

PRIVACY POLICY

Personal Data Protection Act (PDPA)

At every, we value your privacy and strive to protect your personal information in compliance with the laws of Malaysia.

Pursuant thereto, this Privacy Policy is designed to explain and elaborate upon some of our policies and principles pertaining to the privacy of your personal information, all of which we have adopted as a sign of our commitment to respecting, maintaining, protecting and safeguarding the privacy of your personal information.

Every will only collect, record, hold, use, disclose and store (i.e. "process") use your personal information in accordance with such laws (including the Personal Data Protection Act 2010 and other applicable data protection or privacy laws regulations).

This Privacy Policy explains:

- The type of personal information we collect and how we collect it
- How we use your personal information
- The parties that we disclose the personal information to
- The choices we offer, including how to access and update your personal information

Your privacy matters to us, so please take the time to get to know our practices and if you need further information, please contact our Customer Service at support@iimpact.com.

For the purposes of this Privacy Policy, please note that:

- *“Personal information” refers to any information which relates directly or indirectly to you and/or your transactions with us. This information includes your name, address, occupation, contact details, the details of your account(s), the type of products and/or services subscribed to and such other necessary information regarding yourself and your transaction(s) with us. For the avoidance of doubt, please note that this Privacy Policy is applicable only if you are an individual.*

What Kind Of Personal Information We Collect And How We Collect It

In order to enable us to deal with your inquiries, open and operate an account/facility for you and/or to generally provide you with our products and services, we may need to and/or may be required to process personal information and financial information about you, including but not limited to:

- personal information including your particulars, images and biometrics to establish your identity and background;
- specimen signatures, as well as, digital or electronic signatures as defined under the applicable laws and regulations;
- personal information to establish your financial standing, employment details, creditworthiness and/or suitability for any of our products/services applied for (if required);
- personal information that you provide when you apply for any of our products and services, including your views or opinions made known to us via feedback or surveys;

- other electronic data or information relating to you such as IP addresses, cookies, activity logs, online identifiers and location data through your usage of our products and services or as part of their delivery to you.

We may obtain this information from yourself and from a variety of sources, including but not limited to:

- through your relationship with us, for example information provided by you in application forms, when you operate your account and use our products or services, when taking part in customer surveys, competitions and promotions, and during financial reviews;
- through your verbal and written communications with us and/or our authorised agents via SMS, phone or mobile device, email, fax, mail, websites or browsers, social media and/or any other appropriate communication channels;
- from an analysis of the way you use and manage your account(s)/facility(ies) with us, from the transactions you make and from the payments which are made to/from your account(s)/facility(ies);
- from such other sources in respect of which you have given your consent to them disclosing information relating to you and/or where they are not otherwise restricted;
- from the Malaysia Department of Insolvency, other relevant governmental authorities and/or law enforcement agencies to ascertain inter alia your current and past financial standing;
- from any information that is supplied and/or collected when you visit our websites which may include your device's IP address or from data that is collected via cookies.

We use cookies for a number of purposes, including to store your preference for certain types of information or products, further analysis for the purpose of providing products and services to you, to improve our products and/or to personalize our services to you. Cookies are small text files that collect information about users and their visit to the web site or use of the app, such as their Internet protocol (IP) address, how they arrived at the web site (for example, through a search engine or a link from another web site) and how they navigate within the web site or mobile application.

You may adjust settings on your browser and/or mobile device so that you will be notified when you receive a cookie or other similar tracking tools. Please refer to your browser documentation to check if the tracking tools have been enabled on your computer and/or mobile device or to request not to receive cookies or to disable cookies if you do not wish to have information collected via the use of cookies. However, do note that if you enable blocking or disabling of cookies, it may limit certain features and functions in your use of our web or mobile sites.

How We Use Your Personal Information

Other than as stated above, we may use your personal information for one or more of the following purposes:

- to assess your application(s) /request(s) for our products and services;
- to verify your financial standing;
- to manage and maintain your account(s) and facility(ies) with us;
- to better manage our business and your relationship with us;
- to improve our products and services and to test, research, analyse and develop new products/ new features of products and/or services;

- to notify you about benefits and changes to the features of products and services;
- to respond to your enquiries and complaints and to generally resolve disputes;
- to update, consolidate and improve the accuracy of our records;
- to produce data, reports and statistics which have been anonymised or aggregated in a manner that does not identify you as an individual;
- to conduct research for analytical purposes including but not limited to data mining and analysis of your transactions with us;
- to meet the disclosure requirements of any law binding on every;
- to conduct anti-money laundering checks; for crime detection, investigation, prevention and prosecution;
- to comply with any sanction or law enforcement requirements;
- to enforce and/or defend any of our rights; and/or
- for any other purpose that is required or permitted by any law, regulations, guidelines and/or the order of any court and/or relevant regulatory authorities.

