

Privacy Policy

(updated 27th December 2023)

MetaFin Sdn. Bhd. and its' respective affiliates, and associated companies (collectively "MetaFin", "we", "us" or "our"), understand the importance of your privacy. We understand the importance of your personal information and recognise our responsibility to manage, protect, and process it in accordance to applicable privacy laws and regulations ("Privacy Laws"). This policy aims to help you understand how your personal data is collected, used, stored, shared, disclosed and/or processed in accordance to applicable laws.

This policy applies to all users, suppliers, customers, partners, contractors and service providers (collectively "you", "your" or "yours")

In this Privacy Policy, "Platform" shall refer to any use any of the features available on our Services, interact with us via an external service, application or through customer service, or access our Services or our Platform through your computer, mobile device, or any other device with Internet connectivity.

This Privacy Policy will assist you to understand some basic questions including, amongst others, why and how do we collect your personal information, your rights to access these information, how to contact us and third party disclosure policy.

You may at your convenience review the details of any of your personal data which we have retained at our corporate head office located at Metafin Sdn. Bhd, Level 1201, Block A, Pusat Dagangan Phileo Damansara II, No 15, Jalan 16/11, Off Jalan Damansara, 46350 Petaling Jaya, Selangor Darul Ehsan. For more information with regards to this Policy, you can review the latest updates at <https://metafin.com.my/privacy-policy.php>.

For further clarification, please do not hesitate to contact our office at +603-7721 2888 or email us at enquiries@metafin.com.my

Thank you for your continued support.

PERSONAL DATA PROTECTION POLICY

This Personal Data Protection Policy is issued to all our existing, immediate and/or prospective membership advisors and members pursuant to the Personal Data Protection Act 2010 ("**the Act**") which came into force on 15 November 2013.

In the course of your dealings with MetaFin Sdn. Bhd. ("MetaFin"), we will require you to voluntarily provide data and information about yourself ("**Personal Data**") to enable us to deliver notices, services and / or other information in connection with our existing and future membership programs, new membership program launches and incentive campaigns.

MetaFin will follow in accordance to the s. 30(4) of the Act, where any separate entries in respect of personal data held for different purposes, a separate data access request shall be made for each separate entry.

1. Personal Data

The Personal Data refers to any information, regardless of its accuracy or form, that identifies or can be used to identify an individual. This encompasses a wide range of data including but not limited to your name, government issued IDs, date of birth, identity number, passport number, biometric data, address, gender, race, nationality, photographs and videos, contact information, e-mail address, education, occupation, marital status, religious beliefs, health records, telephone or fax number, your previous addresses, and preferred mode of communication, bank and credit card details, personal interests, and any other data to which we have or might gain access. It also includes indirect identifiers such as identification numbers and vehicle or insurance information and other information where permitted by applicable laws.

For sensitive personal data, explicit consent has to be obtained from the individual for processing of the personal data. Sensitive personal data refer to any personal data that contains any of the following attributes:

- a. Physical or mental health
- b. Political Opinions
- c. Religious Beliefs
- d. Commission or alleged commission of any offense or any other personal data as determine by the minister

Other data includes:

- a. Demographic data (age, gender, location, etc.)
- b. Behavioural data (website visits, app usage, etc.)
- c. Transaction data (purchases, standing instructions, etc.)

2. Purpose

When you use our platform, we only collect the data we need to provide you with the best possible experience. Personal Data may be collected, processed and used for one or more of the following purposes:

- a. to process your application or request on the MetaFin Platform ;
- b. to send you information by e-mail, telephone calls, SMS or social network applications or internet social media about the membership programs, services and incentive campaigns offered by MetaFin and selected third parties that we think may interest you while we maintain control over your Personal Data;
- c. for the delivery of notices, services or other information and the marketing of such services or membership programs whether present or future, to you;
- d. to conduct marketing and client profiling activities regarding our latest programs, products, services and/or incentive campaigns;
- e. for our internal record keeping and maintenance of records;
- f. for insurance and risk management purposes;
- g. for billing, accounting and financial purposes, including recovery of any debt owing to us;
- h. to meet any legal or regulatory requirements imposed on us;
- i. to facilitate any subsequent commercial transactions in relation to any incentive campaigns, membership programs and/or services; and/or
- j. for any other purpose that is required or permitted by any law, regulations, guidelines and/or relevant regulatory authorities.
- k. to provide you with enhanced customer support, and offer tailored services and recommendations,
- l. improve the performance and reliability of the platform, and develop new features and benefits for users of the platform.

We may utilise your Personal Data to promote MetaFin's products, services, events, and those of our partners, sponsors, and advertisers. Our marketing activities could include, but are not limited to:

- a. Sending you notifications, newsletters, updates, mailers, promotional content, special privileges, and festive greetings.
- b. Notifying you about, inviting you to, and managing your participation in our events or activities.

These communications may be delivered through various channels such as postal mail, telephone calls, SMS, online messaging services, push notifications, in-person, and email.

