

Data Protection Policy

We know that your privacy is very important to you. We make it our business for it to be as important to us. We aim to be as clear as possible about how and why we use data that we collect about you and this data protection policy explains how we collect, use, share and protect your personal data. If your questions are not fully answered by the information below, please contact us. We shall be happy to assist.

What data we collect?

We may collect the following types of data about you:

- Your name, your email address and other contact details that you provide to us from time to time.
- Your company's name, your position in the company, the company's address and telephone number.
- Your payment information such as credit or debit details.
- Your use of our websites (please see the section below headed "Cookies").
- Information that you provide when filling in forms, posting information on our website, or when you contact us directly.

Why we collect data about you?

The reasons that we collect data about you are:

- To provide you with services that you may request including but not limited to online services. Each service has different requirements. Therefore the information we need, and what it is needed for, can differ. For full details please refer to the terms and conditions for each service.
- To enhance or improve your experience on our website and/or with us generally. When you indicate your preferences through our registration forms or through your use of our website, we will use this information to personalise the website and/or our services to better meet your needs.

- To provide you with information about products and services that we, or third parties we have carefully selected, believe will be of interest to you (please see the sections below headed “Who accesses your data” and “Consent”).
- To keep your information secure. To minimise the risk of unauthorised access to your information, we use some of your information to authenticate you when using the website and our customer service helpdesk.

Who accesses your data?

The data we collect will be used within TITISAN KEJORA SDN BHD trading under the name and style of MALAYSIAPASS, its subsidiary and related companies (“MALAYSIAPASS”).

Exactly who sees your data depends on the context in which you provided it and the purpose for which it is being used (please see the section above headed “Why we collect data about you”).

Sometimes we will share your data with carefully selected third parties outside MALAYSIAPASS. We may do this for the following reasons:

- To provide you with a service. Some of our services are provided in conjunction with our business partners, and we will need to disclose your information to them to provide you with the services. We make it clear in the terms and conditions for each service whether information will be passed to third parties or not. We may also share your information with certain third parties performing services for us where this will help us to provide services to you, or to improve the quality of the services that we provide to you.
- To provide you with information about special promotions and offers. If you have given your consent by choosing to opt in on the registration form, we may share some of your information with carefully selected third parties so that they can provide you with information about products and services that may be of interest to you.
- To protect MALAYSIAPASS or others. We may share your information with third parties when we believe it is necessary to comply with the law or protect our or another person’s rights, property, or safety. This includes

exchanging information with third parties to protect against fraud and to reduce payment risks.

We will only deal with third parties that we trust to act in our customers' best interests and who treat our customers' information with the same stringent controls that we apply ourselves. In cases where we have to pass or transfer your information to any third party within or outside Malaysia, we will ensure that our contractual arrangements with these third parties protect your personal data information in compliance with the Personal Data Protection Act 2010.

Where do you keep and process your data?

Generally we will keep and process your personal data within Malaysia. However, the personal data that we collect about you may be processed in, transferred to, and/or stored at, a destination outside Malaysia where data protection laws are not in existent or the laws may not provide the same level of protection. By registering to use our website, you agree to this processing, transfer and/or storage outside of Malaysia. Please be informed that we will take all practicable steps that are reasonably necessary to ensure that your personal data is protected and in accordance with the Personal Data Protection Act 2010 even when your information is processed in, transferred to, and/or stored at, a destination outside of Malaysia.

How long do we keep your personal data?

How long we keep your data depends on the context in which you provided it and the purposes for which we use it. We will only retain data for as long as is necessary for such purposes. In particular:

- We will keep your data that is necessary for us to provide you with a service you have requested or purchased for as long as it takes us to provide you with that service;
- We will keep your contact details for marketing purposes for as long as we have your consent for: (i) us to send you marketing information about our products and services by you opting-in of receiving this marketing information; and/or (ii) third parties to provide you with information about products and services that may be of interest to you by you opting-in to receiving this marketing information;

- We will keep records of any transactions you enter into for up to seven years. This is so that we can respond to any complaints or disputes that arise in that period;
- We will keep other information about you if it is necessary for us to do so to perform our duties; and
- To comply with the law or protect our own or other persons' interests.

Data Security

MALAYSIAPASS is committed to keeping your trust by protecting and securing your personal data. We employ appropriate technical, administrative and physical procedures to protect personal data from unauthorised disclosure, loss, misuse or alteration. We train our staff to process and handle your data securely.

We limit access to personal data to individuals with a business need consistent with the reason the data was provided. We keep personal data only for as long as it is required for business purposes or by the law.

MALAYSIAPASS protects your personal data complying with industry best-practice standards and our security policy.

Website security and privacy

We understand that you may be concerned about the security of the personal data we collect from you online. Accordingly, we have systems in place to ensure our online dealings with you are as secure as your dealings with us in person, or on the telephone.

For site security purposes and to ensure this service remains available to all users, we employ software programmes to monitor network traffic in order to identify unauthorised attempts to upload or change information, or otherwise cause us damage.

