



PRIVACY POLICY

We, E-Maintenance Sdn. Bhd. (Company Registration Number: 801263-V), (collectively "**EMS**B") respect the privacy of individuals with regard to personal data and are committed to protecting the privacy of our users/subscribers/customers (collectively, "**Users**"), and strive to provide a safe and secure user experience. This Privacy Policy is formulated in accordance with the Personal Data Protection Act 2010 ("Act"), which describes how your information ("**Personal Data**") is collected and used and your choices with respect to your Personal Data. For absolute clarity, any reference to "we", "our" or "us" in this Privacy Policy shall include any member of EMSB. The following discloses our information gathering and dissemination practices for Star Protection websites and/or mobile App. (collectively, "**Websites**") and if relevant, for the use of, or subscription to, or purchase of any products and/or services offered by EMSB.

1. Information collected by the Websites

Our Websites' servers do not automatically recognize specific information about individual users on our Websites. In addition, our servers do not automatically record information regarding a User's e-mail address unless the User supplies it.

We collect information about Users during the registration process for certain parts of our sites; through their participation in certain activities, including contests, forums, and polls; and through the use of cookies. When you request pages from our server, it automatically collects some information about your preferences, including your internet protocol ("IP") address. We use this to help diagnose problems with our server, and to administer our Websites.

The User-supplied information collected through the registration process, surveys, contest entry forms, polls or other similar vehicles is used to improve the content of our sites, or used for our marketing purposes. It is not shared with other organizations for commercial purposes unless specifically stated herein.

2. Purpose of Personal Data collected

Personal Data that you provide to us voluntarily on our Websites and the other related channels may be processed and/or disclosed to our Vendors (as hereinafter defined) for the following purposes (collectively, "Purposes"):

- to manage, verify and complete transactions with you;
- to manage and verify your membership for our customer loyalty scheme (where applicable);
- to direct market our products and/or services to you;

- to understand and analyse our sales, and your needs and preferences;
- to develop, enhance, market and provide products and services to meet your needs;
- to enable you to participate in promotions and contests;
- to process exchanges or product returns;
- to improve our services;
- to respond to your requests or complaints;
- to send you updates on products, news and event updates, rewards and promotions, special privileges and initiatives offered by EMSB and/or its partners and/or advertisers;
- to process your payment transactions;
- for our credit control service and/or collection of debts due and owing to us; and
- to comply with any regulatory, statutory or legal obligation imposed on us by any relevant authority.

Although the precise details of the Personal Data collected will vary according to the specific purpose (such as contests, forums, surveys etc.) whether via online or otherwise, we may typically collect the following Personal Data from or in relation to you:

- Name;
- Address;
- Phone number(s);
- Date of birth;
- Email address;
- Gender;
- Identity card number or passport number
- Products and/or hardware detail

Use and Disclosure

We may disclose your Personal Data within EMSB and/or to the Vendors (as hereinafter defined) for the Purposes set forth hereinabove in accordance with the terms and conditions set out herein.

We are responsible for the Personal Data under our control, including Personal Data disclosed by us to a Vendor (often referred to as the data processor and third party service providers). "**Vendor**" in this Privacy Policy means in relation to Personal Data, any person or entity (other than our own employee) who processes the Personal Data on behalf of us and/or who provide third party services for us.

"**Processing**", in relation to Personal Data means for example obtaining, recording, holding or using the

Personal Data in carrying out any operation or set of operations on the Personal Data and/or providing its respective services to us.

We take every measure to provide a comparable level of protection for Personal Data should the information be processed by a Vendor.

We use and disclose aggregated non-personally identifying information collected through the Websites as part of our organization's process of constantly improving the Websites, and the products and services offered by EMSB.

Impact of Non Provision of Personal Data

Please note that in the event that sufficient Personal Data is not supplied, or is not satisfactory to us, then your application or request for any of the above Purposes may not be accepted or acted upon or your request to browse some information on the Websites, or the use of, or subscription to, or purchase of any products and/or services offered by EMSB may be denied or affected.

Storage and Retention of Personal Data

Your Personal Data shall be stored in hard and/or soft copies in our offices and/or in servers located in Malaysia. It may be necessary to transfer your Personal Data to third party services providers based/located outside Malaysia. By continuing to use the Websites, products and/or services of EMSB, you hereby consent to such transfer.

Any Personal Data supplied by you will be retained by us as long as necessary for the fulfillment of the Purposes stated in paragraph (2) above or as required to satisfy legal regulatory, accounting requirements or to protect our interests.

Save and except as provided in paragraph (15) hereof, we do not offer any online and/or mobile app facilities for you to delete your Personal Data held by us.

