### **GENERAL**

This notice is issued to all vendors, suppliers, distributors, and/or service providers of Sedania Innovator Berhad which includes its subsidiaries and affiliate companies, existing presently and/or at a future date (hereinafter referred to as the "Company"), pursuant to the statutory requirements under the Personal Data Protection Act 2010 ("Act").

The Act regulates the collection processing and storage of all personal data which may occur during a commercial transaction. Under the context of the Act, 'commercial transactions' mean any transaction of a commercial nature, regardless of whether it is contractual and this may include the collection of personal data of potential customer.

We have developed this Privacy Policy to inform you how we collect, store, use, share, process and protect personal information about our consumers ("you"). It also tells you how you can access and update your personal information and make certain choices about how your personal information is used.

By using our websites, applications or by otherwise giving us your personal information you are accepting the practices described in this Privacy Policy. If you do not agree to this Privacy Policy, please do not use our websites or applications or give us any of your personal information. We reserve the right to make changes to this Privacy Policy at any time. Any changes will be posted in this Privacy Policy. We encourage you to regularly review this Privacy Policy to make sure you are aware of any changes and how your information may be used.

If you have any requests concerning your personal information or any queries with regard to this Privacy Policy please Contact Us.

# 1. DISCLOSURE OF YOUR PERSONAL INFORMATION

SEDANIA may share and transfer your personal information with our related companies anywhere in the world including our parent company and its subsidiaries (collectively our "Related Companies"), and Authorised Third Parties. However, before we forward personal data to these partner companies for processing on our behalf, each individual company undergoes an audit. All data recipients must meet the legal data protection requirements and undertake to protect your personal data to a comparable standard as required under applicable data protection laws.

## 2. ACCESS AND UPDATE OF YOUR PERSONAL INFORMATION

If you would like to access, update, correct or delete your personal information, you may contact us at and provide your name, account information, contact information and provide brief details of your request. We will use reasonable efforts to comply with your request to access, update or correct your personal information within 21 days of receiving your request and such request may be subject to a fee and will be bound by data protection laws in Malaysia.

Users may choose to not share any of your personal information with us. However, if you choose this option, you will be limited in the activities and features we can provide you provide you. If you do not want to receive communications and/or services from a SEDANIA website or brand, please do not opt-in for those communications or services at the time of registration. If you have opted-in and, at a later time, wish to opt-out, please visit the appropriate opt out section(s) on our website or application and amend your preferences. If any of the mechanisms set forth above is not available or you wish to make a different request or if you have any questions, complaints, or comments regarding this Privacy Policy or our information collection practices please let us have your written requests or queries at the following address:

## **Sedania Innovator Berhad**

Level 11, Kelana Parkview Tower, Jalan SS6/2 47301 Petaling Jaya, Selangor Darul Ehsan.

Tel: 03 7880 2001

#### 3. CHANGES TO THIS POLICY

SEDANIA may review and change this Policy from time to time to reflect changes in the law, our business practices, processes or structure. While it is not generally feasible to notify you of the changes to this Policy, the latest version of this Policy will be available on our website. This policy is not a contract, nor does it suggest any obligation on our part with another party.

### 4. **SECURITY**

SEDANIA has security measures in place to prevent the loss, misuse, and alteration of the information that we obtain from you, but we make no assurances about our ability to prevent any such loss to you or to any third party arising out of any such loss, misuse, or alteration.

## 5. WEBSITE AREAS BEYOND COMPANY'S CONTROL

From time-to-time, SEDANIA's may contain links to other websites. If you choose to visit those websites, it is important to understand our privacy practices and terms of use does not extend to those sites. It is your responsibility to review the privacy policies at those websites to confirm that you understand and agree with their practices.

