

## PRIVACY POLICY

In this Privacy Policy, “**DapatGaji**”, “**we**”, “**our**” or “**us**” refers to **DAPAT GAJI SDN. BHD.** (Company No.: 202201008817 (1454514D) ), a private company limited by shares incorporated under the laws of Malaysia and having its registered address at 72, Plaza Danau 2, Jalan 2/109F, Taman Danau Desa, 58100 Kuala Lumpur, Wilayah Persekutuan Kuala Lumpur and business address at Lot 4.01, Tingkat 4, Kompleks Ostia, Batu 14 ½, Jalan Cheras, 43000, Kajang, Selangor. We value your privacy and this Privacy Policy informs you of your choices and our practices regarding any Personal Data you provide to us or that you generate through your use of our services (“**our services**”), including our mobile application and website at [www.dapatgaji.com](http://www.dapatgaji.com) (“**Website**” or “**our Website**”).

### SCOPE OF THIS PRIVACY POLICY

This Privacy Policy applies to our services and is incorporated into and forms part of the Terms of Service (“**Terms**”) that you have agreed to in order to use our services. Any terms used in this Privacy Policy will have the same meaning as the equivalent defined terms in the Terms, unless otherwise defined in this Privacy Policy or the context requires otherwise. Please note that:

- this Privacy Policy does not apply to Personal Data collected through third party services (including any third-party websites or mobile apps) that you may access through our services;
- in providing our services, we may collect, use, disclose and retain your Personal Data;
- we may share your Personal Data with our affiliates, business partners and service providers in order to provide our services to you, to carry out our obligations and enforce our rights, and to carry out our business (as set out in the “Sharing of Your Personal Information” section below).
- you have rights that you may exercise in relation to your Personal Data and you may exercise these rights by contacting us through the methods set out in the “Your Rights” section below.

Kindly read this Privacy Policy carefully as it is important for you to understand how we collect and use your Personal Data and how you may control it. **By using our services, you agree that we may collect, use and process your Personal Data in accordance with this Privacy Policy,**

as revised from time to time. If you do not agree with this Privacy Policy, you must not use our services.

### CHANGES TO THIS PRIVACY POLICY

We may from time to time, at our sole and absolute discretion, revise or add specific instructions, policies and terms to this Privacy Policy where such revisions, instructions, policies and terms shall form part of this Privacy Policy. Where there are any changes to this Privacy Policy, we will notify you (via our website, mobile application, direct communication to you, or any other means which we deem appropriate). You agree that by continuing to use our services after any changes to this Privacy Policy, you are agreeing to the revised Privacy Policy.

### THE INFORMATION WE COLLECT AND HOW WE COLLECT IT

In providing our services, we collect and process the following Information relating to you:

“**Personal Data**”, such as any data or information, whether true or not, which is (a) about an individual who can be identified (i) from that data; or (ii) from that data and other information to which we have or are likely to have access and would include data in our records as may be updated from time to time, or (b) defined as “personal data” or “personal information” under Malaysia’s Personal Data Protection Act 2010 (“**PDPA**”) and its subsidiary legislations and regulations as may be amended from time to time. Personal Data we collect and process include Identity Data, Contact Data, Biometric Data, Location Data, Log Data Payment Data, Payroll Data and Marketing and Communications Data;

“**Identity Data**”, such as your name, gender, date of birth, identification/passport number, nationality and photocopy of identity document or passport that you upload when using our services;

“**Contact Data**”, such as residential address, mailing address, email address and phone numbers;

“**Biometric Data**”, such as facial images when you upload image or video of yourself when using our services;

“**Location Data**”, such as information regarding your location (when you use a location-enabled services), including the location of your device when you use our services, such as from the GPS, WiFi, compass, accelerometer or other sensors in your device;

"**Log Data**", such as technical information that is automatically collected when you use our services, including (a) technical information such as your mobile carrier, configuration information made available by your device, web browser or other programs you use to access our services, your IP address, mac address and your device’s type, model, version and identification number; and (b) information about your use of our services;

“**Marketing and Communications Data**”, such as your preferences in receiving marketing information from us, our affiliates, business partners and service providers, and your communication preferences;

“**Payment Data**”, such as your bank account, payment information and your transactional data.

