

## **E NATION SDN BHD PRIVACY POLICY (Effective from 1 March 2020)**

### **Our commitment to your privacy**

This Privacy Policy outlines how E Nation through its lifestyle application collects, uses, maintains and discloses your personal data in respect of commercial transactions and how E Nation safeguards the personal data.

"E Nation", "Us" or "We" in this Privacy Policy refers to E Nation Sdn Bhd (Company No. 1362527-V).

### **Your consent is important**

When you sign up for our products and services or when you enter into any commercial transactions with E Nation, you may be required to provide E Nation with your personal data. In doing so, you consent to us using your personal data in accordance with this Privacy Policy.

Your personal data may have otherwise been provided to E Nation by a third party for products or services that these third parties have sought from E Nation. In this context, the term "you" or "your" in this Privacy Policy extends to any individual whose personal data has been provided to E Nation.

You have the choice, at any time, not to provide your personal data/sensitive personal data or to revoke your consent to E Nation processing your personal data/sensitive personal data. However, failure to provide such personal data/sensitive personal data or revocation of your consent to for us to process personal data/sensitive personal data provided may result in E Nation not being able to effectively and continuously provide you with our products and 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 E Nation, including any sensitive personal data and expression of opinion about the individual.

The types of personal data we collect may include, but is not limited to your name, address, other contact details, age, occupation, 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 your transaction history.

The personal data we collect can be either obligatory or voluntary. Obligatory personal data are those that we require in order to provide you with our products and services. If you do not provide us with obligatory personal data, we would not be able to provide you with our products and services. Voluntary personal data are those that are not mandatory in order for us to provide you with our products and services. If you do not provide us with voluntary personal data, you can still sign up for our products and services. Obligatory and voluntary personal data differ for each products and services and will 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 E Nation website and the lifestyle application.

- When you contact E Nation through various methods such as application forms, emails and letters, telephone calls and conversations you have with our staff in a branch. 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 E Nation 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 in 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 will 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 also collect "aggregate data," that is, group data with no personal identifiers. We use this aggregate data to help us understand how the website, products and/or services are being used and to improve its usability. We also use it to enhance the quality and availability of products and 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 our products and 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 E Nation 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.

- In addition, we may also use your personal data for the fulfilment of any regulatory requirements and for any other reasons connected with providing you the services you require and fulfilment of any commercial transactions entered into by you with E Nation.

### **Marketing communications**

From time to time, we may share your personal data with other entities within E Nation, our agents or strategic partners and other third parties ("**other entities**") as E Nation 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 will stop processing and sharing your personal data with these other entities for the purpose of sending 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, E Nation may still contact you for other purposes in relation to the accounts, facilities or services that you hold or have subscribed to with E Nation.

### **Links to other websites**

E Nation websites 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, in order to provide you with effective and continuous products and services and to comply with any legal and regulatory requirements, we may need to disclose your personal data to:

- Other entities within E Nation.
- 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 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 your personal data, you agree to such a transfer where it is required to provide you the services you have requested, and for the performance of any contractual obligations you have with E Nation including for storage purposes.

#### **How do we protect your data?**

The security of your personal data is our priority. E Nation 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 will require them to appropriately safeguard the personal data provided to them.

#### **How long do we retain your personal data?**

We will only retain your personal data for as long as necessary to fulfil the purpose(s) for which it was collected or to comply with legal, regulatory and internal requirements. Afterwards we will destruct or permanently delete your data.

#### **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 but we will provide you with a written reason.

#### **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 [enquiry@enationsb.com](mailto:enquiry@enationsb.com).

#### **Changes to privacy notice**

We reserve the right to update this privacy notice at any time as we deem necessary. Changes shall become effective immediately upon upload and publication by us on E Nation website. Your continued use of E Nation services shall constitute your acceptance of the revised privacy policy. You are responsible to regularly check 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.

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