

Effective 1 April 2022

Our commitment to your privacy

"Herepay", "Us" or "We" in this Privacy Policy refers to Herepay Sdn Bhd (Registration No.: Registration No. 202201009943 (1455640-T)).

"You" or "Your" means an organization using Herepay Services that is verified by Herepay and extends to any individual whose personal data has been provided to Herepay.

This Privacy Policy outlines how Herepay collects, uses, maintains and discloses your personal data in respect of commercial transactions and how Herepay safeguards the personal data.

Your consent is important

You agree that by registering a Herepay Account with us and/or using Herepay Services, you have authorized and consented to your data being disclosed to and/or processed by such third parties as may be necessary for our providing the Herepay Services services to you.

Your personal data may have otherwise been provided to Herepay by a third party for Herepay Services that these third parties have sought from Herepay.

You have the choice, at any time, not to provide your personal data/sensitive personal data or to revoke your consent to Herepay processing your personal data/sensitive personal data. However, failure to provide such personal data/sensitive personal data or revocation of your consent for us to process personal data/sensitive personal data provided may result in Herepay not being able to effectively and continuously provide you with Herepay Services.

What types of personal data do we collect?

Personal data refers to any information that relates directly or indirectly to an individual, who is identified or identifiable from that information or from that and other information in the possession of Herepay, including any sensitive personal data and expression of opinion about the individual.

The types of personal data we collect may include but are not limited to your name, address, other contact details, age, occupation, and marital status. We also collect financial information such as your income, or income tax particulars, your identity card or passport, place of birth, credit history and transaction history.

The personal data we collect can be either obligatory or voluntary. Obligatory personal data are those that we require to provide you with Herepay Services. If you do not provide us with obligatory personal data, we would not be able to provide you with Herepay Services. Voluntary personal data are those that are not mandatory for us to provide you with Herepay Services. If you do not provide us with voluntary personal data, you can still sign up for Herepay Services. Obligatory and voluntary personal data differ for each Herepay Service and shall be indicated in the application forms.

How do we collect your personal data?

We obtain your personal data in various ways, such as:

- When you sign up at Herepay Website.
- When you contact Herepay through various methods such as application forms, emails and letters, and telephone calls. If you contact us or we contact you using telephone, we may monitor or record the phone call for quality assurance, training and security purposes.
- From our analysis of your transactions.
- When you participate in customer surveys or when you sign up for any of our competitions or promotions.
- When we obtain any data and information from third parties.

- When you enter into any commercial transactions with Herepay including but not limited to your providing goods and/or services or your professional services;
- From publicly available sources.

IP Address

An IP address is a number that is automatically assigned to your computer when you signed up with an Internet service provider. When you visit our website, your IP address is automatically logged into our server. We use your IP address to help diagnose problems with our server and to administer our website. From your IP address, we may identify the general geographic area from which you are accessing our website. Generally, we do not link your IP address to anything that can enable us to identify you unless it is required by law and regulation.

Information on Cookies

A cookie is an element of data that a website can send to your browser, which may then be stored in your computer system. We use cookies on some of our pages to store visitors' preferences and record session information. The information that we collect is then used to ensure a more personalised service level for our users. You can adjust settings on your browser so that you shall be notified when you receive a cookie. Please refer to your browser documentation to check if cookies have been enabled on your computer or to request not to receive cookies.

Digital Analytics Tools

We may use other digital analytics tools to process and analyse common attributes associated with your use of our website and/or services. We may use this information for various reasons, including to provide you with better customer support services, and also to present targeted or tailored marketing campaigns or content to you. In the process, we may also collect "aggregate data," that is, group data with no personal identifiers. We use this aggregate data to help us understand how the

website and/or services are being used and to improve its usability. We also use it to enhance the quality and availability of Herepay Services we offer.

What is the purpose of processing your personal data?

