

## **PRIVACY POLICY (ver1.0-March 2020)**

We, Sun Victory Sdn Bhd (Company No.: 199001002010 (193573-M)), our subsidiaries and associate companies (collectively, “Sun Victory” or “The Company”) respect your right to privacy and we respect all Personal Information you provide to us.

We are committed to protecting all Personal Information kept by us. Sun Victory is bound by the Personal Data Protection Act 2010 (“PDP Act”) and all other applicable law in Malaysia in respect of privacy protection which set out a number of principles concerning Personal Information and consumer protection in Malaysia.

For the purpose of this Privacy Policy:

**“Authorised Third Parties”** means Sun Victory’s bankers, professional advisors, agents, consultants, contractors, agents or third-party suppliers or service providers with whom Sun Victory enters into an agreement;

**“Sun Victory”, “we”, “us” or “our”** means collectively, Sun Victory Sdn Bhd, a company incorporated in Malaysia and having its registered office at Lot 8 & 8a, Level G1, Publika Shopping Gallery, No 1, Jalan Dutamas 1, Solaris Dutamas, 50480, Federal Territory of Kuala Lumpur, Malaysia.

**“Personal Information”** means any personal information relating to you that you have provided to Sun Victory or made available to Sun Victory;

**“Sensitive Personal Information”** comprises information as to your physical or mental health or condition, political opinions, religious beliefs or other beliefs of a similar nature, commission or alleged commission of any offence, or any other Personal Information designated as such; and

**“Services”** comprises any communications, information or other products or services provided by Sun Victory to you.

### **1. PERSONAL INFORMATION**

1.1 We may obtain your Personal Information from various sources.

1.2 The types of Personal Information we may obtain about you are:

- a) contact information;
- b) business contact information;
- c) username and password to access our Services;
- d) financial information;
- e) employment information;
- f) medical records;
- g) social media identifier; and
- h) other information (such as shopping behaviour and preferences, language preference, age, date of birth, gender and family status).

1.3. We may also obtain your Personal Information from publicly available information systems and reporting agencies in connection with our contract with you.

### **2. USE OF PERSONAL INFORMATION**

We require this information to understand your needs and provide you with a better service, and in particular for the following reasons:

- a) to communicate with you;
- b) to provide Services to you;
- c) to process your payment transactions;
- d) to respond to your inquiries;

- e) to administer your participation in contests;
- f) to conduct internal activities;
- g) to conduct market surveys and trend analysis;
- h) to provide you with information on products and services of Sun Victory;
- i) for other legitimate business activities of Sun Victory;
- j) for such other purposes in relation to your contract with Sun Victory or its associate companies;
- k) for customer loyalty, privilege, improvement, appreciation, recognition, benefits, rewards, rebates, discounts and other engagements programmes, marketing and promotional activities and such other strategic alliances.
- l) for marketing profiling activities regarding to Sun Victory or its associate companies' latest projects, products or services.
- m) to send out invitation for Sun Victory or its associate companies' present and future project launches, events and exhibitions.
- n) for processing of relevant documents for our projects and services.
- o) to send information, updates and corporate information by postage, email, text messages or social media about our products or services that Sun Victory think may interest you.
- p) to maintenance and upkeep of customer's records and data.
- q) for registration and maintenance of Sun Victory Vendor Listing System.
- r) to send out invitations for Sun Victory or its associate companies' present and future tendering/contracting exercises.

(collectively, "**Purposes**").

### **3. INFORMATION SHARING**

- 3.1 We do not sell or otherwise use, process, record, hold, store, share and disclose ("**process**") your Personal Information we collect about you, except as described in this Privacy Policy or otherwise disclosed to you at the time the Personal Information is collected.
- 3.2 We may need to share your Personal Information with Authorised Third Parties who perform services on our behalf. We do not authorise the Authorised Third Parties to use or disclose the information except as necessary to perform certain services on our behalf or comply with legal requirements. We require the Authorised Third Parties by contract to appropriately safeguard the privacy and security of Personal Information they process on our behalf.

### **4. PERSONAL INFORMATION PROTECTION PRINCIPLES**

- 4.1 We will process Personal Information provided to Sun Victory by you when you register or apply for or express an interest in our Services with your specific consent.
- 4.2 We may use your Personal Information for the Purposes.
- 4.3 If you are below the age of 18, you should ensure that you obtain the prior consent of your parents or legal guardian before using Sun Victory's Services.
- 4.4 Any individual who have provided his/her Personal Information prior to this Policy, may contact Sun Victory using the contact details set out below to know what types of Personal Information have been processed and the purpose for the processing.
- 4.5 Sun Victory will not process Personal Information without your prior written consent, except for the Purposes and where it is required or permitted under Malaysian law.
- 4.6 You will be given the opportunity to 'opt-out' of having your Personal Information used for purposes not directly related to the Services at the point where Sun Victory asks for information. If you do not wish to receive our promotional updates you may opt-out of receiving these communications by emailing us at [help@risedigital.my](mailto:help@risedigital.my). Please note that should you decide to "opt-out", we may not be able to provide you with certain Services and your subscription to or application for certain Services may be declined, denied or refused by Sun Victory.

