

## Privacy Policy in Respect of Personal Data

1 June 2023

The Personal Data Protection Act 2010 ( as may be amended from time to time hereinafter referred to as the “Act”), which regulates the processing of personal data in commercial transactions, applies to Tagy Tech Sdn. Bhd. 201901011249 (1320577-X) (hereinafter referred as “Tagy”). For the purposes of this personal data policy, the terms “personal data” and “processing” shall have the meaning in the Act. This Privacy Policy applies to any person whose personal data is processed by us and describes our gathering, storing, dissemination and processing practices in respect of such personal data.

This Privacy Policy applies to all operations and business units of Tagy. To the extent any operation or business unit Tagy already has data protection Privacy Policy in place; this Private Policy shall supercede and repalce any such notice. Please read this Privacy Policy to undestand how we use and processs the personal data we have collected or may collect from you. By providing your personal/assets data and/or using our site and/or service, you are consenting to this Privacy Policy as modified from time to time by Tagy.

Any changes to this Privacy Policy will be updated to our site. Any such revised Privacy Policy will continue to apply to all personal/asset data that has previously been collected as well as information that has been stored or processed on an ongoing basis by Tagy. Therefore, you are encouraged to check the date/version of the Privacy Policy whenever you visit the site for any updates or changes.

If you are under 18, you should ensure that you obtain the consent of your parents or legal guardian before using our services and/or products. If you are a firm, corporation or entity suplying personal data of your partners, directors, employees, shareholders, officers and/or other persons to us, please do ensure that you have obtained their consent and bring this Privacy Policy to their attention.

### 1. What This Private Policy Explains

This Privacy Policy sets out:

- a. what kind of personal data is being processed;
- b. the purposes for which the personal data is being or is to be collected and further processed;
- c. the source of that personal data;
- d. the persons to whom we disclose or may disclose your personal/asset data;
- e. where it is obligatory for you to supply the personal data, the consequences to you if you fail to supply the personal data;
- f. the choices and means that you may limit the processing of your personal data, including personal data relating to other persons who may be identified from that personal data and
- g. your right to request access to and to request correction of your personal data and how to contact us with any inquiries or complaints in respect of the personal data.

## 2. Type of Personal Data

Personal data refers to all information that relates directly or indirectly to you or your asset, including any sensitive personal data and expression of opinion about you. Sensitive personal data refers to any personal data as to your physical or mental health or condition, your political opinions, your religious beliefs or other beliefs of a similar nature, the commission or alleged commission by you of any offence or any other personal data as may be determined by law from time to time.

The personal data collected by us may include (but is not limited to) the following:

- a. Personal contact information - e.g. your name, date of birth, identification number (such as NRIC or passport number), gender, nationality, race, address, contact number, fax number, email address, credit card information and other necessary information to complete the purchase.
- b. Your asset information - e.g. name, registration/identification number, model, cost, basic technical information, year/mode of purchase, maintenance information, maintenance/fuel supplier information, fuel type, road tax and insurance information/records.
- c. Your personal interests and preferences to help us tailor offerings of our services and products which would suit you best.
- d. In addition to Personal Data you provide to us, we may also collect your Personal Data from variety of sources, including from application forms, registration forms, contest forms, corporate searches. We may also collect analytics data, or use third-party analytics tools, to collect information sent by your browser, including the pages you visit, your use of third-party applications, and other information that assists us in analyzing and improving our Services. When you access our Site and use our Services by or through a mobile device, we may receive or collect and store a unique identification number associated with your device (for example, a UDID, IDFA, Google Advertising ID or similar), mobile carrier, device type and manufacturer, and phone number.

If need arises, we will obtain explicit consent from you to process sensitive personal data. We may however process personal data without your consent in limited circumstances as permitted by law.

## 3. How we protect information

- a. Our Site or software may integrate with or contain links to other third-party sites and services. Your interactions with any third-party website or service are subject to that third party's own rules and policies. We are not responsible for the use of such information by any third party.
- b. Information collected about you through our Site and software is stored and processed in Malaysia.
- c. We do not undertake to review, edit, manage or determine the suitability, legality or value of any Content or Content Data entered or uploaded to the Site or our software.
- d. When you enter personally identifiable information through the Site or our software we encrypt that information using secure socket layer technology (SSL).
- e. We use commercially reasonable physical, administrative, and technological safeguards to preserve the integrity and security of all information collected through our Site and software.
- f. Please understand that no security system is impenetrable and we cannot guarantee the security of our systems 100%. In the event that any information under our control is compromised as a result of a breach of security, Tagy will take reasonable steps to investigate the situation and, where appropriate,

notify those individuals whose information may have been compromised and take other steps, in accordance with any applicable laws and regulations.

- g. You may “opt out” of the collection of any information through cookies or other tracking technology by managing the preferences or settings on your browser. However, if you decide not to accept our cookies, your ability to use some Service features and Site features may be impaired. Please refer to your browser’s technical information for instructions on how to delete and disable cookies, and other tracking/recording tools.

