

Privacy Policy

Introduction

We, **Rexbridge Sdn. Bhd.** (Company Registration No.: 1106802-H), are committed to protecting your privacy in line with Malaysia's Personal Data Protection Act 2010. We will use our best efforts to ensure that the information you submit to us remains private and is used only for the purpose(s) set forth herein.

This Privacy Policy outlines how we collect, store, use, share, process and protect personal data when individuals access or use our portal ("**Portal**"), all related websites, mobile applications, services and/or tools (collectively, our "**Service**"), or interact with us. This Privacy Policy also details how individuals can access and update their personal data and make certain choices about how their personal data is used.

By accessing or using our Service, you accept the practices and terms described in this Privacy Policy. If you do not agree to this Privacy Policy, please do not use our Service or give us any of your personal data.

Collection of Personal Data

In the course of your dealings with us, we may request that you provide information about yourself or any other person ("**Personal Data**") for the purpose(s) stated in this Privacy Policy. We collect only personally identifiable information that is specifically and voluntarily provided by you.

In your communicating with us or by continuing to access or use our Service, we may collect certain data including but not limited to your name, email address, Internet Protocol (IP) address, website or mobile application usage information, information collected through the use of cookies, preferences such as preferred mode of communication, and other information permitted by applicable law.

To access or use our Service, you may provide your location information for some functions and features that utilize geolocation data for your convenience and to improve your user experience. In cases where we collect or use your geolocation data or any other Personal Data in the course of providing any additional service, we are not required to provide you with any notice or obtain your prior consent unless the applicable laws otherwise provided.

If you provide us Personal Data about another person, you confirm that the other person has appointed you to act on his/her behalf and has agreed that you can:-

- give consent on his/her behalf to the processing of his/her Personal Data;
- receive on his/her behalf any data protection notices; and
- warrant that you have obtained his/her consent for us to store his/her Personal Data or have the right to allow us to process his/her Personal Data.

Cookies and Other Tracking Technologies

Cookies (small text files placed on your device) and similar technologies may be used on some pages of the Portal to enable us to streamline your experience of using the Portal, to enable effective provision of our Service, and to help collect usage and performance data. Cookies allow us to help us recognise when you return, store your preferences and settings, enable you to sign-in, combat fraud, and analyse how the Portal is performing.

We may also use small pieces of code called “web beacons” or “clear GIFs” to collect anonymous and aggregate advertising metrics such as counting page views, promotion views, or advertising responses. A web beacon is an electronic image called a single-pixel or clear GIF. Web beacons can recognise certain types of information, such as a user’s cookie number, time and date of a page view, and description of the page where the web beacon is placed. These web beacons may be used to deliver cookies that conform to our cookies policy. Such cookies, web beacons and clear GIFs may come from third parties.

We may further use cookies for the following purposes:-

- Security enhancement of our systems;
- Storage of your preferences and providing customised services to you; and
- Helping us understand how people use these services and improving them.

You may choose to accept or refuse the use of cookies including cookies associated with the Portal, or to indicate when a cookie is being set by us. You may refuse the use of cookies by selecting the appropriate settings on your browser, however, you may not be able to use the full functionality of the Portal. After termination of the visit to the Portal, you can always delete the cookie from your system if you wish.

Cookies and other tracking technologies may also be used to support analytics by other third parties.

By continuing to use our Service, you consent to our use of cookies and similar technologies in accordance with this Privacy Policy.

Source of Personal Data

The Personal Data collected, used and processed by us are sourced from wholly legitimate and transparent means including but not limited to:-

- your access or use of our Service;
- any emails or correspondences that we have received from you requesting for information or making any inquiries;
- during conversations between you and our representatives;
- any applications or forms that you have submitted on the Portal;
- customer surveys or promotional events;
- authorised third parties, including but not limited to credit reporting agencies, regulatory and enforcement agencies, and other government entities;
- contractors and business partners; and
- mailing lists.

Purpose of Collection of Personal Data

We may collect, use and process Personal Data which shall include but not limited to the following purposes:-

