

PRIVACY POLICY

Effective from: 1 July 2023

Introduction

This privacy policy ("**Privacy Policy**") described how Flawu Solutions (T/A Flawu), its respective subsidiaries, affiliates, associated companies and jointly controlled entities (collectively, "**subsidiaries**") ("**Company**", "**we**", "**us**" or "**our**") collect, use, process, share and disclose information about you when you visit and interact on our website (mobile and desktop) and/or mobile app (collectively, "**Site**") or other means connected to the Sites.

This Policy applies to our users, visitors, customers, agents, vendors, suppliers, affiliates, business partners, contractors and service providers (collectively "**you**", "**your**" or "**yours**").

PLEASE NOTE THAT OUR SITE IS NOT DIRECTED TO MINORS UNDER THE AGE OF 18. However, minors can normally accompany their parent(s) or legal custodian(s) who have reserved, booked, or purchased our goods and/or services.

We will comply with the applicable data protection and privacy laws of Malaysia ("**PDPA**") and other applicable data protection and privacy laws.

"**Personal Data**" shall mean the information that may come within the meaning as defined in the applicable PDPA and is any information which can be used to identify, directly or indirectly, you or from which you are identifiable. This includes but is not limited to your name, nationality, telephone number, bank and credit card details, financial information, personal interests, email address, your image, government-issued identification numbers, biometric data, race, date of birth, marital status, religion, health information, vehicle and insurance information.

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1. COLLECTION OF INFORMATION

1.1. We collect Personal Data about you in the ways listed below. We may also combine the collected Personal Data with other Personal Data in our possession: -

- a. We collect information about you that you voluntarily provide to us when using the Site, such as your name, address, phone number, payment details, credit card details, and e-mail address.
- b. By visiting our Site, we may also automatically collect certain usage information, such as your IP address, geographic data, country, search preferences related to specific searches, browser, and information about your device's operating system, application version, language settings, and pages that have been shown to you. If you are using a mobile device to access our mobile app or mobile optimized Site, we might also collect information that identifies your mobile device, such as the device ID, location of the device (with your consent), and device-specific settings and characteristics.
- c. We collect information if you need to get in touch with our customer support team or reach out to us through other means (such as through social media).
- d. Where you submit reviews regarding your, services and/or products experiences or other ancillary services available on our Site through us, we will collect information from you including your reviews, your name, your email address and/or country of residence.
- e. Where you are purchasing our services and/or products with other users or customers whose details you provide to us as part of your purchase for the services and/or products offered by us, or if you make a purchase for the services and/or products offered by us on behalf of someone else, it is your responsibility to ensure that the person or people you have provided Personal Data about are aware that you have done so, and have understood and accepted how we use their information as described in this Privacy Policy.
- f. Our agents or partners may share information about you with us if you have questions about your purchase, or if disputes arise regarding your purchase in relation to the goods and/or services provided by us.

- g. For the purposes of our Know-Your-Customer (“**KYC**”) checks, we may, in addition to the Personal Data, have obtained information about your race and ethnicity as well as other details that may have been contained in the KYC documents you had provided to us.
 - h. Unless otherwise necessary to comply with legal or regulations requirements, we may collect information that is sensitive in nature such as national ID numbers, race, marital status, and your health or religious beliefs.
- 1.2. **Cookies.** Our Site uses and allows third parties to place cookies (session and persistent), pixels/tags, SDKs, application program interfaces (“**APIs**”), and other technologies (collectively, “**Cookies**”) on our Site that collect and store certain information about you. Some of these Cookies are necessary to provide, secure, and maintain the Site to you, such as to keep you logged in while your visit our Site, while other Cookies are used to provide you with better user experience, such as (i) to personalize the Site by remembering information about your activities on the Site (e.g., the language you selected or your log-in details); (ii) perform website analytics, such as impression reporting, demographic reporting and interest reporting to improve our Site and services; and (iii) to provide you advertising tailored to your interest. Please review your Internet browser settings, typically under the sections “Help” or “Internet Options,” to exercise the choices you have for certain Cookies. If you disable or delete certain Cookies in your Internet browser settings, you might not be able to access or use important functions or features of this Site.