You must only submit Personal Data which is accurate and not misleading and you must keep it up to date and inform us of any changes to the Personal Data you have provided to us. We shall have the right to request for documentation to verify the Personal Data provided by you as part of our customer due diligence processes. We disclaim any liability for failure to provide services to you if you fail to ensure that your Personal Data submitted to us is complete and accurate. You may access and update your Personal Data submitted to us at any time by contacting us using the details set out in the “Contact” section below; and

“**Payroll Data**”, such as your employment and payroll information, wages, taxes, deductions, social security and statutory contributions.

## HOW WE USE YOUR PERSONAL DATA

We may use your Personal Data for any of the following purposes:

- to provide our services to you;
- to consider and process your transaction or communications with third parties (such as your employer) via our services;
- for identification, verification, due diligence, or know your customer purposes;

- to respond to, process, deal with or complete a transaction and/or to fulfil your requests for certain products and services and notify you of service issues and unusual account actions;
- to enforce our Terms or any applicable agreement(s);
- for customer service, security, fraud-detection, archival and backup purposes in connection with the provision of our services;
- to better understand how you access and use our services, for the purposes of trying to improve our services and to respond to customer desires and preferences, including language and location customisation, personalised help and instructions, or other responses to your and other clients' usage of our services;
- to carry out due diligence or other screening activities (including, without limitation, background checks) in accordance with legal or regulatory obligations or our risk management procedures that may be required by law or that may have been put in place by us;
- to audit our services and business;
- to prevent or investigate any actual or suspected violations of our Terms, fraud, unlawful activity, omission or misconduct, whether relating to your use of our Services or any other matter arising from your relationship with us;
- to respond to any threatened or actual claims asserted against us;
- to store, host, back up (whether for disaster recovery or otherwise) of your personal data, whether within or outside of your jurisdiction;
- to help us develop our new services and/or improve our existing services;
- software verification or administering software upgrades;
- our business and commercial transactions; and/or
- any other purposes which we notify you of at the time of obtaining your consent.

Please note that as the purposes for which we will/may collect, use, disclose or process your Personal Data depend on the circumstances at hand, such purpose may not appear above. However, we will notify you of such other purpose at the time of obtaining your consent, unless

processing of the applicable data without your consent is permitted by the applicable laws or regulations.

If we rely on your consent for us to use your Personal Data in a particular way, but you change your mind, you may withdraw your consent by contacting us using the details set out in the “Contact” section below. Upon the receipt of such withdrawal notice from you, we will stop such use of your Personal Data. However, if you withdraw your consent, this may impact our ability to provide you with our services.

## **SECURITY PRACTICES**

We use a variety of security technologies and procedures for the purpose of preventing loss, misuse, unauthorised access or disclosure of your Personal Data. We use Secure Socket Layer (SSL) technology to store your Personal Data. We impose a high level of security measures to protect your Personal Data but we exclude any guarantee to you unless required by the applicable laws or regulations.

## **ADVERTISING**

In the event that we use your Personal Data for advertising purposes, we will do so in accordance with this section. We may use your Personal Data to try to offer advertising that is more relevant to you. We may also use your Personal Data for the purpose of sending you direct marketing information or materials (whether by messaging within our services or by other means) that offer or advertise our products and/or services and/or the products and/or services of selected third parties including our affiliates, business partners and service providers.

We will honour your request for us to not use your Personal Data for the marketing purposes as described above. If you wish to make such a request, please: (a) contact us by using the details set out in the “Contact” section below; (b) follow the relevant instructions on our marketing communications; or (c) follow the instructions as set out in certain service-specific guidance (in relation to the relevant service).

Please note that we do not share your Personal Data with advertisers. We may, however, share Personal Data that cannot be used to identify you in aggregated, anonymised or pseudonymised

form with advertisers for the purposes of trying to offer you advertising that is more relevant to you.

**SHARING OF YOUR PERSONAL DATA**

Unless permitted under this Privacy Policy or otherwise consented by you, we will not transfer your Personal Data to any third parties except our affiliates, business partners and service providers where such affiliates, business partners and service providers may collect your Personal Data across our services.

Any collection and/or sharing of your Personal Data as permitted under the provision above or any other provisions of this Privacy Policy will only be used for the purposes of:

- providing our services to you;
- assisting us in carrying out the purposes set out under the “How We Use Your Personal Data” section above;
- carrying out our obligations and enforcing our rights under the Terms or this Privacy Policy; and/or
- our business, including helping us to understand our client/user better and/or to improve our services.