Please be assured that we will ask for your consent before using your personal information for a purpose other than those that are set out in this Privacy Policy.

Disclosure Of Your Personal Information

As a part of providing you with our products and services and the management and/or operation of the same and for the purposes as set out in this Privacy Policy in relation to our use of your personal information, you consent and authorise us to disclose information about you and/or your accounts and/or facilities with us to:

- companies and persons that act as our agents, contractor, affiliates, service providers, merchant and strategic/ business partners, lawyers, auctioneers, valuers and/or professional advisers (including their sub-agents, sub-contractors, affiliates, service providers, professional advisors), and the employees, directors and officers of all the parties mentioned above);
- companies and/or organisations that assist us in processing and/or otherwise fulfilling transactions that you have requested;
- companies and/or organisations that assist us in providing value added services that you have requested;
- companies and/or organisations that provide services to us in delivering or communicating information about our products and services to you;
- any other person under a duty of confidentiality to us which has undertaken to keep such information confidential;
- any law enforcement, government, courts, dispute resolution bodies and regulatory bodies including Bank Negara Malaysia and their appointed personnel or party.

We will treat your personal information as private and confidential and will not disclose your information to anyone outside every except:

- where you have given your express consent as set out in our application form(s) and/or pursuant to your consent and authorisation as contained in this Privacy Policy and/or in the terms and conditions governing the products and services which you have with us;
- where we are required or permitted to do so by law;
- where required or authorised by any order of court, tribunal or authority, whether governmental or quasi-governmental with jurisdiction over every.

Security Of Your Personal Information

Information is our asset and therefore every places great importance on ensuring the security of your personal information. We regularly review and implement up-to-date technical and organisational security measures when processing your personal information.

Employees of every are trained to handle the personal information securely and with utmost respect, failing which they may be subject to disciplinary action.

Retention Of Your Personal Information

Every will retain your personal information in compliance with this Privacy Policy for the duration of your relationship with us, or as necessary to perform our obligations to you or to enforce or defend the interests of every and/or its customers as may be deemed necessary, or as required by applicable law and every's policies in relation to data retention.

What If Personal Information Provided By You Is Incomplete?

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 products or services. Should you decline to provide such obligatory personal information, we may not be able to process your application/request or provide you with our products or services. You shall update us on any changes to your personal information recorded with us.

Your Rights To Access And Correct Your 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 every's possession, or where you are of the opinion that such personal information held by us is inaccurate, incomplete, misleading or not up-to-date, you may make a request to us via our Customer Service.

We will use reasonable efforts to comply with your request to access or correct your personal information within fourteen (14) days of receiving your request.

Please note that every 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.

Please also note that every may use its discretion in allowing the corrections requested and/or may require further documentary evidence of the new information to avoid fraud and inaccuracy.

Please ensure your personal information (such as your mailing address(es), e-mail address(es) and telephone number(s) recorded with us are current, complete and accurate. Please notify of any change in your personal particulars via the channels made available by us to ensure that all correspondence and/or communication reach you in a timely manner and to enable us to serve you better.

Please help us to ensure your personal information (such as your current mailing address(es), e-mail address(es) and telephone number(s) recorded with us are current, complete and accurate by updating us as soon as possible if there are any changes to your personal information recorded with us, as it will ensure that all correspondence and/or communication reach you in a timely manner and enable us to serve you better.

Exercising Choices Over The Disclosure, Retention And Use Of Your Personal Information

Subject always to our contractual rights and obligations under relevant laws and regulations, you may exercise your choice in respect of the disclosure, retention and use of your personal information. Should you wish to do so, kindly contact us at the e-mail address given at the end of this Privacy Policy.

Please take note that certain communications such as statements of account and our websites contain standard information regarding our other products and services that cannot be removed without affecting the delivery/provision of our services and/or products, the operation of your account(s) and/or facility(ies) with us, and/or additional costs to you.

Revisions To Privacy Policy

This Privacy Policy may be revised from time to time. Notice of any such revision will be given on every's website and/or by such other means of communication deemed suitable by every.

Contacting every About Your Privacy And How We Handle Your Personal Information

Should you have any query in relation to this Privacy Policy or how we handle your personal information, kindly contact our Customer Service at support@iimmpact.com