using the contact details stated below.

### WITHDRAWAL/LIMITATION OF CONSENT

7. The provision of your Personal Data to us is on voluntary basis. You may at any time hereafter withdraw your consent for us to collect, process, use, store or limit the processing of your Personal

Data for any of the purposes mentioned above by notifying us in writing using the address set out below.

- 8. If you do not provide your Personal Data or if insufficient Personal Data is supplied to us when requested, Shopper360 may not be able to communicate with you and this may affect our ability to fulfil the purposes mentioned above and your ability to enjoy the full range of benefits provided above.
- 9. If you do not wish for your Personal Data to be collected via cookies on our website, you may deactivate the cookies.

### **DISCLOSURE & TRANSFER**

- 10. Shopper360 may disclose your Personal Data to our employees, our affiliates, our strategic partners, our service providers/vendors, our appointed agents, our consultants, our legal advisors, our external auditors and any person who is under a duty of confidentiality to us.
- 11. Your Personal Data may be transferred for any of the purposes as stated herein to any of the above-mentioned parties who are located within or outside Malaysia.
- 12. You understand and consent to the transfer of your Personal Data as described herein.

#### **RETENTION**

13. Any Personal Data supplied by you will be retained by us as long as it is necessary and expedient for the fulfilment of any purpose as stated above pursuant to our internal practices, regulatory requirements, legal and accounting requirements.

## **INTEGRITY & SECURITY**

- 14. Shopper360 is committed to ensuring that your Personal Data is stored securely in our databases and in our offices.
- 15. All reasonable efforts and practical steps are made to ensure that any Personal Data held by us is protected against any loss, misuse, modification, unauthorized or accidental access or disclosure, alteration or destruction.
- 16. To ensure that your Personal Data in our retention is accurate and up to date, you are advised to notify us promptly in the event of any inaccuracy or any changes to your Personal Data.

# **ACCESS AND CORRECTION**

17. If you wish to request access to or to rectify your Personal Data or withdraw/limit your consent, you may send your request in writing to this address:

## **SHOPPER360 SDN BHD**

Address: 505, 5th Floor, Block A Phileo Damansara 2, 15 Jalan 16/11, Pusat Perdagangan

Phileo Damansara, 46350 Petaling Jaya, Selangor

Contract No.: +603 7955 1100 Fax No.: +603 7954 1818