Should you prefer not to receive marketing and promotional materials regarding your Personal Data, you have the option to opt out. This can be done by clicking the

'unsubscribe' link found in the relevant email or message. Alternatively, you can adjust your preferences directly within our App settings.

We will seek your prior agreement, consent and authorization in the event we intend to use your Personal Data for a purpose other than those that are set out above and in the privacy terms, if any, in your agreement(s) with us.

3. Source

The Personal Data will be legitimately and transparently obtained via the following manner:

- a. official registration forms (either electronic or printed)
- b. official Request for Information forms that are provided to you by our employees or membership advisors;
- c. any emails, surveys or any correspondences that we have received from you requesting for information or making any inquiries;
- d. any forms that you have submitted onto our website or any websites contracted by us;
- e. any referral from any person or within the platform which have included his/her verifiable personal contact details;
- f. Business cards that were dropped or given to our affiliates, employees or associates; and/or
- g. any documents (including, but not limited to, statutory forms and returns) that were submitted to us for processing.
- h. Participation in any campaigns, contests or any other promotional events organised by us;
- i. feedbacks, reviews, and ratings in interaction our apps, websites or services including content interaction and features used;
- j. vehicle data; travel data, home data entered for ownership and item verification;

When we collect Personal Data from other sources, we make sure that that data is transferred to us in accordance with applicable laws. Such sources include:

- a. referral programmes;
- b. our business partners, such as corporate agents, and payment providers,
- c. service and product providers;
- d. publicly available data;
- e. governmental sources of data;
- f. when our users add you as an emergency contact; and
- g. marketing services providers or partners.

At no time will any Personal Data be in any way commercially acquired, without your prior consent, from a source other than those that are set out above, such as through the purchase or trading of illegitimate and illegal Personal Data databases or lists.

4. Rights of Access

You have the right to request access to and if required, correction of your Personal Data in our records. You have the right to:

- a. request access to your Personal Data in our records for verification purposes. You may access and review all of your Personal Data held by us, in person, at our corporate offices located at the address given in (g) below;
- b. request the correction of your Personal Data in our records in the event the information is inaccurate, misleading, out-of-date or incomplete, upon validation and verification of the new information provided in person, at our corporate offices located at the address given in (g) below;
- c. request that your Personal Data shall only be used for the fulfilment of the purpose of the collection of such information;
- d. request for proof of policy and procedure in relation to the safeguard and guarantee of your Personal Data in our records;
- e. request that we specify or explain our policies and procedures in relation to data and types of Personal Data handled by us; and
- f. communicate to us your objection to the use of your Personal Data for marketing purposes whereupon we will not use your Personal Data for these purposes, in person, at our corporate offices located at the address given in (g) below.
- g. If you wish to make a request to access, review, amend and correct your Personal Data, you may do so by submitting such request via post, email or facsimile transmission to the following address:

Database Department

MetaFin Sdn. Bhd
Level 1201, Block A,
Pusat Dagangan Phileo Damansara II,
No 15, Jalan 16/11, Off Jalan Damansara,
46350 Petaling Jaya, Selangor Darul Ehsan

Telephone Number: 03-7721 2888

Email: enquiries@metafin.com.my

5. Disclosure

MetaFin rigorously upholds the confidentiality and security of your Personal Data. Nevertheless, certain business necessities may mandate the sharing of your Personal Data with specified parties in the course of conducting, management and/or operation of our business, to facilitate our services, we may need to disclose your Personal Data to the following classes of persons essential for the efficient provision of our services and may be delineated below:

- a. Any related companies, entities and/or associates of MetaFin, including those incorporated in the future, for streamlined business operations,
- b. Our vendors, business partners and affiliates that provide related services or products in connection with our business;
- c. Engaged professional advisors such as our auditors, consultants, lawyers, accountants or other financial or professional advisers appointed in support of our business operations;
- d. External third party service providers, third party management companies, sub-contractors or other parties as may be deemed necessary by us to facilitate your dealings with us. This may include:
 - i. Payment processing entities, facilitators;
 - ii. Providers of background check and anti-money laundering services;
 - iii. cloud storage providers;
 - iv. Marketing partners and marketing platform providers;
 - v. Data analytics providers;
 - vi. Research partners, including those conducting surveys or research projects in collaboration with MetaFin or on our behalf;
 - vii. Referral partners or individual referrals on the MetaFin Platform;
 - viii. Insurance and financing partners;
- e. our appointed service providers in relation to our membership programs, for the purposes of delivery of admission gifts and services; and/or
- f. law enforcement officials, government authorities.

The Personal Data provided to us will otherwise be kept private and confidential at all times and they will not be commercialized, disclosed, or shared with unauthorized third parties except as explicitly stated above. This commitment is in adherence to prevailing laws, regulations, court orders, guidelines, or codes, applicable both domestically and internationally.

Third-party affiliates are legally bound to process your Personal Data in alignment with MetaFin's stipulated principles. They are further obligated to safeguard your Personal Data in compliance with established data protection laws and recognized

industry standards.

You are entitled to rescind or adjust your consent for data disclosure at any juncture, subject to legal, contractual constraints, and a reasonable notification period. Modifications to your consent can be executed in person at our corporate headquarters, as specified in section 4.

