

CULT CREATIVE PERSONAL DATA PROTECTION POLICY NOTICE

As required and in accordance with the Personal data Protection Act 2010 of Malaysia (“PDPA”), we view the protection of your privacy and your personal information to be one of our utmost duties. As such, please read this Personal Data Protection Notice (“Notice”) carefully IN FULL which shall explain and notify you of:

- 1) the type of data we collect from you;
- 2) how we collect your data;
- 3) how we use your data;
- 4) to whom we disclose your data to; and
- 5) how you may access and update your personal data kept with us.

Note that you must extend a copy of this Notice and to obtain the consent of any person other than you before submitting any personal data of other persons than yourself to us.

By providing to us with any personal data or by continuing to use, rely or subscribe to our services, you are indicating to us that you and the other persons have accepted, consented and continue to accept and consent to these terms and conditions. DO NOT provide us with any personal data if you disagree or do not consent to the use of any such personal data by us. Note that any refusal to provide or consent certain data may affect our ability to provide full and effective services to you.

WHAT PERSONAL DATA DO WE COLLECT FROM YOU?

The personal data we collect may include:

- any of your identification details such as but is not limited to your full name, age, national identification card or passport number, and nationality;
- your contact details such as but not limited to addresses (residential, office or billing), emails or telephone numbers;
- contact information such as billing address, residence address, telephone number, email, mobile phone number, social media account details;
- payment information such as your debit or credit card information (including the cardholder name, card number, billing address, expiry date), electronic wallet details, and other bank account details;
- recording of your image and voice via any camera whether recorded by us at any of our events and workshops, or provided by you, or whether available on any media platform;
- recording of any calls placed by you to any of our customer services;
- social media posts in relation to any of our business endeavors; or
- any technical and statistical information that is available to us via our internet service provider or any of our digital platforms such as cookies, IP addresses, time, date, duration of web browsing visit.

We will clearly indicate to you when it is mandatory for you to provide us any personal data. If you choose not to provide us with any required mandatory personal data or withdraw your consent for us with

regards to the same, please be advised that it may and will hinder our ability to provide you with any of our services and we will be entitled to cease the provision of any of our services without us incurring any liability to you.

HOW DO WE COLLECT PERSONAL DATA FROM YOU?

We may collect personal data either from you directly or from any authorized representatives, or from any third parties, or from any publicly available source which may include (but is not limited to):

- when you register for any of our services;
- when you get in contact to us either in person, phone call, letter, email or via any other communication medium where we will keep a record of that communication including, but not limited to, for any enquiries, comments, feedbacks, complaints;
- when you commence any sort of business relationship to us including, but not limited to, as a business partner, joint venture, service provider;
- When you participate in any of our events, surveys, promotions whether these are conducted by us directly or via a third party which information is kept in our records;
- When you visit, browse through, interact with any of our websites, platforms, applications, social media platforms such as Facebook, Instagram, etc;
- When you apply for a job with us;
- When you engage with a third party which we deal with or is connected with you such as regulatory bodies, payment systems, credit reporting agencies, financial institutions, marketeers, etc; or
- From other sources which you have given consent to for the disclosure of your private data as and where it is lawfully permitted.

WHY DO WE COLLECT PERSONAL DATA FROM YOU AND HOW DO WE USE IT?

We may collect (with your consent) personal data from you for the following purposes as per permitted by the law:

- To ascertain and verify your identity or any information obtained within the course of our engagement with you;
- To provide you with any of our services in relation to any engagement which you have made with us;
- To communicate any offers, promotions, contests, events, workshops;
- To maintain your account or any contract you may have with us;
- To notify you of any correspondence in relation to our services or change in those services;
- To fulfill any requirements we may have such as regulatory requirements, audits, billing services, payment facilities;
- To respond to any enquiries, complaints, comments, feedback, or request you have made to us;
- To comply with any legal or regulatory obligations imposed on us by any law, regulations, guidelines, code of conduct which is applicable to us;
- To comply with any request or order of court, tribunal, arbitration, enforcement agency, statutory authority or any other direction from the government of any country;
- To enforce any of our legal or contractual rights including to recover any debt owing to us;

- To transfer or assign our rights, interests and obligations under any agreements which we may have;
- To update, consolidate and improve on the accuracy of our records which may include any analysis or report preparation;
- To prepare data, reports, statistics of which we will anonymised or aggregated in a manner that does not identify you as an individual for any analytical purposes including but shall not be limited to data mining, transactions analysis, or preference detection;
- To assess financial and insurance risks and also to act upon them;
- To engage in business transactions which is related to the services which we provide you with;
- To ensure our internal management of services provided to you including, but not limited to, training for our staffs, market research, and information technology related management are maintained and operationally;
- To process any transaction or enquiry including the access to your data by persons identified as you or your authorized representatives;
- To third parties with whom we have contracted to provide services to us for any of the purposes above whereupon the information shared shall only be as minimal as required to ensure their services to us; or
- For any other purposes as permitted by the applicable laws and regulations.

TO WHOM DO WE SHARE YOUR PERSONAL DATA TO?

It may be necessary, required or even mandatory for us to provide your personal information to the following third parties (we assure you that it is our utmost policy to keep the sharing of information as minimal as necessary):

- Federal or state governments, law enforcement agencies, statutory authorities or regulatory bodies and related bureaus;
- Our agents, contractors, service providers or consultants;
- Our business associates or parties which assists us in processing transactions, providing us services or other purposes which are related to the services which we provide you including any financial institutions;
- Parties which assists us in processing or providing services to us for our operations;
- Other parties which you have given your express or implied consent; and/or
- Any credit reporting agencies or in the event of default, any debt collection agencies; subject to the permitted law applicable to us.

HOW YOU MAY ACCESS AND UPDATE YOUR PERSONAL DATA KEPT WITH US

Your personal data will be kept by us securely at all times. However, whenever you wish to access your personal data that is in our records or should you consider that our data is inaccurate, incomplete, misleading or requires updating, we can assist you to revise such personal data. Please notify us via sending to us an email correspondence to our customer service representative to the email address located in the Cult Creative website. Please note that we also will require that you provide or maintain full and accurate data with us at all times where such data is necessary to provide and continue to provide you with our services. We may request for certain information to verify your identity to process your

application.

WHERE DO WE STORE AND PROCESS YOUR PERSONAL DATA?

All personal data will be stored and processed in our servers and records according to the standards and requirements of the PDPA. We shall ensure that reasonable and necessary steps are taken to safeguard all personal data including but not limited to ensuring server backups, strict identification checks, only necessary processing of personal data, and encryption (as and where we deem necessary). However, it may be necessary for us to transfer your data outside of Malaysia if any of our service providers or business venture partners involved in providing services to you are located outside of Malaysia. Our site, application or platform may also be linked to other websites, and we are not responsible for their data policies, procedures, or content.

We strive to endeavor and assure you that we shall take all steps necessary and reasonable to ensure that none of your personal data transmitted overseas will be used for any reason other than to provide the services which they are contracted to and that they shall abide by the same level of safeguards (or higher) to your personal data.

FOR HOW LONG DO WE KEEP YOUR PERSONAL DATA?

Your personal data shall be kept in compliance with this Policy for the duration of our provision of our services to you and for any other periods as necessary to protect our interests as we deem necessary, or for whatever periods as necessary under the PDPA and related applicable laws. This policy may be amended and updated from time to time and shall be published by us in all our websites, applications, platforms and is accessible at all times.

Should you have any questions or enquiries regarding our administration of personal data, please contact us via our website, application, or platforms.

(15 May 2024)