

# Privacy Notice

## **1. General**

- 1.1. This Notice is issued pursuant to the requirement of the Personal Data Protection Act 2010 (Act 709) (“Act”).
- 1.2. In the course of dealing between you and Focus Marketing Technologies Sdn Bhd and its related companies (collectively referred to as “the Group”, “us”, “our” or “we” in this Notice), you will be requested to provide your Personal Data (as hereinafter defined) to enable us to enter into transactions with you or to communicate with you on the services and/or products related to our business.

## **2. Collection of Personal Data**

- 2.1. For the purpose of this Notice, “Personal Data” means information about you, from which you are identifiable, including but not limited to information concerning your name, age, identity card number/passport number, residential and/or office address, email address, gender, date of birth, marital status, race, ethnic origin, nationality, occupation, children’s details, photograph, income range, employer’s details, contact information such as telephone, mobile and facsimile number, salutation, bank details, credit card details, sociological and/or lifestyle data, your IP address and any other information about you which you have provided to us from time to time.
- 2.2. Your Personal Data are collected from a variety of sources including but not limited to the following :-
  - (a) directly from you by whatsoever means and/or in whatever manner;
  - (b) obtained independently from publicly available sources or other lawful sources;
  - (c) obtained from various entities or divisions within the Group; and
  - (d) obtained from third parties.

## **3. Purpose of Collection of Personal Data**

- 3.1. Your Personal Data will be collected, processed and used by us for the following purpose :-
  - (a) to send you invites to our product launches, promotional materials, updates, special offers and advertisements for marketing purposes;
  - (b) to carry out and/or discharge our obligations including customer care;
  - (c) to provide you with services and/or products offered by us or third parties that you have requested or which we think may be of interest to you or to process any application or otherwise any communication from you to us;
  - (d) for registration of a user account and to manage and maintain your account(s) or membership(s) with us;

- (e) to process your entries and to communicate with you in respect of your participation in any events, activities or contests organized by us;
- (f) to process payments relating to any services and/or products;
- (g) to respond to your enquiries or complaints and to resolve disputes;
- (h) to maintain our records of our customers and prospective customers and our internal record keeping;
- (i) for conducting research;
- (j) for internal administrative purposes, including but not limited to preparation of and conducting of any assessment, statistics, analysis or internal reports in relation to our customers, potential customers, products and services;
- (k) for purposes of preparation and submission of any claims or payments to any party or for any audit/check by any party for whatever purposes related to our business;
- (l) for employment opportunities in the event you have provided information for such purposes;
- (m) to comply with any legal or regulatory and/or to make the necessary disclosures under the requirements of any applicable law, regulation, direction, court order, by-law, guideline, circular and/or code which are applicable to us and/or for the prevention of crime;
- (n) for purposes connected with the enforcement of our rights pursuant to any letter, agreement and/or document including debt collection, seeking legal and financial advice, taking preliminary steps or commencing any legal proceedings; and/or
- (o) for any other purposes that is incidental or in furtherance to the Group's business or purposes.

#### **4. Website Cookies**

- 4.1. We make use of "cookies" to make our website perform better. Cookies help us identify your computer to our servers when you visit us and we may also collect information about your computer hardware and software including your IP address, browser type, domain names, access times and referring web site addresses. You can modify your browser setting to decline cookies if you prefer. If you choose to decline cookies, you may not be able to fully experience the interactive features of our website or services.

#### **5. Non-provision of your Personal Data**

- 5.1. In the event sufficient Personal Data is not provided or is not satisfactory to us, your application or request for any of the above purposes set out in Item 3.1 may not be accepted or acted upon or your request to browse some information on our website may be denied or we may not be able to provide the full range of benefits and/or services and/or perform our obligations under any potential or existing contract with you. In such event, we shall not be held liable for the

non-provision, interruption or loss of services and/or products and/or for any losses and/or damages arising therein.

## **6. Disclosure**

- 6.1. Your Personal Data provided to us shall be kept confidential in accordance with this Notice pursuant to any applicable law that may be in force from time to time. However, you agree that we may disclose your Personal Data to the following parties as may be necessary or appropriate including and not limited to the following :-
- (a) any person to whom we are required to do so by law or in response to any authorities, government agencies and/or industry regulators;
  - (b) our financiers, auditors, legal advisors, financial advisors, accountants, consultants and other professional advisors;
  - (c) third party service and product provider;
  - (d) our advertisers, network operators or market research companies; and/or
  - (e) our joint venture and/or business partners or any of the companies which is related or affiliated to us.
- 6.2. We shall endeavour to ensure that reasonable steps are taken to procure that such third parties shall not use the Personal Data other than for that part of the purpose as set out herein and to adequately ensure the confidentiality of the Personal Data.

## **7. Security**

- 7.1. We shall keep and process your Personal Data in a secure manner. We endeavor, where practicable, to implement appropriate administrative and security safeguards and procedures in accordance with the applicable laws to prevent unauthorized or unlawful processing of your Personal Data.

## **8. Transfer of Personal Data**

- 8.1. You hereby consent to us transferring or sharing your Personal Data among the Group or to our third party service or product providers, within or outside Malaysia, where we consider it necessary for the purposes of provision of products or services to you, and in this respect we will adhere to the applicable conditions of confidentiality and similar levels of security safeguards.

## **9. Access to Personal Data**

- 9.1. You have the right to:-
- (a) request access to your Personal Data;
  - (b) request correction of your Personal Data which is inaccurate, misleading or not updated;
  - (c) request us to stop processing your Personal Data for direct marketing;
  - (d) withdraw your consent to us for the processing of your Personal Data for the purposes set out in Item 3.1 or limit the processing of your Personal Data; and/or
  - (e) make any inquiries regarding your Personal Data,

subject to any applicable legal restrictions and/or contractual conditions.

For the abovesaid purpose, please contact us at the following address :-

Address : Wisma HCK, No 6, Jalan 19/1B, Seksyen 19, 46300 Petaling Jaya,  
Selangor Darul Ehsan, Malaysia.  
Email : enquiry@focusmarketing.my  
Tel No.: : +603 7968 8888

- 9.2. We reserve the right to charge a fee for the processing of any Personal Data access request.
- 9.3. If there is any change to your Personal Data, please notify us directly and as soon as possible to enable us to ensure your Personal Data is accurate and up to date.

**10. Personal Data Given By You**

- 10.1 You hereby confirm that you have obtained the consent of the relevant person(s)/company(ies) whose Personal Data is provided by you to us for the purposes set out in Item 3.1 and 6.1.

**11. Changes to Notice**

- 11.1. We reserve the right to amend this Notice from time to time without any prior notice.

**12. Language**

- 12.1. This Notice is issued in both English and Bahasa Malaysia. In the event of any inconsistencies between the English version and Bahasa Malaysia version, the English version shall prevail.

\*\*\*\*\*