2. **USE OF INFORMATION**

- 2.1. We may use, combine and process the Personal Data collected through the Site to:
- a. Provide you with the use of the Site and the services and/or products offered on the Site, such as creating a user profile with us, processing and/or confirming your request for purchase for the services and/or products offered by us, responding and/or communicating with you about our goods and/or services, customer support and/or marketing materials;
 - b. respond to your enquiries, requests or feedback;
 - c. enforce our terms, conditions and policies;
 - d. allow you to participate in interactive features of the Site, when you choose to do so
 - e. Investigate and address concerns raised by you in relation to the goods and/or services;
 - f. Send you email marketing communications inter alia mobile push notifications, emails, SMS, MMS, and/or phone calls (telemarketing) about products and services that may be relevant to you. You may, however, at any time choose to opt out of these marketing communications.
 - g. Conduct surveys, market researches and developments or provide you with information about our services on our Site or on other websites you may visit;
 - h. Customise our products and services to you, including by responding to and catering for your customer preferences
 - i. Create aggregated and anonymised reporting data;
 - j. Optimise and enhance the Site or any website or platform operated by the Company, tailor and enhance the user experience, and for internal operations;
 - k. Monitoring, processing and/or tracking your use of the Site in order to provide you with a seamless experience;
 - l. Monitor and record calls or communication in whatever form for quality, training, legal compliance, analysis and other related purposes in order to pursue our legitimate interests and to improve service delivery;
 - m. Conduct anti-fraud, anti-money laundering and countering of terrorist financing (“**AML/CFT**”), and identity verification and authentication KYC checks as required by the applicable laws and regulations. You expressly authorise and consent the Company to share your information with our third-party service providers, when applicable, who may also conduct their own searches about you;
 - n. Keep the Site safe and secure;
 - o. Monitor the usage of the Site, and conduct automated and manual security checks of our service
 - p. Exercising a right or obligation conferred or imposed by law, including responding to requests and legal demands;
 - q. be the assets transferred in connection with mergers, acquisitions, joint ventures, sale of company assets, consolidation, restructuring, financing, business asset transactions, or acquisition of all or part of our business by another company, .

(Collectively, “**Purposes**” or each, a “**Purpose**”)

3. **DISCLOSURE OF INFORMATION**

- 3.1. In connection with your visit to our Site and the use of our services, we may share or disclose your Personal Data as follows:
- a. *With our subsidiaries* where our subsidiaries’ employees who have access to the Personal Data with our permission and who need to know or have access to this Personal Data to perform the services requested by you (including customer services) and internal (audit/compliance) investigations.

- b. *Third-Party Service Providers* who provide data processing services to us (for example web hosting), or who otherwise process Personal Data for purposes such as credit card and payment processing, business analytics, customer service, marketing, or distribution of surveys, to facilitate the delivery of online services and advertising tailored to your interests, and/or fraud prevention. Our third-party service providers will only process information as needed to perform their functions in accordance with their own independent privacy policies. They are not permitted to share or use the information for any other Purpose. If you are a European Union (“EU”) resident, and if we do store any of your data in the European Economic Area (“EEA”), when we disclose or transfer the data outside the EEA under this paragraph, this is done either on the basis that it is necessary for the performance of the services provided to you by the Company.
- c. *Our appointed agents, vendors, suppliers, affiliates, merchant partners, contractors and service providers (collectively “suppliers”).* These suppliers may inter alia contact you as necessary to obtain additional information about you, facilitate your requests and enquiries, or respond to a review you may submit in accordance with their own independent privacy policies.
- d. *Business Partners* with whom we may jointly offer products or services, or whose products or services may be offered on our Sites.
- e. *Where Required or Permitted by Law* - such as to protect ourselves against liability, to respond to subpoenas, judicial processes, legitimate requests, warrants or equivalent by law enforcement officials or authorities, to investigate fraud or other wrongdoing or as otherwise required or necessary in order to comply with applicable law. We may also, in compliance with applicable law, disclose your information to enforce or apply the terms and conditions applicable to our services or to protect the rights, property, or safety of Company, our users, or others.
- f. *Business Reorganization* - such as part of any sale, assignment or other transfer of our business, or transition of service to another provider. We will ask for your consent if required by applicable law.

