

## **PRIVACY POLICY**

Effective Date: **30 July 2018**

Hikaru Technology Sdn Bhd (“Hikaru”) is committed towards protecting the privacy of our affiliates/ members/ customers Personal Information\* in accordance with the Personal Data Protection Act 2010.

\*Personal Information in this Privacy Policy refers to any information which relates directly or indirectly to you and/or your transaction with us which is hereinafter explained.

We believe this Privacy Policy enables you to understand the following:

- Types of Personal Information which we collect;
- How we collect your Personal Information;
- How we use your Personal Information;
- Who we disclose your Personal Information; and
- Your right to access and update the Personal Information.

**When you subscribe to our products and/or services, purchase of any third party’s products and/or services distributed by us, you may be required to provide us with your Personal Information. In doing so, you consent the use of the Personal Information by us in accordance with this Privacy Policy.**

### **(a) Types of Personal Information which we collect**

The types of Personal Information which we collect includes but not limited to your name, address, contact details (phone numbers, email address or other contact details), age, gender, National Registration Identification Card (NRIC) Number, financial information such as the details of your account(s), bank balance, bank transactions, assets, liabilities, sales turnover as well as credit facilities (if applicable).

### **(b) How we collect your Personal Information**

We collect your Personal Information to operate efficiently and offer you the best customer experiences with our products and/or services. We may collect your Personal Information from yourself and from a variety of sources, including but not limited to:

- i. through your relationship with us, for example information provided by you in application forms, when subscribing/using our products and/or services, when taking part in customer surveys, competitions and promotions, and during financial reviews, if applicable;
- ii. through your verbal, written and e-mail communications with us and/or our authorized agents;
- iii. from an analysis of the way you use and manage your account(s) with us, from the transactions you make and from the payments which are made to your account(s);
- iv. from third parties such as credit reference information providers, government/statutory agencies, and/or
- v. from such other sources in respect of which you have given your consent to disclose information relating to you and/or where not otherwise restricted.

- vi. When you access our websites, please be aware that your IP address and information about your visit (such as time stamp, date, duration etc) will be automatically picked up by Hikaru's systems, a small data files in the form of "cookie" or other similar technologies may be attached. Cookies are pieces of information that websites transfer to your computer or other device for record-keeping purposes. Our websites may also contain links to third parties websites and when you leave our websites we shall not be responsible for such third parties websites and information which you made available to such third parties websites.

**(c) How we use your Personal Information**

We collect, use, and/or process your Personal Information for the following purposes:

- i. to process application for the provision of products and/or services offered by Hikaru and/or its business partners and/or services which you had subscribed for;
- ii. to notify you about important changes/developments to the products and/or services features;
- iii. to communicate with you including responding to your queries and/or complaints to resolving disputes;
- iv. to comply with regulatory requirements and provide assistance to law enforcement agencies;
- v. to research and develop products and/or services including improving and developing our services and quality assurance to you;
- vi. to administer and manage products and/or services to you including enforcement of our rights and obligations;
- vii. to prevent, detect or prosecute cases of fraud/criminal in nature;
- viii. to assess/verify your credit worthiness and to maintain your credit history for present and future reference (if deemed necessary);
- ix. for the purposes of strategic alliances, cross selling, marketing, and promotions; by other units/department/ entities within Hikaru's group/affiliates, our agents and third parties; and
- x. to protect Hikaru's interests and other related purposes.
- xi. You may inform us at any time if you do not wish to receive marketing materials from us, any entities and business units within the Hikaru group in and outside Malaysia.

**(d) Who we disclose your Personal Information**

Notwithstanding that Hikaru treats your Personal Information as private and confidential, the Personal Information may be disclosed, disseminated and/or transferred to for the following parties:

- i. entities and business units within Hikaru group in and outside Malaysia;
- ii. licensees, business partners and third parties service providers;

- iii. professional advisors including consultants, lawyers, accountants, auditors, bankers, rating agencies, trustees, insurers, auctioneers and brokers on a need to know basis for the purposes of providing their services/advices to us;
- iv. credit bureaus, credit reporting agencies, debt-collection agencies and/or other parties who assist with debt recovery functions;
- v. agent or contractors acting on our behalf or appointed by us to act on our behalf;
- vi. regulatory, government bodies or other authorities if required or authorized to do so to discharge any regulatory function under any law or in relation to any order or judgment of a court; and
- vii. any parties authorized by you.

**(e) Security measures adopted to protect Personal Information**

Hikaru protects your Personal Information against unauthorized access, use or disclosure. Hikaru keeps, protects and processes your Personal Information in a secure manner by maintaining physical, electronic and procedural safeguards, in compliance with applicable regulations.

We ensure that access of Hikaru employees to the Personal information which you have provided to us is limited to authorised employees who are trained in handling your information. These authorised personnel are required to ensure the confidentiality of your information and to respect your privacy at all times.

**(f) Retention of your Personal Information**

Hikaru will retain your Personal Information in accordance with this Privacy Policy and/or the terms and conditions of your agreement(s) with Hikaru for the duration of your relationship with us, for such period as may be necessary to protect the interests of Hikaru as it may be deemed necessary, where otherwise required by the law.

**(g) Your obligation to supply Personal Information**

For us to process your application for products and/or services offered by Hikaru, you are required to provide the necessary Personal Information as indicated in the application or service request forms. Notwithstanding that, you may opt to limit the disclosure, retention and use of your Personal Information by contacting us through the avenues provided under Clause (j). However, should you decline to provide any such obligatory Personal Information, we may not be able to process your application/request or provide you with our products and/or services.

**(h) Your right to access and correct the Personal Information**

You are responsible to ensure that the Personal Information which you provide to us is accurate, complete, not misleading and up to date. If you wish to have access to your Personal Information in our possession, or where you are of the view that such Personal Information held by us is inaccurate, incomplete, misleading or, not up-to-date, you may make a request to us through the avenues provided under Clause (j).

We will use our reasonable efforts to comply with your request to access and/or correct your Personal Information within 21 days of receiving your duly completed relevant forms and processing fee.

**(i) Revisions to Privacy Policy**

We reserve our right to revise and/or modify this Privacy Policy from time to time. The updated version shall apply and supersede any and all previous versions, including but not limited to, booklets, leaflets or hard copy versions. By continuing to subscribe to our products and/or services after the communication of such revision and/or modification, you are accepting and consenting to such revision and/or modification. Please visit this website for information on our most up-to-date practices.

In the event of any inconsistency between the English Language version and the National Language version of this Privacy Policy, the English Language version shall prevail.

**(j) Our Contact Details**

If you have any requests, inquiries or feedback to Hikaru on this Privacy Policy, kindly contact our Customer Support team at +603 5891 0995 or [cs@elite.com.my](mailto:cs@elite.com.my).