

PRIVACY POLICY

1. Introduction

ETESHA SDN BHD (Company No.: 1293437-A)(“**Company**”) respects the privacy of individuals with regard to personal data and is committed to protecting the privacy of its users, and strives to provide a safe, secure user experience. The Company places great importance and/or priority on data security and data protection. Protecting personal rights is integral to the Company's corporate culture and built into the Company's services and products. Hence, the Company continuously works to improve data security measures to protect you and your privacy.

This privacy policy is formulated in accordance with the Personal Data Protection Act 2010 (“**Act**”), which describes how your information is collected, used, processed and your choices with respect to your Personal Data (“**this Policy**”). The following discloses the Company's information gathering and dissemination practices for the Website (“**the Site**”).

2. Collection of Information

2.1 “Personal Data” means information about you, from which you are identifiable, including but not limited to your name, identification card number, birth certificate number, passport number, nationality, address, telephone number, fax number, bank details, credit card details, race, gender, date of birth, marital status, resident status, email address, your occupation, the industry in which you work in, any information about you which you have provided to the Company in registration forms, application forms or any other similar forms, personal photographs, personal videos and/or any information about you that has been or may be collected, stored, used and processed by the Company from time to time and includes sensitive personal data such as data relating to health, religious or other similar beliefs (“**Personal Data**”).

2.2 The provision of your Personal Data is voluntary. However if you do not provide the Company with your Personal Data, the Company will not be able to process your Personal Data for the Purposes and Additional Purposes outlined below.

2.3 If you are an agent, vendor, supplier, or independent contractor (“**IC**”), provision of your Personal Data is mandatory and failure to provide your Personal Data, may be a breach of laws or regulatory requirements, and may cause the Company to be unable to engage you to provide services or products or issue payments to you for products or services provided.

3. Purpose of Processing Personal Data

3.1 The Company may use and process your Personal Data for business and activities of the Company which shall include, without limitation the following ("**Purpose**"):-

3.2 If you are a Client for the services provided by the Company and/or such services envisaged under the Site:-

- a. to perform the Company's obligations in respect of any contract entered into with you;
- b. to facilitate and/or provide you with any service you have requested as envisaged under the Site;
- c. to perform our services to you;
- d. to process your subscriptions or requests and to deliver and/or facilitate the services to you;
- e. where you have requested to download and use the Site, to process your request, to deliver the Site to you and to provide you a license for the use of the Site;
- f. to process your participation in any events, activities, focus groups, research studies, contests, promotions, polls, surveys or any productions;
- g. to process, manage or verify your application for subscription with the Company and to provide you the benefits offered to subscribers;
- h. to validate your bookings and process payments relating to any products or services you have requested;
- i. to process cancellations and/or refunds for the services that have not been rendered to you, where applicable, subject to other specific terms and conditions for the services;
- j. to understand and analyses our sales as well as your needs and preferences to improve the Company's services to you;
- k. to develop, enhance and provide products and services to meet your needs;
- l. to contact you for product or customer satisfaction surveys and market research; and
- m. for all other purposes ancillary to any of the purposes stated above.

3.3 Where you are an agent, vendor, supplier, partner, contractor, IC:-

- a. for the purposes of engaging you to provide services or products;
- b. to facilitate or enable any checks as may be required by the Company in order to engage you;
- c. to contact you in respect of job offers, job training and any additional works relating to the performance of a job;
- d. to process payments relating to any products or services rendered by you; and
- e. to monitor the services or products rendered by you; and

f. to contact you.

3.4 The Company may also use and process your Personal Data for some additional purposes (“**Additional Purposes**”):-

- a. to send you alerts, newsletters, updates, mailers, promotional materials, special privileges, festive greetings from the Company, its partners, suppliers, vendors, sponsors or advertisers;
- b. to notify and invite you to events or activities organized by the Company, its partners, suppliers, vendors, sponsors or advertisers;
- c. to process your registration to participate in or attend an event or activity and to communicate with you regarding your attendance at the event or activity;
- d. to share your Personal Data amongst its subsidiaries, associate companies and jointly controlled entities as well as with its agent, vendor, supplier, partner, contractor or service provider who may communicate with you to market their products, services, events or promotions.

by way of post, telephone call, short message service (SMS), by hand and/or by email.

3.5 Other general purposes:-

- a. to respond to questions, comments and feedback from you;
- b. to communicate with you for any of the purposes listed in this Policy;
- c. for internal administrative purposes, such as auditing, data analysis, database records;
- d. for purposes of detection, prevention and prosecution of crime; and
- e. for the Company to comply with its obligations under law;

4. Revocation of Consent

If you wish to revoke the consent that the Company has obtained from you for the Purposes or Additional Purposes stipulated herein, please notify the Company using the contact details stated below.

