

## **PRIVACY NOTICE**

### **1. INTRODUCTION**

- 1.1 This Privacy Notice describes how BE International Marketing Sdn. Bhd. (Company no: 201601028139/1199078-X)(AJL932172), BE International Marketing Pte. Ltd. (Company no: 201709715E), BE International Marketing (HK) Pte. Limited.(Company no: 2760241), BE International Marketing (B) Sdn. Bhd. (Company no: RC20003059), and PT BEI International Marketing (Company no: 9120004170023) (referred to herein as “**BE International**”, “**us**”, “**we**” or “**our**”) and it’s affiliates collects, processes, uses and discloses your personal data, which will assist you in making an informed decision before you provide us with any of your personal data.
- 1.2 We may update this Privacy Notice from time to time without any prior notice. When we make any material changes to our Privacy Notice, we will notify you on our website, or by other reasonable means. You may determine if any such revision has taken place by referring to the date on which this Privacy Notice was last updated. Your continued use of our services constitutes your acknowledgement and acceptance of such changes.
- 1.3 Where this Privacy Notice appears in a national language or any other language other than the English language, in the event of any inconsistencies between the English version and the alternate language version, the English version will prevail, save and except in jurisdictions where it is a legal requirement for the national language to prevail.

### **2. WHAT PERSONAL DATA WILL WE COLLECT?**

- 2.1 In this Privacy Notice, “**personal data**” refers to any data, whether true or not, about an individual who can be identified: (a) from that data, or (b) from that data and other information to which BE International has or is likely to have access.
- 2.2 Depending on the nature of your interaction with us, the personal data which we may collect, process, use and disclose includes but is not limited to:
  - (a) Personal details (such as your name, identity card number or passport number, gender, nationality, date of birth and marital status);
  - (b) Contact information (such as your address, billing address, delivery address, email address, and telephone number);
  - (c) Financial information (such as your credit card numbers, debit card numbers, and bank account information);

- (d) Profile information (such as your username, password, Independent Business Owner's number, and order history).
- 2.3 By clicking "Agree" and providing us with your personal data, you consent to our collection, processing, use and disclosure of your personal data for the purposes and usage that have been notified to you in this Privacy Notice and/or by any other means as communicated by us through the online or offline medium ("**Consent**"), and in accordance with the terms of this Privacy Notice.
- 2.4 In addition, in order to comply with legal and regulatory obligations, to protect BE International's assets and employees / external contractors and specifically to ensure that BE International can comply with trade control, anti-money laundering and/or bribery and corruption laws and other regulatory requirements, we carry out screening on our Independent Business Owner on a periodic basis. This screening takes place against publicly available or government issued sanctions lists and media sources.
- 2.5 This data may include personal data regarding suspected and actual criminal behaviour, criminal records or proceedings regarding criminal or unlawful behaviour but only for the purposes of ensuring BE International's compliance with legal and regulatory obligations and / or to the extent permitted or required by local law, all of which are included in the subject matter of the Consent.
- 2.6 The screening does not result in any automated decision making in relation to the counter-parties or potential counter-parties.
- 2.7 As we rely on the personal data provided by you, please ensure that your personal data is current, complete, and accurate. If there are any changes to your personal data, please log in to <https://bos.beintl.com/member/> to do the changes update.

### **3. WHY DO WE COLLECT, USE AND DISCLOSE YOUR PERSONAL DATA?**

- 3.1 We will not collect, process, use or disclose your personal data unless:
- (a) You have been notified of the purposes and usage for which your personal data is collected, and you consent to the collection, processing, use and disclosure of your personal data for those purposes; or
  - (b) The collection, processing, use and disclosure of such personal data are permitted or required under the relevant data privacy laws, if any, of Malaysia, Singapore, Indonesia, Hong Kong and/or Brunei as applicable in view of the circumstances (**the "Data Privacy Laws"**).
- 3.2 Depending on the nature of your interaction with us, we may collect, process, use and disclose your personal data, for any or all of the following purposes:
- (a) Verifying your identity;

- (b) Processing your application and/or transaction with us;
- (c) Processing payment or credit transactions;
- (d) Performing obligations in the course of or in connection with our provision of the goods and/or services requested by you;
- (e) Managing your relationship with us (including responding to, handling, and processing your queries, requests, complaints, and feedback, which could involve the disclosure of personal data to bring about delivery of the same);
- (f) Conducting investigations relating to fraud, unlawful activity, omission or misconduct, whether relating to your use of our services or any other matter arising from your relationship with us;
- (g) Sending you marketing information about our goods and services, including notifying you of our marketing events, initiatives and promotions, lucky draws, membership and rewards schemes, and other promotions;
- (h) Requesting feedback or participation in surveys, as well as conducting market research and/or analysis for statistical, profiling or other purposes for us to review, develop and improve the quality of our products and services;
- (i) Complying with any applicable laws, regulations, rules, codes of practice, or guidelines issued by any governmental and/or regulatory bodies (including but not limited to assisting in law enforcement and investigations conducted by any governmental and/or regulatory authorities);
- (j) Transmitting to any unaffiliated third parties including our third party service providers (e.g. payment service providers, data hosting providers) and agents, and relevant governmental and/or regulatory authorities, for the aforementioned purposes;
- (k) Any other incidental business purposes related to or in connection with the aforementioned purposes.

3.3 In particular, if you intend to join us as an Independent Business Owner in Singapore, please note that we are required under Section 65B(3) of the Singapore Income Tax Act to electronically submit the information on the commission paid to you to the Inland Revenue Authority of Singapore (“IRAS”). In order to make such a submission, the IRAS has confirmed that we will need to obtain the NRIC numbers and/or the relevant identification numbers of our Independent Business Owner.

