

## Privacy Statement

This Privacy Statement is issued to all current and prospective Users of profits.com (the “Webportal”), operated by PROPFITS FinTech Sdn Bhd (“PROPFITS”, “we”, “us”, or “our”), pursuant to the requirements of the Personal Data Protection Act 2010 (“PDPA”) in Malaysia.

PROPFITS values the privacy and we are committed in protecting all of your Personal Information, in accordance to the relevant laws (specifically the Personal Data Protection Act 2010), this Privacy Statement, and in conjunction with our [Terms Of Use](#). For the avoidance of doubt, unless the context requires otherwise, the words used in this Privacy Statement shall have the same meaning stipulated in the [Terms Of Use](#).

As part of the day to day business operations of PROPFITS, we collect your Personal Information that are provided to us when you visit the Website, sign-up as User, make submission for any of our products &/or services or communicate with us in any form through online or offline channels. This Privacy Statement describes our practices when collecting Personal Information via access to the Webportal or its associated sites, communication with any of our authorized personnel, the use of other channel or device applications, including dealings with our associate companies &/or service partners.

This Privacy Statement explains :-

- ✓ types of Personal Information that are collected
- ✓ how or when the Personal Information are being collected
- ✓ purpose of Personal Information being collected, how is it being used
- ✓ to whom the Personal Information are being disclosed
- ✓ data security, storage & retention of Personal Information
- ✓ tracking or monitoring of data / activity log & cookies
- ✓ approach to direct marketing, sales & promotional activities
- ✓ your options, rights to access or update Personal Information, including withdrawal of consent

By using our Services, you agree to the terms of this Privacy Statement and you will be deemed to have consented to the collection, use, and disclosure of your Personal Information in accordance with this Privacy Statement. PROPFITS reserves the right to amend this Privacy Statement at any time and will place such amendments on the Website or via any other mode deem suitable.

### 1. Types Of Personal Information Collected

- a. Personal Particulars – Name, Age, Race, Gender, Marital Status, Nationality, NRIC / Passport No., Date Of Birth, Photographs & Videos, etc;
- b. Contact Information – Home / Work Address, Fixed / Mobile Phone No., EMAIL;
- c. Employment & Business Information – Occupation, Income Source / Range, Employment Pass, Work Permit, Business Card, Company Documents, etc;
- d. Financial Information – Credit Card, Banking Account Details, Credit Facility related to you, your families, or business transactions, etc;
- e. Interaction Details – Phone Conversations, Call Recordings, Mobile Text Messages, Email Exchanges, Faxes, Letters, Forms, or any other method of correspondences;
- f. Service Information – Promotions, Plans, Packages, Programmes, Schemes, Courses, or any other form of assistance that may be relevant;
- g. 3<sup>rd</sup> Party Information – Individuals, Agencies, Companies, Institutions, Organisations or any other parties may have rendered services to you;

h. Other Information – any other information supplied by you that can directly or indirectly identify you, in order for us to carry out our engagement with you.

## 2. How / When Personal Information Are Collected

- ❖ when you sign-up or register a User Account
- ❖ when you make or request for a Payment instruction
- ❖ when you make the Payment Charge to your credit card account
- ❖ when you upload required documents to support the transaction
- ❖ when you request or apply for a product &/or service
- ❖ when you are requested to provide additional supporting documents
- ❖ when you key-in the information of the corresponding party to the transaction
- ❖ when you make inquiry or raise investigation request to us
- ❖ when you are communicating with our authorized staff / personnel

## 3. Purpose Of Personal Information

- ❖ identity verification, KYC steps
- ❖ payment processing review including screening and conducting due-diligence checks
- ❖ settlement of fund & Payment reconciliation, Reversal, Return or Refund
- ❖ manage repeat or scheduled recurring payment instruction &/or tokenization
- ❖ complete payment transaction through banking support service providers, financial institutions, insurers, Trustee Manager, Credit Card Network or payment gateway operators, electronic clearing houses, and all components of the transaction processing-cycle
- ❖ general management & administration, maintain User Account, User Profile, function & facility
- ❖ respond to enquiries, complaints or suggestions, update & enhance records accuracy
- ❖ conduct research, survey, analysis, studies, statistical compilations, evaluation, pricing strategy, policy formulation, reporting, auditing and record keeping
- ❖ generate statistical & transaction reports with aggregated data, including data mining that does not identify individualistic information
- ❖ produce materials for internal &/or external communications, publicity, or other purposes deemed appropriate whether in the print, online or in any other medias
- ❖ share information on Promotions, plans, packages, programmes, schemes, courses, or any other form of assistance that may be relevant
- ❖ adhere to the disclosure requirements of applicable laws binding on our business as well as to meet legal, regulatory including providing assistance to applicable law enforcement, judicial and other government agencies
- ❖ manage accounting, taxation, auditing, compliance & risk management policies
- ❖ any other purposes that are deem necessary &/or required or permitted by applicable laws, regulations, practices, guidelines &/or imposed by relevant authorities

## 4. Disclosure Of Personal Information

Your Personal Information shall be kept confidential but you consent and authorise us to share or disclose your Personal Information to the following parties :-

- a. Persons or Organisations required under applicable laws;
- b. Associated Companies, Partners, Managers of PROPFITS, including future entities within the PROPFITS group;
- c. Government Agencies, Statutory Bodies, Legal Authorities, Enforcement Offices under applicable laws;
- d. Accountants, Auditors, Taxation Consultants, Lawyers, engaged or appointed by PROPFITS;
- e. Affiliates, Contractors or Sub-Contractors, Affiliates of PROPFITS;

f. Banking Facilitators, Trustee Managers, Insurers & Underwriters, or any other 3<sup>rd</sup> Party Service / Product Providers that are deemed suitable and appropriate for the business (including those located overseas, under conditions of confidentiality and acceptable levels of security);

g. Persons / Organisations under a duty of confidentiality to PROPFITS, including the Directors & Management;

h. Any other purpose that PROPFITS deem necessary or as required and permitted by applicable laws, regulations, compliances, policies, guidelines &/or relevant legal authorities.