4. TRANSFER OF INFORMATION

- 4.1. In connection with the Purposes described above, your Personal Data may be transferred from your home country and/or stored in locations outside of your home country. We provide appropriate protections for cross-border transfers as required by law for international data transfers, including information transferred to third parties. In this regard, you hereby acknowledge, agree and consent to the transfer of your Personal Data from your home country to the alternate country. Please refer to paragraphs 3.1 (b.) if you are an EU resident

5. RETENTION OF INFORMATION

- 5.1. We will retain your Personal Data for the period necessary to fulfil the Purposes outlined in this Privacy Policy and internal company policies. When we no longer need to use your information, we will – unless we need to keep your information to comply with applicable legal or regulatory obligations or the Personal Data is required to carry out corporate tasks and achieve our business objectives – remove it from our systems and records and/or take steps to properly anonymize it so that you can no longer be identified from it.

6. SECURITY MEASUREMENTS

- 6.1. We maintain reasonable physical, electronic, and organizational security measures to protect your Personal Data against accidental or unlawful destruction or accidental loss, alteration, or unauthorized disclosure or access.
- 6.2. The Company undertakes to review the security measures from time to time in light of new and relevant legal and technical developments.

7. RIGHTS IN RELATION TO INFORMATION

- 7.1. You can access your Personal Data such as your name and contact number at any time by signing in to your account on the Site. Alternatively, you may email us to exercise any of the following rights:
 - a. *Access:* You are entitled at any time to obtain information about your Personal Data that we store, in accordance with applicable law, subject to a reasonable fee for the handling and processing of your requests to access your Personal Data.
 - b. *Rectification:* You may request that we rectify any of your Personal Data that is incomplete or incorrect.
 - c. *Deletion:* You may request that we delete your Personal Data.
 - d. *Restrictions of Processing:* You may ask us to cease processing of your Personal Data for example if you have objected to the processing and the existence of legitimate grounds is still under consideration.

- e. *Objection:* You may object, at any time, to your Personal Data being processed by us for direct marketing purposes.
- f. *Right to Revoke Consent:* You have the right to withdraw your consent at any time, without affecting the lawfulness of our processing based on such consent before it was withdrawn.
- g. *Data Portability.* If applicable, you may request us to send you your Personal Data which we store, in a commonly used and machine-readable format which shall be decided at our sole discretion.
- h. *Opt Out of Marketing Communications.* If you wish to unsubscribe to the processing of your Personal Data for any marketing and promotions related communications, please click on the unsubscribe link in the relevant email or message. Alternatively, you may also contact us by sending an email for opting out.

- 7.2. To protect your privacy and security, we will verify your identity before responding to such a request, and your request will be answered within a reasonable timeframe. We may not be able to allow you to access certain personal information in some cases e.g. if your personal information is connected with the personal information of other persons, or for legal reasons. In such cases, we will provide you with an explanation of why you cannot obtain this information. We may also deny your request for deletion or rectification of your personal information due to statutory provisions, especially those affecting our accounting processes, processing of claims, for fraud detection or prevention purposes, and mandatory data retention, which may prohibit deletion or anonymization.

8. UPDATES TO PRIVACY POLICY

- 8.1. On occasion, we may revise this Privacy Policy to reflect changes in the law, our information collection and use practices, the features of our Site, or advances in technology. If we make revisions that change the way we collect or use your Personal Data, those changes will be posted in this Privacy Policy and the effective date will be noted at the beginning of this Privacy Policy. Therefore, you should review this Privacy Policy periodically so that you are up to date on our most current policies and practices. We will also prominently post such material changes prior to implementing the change (if any) and ask for your consent if required by law. By continuing accessing or interacting with Company following the modifications, updates or amendments to this Privacy Policy, you signify your acceptance of such modifications, updates or amendments.

9. LINKS TO THIRD PARTY WEBSITES

- 9.1. Our Site contains links to other sites ("**Third-Party Sites**"). Please be aware that we are not responsible for the privacy practices or content of those Third-Party Sites. We encourage you to read the privacy statements of each site that collects information from you before submitting any personal information. Our Privacy Policy applies solely to information collected by Company and does not apply to Third Party Sites.

10. CONTACT AND ENQUIRIES

- 10.1. If you have any queries about your personal data, please contact us at:

Email: hello@flawu.com