How Email and 'Contact Us' messages are being handled

We may preserve the content of any email or "Contact Us" or other electronic message that we receive.

Any Personal Data contained in those messages will only be used or disclosed in ways set out in this Privacy Policy.

The message content may be monitored by our service providers or employees for purposes including but not limited to compliance, auditing and maintenance or where email abuse is suspected.

Communication or Utilisation Data

Through your use of telecommunications services to access the Websites and/or any other sites operated and/or managed by EMSB, your communications data (e.g. IP address) or utilization data (e.g. information on the beginning, end and extent of each access, and information on the telecommunications services you accessed) are technically generated and could conceivably relate to Personal Data.

To the extent that there is a compelling necessity, the collection, processing and use of your communications or utilization data will occur and will be performed in accordance with the applicable data privacy protection legal framework.

Automatic Collection of Non-Personal Data

When you access the Websites and/or use of any product/services offered by EMSB, we may automatically (i.e., not by registration) collect non-personal data (e.g. type of Internet browser and operating system used, domain name of the website from which you came, number of visits, average time spent on the site, pages viewed).

We may use this non-personal data and share it within EMSB to monitor the attractiveness of the Websites and improve their performance or content.

For example, we may collect:

- Device information— such as your hardware model, IP address, other unique device identifiers, operating system version, browser type and settings, such as language and available font settings, and settings of the device you use to access our Websites.
- Usage information— such as information about your usage of the Websites, products and/or services offered by EMSB, the time and duration of your usage and other information about your interaction with content offered by EMSB, and any information stored using cookies, mobile ad identifiers, and similar technologies that we have set on your device. For detailed information about our use of cookies, web beacons, and other technologies, see Online Tracking and Advertising in paragraph (9) below.
- Location information— such as your computer's IP address, your mobile device's global positioning system (GPS) signal or information about nearby WiFi access points and cell towers that may be transmitted to us when you use certain services.

Confidentiality

Personal Data held by us will be kept confidential in accordance with this Privacy Policy pursuant to any applicable law that may from time to time be in force.

Any questions, comments, suggestions or information other than Personal Data sent or posted to the Websites, or any part thereof by Users will be deemed voluntarily provided to us on a non-confidential and non-proprietary basis.

We reserve the right to use, reproduce, disclose, transmit, publish, broadcast and/or post elsewhere such information freely without further reference to you.

Security

Our Websites have security measures in place to protect the loss, misuse and alteration of the information under our control. When a User is asked to provide his/her credit card information, we provide a secure environment through our partners' systems (using industry standard SSL or SET protocols) for this purpose.

For the internet, unfortunately, no data transmission over the internet can be guaranteed as completely secure. So while we strive to protect such Personal Data, we cannot ensure or warrant the security of any

Personal Data transmitted to us and individuals do so at their own risk. Once any Personal Data comes into our possession, we will take reasonable steps to protect that information from misuse and loss and from unauthorised access, modification or disclosure.

A username and password may be essential for you to use some sections of the Websites. For your own protection, we require you to keep these confidential and to change your password regularly (if required).

Links

Our Websites contain links to other sites. We are not responsible for the privacy practices or the content of such sites. We have established relationships with advertisers and/or business partners but such relationships are generally technical in nature, or content collaborations. If any advertisers and/or business partners access to any information entered by Users in our database, this fact shall be disclosed to the Users upon initiating the registration process. Users who feel they do not wish their information to be shared by anyone other than the Websites may then opt out of completing the registration.

Right of Access to Personal Data

Under the Act, you have the right of access to your Personal Data held by us on payment of a prescribed fee and to request correction of the Personal Data that is inaccurate, incomplete, misleading or not up-to-date. If you have any questions regarding this Privacy Policy or if you wish to request access to your Personal Data or if you wish to correct your Personal Data or if you wish to withdraw your consent for future marketing communication, you may send your request in writing to:

E-Maintenance Sdn. Bhd. (801263-V)
C715 & C716, Block C, Kelana Square
No. 17, Jalan SS7/26, Kelana Jaya,
47301 Petaling Jaya
MALAYSIA

or

Email: ew.care@e-maintenance.com.my

Changes to Privacy Policy

We reserve the right to amend this Privacy Policy from time to time without prior notice. Any changes to the Privacy Policy will be uploaded onto our Websites and therefore, we encourage you to check/visit the Websites from time to time for any changes on a regular basis.

In the event of conflict between the English and Bahasa Melayu versions of the Privacy Policy, the English version of the Privacy Policy shall prevail.

(Last updated 01 December 2020)