- to administer your Account;
- to enable us to provide, facilitate, perform, personalise and improve our Service to meet your current and future needs;
- to help us understand and develop a customised user experience based on your preferences, behaviour, and activities;
- to contact and communicate with you;
- to respond to your enquiries, and to provide customer support;
- to resolve disputes or to investigate any complaints you made or made against you;
- to prevent, detect or investigate any potential breaches, illegal activities or prohibited content on our Service;
- to monitor and analyse your use of our Service;
- to research, evaluate and develop our Service;
- for general operation and maintenance of our Service and/or the Portal;
- to promote or communicate information, updates, and news about our Service or new services of ours, our subsidiaries and third parties, and such communications may be initiated from us or through third parties;
- to be used in, to provide and/or to improve our Service, market surveys, processing invoices and payment, and client profiling activities regarding our Service;
- for internal functions such as evaluating the effectiveness of marketing, market research, statistical analysis and modelling, reporting, audit, and risk management;
- to develop, show, measure, and track advertising (including but not limited to content, survey, and promotions of our Service or new services of ours, our subsidiaries and third parties), and to collect information about you and on how you interact with it while you use our Service;
- to maintain our operations or client relationship management systems;
- to enforce and exercise rights stated in this Privacy Policy or the Terms of Use;
- to maintain and upkeep customer or company records and development in the ordinary course of business;
- for our internal record keeping;
- for prevention and detection of crime;
- to conduct client due diligence, to verify your identity, to monitor, detect and deter unauthorised or fraudulent use or abuse of our Service;
- for the preparation and execution of all necessary documents, agreements and/or contracts for our Service;
- those purposes specifically provided for in any particular service offered by us; and
- to meet any legal or regulatory requirements relating to all the commercial transactions, our conduct of the business or activities or our provision of services, and to make disclosure under the requirements of any applicable law, regulation, direction, court order, by laws, guideline, circular, code applicable to us or any member of our group of companies from time to time.

Consequences of Refusal or Failure to Provide Personal Data

Unless stated otherwise, the Personal Data provided to us are wholly voluntary in nature and you are not under any obligation or duress to do so. However, in some circumstances if you

do not provide us with the Personal Data described in this Privacy Policy, we shall not be held liable for any of the consequences arising therefrom:-

- the inability for us to provide you with the products or services you requested, either to the same standard, or at all;
- the inability for us to provide you with information about products and services that you may want, including information about discount sales or special promotions, or our new products or services;
- the inability for us to tailor the content of the Portal to your preferences and your experience of the Portal may not be as enjoyable or useful;
- the inability to complete commercial transactions in relation to our Service; and
- the inability to comply with any applicable law, regulation, direction, court order, by laws, guidelines and/or codes applicable to us.

Disclosure of Personal Data

In order for us to fulfil the purposes listed above, the Personal Data may be disclosed to the following, but not limited to, classes of parties:-

- other users of the Portal, including, but not limited to, the Buyers and Suppliers;
- any persons, government agencies, statutory authorities and/or industry regulators whom we are compelled or required to do so pursuant to any law, or if we have good faith belief that such disclosure is necessary to protect and/or defend our rights and interests or in connection with an investigation of fraud, infringement, piracy, tax avoidance and evasion or other unlawful activity;
- any of our holding, subsidiary or related companies, including those incorporated in the future, and/or any member of our group of companies;
- our existing or potential business partners and affiliates that provide related services or products in connection with our business;
- our auditors, consultants, lawyers, accountants or other financial or professional advisers appointed in connection with our business;
- our employees, partnerships, joint venture entities, contractors or third-party service providers, third party management companies, subcontractors or other parties as may be deemed necessary by us to facilitate your dealings with us;
- third parties (including those overseas) who provide data processing services or payment gateway services; and
- any person who is under a duty of confidentiality to which he/she has undertaken to keep such data confidential which we have engaged to fulfil our obligations to you.

Third parties are legally tasked with processing the Personal Data in line with the principles specified by us. Third parties are also held legally responsible for securing the Personal Data at an appropriate level of security in relation to applicable data protection laws and widely accepted industry standards.

If we or our business is acquired by another entity or merged with another entity or there is a proposed acquisition or merger, the Personal Data may be transferred to such entity as part of the proposed or actual merger or acquisition.

Protection of Personal Data

We ensure that all appropriate confidentiality obligations and technical and organisational security measures are in place to protect the confidentiality and security of the Personal Data collected through the various methods described in this Privacy Policy to prevent any unauthorised access, unauthorised or unlawful alteration, disclosure or processing of such information and data, and the accidental loss or destruction of or damage to such information and data. These efforts include but are not limited to:-

- storing the Personal Data in systems that are protected by secure networks and secure operating environments that are not available to the public and are only accessible by our employees for the purpose of performing their official duties, and authorised third parties who are contractually bound to take reasonable measures to keep the Personal Data secure;
- regularly monitoring our systems for possible vulnerabilities and attacks and regularly review our information collection, storage and processing practices to update our physical, technical and organizational security measures; and
- verifying the identities of users before they can access the Personal Data we maintain about them.

Compliance with these provisions will be required by all authorised third parties who may access the Personal Data as described above.

Choices to Limit Processing of Personal Data

You have the right to limit in part, or wholly, any of the processes by which the Personal Data is subjected to in terms of the operations allowed to be performed upon it, the period of time allowed, or alternatively, the deadline of the consent given.

The responsibility for compliance rests with us, who determines the purposes and means of processing of the Personal Data.