Where we permit any third parties to collect and use your Personal Data in accordance with the provisions above, we will use reasonable efforts to ensure that such third parties only use your Personal Data: (i) in compliance with this Privacy Policy; and (ii) subject to any other instructions we give them, including any appropriate confidentiality and security measures that we implement. You hereby consent to the third-party use and sharing of your Personal Data as described in this "Sharing of your Personal Data" section.

Under specific circumstances, you agree that we may be required to retain, preserve or disclose your Personal Data to comply with any legal requirements, including:

- in order to comply with applicable laws or regulations or where we believe it is reasonably necessary to comply with the applicable laws or regulations;
- in order to comply with a court order or other legal process; and/or
- in response to a request by a government authority, law enforcement agency or similar body.

**COMMUNICATIONS FROM US**

When you use our services, we may send you notifications through email, sms, our website and/or our mobile application installed on your device. If you no longer wish to receive these communications, you can do so by opting out of notifications at the website user account level or device level, whichever applicable. We may from time to time send you service-related announcements when we consider it necessary to do so (such as when we temporarily suspend one of our services for maintenance). You may not opt-out of these service-related announcements, which are not promotional in nature.

**THIRD PARTY SERVICES ON OUR SERVICES**

Our services may include, or they may link you to, social media or other services (including websites) provided by third parties. For example, we may (whether in advertisements or otherwise within our services) provide you with links that allow you to access third party services or websites.

Your use of any such third-party services, including any Personal Data you provide to such third parties, are subject to the relevant third party's own terms of services and privacy policies and not our Terms or this Privacy Policy, so please review their terms carefully. This Privacy Policy only applies to any Personal Data collected by us, does not apply to any Personal Data collected by such third parties or services offered by such third parties, and we bear no liability for any third-party use of any Personal Data provided by you to them.

**RETENTION OF YOUR PERSONAL DATA**

We retain your Personal Data only if we need it to support justifiable business requirements or if required by the applicable laws. For example, we will only retain your Personal Data for as long as we have a business relationship with you and for a period of time afterwards where we have an ongoing business need to retain it, or where we are required by law to retain it. Upon the expiry of time relating to any business needs or legal requirements to retain your Personal Data, we will take reasonable steps to ensure that your Personal Data is deleted or anonymised.

**TRANSFER YOUR DATA OVERSEAS**

Your Personal Data is transferred to and stored in Singapore. We are committed to complying with all applicable legal requirements to safeguard your personal data transferred or accessed outside of Malaysia, by entering into contractual clauses to ensure that an equivalent level of data protection applies to your Personal Data.

**YOUR RIGHTS**

You have the right to request access to Personal Data that we hold about you, subject to certain conditions and limited exceptions set out in the applicable laws. If you wish to do so, please email your request to us by using the details set out in the “Contact” section below.

We will be as open as we can with you but sometimes we might not hold any Personal Data about you or may have to withhold Personal Data from you, but only to the extent we are allowed to do so under the applicable laws. For example, where the information is not Personal Data about you, is commercially sensitive, is legally privileged or relates to the Personal Data of another person, or disclosure of the information may have impact on the safety or security of our employees, clients or any person. In any of such circumstances, we may withhold the information requested by you and provide you with reason.

You have the right to ask us not to use your Personal Data for marketing purposes or any other purpose. You can exercise the right at any time by contacting us using the details set out in the “Contact” section below.

You may also have a right under the applicable laws to make other requests relating to your Personal Data. For example, you may have a right to:

- request that we update or correct the record of your Personal Data maintained by us if it is inaccurate or out of date;
- request that we erase that data or cease processing it, subject to certain exceptions;
- receive your Personal Data in a structured, commonly used and machine-readable format, and to transmit that data to another data controller; and



- lodge a complaint with the appropriate data protection authority if you have concerns about how we process your Personal Data. Alternatively, you may seek a remedy through the courts if you believe your rights have been breached.

If you wish to exercise any of the above rights, please make your request by using the details set out in the “Contact” section below.

## CONTACT

If you wish to contact us regarding this Privacy Policy or to exercise your rights under the PDPA, please contact our Privacy Officer via email at [support@dapatgaji.com](mailto:support@dapatgaji.com).