#### 4. Purpose of Processing Personal Data

We may collect and process personal data from you or from the third parties, for one or more of the following purposes:

- a. to remember information so that you will not have to re-enter it the next time you use our Services.
- b. to administer and manage our services.
- c. to investigate, process and resolve any service issues, complaints, communications or other enquiries that you may submit to us regarding our services.
- d. to keep in contact with you and provide you with any information you have requested, services and/or products offered by us and/or changes thereto, or by our service providers and/or business partners.
- e. to maintain and develop our services, products, business systems and infrastructure
- f. to manage staff training and quality assurance.
- g. to produce data, reports and statistics which shall be anonymised or aggregated in a manner that does not identify you as an individual.
- h. to process your participation in any activities, events or contest.
- i. to contact you if you are declared a winner, which may include publication of your Personal Data such as name and identification number in newspapers or online platform for announcement of winners.
- j. for publication of your testimonials in relation to activities, events, contest or services.
- k. to investigate, respond to, or defend claims made against, or involving Tagy.
- l. to conduct marketing/promotional activities.
- m. to maintain records required for security, claims or other legal purposes.
- n. to detect and prevent fraudulent activity.
- o. to diagnose or fix technology problems.
- p. to plan for and enhance our Services and our Site.
- q. to comply with legal and regulatory requirements.
- r. for any other purposes that is required or permitted by any law, regulations, guidelines and/or relevant regulatory authorities.

#### 5. Source of Personal Data

We may collect personal data from application registration or visit to websites owned and/or operated by Tagy, registration for a specific service provided by us, use of our services, documents provided by you to us, participation in our survey, entry in competitions, contests, promotions, programmes organised by us, request for information regarding our product, commencement of any business or commercial relationship with us and/or any communication made with us.

We may also obtain your personal data from:

- a. third parties we deal with or are connected with you.
- b. public domain and such other sources where you have given your consent for the disclosure of information relating to you
- c. Other third parties engaged to provide your requests for services from publicly available sources. For example, we may receive information about you when you interact with Tagy or the Site through various social media, such as Facebook, Twitter and Instagram. The data we receive is dependent upon your privacy settings with the social network, which you can change at any time
- d. where otherwise lawfully permitted.

## 6. Request for access and Correction of Personal Data

If you wish to correct, change or update your personal data, all you have to do is to go to your "My Profile" page to do so. You will need to have your user id and password. You may likewise contact us at the Contact Details below.

You shall provide and maintain accurate, complete and current data required to register with Tagy. You represent and warrant that all information furnished to Tagy from time to time through its application, website or otherwise is correct, validly issued and legally binding on you.

You will be liable for any loss that results from any failure to notify Tagy of such a change as a result of undue delay, your gross negligence or fraud. Where you fail to inform of any change in its address, Tagy shall be discharged from all liabilities upon sending of any notice or document to the last known address.

In the event you may need to provide us with personal data relating to third parties (e.g. spouse or children or where you are the designated person in charge (from an organisation or company) for dealing with us, if you are acquiring and are responsible for a service and/or product that they will use), you confirm that you have :

- a. obtained their consent or otherwise entitled to provide their personal data to us and for us to use accordingly, and
- b. informed them to read this Privacy Policy.

Tagy reserves the right at any time to satisfy itself as to your identity and personal details provided including for the purposes of preventing fraud and/or money laundering and pending verification, we may subject to the Act withhold your access to your personal data. In addition, at the time of your application or at any time in the future, you authorise TAGY to perform identity verification checks directly or using relevant third parties.

## 7. Retention and Disposal Principle

Tagy shall take all reasonable steps to ensure that:

- a. Personal Data, whether stored electronically or in paper form, is secured against risks of loss, destruction, duplication, use, modification or disclosure by having in place regular Personal Data housekeeping in terms of retention periods for and classification of Personal Data for legal and business requirements.
- b. Disposal of documents containing Personal Data, or remove the means by which the Personal Data can be associated with particular individuals as soon as it is reasonable to assume that the purpose

for which the Personal Data was collected is no longer being served by such retention, and to maintain such record of the disposal. In this connection, Tagy will periodically review the length of time and the purpose for which the Personal Data is held.

## 8. Disclosure of Personal Data

We will process personal data for the following reasons and may disclose to the following third parties:

- a. With third-party vendors and other service providers as needed to fulfill your requests and provide Services to you;
- b. With third-party vendors and other service providers that perform services on our behalf, such as hosting and record-keeping services;
- c. With our parent, subsidiaries, divisions, and affiliates;
- d. As an asset of ours in connection with a company transaction, such as a merger, sale of all or a portion of company assets or shares, reorganization, financing, change of control or acquisition of all or a portion of our business by another company or third party or in the event of bankruptcy or related or similar proceedings;
- e. With third parties as required by law or subpoena or, if we reasonably believe that such action is necessary, to
  - i. comply with the law and the reasonable requests of law enforcement;
  - ii. to enforce our Terms of Service or to protect the security, integrity, or reputation of our Service; and/or
  - iii. to exercise or protect the rights, property, or personal safety of Tagy, our Users, or others; and
- f. We may also aggregate or otherwise strip data of all personally identifying characteristics and may share that aggregated, anonymized data with third parties.
- g. to provide, maintain, protect and improve all or any of our services and to develop new ones
- h. for internal and marketing purposes of Tagy
- i. companies and/or organisations that assist us in processing and/or otherwise fulfilling transactions and providing you with services that you have requested or subscribed for
- j. to companies, corporations and/or entities that act as Tagy's service providers, gateway providers, agents, contractors and/or professional advisers
- k. law enforcement agencies, government agencies and/or to detect, prevent, or otherwise address fraud, security or technical issues
- l. our business partners and other parties for purposes that are related to the purpose of collecting and using your personal data set out in this Privacy Policy
- m. Tagy will share personal data with other parties, companies, organizations or individuals outside of Tagy when Tagy has your consent to do so subject at all times to any laws (including regulations, guidelines and/or obligations) applicable to the Tagy.

Tagy shall be entitled to retain all data and information supplied by you for the use of Tagy, notwithstanding the termination or suspension of our services to you.

We are committed to safeguarding your privacy. However, no data transmission over the internet can be guaranteed to be 100% secure. Accordingly, despite Tagy's efforts to protect your personal data, Tagy

cannot ensure or warrant the security of any information you transmit to us, or to or from our online products or services. All such transmission of information is carried out at your own risk. However, once we receive your transmission, we will make reasonable efforts to ensure its security in our systems.

#### 9. Limiting Processing

Whenever we send you any information online, we will include instructions on how to unsubscribe and a link to do so. If you do not wish to receive further information of a similar nature, you may e-mail us. If you do not wish to receive any information of any kind from us at all, you may e-mail us.

#### 10 . Whether obligatory to provide personal data and consequences of not providing.

Where indicated (e.g. on our website, registration/application forms), it is obligatory to provide your personal data to us to enable us to process your application for our services. Should you decline to provide or limit processing such obligatory personal data, we may not be able to process your application or provide you with our services.

#### 11. Cookies

Tagy uses "cookies", where a small data file is sent to your browser to store and track information about you when you enter our websites. The cookie is used to track information such as the number of users and their frequency of use, profiles of users and their preferred sites. While this cookie can tell us when you enter our sites and which pages you visit, it cannot read data off your hard disk.

Tagy may process and/or otherwise use information collected from cookies and other technologies, to improve the user experience and the overall quality of Tagy's services. You may set your browser to block all cookies, including cookies associated with Tagy's services, or to indicate when a cookie is being set by Tagy. However, it's important to remember that many of Tagy's services may not function properly if your cookies are disabled.

Like many web site operators, Tagy also uses the independent companies to measure and analyse the internet usage across Tagy websites. This aggregate, non-personal data is collated by such independent companies and provided to Tagy to assist in analysing the usage of Tagy websites.

Tagy also collects Internet Protocol (IP) addresses. IP addresses are assigned to computers on the internet to uniquely identify them within the global network. Tagy collects and manages IP addresses as part of managing its services and for security purposes.

#### 12. Links to other sites

A link from this site to another site(s) does not imply endorsement of that site. Tagy does not control the sites to which Tagy links and assumes no responsibility for their content or privacy policies and/or statements. Therefore, you should carefully review the Privacy Policy and/or statements and the terms and

conditions that apply to any site you access from our websites. This includes any company providing on-line payment via credit card or e-banking.

### 13. Transfer of your personal data outside Malaysia.

It may be necessary for us to transfer your personal data outside Malaysia subject always to the Act if any of our service providers or strategic partners ("overseas entities") who are involved in providing part of our services are located in countries outside Malaysia or if you use the services from a country other than Malaysia. You consent to us transferring your personal data outside Malaysia in these instances. We shall take reasonable steps to ensure that any such overseas entities are contractually bound not to use your personal data for any reason other than to provide the services they are contracted by us to provide and to adequately safeguard your personal data.

### 14. Changes

Tagy reserves the right at any time and at its sole discretion to revise, change, alter or vary the contents of our website and/or terms and conditions of use and/or the Privacy Policy as herein contained. The continued use of our website and/or our service following any such revision, change, alteration or variation shall constitute the acceptance of, and agreement to be bound by such revision, changes, alteration and/or variation.

### 15. Language

This Privacy Policy is issued in English.

### 16. Contact Details

If you wish to access and request for correction or limit the processing of your personal data or have any queries or complaints regarding your personal data, please contact us during our office hours as set out below and the following contact points:

Office Hours	:	9:00am to 5:00pm
WhatsApp	:	+6012 220 5649
Email address	:	pdp@tagyasias.com
Address	:	Unit D-3-4, Level 4, Block D, Setiawalk. Persiaran Wawasan, Pusat Bandar Puchong, 47160 Puchong Selangor DE, Malaysia.
Contact person	:	Manager, Helpdesk

In accordance with the Act, we may:

- a. charge a fee for processing your request for access; and
- b. refuse to comply with your request for access or correction in accordance with the Act.