We may process your personal data for the following reasons:

- To send bills and receipts.
- To assess your application for any of Herepay Services.
- To verify your financial standing through credit reference checks.
- To manage and maintain your account and facility.
- To evaluate your financial needs and to continue performing the contractual obligations entered into between Herepay and you.
- To respond to your enquiries and complaints and to resolve disputes.
- For internal functions such as evaluating the effectiveness of marketing, market research, statistical analysis and modelling, reporting, audit and risk management and to prevent fraud.
- To fulfill any regulatory requirements and for any other reasons connected with providing you with the services you require and fulfillment of any commercial transactions entered into by you with Herepay.

Marketing communications

From time to time, we may share your personal data with other entities within Herepay, our agents or strategic partners and other third parties ("other entities") as Herepay deems fit and you may receive marketing communication from us or from these other entities about products and services that may be of interest to you. If you no longer wish to receive these marketing communications, please notify us to withdraw your consent and we shall stop processing and sharing your personal data with these other entities to send you marketing communications.

You have a choice whether to withdraw your consent from receiving marketing or promotional materials/communication. You may contact us using the contact details found below. Please be aware that once we receive confirmation that you wish to withdraw your consent for marketing or

promotional materials/communication, it may take up to fourteen (14) working days for your withdrawal to be reflected in our systems.

Therefore, you may still receive marketing or promotional materials/communication during this period of time. Please note that even if you opt-out from receiving marketing or promotional materials, Herepay may still contact you for other purposes in relation to the accounts, facilities or services that you hold or have subscribed to with Herepay.

Links to other websites

Herepay Website or services may contain links to third-party websites and services. We have no control over how third-party websites and services process your personal information. We do not review third-party websites and services, and we are not responsible for such third-party websites and services or their privacy practices. You are encouraged to read the privacy policies of any third-party websites or services that you access from our websites or services.

To whom do we disclose your personal data?

Your personal data held by us shall be kept confidential. However, to provide you with effective and continuous Herepay Services and to comply with any legal and regulatory requirements, we may need to disclose your personal data to:

- Other entities within Herepay.
- Credit reference agencies.
- Our agents and service providers with whom we have contractual agreements for some of our functions, services and activities including business partners and research/analytics providers.
- Financial service providers.
- Our merchants and strategic partners.
- Parties authorised by you.

- Enforcement regulatory and governmental agencies as permitted or required by law, authorised by any order of the court or to meet obligations to regulatory authorities.

The disclosure of your data may involve the transfer of your personal data to places outside of Malaysia, and by providing us with your personal data, you agree to such a transfer where it is required to provide you with the services you have requested, and for the performance of any contractual obligations you have with Herepay including for storage purposes.

How do we protect your data?

The security of your personal data is our priority. Herepay takes all physical, technical and organisational measures needed to ensure the security and confidentiality of personal data. If we disclose any of your personal data to our authorised agents or service providers, we shall require them to appropriately safeguard the personal data provided to them.

How long do we retain your personal data?

We shall retain your personal data for such period or duration as required by your relationship with us, in compliance with the User Agreement, or for such other period as may be necessary to protect the interests of Herepay.

There may also be residual personal data that may remain within our databases and other records, which shall not be removed to meet our operational, legal, regulatory, tax or accounting requirements.

What if you noticed the data we have about you is inaccurate?

If your personal data reflected in your account is inaccurate or obsolete, you may request for those records to be corrected. We may charge a fee for such correction (to the extent allowed by law). We may also refuse to comply with your request.

How can you contact us about privacy questions?

If you have questions, comments, concerns or feedback regarding this Privacy Policy or any other privacy concern, send an email to finance@herepay.org

Changes to privacy notice

We reserve the right to update this Privacy Policy at any time we deem necessary. Changes shall become effective immediately upon upload and publication by us on the Herepay Website. Your continued use of Herepay services shall constitute your acceptance of the revised Privacy Policy. You are responsible for regularly checking the Privacy Policy for updates or amendments.

Language

In the event of a dispute between the English and non-English versions of this Privacy Policy, the English version shall be the prevailing and governing document.