

## 1. STATEMENT

The following statement explains our Privacy Policy (“Policy”) with respect to information including personally identifiable data (“Personal Data”) and other information that is collected by us when you access and/or use our Services. As you use our Services, we want you to be clear how we are using such Personal Data and the ways in which you can protect your privacy. By voluntarily providing us with Personal Data, you are consenting to our use of it in accordance with this Policy. If you provide Personal Data, you acknowledge and agree that such Personal Data may be transferred from your current location to the offices and servers of the Company. All words and phrases used in this Policy shall have the same meaning given to them in our Terms of Use. Specifically, the word “Authorised Third Party” shall mean contractors, agents and/or third-party supplier engaged by us from time to time for the purposes of providing certain Services.

## 2. CHANGES

Our Policy may change from time to time. As a result, at times it may be necessary for us to make changes to this Policy. We reserve the right to update, revise or modify this Policy at any time and from time to time without prior notice. Please review this policy periodically, and especially before you provide us any of your Personal Data. This Policy was last updated on the date indicated above. Your continued use of the Services after any changes, revisions or modifications to this Policy shall indicate your agreement with the terms of such revised Policy.

## 3. PARENTAL ADVISORY

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. THE INFORMATION WE COLLECT

We collect information in 2 ways: -

(a) **PERSONAL DATA THAT YOU PROVIDE TO US.** We collect Personal Data (such as name, gender, postal address, 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.

(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,
- how our users use and interact with our Services.

As an ongoing effort to better understand and serve the users of the Services, We often conduct research on its customer demographics, interests and behaviour based on the Personal Data and other 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 affiliates, agents and business partners 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 current and prospective business partners and to other third parties for other lawful purposes.

## 5. USE OF YOUR PERSONAL DATA AND INFORMATION

We use the Personal Data you provide in a manner that is consistent with this 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 affiliates or Authorised Third Parties for the following reasons: -

For the purposes of technical administration of the Services;

- For research and development;
  - Statistical analysis;
  - Customer administration;
  - Profiling services preferences;
  - Finance and marketing operations and activities and/or as required in the provision of our services including but not limited to credit control services;
  - In compliance with any regulatory, statutory or legal obligation imposed on us by any relevant authority;
  - To operate and provide the Services to you;
  - To support your questions about the use of the Services;
  - To detect and prevent fraudulent activity;
  - To provide other goods and services by Us or its designated representatives and/or business partners to you or parties designated by you and matters ancillary thereto;
  - To verify and process payment when you use the Services;
  - To verify and record your personal particulars including comparing it with information from other sources and using the information to communicate with you;
  - To conduct market research of the users of the Services including the number of users, the frequency of use, profile of users and using such analysis for our business plans, the enhancement of our products and services, targeted advertisements and conveying such information in broad aggregate terms to third parties who have or propose to have business dealings with Digital Five;
  - To send you information, promotions and updates including marketing and advertising materials in relation to our goods and services and those of third-party organisations selected by Us;
- If we intend on using any Personal Data in any manner that is not consistent with this Policy, you will be informed of such anticipated use prior to or at the time at which the Personal Data is collected.

## 6. DISCLOSURE OF YOUR PERSONAL INFORMATION

We are not in the business of selling your information. 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, reorganisation, dissolution or similar event, Personal Data may be part of the transferred assets. Pantai Bharu Group of Companies. We may also share your Personal Data with Pantai Bharu Group of Companies for purposes consistent with this Policy. 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 in the Terms of Use, Privacy Notices or, where such action is necessary to protect and defend the rights or property of the Company. 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.

## 7. THIRD PARTY SERVICES

Our Services may provide a link or a platform to third party applications, websites 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 Policy applies solely to information collected by our Services.

## 8. COOKIES

## What is a Cookie?

When you use our Services, your Device will automatically be issued with a cookie. Cookies are text files 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 Policy 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 personalise 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 frequent during a session.

## 9. OPTING-OUT, CHANGE, UPDATE OF AND ACCESS TO YOUR INFORMATION

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 and Information to contact you in the future to tell you about our services we believe will be of interest to you. If we do so, each communication we sent you will contain instructions permitting you to "opt-out" of receiving future marketing communications. In addition, if at any time you wish not to receive any future communications or you wish to have your name deleted from our mailing lists, please contact us or you may opt-out by replying UNSUBSCRIBE in the subject line in the email sent or by emailing us. You can write to us vide the email address provided in our Privacy Notice at any time to obtain details of the Personal Data we hold about you. Please quote your name, address. 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 our Users with a copy of their Personal Data but will give reasons for our refusal.

## 10. SECURITY

The internet is not a secure medium, and communications over the internet may be subject to third-party interception. The Company and/or Pantai Bharu Group of Companies cannot accept responsibility for any unauthorised access or loss of personal information, save in accordance with the Terms of Use. 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 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 authorised people with user ID and password from our company have access to the information. You must remember to log off after accessing and/or using our Services and/or close the browser window after use so that no unauthorised party can have access. You must not, at any time, divulge your Personal Data to any third party.

## 11. CONTACTING THE WEBSITE

If you have any questions about your dealings with the Services, please write to:  
dmos@pantaibharu.com

## 12. 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.

We do not sell any of the information collected or stored about you.