

PRIVACY POLICY

PERSONAL DATA PROTECTION NOTIFICATION AND CONSENT

Pursuant to sections 7 and 6, respectively, of the Personal Data Protection Act 2010

1. Collection and Processing of Personal Data

We hereby inform you that we, Pocca Dot Media Sdn. Bhd. and each of our respective related corporations (as the term is defined in the Companies Act 1965), affiliates, and associated companies (hereinafter referred to as the "Company", "we", "our" or "us") (whether or not controlled by us) as data users (as the term is defined in the Personal Data Protection Act 2010) have or will collect, record, hold, store, use, disclose and/or process (collectively referred to as "Process") one, or all of the following categories of personal information about you:

- (a) master data: name, age, gender, date of birth, citizenship, NRIC No., nationality;
- (b) contact details: home address, home phone number and mobile number, email address, work address, work number;
- (c) compensation information: bank account details, credit card details, credit records; and
- (d) any such information as we deem necessary or appropriate from time to time in connection with your commercial relationship with us.
- (e) We may also process some or all of the following types of sensitive information about you in connection with your contractual relationship with us, including without limitation your health condition, your menstrual cycle and / or status, and the daily living activities of those in need of nursing care.

(collectively together with (a)-(d) above, "Personal Data"). To the extent that you wilfully and voluntarily disclose to us any personal information whether or not coming within the definition of Personal Data above of any individual, we shall assume, without independent verification, that you have obtained such individual's consent for the disclosure as well as the Processing of the same in accordance with the terms of this notification ("Notification").

2. Sources of Information

Your Personal Data has and / or will be obtained from the following sources, where applicable, or such other sources which we may see fit from time to time:

- (a) information provided or submitted by you through among others, registration forms pertaining to the use of our website;
- (b) information gathered through promotional activities;
- (c) as applicable, publicly available or publicly accessible information; and

- (d) such other written or verbal communications or documents delivered to us prior to and during the course of our contractual or pre-contractual dealings with you.

As the accuracy of your Personal Data depends largely on the information you provide to us, kindly inform us as soon as practicable if there are any errors in your Personal Data or if there have been any changes to your Personal Data.

3. Purpose of Processing Personal Data

We will Process the Personal Data that you have provided to us for the following purposes, including but not limited to (“Purpose”):

- (a) the delivery of notices, services or products to you;
- (b) in order for you to enter into the necessary agreement and/or contract to purchase the products/ services from/to us;
- (c) user or customer relationship management procedures;
- (d) for business contact purposes;
- (e) for the facilitation of transactions that you have or may have with us;
- (f) those purposes specifically provided for in any particular service or product offered by us;
- (g) credit assessments and other background checks of customers/suppliers as we may determine to be necessary or appropriate;
- (h) collection of outstanding payments from clients and/or customers/suppliers;
- (i) customer care and/or defect rectification works;
- (j) conducting marketing and client profiling activities in connection with our services and related products;
- (k) for research, benchmarking, and statistical analysis purposes;
- (l) to enable us and / or our selected authorised third parties to send you information by e-mail, telecommunication (telephone calls and text messages) or via social media concerning related and unrelated products and services offered by us and our business partners which may include but is not limited to the abovementioned purposes which we consider will or may interest you;
- (m) our internal record keeping;
- (n) the prevention of crime including but not limited to fraud, money-laundering, and bribery; and / or
- (o) meeting any legal or regulatory requirements relating to our provision of services and products and to make disclosure under the requirements of any applicable law, regulation, direction, court order, by-law, guideline, circular, code applicable to us or any of our member companies.

4. Storage and Security

We store your Personal Data in hard and soft copy. Soft copy data is stored on, amongst others, the file server, e-mail server, personal computers, notebooks, tapes and compact disc.

There are security policies and procedures in place which among others confines access to your Personal Data to authorised personnel only on a strictly need to know basis to the relevant department such as the administration, finance, sales and/or customer service, marketing and human resource departments of the Company.

We may retain the Personal Data and that of other individuals that you provide to us for a reasonable period in accordance with commercial requirements and at all times subject to prevailing legal requirements.

5. Disclosure

Personal Data provided to us will, generally, be kept confidential but you hereby consent and authorise us to provide and / or disclose your Personal Data to the following categories of parties:

- (a) any person to whom we are compelled or required to do so under law or in response to a legitimate instruction from a competent or government agency;
- (b) pursuant to an order of a court of competent jurisdiction;
- (c) any related companies and subsidiaries of Pocca Dot Media Sdn. Bhd., including those established in the future;
- (d) where applicable, third parties who provide related services or products in connection with our business;
- (e) government agencies, statutory authorities and industry regulators;
- (f) our auditors, consultants, accountants, lawyers or other financial or professional advisers; and / or
- (g) our sub-contractors or third party service or product providers as we may determine to be necessary or appropriate including without limitation, our mailing vendors, as well as vendors that carry out promotional operations on our behalf.

Please rest assured that consistent with the law, we will only disclose the minimum amount of information which we deem necessary for the purpose and that we will take all appropriate safeguards to ensure the integrity and security of the personal data.

6. Impact resulting from failure to supply and consent to the Processing of Personal Data

6.1 Except for Personal Data which is Processed for direct marketing purposes, it is obligatory for you to provide the categories of Personal Data which we request from you for the said Purpose. Failure to supply and consent to the Processing of the Personal Data in relation to the Purpose will:

- (a) result in us being unable to provide you with the information, notices, services and/or products requested; and
- (b) affect the ability of the parties to enter into the necessary agreement in relation to the provision of our services to you.

6.2 It is optional for you to provide the categories of Personal Data which we request from you for direct marketing purposes. However, failure to agree for us to Process your Personal Data for direct marketing purposes will result in us and / or our selected authorised third parties from becoming unable to send you information by e-mail, telecommunication means (telephone calls and text messages) or via social media concerning related and unrelated products and services offered by us and our affiliated business partners which we consider will or may interest you.

7. Your Rights of Access and Correction

You have the right to, subject to payment of the prescribed fees where applicable, request access to and/or correct your Personal Data and/or limit the Processing thereof. In this respect, you may:

- (a) check whether we hold or use your Personal Data and request access to such data;
- (b) request that we correct any of your Personal Data that is inaccurate, incomplete or out-of-date;
- (c) request that your Personal Data is retained by us only as long as necessary for the fulfilment of the purposes for which it was collected;
- (d) request that we specify or explain our policies and procedures in relation to Personal Data and the categories of Personal Data Processed by us;
- (e) withdraw, in full or in part, your consent given previously, in each case subject to any applicable legal restrictions, contractual conditions and a reasonable time period.

Please address all requests and / or questions or concerns which you may have regarding the subject matter and contents of this Notification to Finance Dept and Human Resource Dept, Tel: 03-77343683, Fax: 03- 78423045, Email: finance@poccadotmedia.com, hr@poccadotmedia.com