5. Use and Disclosure to Third Party

5.1 Your personal data may be transferred, accessed or disclosed to third parties for the Purposes and Additional Purposes listed above. You acknowledge that the IC shall perform the service to you and consequently the Company shall provide access or disclose your Personal Data to such IC and/or third parties. The third parties include, without limitation:

- a. the ICs that are assigned by the Company to perform services to you;

- b. the Company's partners, which include parties with whom the Company collaborates with for certain services, products, events, programs and activities;
- c. event management companies and event sponsors;
- d. marketing research companies;
- e. other service providers, including, information technology (IT) service providers for infrastructure, software and development work;
- f. professional advisors and external auditors, including legal advisors, financial advisors and consultants;
- g. other entities within the Company; and
- h. governmental authorities to comply with statutory, regulatory and governmental requirements.

5.2 Your Personal Data may also be shared in connection with a corporate transaction, such as a sale of a subsidiary or a division, merger, consolidation, or asset sale, or in the unlikely event of winding-up.

6. Accessing, Limiting, Correcting and Updating Your Personal Data

6.1 Subject to any exceptions under applicable laws of Malaysia, you may request for access to and/or request correction of your Personal Data, request to limit the processing of your Personal Data for the Additional Purposes and/or make any inquiries regarding your Personal Data by contacting:

ETESHA SDN BHD
2-20, Jalan 1/152,
Taman Perindustrian Oug,
58200 Kuala Lumpur

Email: hello@etesha.com

6.2 Subject to any laws of Malaysia, the Company reserves the right to impose a fee for access of your Personal Data in the amounts as permitted therein.

6.3 In respect of your right to access and/or correct your Personal Data, the Company has the right to refuse the your requests to access and/or make any correction to your Personal Data for the reasons permitted under law, such as where the expense of providing access to you is disproportionate to the risks to your or another person's privacy.

7. Links to Third Party Website

The Site may occasionally contain links to third parties' websites. Please note that Company is not responsible for the collection, use, maintenance, sharing, or

disclosure of data and information by such third parties. If you provide information directly to such sites, the privacy policy and terms of service on those sites are applicable and the Company is not responsible for the information processing practices or privacy policies of such sites.

8. Retention of Personal Data

8.1 We will not retain your personal data longer than necessary for the fulfilment of the Purposes or Additional Purposes contained herein. However, relevant Personal Data may be retained subject to the conditions below:

- a. as and when required under any applicable laws or legislation of Malaysia;
- b. where legal actions have arisen and are pending; and
- c. for commercial and/or operational purpose of the Company.

8.2 The Company shall take all reasonable steps to ensure that all Personal Data is destroyed or permanently deleted when no longer required for the Purpose and Additional Purpose.

9. Personal Data from Minor or Other Individuals

9.1 As a parent or legal guardian, please do not allow the minor (individuals under 18 (eighteen) years of age) under your care to submit Personal Data to the Company. In the event that such Personal Data is provided to the Company, you hereby consent to the processing of the minor's Personal Data and personally accept and agree to be bound by this Policy and take responsibility for his or her actions.

9.2 In some circumstances you may have provided personal data relating to other individuals (such as your spouse, family members or friends) and in such circumstances you represent and warrant that you are authorized to provide their personal data to the Company and that you have obtained their consent for their personal data be processed and used in the manner as set forth in this Policy.

10. Acknowledgment and Consent

10.1 By communicating with the Company, using the Company's services, purchasing products from the Company or by virtue of your engagement with the Company, you acknowledge that you have read and understood this

Policy and agree and consent to the use, processing and transfer of your Personal Data by the Company as described in this Policy.

10.2 The Company shall have the right to modify, update or amend the terms of this Policy at any time by placing the updated version of this Policy on the Site. By continuing to communicate with the Company by continuing to use the Site, the Company's services, purchasing products from the Company or by your continued engagement with the Company following the modifications, updates or amendments to this Policy, such actions shall signify your acceptance of such modifications, updates or amendments.

11. Confidentiality

11.1 Personal Data held by us will be kept confidential in accordance with this Policy pursuant to any applicable law that may from time to time be in force.

11.2 Any questions, comments, suggestions or information other than Personal Data sent or posted to this Site or any part of the this Site by users will be deemed voluntarily provided to us on a non-confidential and non-proprietary basis. We shall reserve the right to use, reproduce, disclose, transmit, publish, broadcast and/or post elsewhere such information freely.

12. Security

12.1 This Site and/or the site has security measures in place to protect the loss, misuse and alteration of the information under the Company's control. When a user is asked to provide his/her credit card information, the Company take reasonable and necessary steps to provide a secure environment for this purpose.

12.2 For the internet, no data transmission over the internet can be guaranteed as completely secure. So while the Company strives to protect such Personal Data, the Company cannot ensure or warrant the security of any Personal Data transmitted to the Company and individuals do so at their own risk. Once any Personal Data comes into the Company's possession, the Company will take reasonable steps to protect that information from misuse and loss and from unauthorised access, modification or disclosure.

12.3 A username and password may be essential for you to use some sections of this Site. For your own protection, we require you to keep these confidential and to change your password regularly.

Thank you.