

## **POLICY OF PRIVACY AND DATA PROTECTION**

8DGE SOLUTIONS SDN BHD (Company No. 736133-T) respects the privacy of individuals with regards to Personal Data. This privacy policy is prepared and formulated in accordance with the Personal Data Protection Act 2010 (“the Act”). For the purpose of this privacy policy, “Personal Data” shall have the meaning as ascribed to in the Act. 8DGE SOLUTIONS is committed to processing your personal data in accordance to the Act.

### **Scope of the Act**

The Act aims to regulate the collection, holding, processing and use of Personal Data in commercial transactions and also to prevent malicious use of personal information. This Act plays a crucial role in safeguarding the interest of individuals and makes it illegal for anyone, be it corporate entities or individuals, to sell personal information or allow such use of the data by third parties without your consent. The Act only applies to the processing of personal data in respect of “commercial transactions”. A commercial transaction means any transaction of a commercial nature, whether contractual or not which includes any matters relating to the supply or exchange of goods or services, agency, investments, financing, banking and insurance. There must be a transaction in a commercial nature in the processing of the personal data to fall within the ambit of the said Act.

### **What Personal Data Do We Collect?**

8DGE SOLUTIONS may be required to collect your Personal Data when signing up with 8DGE SOLUTIONS as a GateKeeper Member. Your Personal Data may also be collected through the use of GateKeeper App, the GateKeeper Website, feedback, surveys, competitions and promotions related to the GateKeeper Programme and GateKeeper and/or at any meetings, events, activities, contests, as well as social media pages belonging to GateKeeper and /or other related corporations of 8DGE SOLUTIONS.

The Personal Data which 8DGE SOLUTIONS may collect when signing up as a member of GATEKEEPER App:

- (1) Name
- (2) NRIC, Passport and/or MyKid
- (3) Age
- (4) Gender
- (5) Address
- (6) Telephone/Mobile number
- (7) E-mail address

In addition to the above Personal Data, the use of GateKeeper App and the GateKeeper Website allows 8DGE SOLUTIONS to collect the following Personal Data:

- (1) Information on browser type and setting, device type and setting, web browser history, Internet Protocol (IP) address (a number that is automatically assigned to your computer when you use the Internet, domain name, user profiles, and/or date/time stamp of visit;
- (2) Information from corresponding technologies used in connection with mobile devices, including unique device identifier, date/time stamp of visit, location and/or browsing history related to your mobile devices;
- (3) Information about your usage behaviour on GateKeeper and the GateKeeper Website via third party analytics services such as but not limited to Google Analytics for Firebase. Such third party analytics services may use cookies to gather information such as your web browser history, IP address, date/time

stamp of visit, and the website that redirected you to the GateKeeper via the GateKeeper Mobile App or the GateKeeper Website; and

(4) Information from third party service providers, with your consent, which may include your profile content or other types of personally identifiable information and/or information as described under item (1) above.

There could also be information collected from third parties or sources to whom you have given your consent to disclose information relating to you, from related corporations of 8DGE SOLUTIONS or otherwise.

### **What is the Purpose of the Collection of Personal data?**

By providing your Personal Data to 8DGE SOLUTIONS, you hereby agree that 8DGE SOLUTIONS shall collect, retain and use the Personal Data for the purposes stated below:

(1) To register as a GateKeeper Member;

(2) To manage and verify your identity in our system, including sending a one-time pin (OTP) to your registered handphone number for verification and welcome e-mail to new GateKeeper cardholders;

(3) To authorise, process and facilitate all GateKeeper Transactions, Panic Button and Calling Guardhouse;

(4) To maintain close communication and maintain a close relationship with GateKeeper Members in order to personalise and improve your user experience under GateKeeper Programme;

(5) To customise/personalise the experience of our GATEKEEPER Members or visitors by tracking user-specific information on what are visited by our GATEKEEPER Members or visitors;

(6) To comply with 8DGE SOLUTIONS's legal and regulatory obligations under all applicable laws;

(7) To prepare for security, risk management and audit requirements;

(8) To prevent, detect and investigate any illegal or unlawful activities or misuse of GateKeeper Programme;

(9) For the notification of critical alerts, special offers, new services and products, updates and promotions of GateKeeper related third party vendors of 8DGE SOLUTIONS;

(10) To conduct surveys and research/analysis of usage pattern of consumers to develop new products and services and/or other related surveys/researches and to customise /personalise /enhance/improve the content of the GateKeeper App and Website; and where required by law or where 8DGE SOLUTIONS consider that such use or disclosure is necessary to respond to any claims or legal process, or where 8DGE SOLUTIONS suspects any form of fraud or unlawful activity.

