

## **BRILLIANT POINT SDN BHD**

### **Privacy Policy**

The Malaysian legislation controls the collection, use and storage of personal information (“data”). This Privacy Policy sets out how Brilliant Point Sdn Bhd (Company No: 222914-T) (“BPI”) uses and protects any data that you give BPI when you use this website.

BPI is committed to ensuring that your privacy is protected. Should we ask you to provide certain information by which you can be identified when using this website, then you can be assured that it will only be used in accordance with this Privacy Policy. You may have in the past and may or will in the future be required to provide data to BPI in connection with the use of this website and/or in the course of your dealing with BPI. We will retain your data for the period necessary to fulfil the purposes outlined in this Privacy Policy unless a longer retention period is required or permitted by law.

The provisions of this Privacy Policy will form part of the terms and conditions and agreement that you have or may enter into with BPI. If any inconsistency is found, the provisions of this Privacy Policy shall prevail.

### **Changes to Privacy Policy**

Changes may be made from time to time to this Privacy Policy. BPI will post notice of material changes on our website. Please revisit this Privacy Policy from time to time to learn of any such changes. This Privacy Policy is effective from 1st March 2016.

### **What we collect**

We may collect the following data which includes but is not limited to:

- name, date of birth, NRIC number/passport number (for foreigners), marital status and gender information;
- contact information including address, email address and telephone number;
- information about your friends and family such as name, mailing address, email address and phone number for purposes of fulfilling your request to provide relevant product or service for purchase of gift certificates;
- demographic information such as postage, billing and other information to enable delivery of item purchased;
- depending on the service used, financial information such as credit card or bank account numbers;
- transactional information of your activities on our website;
- information in relation to your interaction with our website, services, content and advertising;

- other information required to authenticate yourself; and
- other information that may be required by law from time to time.

You are obliged to provide data that are identified as mandatory. In respect of data identified as optional, the provision of such data by you is voluntary. If you do not supply such data identified as mandatory, this may result in BPI being unable to provide services or otherwise deal with you.

### **What we do with the data we gather**

We require this data to understand your needs and provide you with a better service. Your data may be used or processed by BPI or on its behalf for the following purposes:

- carrying out instructions, providing products and/or services (whether by BPI, companies related to or affiliated to BPI, or a selected third party) and responding to enquiries by you or made on its behalf;
- researching, designing, launching and marketing about new products, services, special offers or other information of BPI and third parties (including but not limited to exchanging information with selected business partners and developing marketing list for exchange with selected business partners) and monitoring the provision, operation and use of such products or services;
- provision of reference (status enquiries);
- verifying and assisting with identification of users and to determine appropriate services;
- sending important notices such as communications about changes to our policies, terms and conditions, and your purchases;
- operating internal controls including determining amounts owed to or by you, payment to or collection of such amounts from you and from any person providing security for your obligations, and processing of financial or payment transactions;
- forwarding publicity materials or other information to you from BPI;
- the enforcement of your obligations, including without limitation the collection of amounts outstanding from you;
- internal record keeping;
- using the data to improve our products and services;
- periodically sending promotional emails about new products, special offers or other information which we think you may find interesting using the email address which you have provided;
- meeting any legal, governmental or regulatory requirements in Malaysia or any other applicable jurisdiction including disclosure or notification requirements;
- assisting any person who is acquiring or participating in any contractual arrangements between BPI and you, to evaluate the transaction for such acquisition or participation;

- from time to time, we may also use your data to contact you for market research purposes. We may contact you by email, phone, fax or mail. We may use the information to customise the website according to your interests;
- sending promotional information about third parties which we think you may find interesting; and.
- any other incidental and associated purposes in order for BPI to carry out its business and/or relating to any of the above..

Data held relating to you will be kept confidential but it may be provided to:-

- any person under a duty of confidentiality to BPI or to companies related to or affiliated to BPI;
- any relevant agent, contractor or third party service provider who provides administrative, telecommunications, computer, payment, securities clearing, management, audit, insurance, professional or other services to BPI;
- any banking, financial or other institution with which you have or propose to have dealings or for financial or payment transactions;
- any person or corporation to whom BPI transfers or proposes to transfer its interests and/or obligations in respect of you or any product or service provided to you;
- any nominee, trustee, co-trustee, centralised securities depository or registrar, custodian, insurance company, estate agent, lawyer, tax advisor, auditor, other professional advisor or other person who is involved with the provision of services or products by BPI to you;
- any person by whom BPI is required by applicable legal, governmental or regulatory requirements to make disclosure; or
- any other person reasonably requiring the same in order for BPI to carry out its business.

BPI may disclose data to any or all of the parties stated above notwithstanding the recipient's place of business is outside Malaysia, or that such information following disclosure will be collected, held, processed or used by such recipient in whole or in part outside Malaysia.

### **Controlling your data**

If you have previously agreed to us using your data for direct marketing purposes, you may change your mind at any time by emailing us at [info@bp-mlm.com.my](mailto:info@bp-mlm.com.my) or writing to The PDPA Officer at Brilliant Point Sdn Bhd, No 20, Jalan Wangsa Budi 1, Wangsa Melawati, 53300 Kuala Lumpur, Malaysia. No fee will be charged.

You may also request access to any data we hold about you at any time by contacting us at the above address. Where we hold information that you are entitled to access, we

will provide you with suitable means of accessing it. A reasonable fee may be charged for processing each data access request.

To help BPI to provide a better service to you, please ensure that your personal data such as contact details including your home and office addresses, your telephone numbers (including your mobile telephone number), email address and other details registered with us are up to date.

If you have any questions or concerns about this Privacy Policy, please contact us at the above address.

## **Security**

BPI is committed to ensuring that your data is secure. BPI maintains appropriate administrative, physical and technical safeguards to help protect the security, confidentiality and integrity of data our customers submit to us to prevent loss, unauthorised access, modification or disclosure. We use a multi-layered approach to protect that key information, constantly monitoring and improving our application, systems, and processes to meet the growing demands and challenges of security. BPI's IT vendors generally do not have a direct relationship with individuals whose personal data is collected and our IT vendors do not collect personal information on our behalf. Our IT vendors do not determine how we use such data. Additionally, BPI's contracts with our IT vendors generally prohibit our vendors from accessing customer data except under limited circumstances.