Personal Information shared shall be for purpose as stated in this Privacy Statement, or purposes not stated but directly or indirectly attributed to the primary purpose. We may also share your Personal Information where disclosure is necessary to comply with updated or amended applicable laws, regulations, compliances, policies, guidelines, legal processes or queries from the relevant legal authorities.

## 5. Data Security

PROPFITS follows generally accepted industry standards to protect your Personal Information, both during transmission and once we receive it. However, no method of transmission over the Internet or electronic storage, is completely secured and therefore, PROPFITS is unable to guarantee your Personal Information's absolute security. We shall take the necessary steps to store and process your Personal Information securely, while putting in place among others :-

a. Implementation of a formal information security administration policy, the necessary combination of technology and manual controls such as encryption, firewall, file transmission protocols, passwords, physical access security, dual-control measures, user-logging activity and monitoring etc;

b. Operational and processing controls such as segregation of duties, defined roles / scope of work and responsibilities on need to know basis for authorized personnel / staff;

c. Engaging with 3<sup>rd</sup> party providers and contractors or sub-contractors to ensure storing or processing Personal Information has implemented similar acceptable standards of security;

d. PROPFITS will make any legally required disclosures of any breach of the security, confidentiality, or integrity of your Personal Information consistent with the requirements of law enforcement &/or any measures necessary to determine the state of the breach to restore the reasonable integrity of the Service.

## 6. Storage & Retention Of Personal Information

Your Personal Information will be stored and retained for a period deemed necessary to fulfil the purposes stated above, after which we shall proceed to ensure that your Personal Information is purged, anonymized or permanently deleted. Your Personal Information storage and retention period may be extended further for transaction matching (in case of repeat / recurring payment), or to comply with legal, statutory, regulatory or accounting requirements.

## 7. Data / Activity Log & Cookies

Our application servers automatically record information that your browser sends whenever you visit the Webportal. These information may include your network's Internet Protocol ("IP") address, browser type, device identity or the activity-trail of websites that you were visiting before you enter our Webportal or applications. PROPFITS use this information to enhance our Webportal's facility, functionality, usefulness and browsing experience including verification of guests / visitors meeting the criteria for processing requests. We do not treat these collated data as Personal Information or use it in association with other Personal Information, though we may aggregate, study, analyse and evaluate on such information for the stated purposes.

Cookies are small data-files that we transfer to your device's hard-disk for record-keeping purposes. As with many websites, we use Cookies to collect browsing information mainly to save your information with persistent Cookies for ease of subsequent log-in process, and with session Cookies for certain features or functionalities of the Webportal to be enabled. The Cookies will also help us better understand how you interact with the Webportal, and to monitor aggregate usage and web-traffic loading for a more pleasant browsing experience. Our 3<sup>rd</sup> party sponsors and advertisers may also place or read Cookies on your browser. You may configure your browser, by instructing or changing its options to stop allowing Cookies, or to prompt you before accepting a Cookie from a particular website. But if you do not allow Cookies to be accepted, you may not be able to enjoy all functions of the Webportal or its Services.

#### 8. Marketing & Promotional Activities

We may use your Personal Information to provide you with communication about our Services, as well as, 3<sup>rd</sup> party products, which may be related to your interests, unless requested otherwise by you.

In circumstances, we may also disclose your Personal Information to strategic partners but such disclosure shall only occur where you have created or subscribed to a particular Services or its related products &/or whereby your consent has been specifically obtained for a certain promotional activities, subject at all times to any applicable laws including relevant regulations.

PROPFITS shall take reasonable steps to ensure that 3<sup>rd</sup> parties that we are sharing your Personal Information should also have appropriate privacy and confidentiality policies. If you do not wish your Personal Information to be used or shared for the purpose of marketing and promotional activities, please communicate to us at [propfits@propfits.com](mailto:propfits@propfits.com) whereby your latest received instruction shall prevail.

#### 9. Rights Of Access & Correction

You, as the User, reserve the right of access to your Personal Information by request, or directly at the profile tab of the User Account, and effect updates, amendments or corrections of the Personal Information that might be inaccurate, obsolete, incomplete or misleading.

In addition, you may also :-

- a. Request to access your Personal Information in our records;
- b. Provide instruction with supporting evidence for us to rectify any inaccurate, obsolete, incomplete or misleading Personal Information about yourself;
- c. Produce a copy of the Personal Information from us, subject to identity verification whereby if there is any discrepancy or disagreement, then we shall specify the reason in clearly stated terms such as where rights of others are impacted, or any regulatory functions that are affected.

#### 10. Withdrawal Of Consent

You may withdraw your consent given, or deem to have been given, for any or all purposes set out in this Privacy Statement. If you withdraw your consent to any or all of the purposes, we may not be in a position to continue to provide the Services, and may render your User Account or any other privileges or functionalities being redundant.

Please any other queries about our Privacy Statement to [propfits@propfits.com](mailto:propfits@propfits.com) including Withdrawal Of Consent or any request to delete Personal Information which we have obtained either directly from you or indirectly through other 3<sup>rd</sup> parties, or to opt out of any our future notifications, messages, newsletters, marketing emails or other promotional materials.