Maintaining the data we hold for you

You can request details of all the personal data MALAYSIAPASS holds about you, by contacting our office. There will be a charges to be imposed for each request. They will send you an application form which you should complete and return. To contact the team please write to:

TITISAN KEJORA SDN BHD

No 31-1, Jalan Seri Rejang 3,
Pusat Industri Sri Rampai,
53300 Kuala Lumpur, Malaysia.

Please let us know if your data is incorrect or inaccurate. We would do the correction on your personal data if you are able to show to us that they are incorrect or inaccurate.

Consent

You can allow us to provide you with information about products and services that we, or third parties we have carefully selected, believe will be of interest to you. We will only do this with your consent.

You give us your consent to receive marketing information from us about our products and services we believe will be of interest to you by choosing to opt-in on your registration form.

You give us your consent to receiving marketing information from third parties about their products and services by choosing to opt-in on your registration form.

You can change your mind and withdraw your consent at any time. We will endeavour to comply with your request as soon as we are reasonably able to do so. When you choose to opt-in through the website, this opt-in will only apply to the information stored about you on this website's databases. If you have provided information to MALYSIAPASS through another channel, the use of that information will not be affected by the opt-in you select on the website.

Data collected on our website

We may collect non-personal information from you such as browser type, operating system, and web pages visited to help us manage our web site.

We use cookies and other internet technologies to manage our website and certain online products and services. We do not use these technologies to collect or store personal data unless you have opted in to such a feature.

Our internet server logs certain information which is provided by your browser for statistical purposes only.

Cookies

A "cookie" is a packet of information that allows MALYSIAPASS server (the computer that houses our website) to identify and interact more effectively with your computer.

When you access our website, we send you a temporary or "session cookie" that gives you a unique identification number. A different identification number is sent each time you use our website. Cookies do not identify individual users, although they do identify a user's internet browser type and your Internet Service Provider. Shortly after you end your interaction with our web site, the cookie expires or "crumbles". This means it no longer exists on your computer and therefore cannot be used for further identification or access to your computer.

Without cookies certain personalised services cannot be provided to users of our website, accordingly you may not be able to take full advantage of all of the MALYSIAPASS website features if cookies have been disabled.

Our Cookie Policy

We use session cookies in the following manner:

- Log-on and log-off administration - If you decide to register with our site, so as, for example, to use one of our online services, session cookies help with the log-on and log-off process. The cookies enable us to recognize your log-on ID when you log on so that we do not establish a duplicate registration record for you.
- Transactions and site usability - We use session cookies to improve how you navigate through our website and conduct transactions. As examples, session cookies are used to maintain your online session as you browse over several pages; to store and prepopulate information so that you do not have to re-enter the same information twice.
- MALYSIAPASS may also use "persistent cookies". A persistent cookie is a small piece of text stored on your computer's hard drive for a defined period of time, after which the cookie is erased. MALYSIAPASS will not collect or link to personal data through persistent cookies without your express consent. We use persistent cookies as follows:
 - Site usage measurement - Our site measurement tool uses a persistent cookie to assist us in measuring how and when our web

site and its various components are used. It functions as a "visit cookie," so we can determine if you are a repeat visitor to our site. This allows us to know if we are attracting new visitors and what aspects of the site seem most useful. The cookie will expire 30 days after your last visit.

- Log-off safety function – MALAYSIAPASS uses a persistent cookie to automatically log you off of certain MALAYSIAPASS sites if there has been no activity for 15 minutes. This is done for your safety to ensure that, if you have finished using our site but have forgotten to log off, no one else can use your computer via your log on and password. The cookie is permanently removed from your computer when you log off, or, if you have closed the browser without logging off, it is removed within 15 minutes from your last activity.

Opt-in cookies - Persistent cookies allow us, at your request, to recognise you when you return to www.malaysiapass.com or to remember certain information that you have provided us. The recognition feature allows you to log on to certain MALAYSIAPASS sites automatically, without having to enter your name and password each visit. The cookie assigns a random number to you, which we link to personal information you have provided and your site activity. This allows us to personalise the site for you and tailor the content to your needs, for instance to show you banner ads about other products you may be interested in.

Other cookies allow us to remember certain information related to prior transactions, such as package tracking numbers, or mailing or address lists, so we may prepopulate those fields for you on return visits. These features and cookies are strictly at your request and for your convenience.

Further Information

Links to other sites

MALAYSIAPASS website contains links to other sites including sites of other companies in the group. We encourage you to read and understand the data protection policies on those websites prior to providing any information to them.

Telephone calls

If you call any of our customer service telephone numbers, we may record your call. These recordings are used for training and quality control to ensure that we continuously monitor and improve our customer service standards.

How to complaint

If you are not happy with the way in which your personal data is being handled by MALYSIAPASS you can complaint to the Personal Data Protection Commissioner at the following address:

Aras 6, Kompleks Kementerian Komunikasi dan Multimedia,
Lot 4G9, Persiaran Perdana, Presint 4,
Pusat Pentadbiran Kerajaan Persekutuan,
62100 Putrajaya, Malaysia.

Information transfer

If MALYSIAPASS transfers personal data to countries outside Malaysia, we will only do so in compliance with the requirements of the Personal Data Protection Act 2010.

We will take reasonable practicable steps to protect personal data no matter what country it is stored in or transferred to. We have procedures and data transfer contracts as appropriate to help ensure this.