### **Do We Share and Disclose Your Personal Data?**

8DGE SOLUTIONS does not sell, rent, lease or otherwise disclose your Personal Data to third parties unless otherwise stated when processing the Personal Data collected.

Selected Personal Data may be shared with third parties for purposes stated below:

(1) Professional Advisors, Third Party Service Providers and Consultants.

We require services of our IT, legal, tax and financial consultants, as well as third party service providers, agents and vendors to assist in providing you with the services under the GateKeeper Programme and among others, to provide assurance on the quality of our services, provide technical support and/or other miscellaneous services. The Personal Data is only disclosed and processed only to the extent as required by 8DGE SOLUTIONS.

(2) Related Corporations.

Related corporations of 8DGE SOLUTIONS which include its affiliates, subsidiaries and joint venture companies, which will be required to comply with this Privacy Policy.

(3) Selected Merchants Participating merchants may request that their marketing and promotional materials and advertisements with regards to exclusive offers for GateKeeper be directed at selected category of GateKeeper members (for instance, certain age group, geographical location, gender, possess certain skills and/or indulge in certain hobbies). We will, in turn, blast out these marketing and promotional materials and advertisements to the targeted categories of GateKeeper members.

(4) External Links and Third Party Sites.

When you click on an external link on the GateKeeper Mobile App or GateKeeper Website to connect to any other website or location, you will leave the GateKeeper Mobile App or GateKeeper Website (as the case may be) and be redirected to another site, whereby the other entity may collect your Personal Data from you. You shall be responsible with the disclosure of your Personal Data and therefore, retain your own discretion in providing such disclosures to external websites. This Privacy Policy does not apply to these external websites subsequent to you leaving our main page to be connected to these external websites. You may also be able to connect with third party social networking platforms via the GateKeeper Mobile App and the GateKeeper Website. Upon logging in to a particular social network platform, a token will be provided to 8DGE SOLUTIONS which allows the site to recognise us when we request, on your behalf, for access to your account information or to post on your profile.

Whenever you decide to revoke our access to any of your social networking sites, you may do so by either unlinking the site on our GateKeeper Mobile App or amending the settings from within your social networking site account settings, but do bear in mind that this may limit the services we are able to provide under the GateKeeper Programme. In addition, when you engage in certain activities through your use of the services under the GateKeeper Programme and GateKeeper App, these activities may be automatically posted to your profile, such as posting or sharing of comments, reviews, photos or promotions through the GateKeeper Mobile App to social networking sites. If you decide not to have this feature, you will be able to disable this feature at any time by logging into your profile and selecting this option to disable.

(5) Other Disclosures.

When such disclosure is necessary in connection with any legal process or investigation, to comply with 8DGE SOLUTIONS's legal and regulatory obligations under all applicable laws, to respond to any legal documents served, resolve any disputes and/or to investigate any violation or potential violation of the relevant laws, this Privacy Policy or the GateKeeper Member Terms and Conditions of Use ("Member's T&C"). You may any anytime request 8DGE SOLUTIONS to cease sharing your Personal Data in this manner by notifying 8DGE SOLUTIONS at the contact particulars provided below.

#### **What Happens If You Decide Not To Provide Personal Data?**

There are some Personal Data which are compulsorily required by us for the stated purposes. Should you decide not to provide the compulsory Personal Data required, 8DGE SOLUTIONS is unable to proceed with the application for a GateKeeper membership and reserves the right to cease the processing of the application and decline the request for the services. On the other hand, the provision of Personal Data which are not compulsorily required are entirely at your discretion.

#### **What Steps Are Taken to Safeguard the Security and Safety of Your Personal Data?**

8DGE SOLUTIONS is required under the Act to protect and safeguard your Personal Data by taking practical steps to implement security measures thereto, i.e. to protect your Personal Data from any loss, misuse, modification, unauthorized or accidental access or disclosure, alteration or destruction. 8DGE SOLUTIONS have assigned specific responsibilities to address privacy and security related matters to a dedicated team and do enforce our internal policies and guidelines through an appropriate selection of activities, including proactive and reactive risk management, training and assessments.