- 4.7 Sun Victory will not sell or rent your Personal Information to third parties. Other than as provided in this Policy, Sun Victory will not disclose your Personal Information to any third party without your consent.
- 4.8 Sun Victory may from time to time, contact you on behalf of external business partners about particular goods, offers or services that may be of interest to you. In those cases, Personal Information that may identify you will not be transferred to the third party. All communication from Sun Victory will be sent to you by Sun Victory.
- 4.9 Sun Victory may, however, need to work with Authorised Third Parties for the Purposes or to provide part or all of Sun Victory's Services and/or other services to you or to perform market research and statistical analysis. In such situations, Sun Victory will share your Personal Information as is necessary for the Authorised Third Party to perform these services, on a strictly confidential basis. These parties are not allowed to process your Personal Information disclosed to them except for the limited purpose of providing the particular service for Sun Victory.
- 4.10 Sun Victory may use or disclose your Personal Information for accounting or reporting purposes, subject to the terms of this Privacy Policy.
- 4.11 It may be necessary to transfer your Personal Information to other entities or service providers located in countries outside Malaysia. This may happen where Sun Victory's servers or suppliers and service providers are based outside Malaysia or where you use the Services from countries outside Malaysia. In these instances, Sun Victory will take steps to ensure that your privacy rights are respected in accordance with this Policy.
- 4.12 Sun Victory has implemented security policies, rules and technical measures to protect your Personal Information from unauthorised access, improper use or disclosure, unauthorised modification, unlawful destruction or accidental loss. All our employees and data processors, who have access to and are associated with the processing of Personal Information, are obliged to respect the confidentiality of your Personal Information.
- 4.13 Personal Information that Sun Victory collects from you will be stored and backed up securely in a location which is accessible by Sun Victory's authorised personnel.
- 4.14 In discharging its responsibilities with respect to the confidentiality of Personal Information, Sun Victory will employ a number of safeguards, appropriate to the sensitivity of the information, to protect Personal Information against loss or theft, as well as unauthorized access, disclosure, copying, use, or modification. Such safeguards will include physical measures, organizational measures and technological measures, for example locked filing cabinets, restricted access to offices, security clearances and limiting access on a "need to know" basis and use of passwords and encryption. Procedures for implementing these measures will be communicated to Sun Victory's employees and third parties to ensure compliance with this principle.
- 4.15 Sun Victory will store your Personal Information as long as the purpose it was collected for remains valid and thereafter for a period of seven years or any other period of time required and/or permitted by Malaysian law.
- 4.16 Sun Victory takes all reasonable precautions to ensure that the Personal Information that we collect, use and disclose is accurate, complete and up-to-date. However, the accuracy of that information depends to a large extent on the information that you provide.
- 4.17 You have the right to access your Personal Information, subject to some exceptions allowed by law. If you would like to do so, please let us know. You may be required to put your request in writing for security reasons. We reserve the right to charge a fee for searching for and providing access to your information.
- 4.18 Sun Victory reserves the right to refuse to provide Sun Victory's visitors with a copy of their Personal Information by providing a written explanation for such refusal.

4.19 You can have access to your Personal Information that Sun Victory has in its possession or control and may request that your Personal Information be amended for purposes of accuracy and completeness.

4.20 You may at any time remove your personal details from our database or amend or correct your Personal Information. If you remove your Personal Information from our records, we will no longer be able to provide the Services to you.

## **5. SENSITIVE PERSONAL INFORMATION**

5.1 Where required under Malaysian law, Sun Victory will obtain consent from you before we process your Sensitive Personal Information.

5.2 Sun Victory will process Personal Information or Sensitive Personal Information without your consent only in those limited circumstances as permitted by Malaysian law.

## **6. SUN VICTORY'S HUB MALL APP**

6.1 When you use the hUb mall App, its web servers generally record anonymous information such as the time, date and URL of the request. This information assists Sun Victory to improve the structure of its websites and monitor their performance. From time to time Sun Victory may also use Authorised Third Parties to analyse this anonymous information.

6.2 As mandatory in the usage of the hUb mall App, Sun Victory may require standard information such as a Login ID, password, Personal Information for verification purposes, contact details and identification numbers. This information is necessary for Sun Victory to provide the services. You are required to maintain the secrecy of his/her Login ID and Password enabling him/her to access the hUb mall App. It is strongly stressed that Sun Victory will not be able to secure the Personal Data if you reveal your Login ID and Password to anyone.

## **7. IP ADDRESSES AND COOKIES**

7.1 Sun Victory also collects Internet Protocol (IP) addresses. IP addresses are assigned to computers on the internet to uniquely identify them within the global network. Sun Victory collects and manages IP addresses as part of the service of providing internet session management and for security purposes.

7.2 The usage of the hUb mall App may transmit to any customer's computer a "cookie". A cookie is a package of data that allows Sun Victory's server to identify and interact more effectively with the customer's computer having to spend time on identifying each customer user, thereby also providing additional login convenience. You may configure and personalize its current browser to refuse, reject or delete such cookies.

## **8. INTEREST BASED ADVERTISING**

Interest Based Advertising is a way of making advertisements more relevant to the customer based on Personal Information provided by the customer. In order to provide the customer with Interest Based Advertising, Sun Victory may collect information about a customer's activities and use that information to associate the customers with one or more pre-defined interest categories. Sun Victory may periodically provide you advertisements that are tailored to your interests.

## **9. CONTACTING SUN VICTORY**

You may submit your written request, between 9.00 am and 5.00 pm, Monday to Friday, if:

(a) you have any questions in relation to this Privacy Policy; or

- (b) for access to, or correction of, your Personal Information or limit the processing of your Personal Information upon payment of a prescribed fee as per Personal Data Protection (Fees) Regulations 2013;

by post or email as set out below:

**SUN VICTORY SDN BHD**

Level U6, Block C5

Solaris Dutamas

No.1 Jalan Dutamas 1

50480 Kuala Lumpur

Malaysia

Email : [help@risedigital.my](mailto:help@risedigital.my)