# 6. COLLECTION OF PERSONAL INFORMATION

SEDANIA and/ or our related companies may collect, store, use and otherwise process your Personal Information during the course of our services only to the extent permitted by applicable law, including but not limited to your:

i. Personal contact information: Information that would allow us to contact you personally such as your name, home or mailing address, phone number or email address. In some cases it would include information you give us about someone else's (e.g. if you provide a friend's email address for a tell-a-friend programme);

- ii. Account login information: Your login credentials and password in accessing our website;
- iii. Demographic information (e.g. date of birth, age etc); Technical computer information (e.g. IP addresses, type of operating system, web browser type); Website Usage Information information about how you use or navigate our websites, applications, online advertisements including which links you click, which pages you view and for how long, and other similar information and /or statistics such as date and time of visit, which site you came from, favourite recipes and site activities);
- iv. Consumer feedback: This includes information that you create and voluntarily share with us (and perhaps others) by uploading it to one of our websites or applications, including on our social network sites such as but not limited to Facebook or Twitter;
- v. Social network information: This includes information that is part of your profile on a third party social network (such as but not limited to Facebook) and that you allow the third party social network to share with us;
- vi. Payment information including your credit card details, billing name and address (for example when you buy Sedania product online);
- vii. Other information which we might need to collect for a specific Sedania contest, event or campaign, form, feature or other service that you use or request; Sensitive personal information This includes information about your physical or mental health or your medical condition and your religious beliefs which was gathered with your explicit consent at the point of collection.

# 7. PURPOSE OF COLLECTION OF PERSONAL INFORMATION

Your personal information will be used for the purposes set out as follows:-

- i. Account maintenance;
- ii. To conduct consumer insight studies;
- iii. Customer service;
- iv. Product improvement and customization;
- v. Consumer engagement;
- vi. Contests and other promotion;
- vii. Marketing communication;
- viii. Third party social networking, which may be integrated in our sites or applications for the purposes of running contests, allowing you to share content with friends and etc;
- ix. Website improvement and personalization;
- x. Website community features such as sharing pictures, videos, artwork or other messages or content;
- xi. Website viral features, which allow you to easily share certain news, product information, promotions, wish list items, or other content with family members and friends (typically using names and email addresses);
- xii. Other general purposes (e.g. website security, internal research, etc)

By using any of the features and services described in Question 1 above, you consent to our collection, use and disclosure (as the case may be) of your personal information as set out in this Privacy Policy.

Please note that the purposes above will be vary according to each user/ customer

## 8. SHARING OF PERSONAL INFORMATION

SEDANIA never give your data to unauthorized third parties. However, to run our business efficiently, SEDANIA may share and transfer your personal information with our related companies anywhere in the world including our parent company and its subsidiaries (collectively our "Related Companies"), and Authorised Third Parties. However, before we forward personal data to these partner companies for processing on our behalf, each individual company undergoes an audit. All data recipients must meet the legal data protection requirements and undertake to protect your personal data to a comparable standard as required under applicable data protection laws.

#### 9. DURATION OF PERSONAL INFORMATION STORAGE

SEDANIA may store the personal information that you send to us in its separate databases. Your personal information will be kept by the SEDANIA only for as long as is reasonably necessary taking into consideration our need to answer queries or resolve problems, provide improved and new services and comply with legal requirements under applicable law(s). This means that we may retain your personal information for a reasonable period after you stop using SEDANIA services or stop using SEDANIA websites. After this period, your personal information will be deleted from all systems in the SEDANIA.

We may keep aggregated demographic or survey information to be used internally, but this information is in anonymous form and does not contain any personal information. The aggregate information that we share may include anonymous information that is captured through the use of cookies and other. We remind you that you have a right to have your personal information deleted at any time.

#### 10. PERSONAL DATA FROM MINORS

We recommend that users under the age of 18 seek your parents/guardians consent when accessing our website.

# 11. PERSONAL INFORMARION COLLECTED THROUGH SURVEYS/ CONTESTS CONDUCTED BY SEDANIA

From time to time, we may ask our website visitors or customers or participants in any of our campaigns, contests or other promotional event to answer survey questions. Surveys generally will relate to the content of our websites, our products or categories of products. We may ask for age or age ranges, gender, and/or other non-personally identifiable information. For the purposes of these surveys, we may add information obtained from Tracking Technologies (for online surveys) deployed to your survey answers but no personally identifiable information will be requested. Personal information gathered from polls and surveys are for Sedania internal use only but aggregated (and non-personally identifiable) information may be shared with others.