8DGE SOLUTIONS takes appropriate steps to address online security, risk of data loss and such other risks taking into consideration the risk represented by the processing and the nature of the data being protected. Further, 8DGE SOLUTIONS takes steps to limit access to our data bases containing Personal Data to authorized persons having the justified need to access such information.

### **How Long Do We Retain Your Personal Data?**

The Personal Data shall not be kept for longer than is necessary. The Personal Data will be retained in compliance with this Privacy Policy for the duration of your relationship with 8DGE SOLUTIONS as a GateKeeper Member and for such extended period as may be necessary to protect the interests of both parties as deemed necessary under any laws or relevant regulations.

8DGE SOLUTIONS shall destroy and/or permanently delete your Personal Data once it is no longer required for the purpose for which it was processed.

### **Your Rights**

#### **(1) The Right of Access Personal Data**

Subject to the provisions of the Act, you have the right to access your Personal Data and/or to correct your Personal Data with 8DGE SOLUTIONS should you believe that the Personal Data provided is incorrect, outdated, inaccurate or incomplete. You may access to your Personal Data at the contact particulars provided below.

8DGE SOLUTIONS requires you to enter a password to access your Personal Data, information stored in your GateKeeper Mobile App's personal profile.

[Disclaimer: No method of transmission over the Internet, or method of electronic storage, is 100% secure. Therefore, while we use reasonable efforts to protect your Personal Information, we cannot guarantee its absolute security.]

#### **(2) The Right to Correct Personal Data**

We assume that the Personal Data you provided are accurate, up-to-date and complete. You may request for the Personal Data provided to be deleted and/or corrected if the data is inaccurate, incomplete, misleading or not up-to-date at the contact particulars provided below.

The integrity of the Personal Data which is collected is a crucial element in the Act. 8DGE SOLUTIONS shall take reasonable steps to ensure that the Personal Data is accurate, complete, not misleading and kept up-to-date.

#### **(3) The Right to Withdraw Consent**

The consent which you have granted in respect of the processing of your Personal Data may be withdrawn any time by notice in writing to the contact particulars as provided below. 8DGE SOLUTIONS shall cease processing of your Personal Data upon receipt of your notice.

8DGE SOLUTIONS shall be required to obtain your explicit consent in the event that "Sensitive Personal Data" is being processed by 8DGE SOLUTIONS and "Sensitive Personal Data" shall include medical history, political opinions, religious beliefs and commission or alleged commission of any offence.

#### **(4) The Right to Prevent Processing for the Purposes of Direct Marketing**

8DGE SOLUTIONS shall process your Personal Data in strict adherence to the consent which you have granted in respect of the processing of your Personal Data. 8DGE SOLUTIONS will not process data for purposes of any direct marketing in which such consent has not been obtained from you.

Should you receive marketing materials from 8DGE SOLUTIONS via short messaging service (SMS), e-mails, telephone and/or by post and you wish to discontinue such receipt of marketing information, you may provide 8DGE SOLUTIONS with a "opt out" notice to remove/delete your Personal Data from 8DGE SOLUTIONS's database. Once an "opt out" notice has been received from you, 8DGE SOLUTIONS shall within a reasonable time remove/delete your Personal Data from our database.

Notwithstanding the above, you may not opt-out of communication or updates related to the Member's

T&C or this Privacy Policy, unless you choose to deactivate your use of GateKeeper Account.

(5) The Right to Prevent Processing which is likely to cause Damage or Distress

We reiterate that 8DGE SOLUTIONS shall process your Personal Data only where you have granted your consent for the processing of your Personal data for the above stated purposes only.

You have the absolute right to prevent the processing of your Personal Data where your consent has not been obtained for such specific purposes and such processing of your Personal Data will cause or is likely to cause substantial unwarranted damage or distress to you or another person.

#### **Change/Amendments to this Privacy Policy**

8DGE SOLUTIONS may from time to time change this Privacy Policy to reflect the changes in law or regulations stipulated by the relevant authority, our business policies, practices and procedures, and the evolving privacy rules. The updated version of the Privacy Policy will be posted on the GateKeeper Mobile App and the GateKeeper website. However, if the changes made are material, 8DGE SOLUTIONS will post a notice advising of such change at the beginning of this Privacy Policy and use reasonable means to communicate to you such change within twenty one (21) days from such change.

You may at any time make written enquiries about this Privacy Policy and/or to enforce any of the above stated rights by contacting 8DGE SOLUTIONS via post, telephone, or e-mail at:

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