You shall notify us in writing to request the Personal Data to be retained by us so long as it is necessary for the fulfilment of the purposes for which it was collected only or inform us your objection to the use of the Personal Data for marketing purposes whereupon we will not use the Personal Data for such purpose. You may withdraw, in full or in part, your consent given below. Your withdrawal in each case is subject to any applicable legal restrictions, contractual conditions, and a reasonable time period. Your withdrawal may also be subject to whether it would affect the operation of our business.

Your Rights

In respect of the Personal Data which you have submitted to us, you have the right at any time to:-

- request for access to the Personal Data in our records;
- request to make correction of the Personal Data in our records in the event the information is inaccurate, misleading, out-of-date or incomplete upon validation and verification of the new information provided;
- request to cease processing the Personal Data for the purposes of marketing;

- object to the processing of the Personal Data, ask us to restrict or limit processing of the Personal Data or request portability of the Personal Data;
- withdraw your consent for us to continue processing the Personal Data; and
- complain to a data protection authority about our collection and use of the Personal Data. For more information, please contact your local data protection authority.

In respect of requests for access to or to make correction of the Personal Data in our records, such requests must be made in writing and supported with submission of the relevant documents as required by us in person from time to time to the following address listed below. We will only make appropriate corrections based on the updated information provided by you. When requested and practical, we will delete identifying information from our current operation systems. Your request may also be subject to payment of a fee in accordance with applicable legal requirements.

Editing or Deleting Personal Data

You may request for deletion of the Personal Data by us, and we will use commercially reasonable efforts to honour your request. However, please note that we may be required to keep such information and not delete it (or to keep this information for a certain time, in which case we will comply with your deletion request only after we have fulfilled such requirements). When we delete any information, it will be deleted from the active database but may remain in our archives. We may also retain your information for fraud or similar purposes.

To provide our Service, we may process and store your information on servers located in Malaysia or other jurisdictions where we deem it appropriate or desirable unless the applicable law otherwise provided. There may be a possibility that the data protection level in other jurisdictions do not completely meet the requirements of data protection law in your country or region, but all such transfers are performed in accordance with the requirements of applicable law.

We may retain the Personal Data while your Account remains active and for a period necessary to fulfil any of the applicable purposes of use described in this Privacy Policy or to comply with any applicable laws and regulations.

Further, we may retain the Personal Data following the closure or termination of your account if retention is reasonable and necessary to:-

- comply with applicable laws, regulations or legal obligations;
- provide and complete customer support service;
- resolve disputes between or with our users; or
- detect and deter unauthorised or fraudulent use of or abuse of our Service.

Retention of Personal Data

The Personal Data you submit to us will only be retained for as long as is required for the purpose(s) for which it was collected or as permitted by applicable law.

In practice, we delete or anonymize the Personal Data upon deletion of your Account, unless:-

- we must keep it to comply with applicable law;
- we must keep it to evidence our compliance with applicable law;
- there is an outstanding issue, claim or dispute requiring us to keep the relevant information until it is resolved; or
- the information must be kept for our legitimate business interests, such as fraud prevention and enhancing users' safety and security.

Even though our systems are designed to carry out data deletion processes according to the above guidelines, we cannot promise that all data will be deleted within a specific timeframe due to technical constraints.

Opting Out and Unsubscribe

If you change your mind at any time about receiving information from us, you can contact us in writing to us. Please be aware that once we have received your request to unsubscribe, it may take up to fourteen (14) working days for us to process your request and to be reflected in our systems. Therefore, you may still receive marketing materials/communication during this period of time.

Language

In the event of any conflict between the English and Bahasa Malaysia versions of this Privacy Policy, the English version shall prevail.

Changes to Privacy Policy

We shall have the right to modify, update or amend the terms of this Privacy Policy at any time. Should this Privacy Policy change, we will take reasonable steps to ensure that these changes are brought to your attention by posting all changes prominently on the Portal for a reasonable period of time. We encourage you to regularly review this Privacy Policy to make sure you are aware of any such changes and how these may affect you. Continued access or usage of our Service and/or the Portal following posting of such changes shall indicate your acknowledgement of such changes and agreement to be bound by the terms of such changes. If you do not agree, you should immediately discontinue your use of our Service.

Contact Us

If you have feedback, comments or questions about this Privacy Policy, or would like to access, correct, amend or delete the Personal Data we have, please contact us at:-

Contact: **[Xbridge Support Team]**
Rexbridge Sdn. Bhd.
16-05-V01,
Tower B, Vertical Business Suite II,
Bangsar South City,
No. 8, Jalan Kerinchi,
59200 Kuala Lumpur.

Email: **[support@xbridge.my]**

Tel No.: [+6017-745-1185 / +6017-715-9340]

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