6. Retention, Deletion, and Disposal of Personal Data

We are committed to retaining personal data only for the duration necessary to serve our business needs or as mandated by legal requirements. Should a situation arise where personal data is no longer necessary for these purposes, we ensure its secure and irreversible deletion or disposal. Alternatively, the data may be anonymized in compliance with our established deletion and disposal procedures, safeguarding confidentiality and adhering to legal standards.

7. Cookies Policy

MetaFin, along with our partners, utilizes various tracking technologies, including cookies, web beacons, tags, scripts, and local shared objects (like HTML5 and Flash, commonly known as “flash cookies”), as well as advertising identifiers (such as Apple’s IDFA or Google’s Advertising ID), collectively referred to as “Cookies.” These technologies are employed in your interaction with our Websites and Apps.

Cookies, which may be unique identifiers, can be found in multiple locations such as on your computer or mobile device, in emails from us, and on our web pages. They are used to gather Personal Data related to your usage of our Service. This may include information like your browser type, search preferences, IP address, data about the ads you’ve seen or clicked on, and the date and time of your usage. Cookies may be of two types: persistent (lasting beyond a single session) or session-based.

MetaFin allows third parties to place Cookies on our Websites and Apps for collecting Personal Data similar to the data we collect for ourselves. These third parties might link the Personal Data they collect with other information they have about you from different sources. Please note that MetaFin may not have direct control over or access to the Cookies used by these third parties.

Furthermore, we may share non-personally identifiable information, such as location data, advertising identifiers, or a cryptographic hash of a common account identifier (like an email address), with third parties. This is to facilitate targeted advertising.

If you prefer not to have your Personal Data collected via Cookies when using our Websites, you can deactivate cookies. This can be done by adjusting your internet browser settings to disable, block, or deactivate cookies. You can also achieve this by

deleting your browsing history and clearing your internet browser's cache. Additionally, you might be able to limit some of this data sharing through your mobile device settings.

8. Limit Processing of Personal Data

The Personal Data provided to us undergoes processing as and when required or upon scheduled maintenance. The definition of processing defines it as "any operation or set of operations which is performed upon Personal Data, whether or not by automatic means, such as collection, recording, organization, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, blocking, erasure or destruction".

You have the right to limit, in full or in part, any of the processes by which your data is subjected to in terms of the operations allowed to be performed upon it, the period of time allowed for the performance of these operations or alternatively the deadline of the consent given.

MetaFin shall be responsible for determining the purposes and means of the processing of Personal Data.

You may at any time withdraw or amend, in full or in part, your processing consent given previously, in each case subject to any applicable legal restrictions, contractual conditions and a reasonable time period, in person, at our corporate offices located at the address given in 5(g) above.

9. Failure/Refusal

The Personal Data provided to us are wholly voluntary in nature and you are not under any obligation or under any duress to do so. The failure to provide the Personal Data may result in any one or more of the following, which we shall not be held liable for any of the consequences arising therefrom:

- a. our inability to provide you with the information, services and/or products requested;
- b. our inability to update you with the latest membership programs, services, incentive campaigns, product and/or launches; and/or
- c. our inability to comply with any applicable law, regulation, direction, court order, by laws, guidelines and/or codes.

10. Protection

Your Personal Data will be kept and processed in a secured manner. The appropriate administrative and security safeguards, policies and procedures will be implemented,

as far as practicable, in accordance to the applicable laws and regulations. We will, as far as practicable, aim to prevent any unauthorized and/or unlawful processing of, and the accidental loss, destruction or damage to your Personal Data.

Metafin is committed to taking appropriate technical, physical and organisational measures to protect your Personal Data against unauthorised access, unlawful processing, accidental loss or damage, and unauthorised destruction.

To safeguard against unauthorised access to your Personal Data by any third parties, all electronic Personal Data held by Metafin is kept, maintained and/or processed on systems that are protected by secured networks. Metafin and its related entities limit the access to any internal systems that hold Personal Data to a select group of authorised users through the use of unique identifiers and passwords. Access to Personal Data is strictly limited, provided only on a need basis, to relevant users for the purposes of performing their official duties.

Compliance with these provisions will be required of all third-party administrators who may access your Personal Data, as described under the 'Disclosure of Personal Data' in Section 6 above.

11. Language

In accordance to Section 7(3) Personal Data Protection Act 2010, this Policy is issued in both Bahasa Malaysia and English languages. In the event of any inconsistency, the English language version of this Policy shall prevail.

12. How to Contact Us:

If you require any clarification on this Policy, you may:

email us at: enquiries@metafin.com.my;

- a. post or fax your queries to the address given in 5(g) above.

13. Changes to this Policy

Metafin may need to modify, update and/or revise this Personal Data Protection Policy from time to time, for example, to comply with changes in business operations or laws and regulations. In any case, the latest version of this Policy will be made available on metafin.com.my at all times and accordingly, you may periodically review this website to obtain the latest information on MetaFin's privacy practices.