3.4 If you intend to join us as an Independent Business Owner in Malaysia, please note that we are required under Section 83A(1) of the Malaysian Income Tax Act 1967 to keep and retain information on the commission paid to you and shall

make it readily accessible to the Inland Revenue Board of Malaysia (“IRBM”). In order to do so, the IRBM has confirmed that we will need to obtain the NRIC numbers and/or the relevant identification numbers of our Independent Business Owner.

- 3.5 If you intend to join us as an Independent Business Owner in Hong Kong, please note that we are required to provide your HKID number and/or other relevant identification number to the Hong Kong Inland Revenue Department when we file our tax returns. In order to do so, we will need to obtain the HKID numbers and/or the relevant identification numbers of our Independent Business Owner.
- 3.6 If you intend to join us as an Independent Business Owner in Brunei Darussalam, please note that we are required under Section 52(1A) of the Income Tax Act (Chapter 35) to provide your NRIC identification number and/or other relevant identification number to the Revenue Division of the Ministry of Finance, Brunei Darussalam when we file our tax returns. In order to do so, we will need to obtain the NRIC numbers and/or the relevant identification numbers of our Independent Business Owner.
- 3.7 Consistent with the practices of the various inland revenue or income tax departments of any jurisdiction involved, where there is a legal requirement for us to make available or submit to such departments information or relevant identification information of you at any stage, then you hereby consent for such collect, process, use or disclose your personal data.
- 3.8 Data collected for the purposes stated above is necessary for us to provide our goods and/or services to you. It is therefore obligatory for you to provide us with the requested data, failing which we may not be in a position to provide our goods and/or services to you.
- 3.9 We shall seek your consent before we collect any additional personal data and before we use your personal data for a purpose which has not been notified to you (except where permitted or authorised by law).
- 3.10 When you give us personal data or information about another person, you confirm that they have: - (i) authorised you to act and receive any data protection notices on their behalf; and (ii) consented to BE International in processing their personal data

#### **4. WILL WE TRANSFER YOUR PERSONAL DATA OVERSEAS?**

- 4.1 Where your personal data has been transferred to companies who are affiliates of BE International and/or to authorised third parties located outside of your country, we take organisational, contractual and legal measures to ensure that your personal data is exclusively processed for the purposes mentioned above, and that adequate levels of protection have been implemented in order to safeguard your personal data.

- 4.2 By clicking “Agree” and providing us with your personal data, you consent to our transfer of your personal data to our related business entities in Malaysia, Singapore, Indonesia, Hong Kong and Brunei, and for their collection, processing, use and disclosure of such personal data in accordance with the terms of this Privacy Notice.
- 4.3 By clicking “Agree” and providing us with your personal data, you consent to our transfer and/or process of your personal data to third party data hosting sites located outside the jurisdictions where BE International carries out its business or trade where necessary for the fulfillment of our obligations in providing you services you signed up for; and in any event out of the country wherein BE International collected the personal data from you. We shall take necessary steps to ensure the aforementioned third party hosting sites are contractually bound not to use your personal information for any reason other than to provide the services they are contracted by BE International, to safeguard your personal information.

## **5. CAN YOU WITHDRAW YOUR CONSENT GIVEN FOR PERSONAL DATA COLLECTED?**

- 5.1 You may withdraw your consent for us to collect, process, use and disclose your personal data in our possession or under our control by contacting our Data Protection Officer at [bepdpa@beintl.com](mailto:bepdpa@beintl.com)
- 5.2 Upon receiving your written request to withdraw your consent, we may require reasonable time (depending on the complexity of your request and its impact on the nature of our relationship with you) for your request to be processed and for us to notify you of the consequences of us acceding to the same, including any legal consequences which may affect your rights and liabilities to us. Such legal consequences shall include, but not be limited to, those stated in our Rules and Regulations. In general, we shall seek to process your request within thirty (30) business days of receiving it.
- 5.3 Whilst we respect your decision to withdraw your consent please note that depending on the nature and scope of your request, we may not be in a position to continue providing our goods or services to you. In such circumstances, we shall notify you of the likely consequences of you withdrawing your consent before we complete processing your request.
- 5.4 Please note that your withdrawal of consent does not affect our right to continue to collect, process, use and disclose your personal data where such collection, processing, use and disclosure without consent is permitted or required under the applicable Data Privacy Laws or other written law.

## **6. CAN YOU ACCESS YOUR PERSONAL DATA?**

- 6.1 Subject to certain exceptions under the applicable Data Privacy Laws, you may request to us to provide you with the personal data which we hold about you or

information about the ways in which we collect, process, use or disclose your personal data by contacting our Data Protection Officer at [bepdpa@beintl.com](mailto:bepdpa@beintl.com)

- 6.2 We may charge you a reasonable fee for the handling and processing of your request. If so, we will inform you of the fee before processing your request.
- 6.3 We will respond to your request as soon as reasonably possible. Should we not be able to respond to your request within thirty (30) days after receiving your request, we will let you know the reason for the extension and inform you in writing within thirty (30) days of the time by which we will be able to respond to your request. If we are unable to provide you with any personal data, we shall generally inform you of the reasons why we are unable to do so (except where we are not required to do so under the applicable Data Privacy Laws).

## **7. CAN YOU REQUEST THAT WE CORRECT OR SUPPLEMENT YOUR PERSONAL DATA?**

- 7.1 Subject to certain exceptions under the applicable Data Privacy Laws, you may request us to correct any error or omission in or make supplements for the personal data which we hold about you by contacting our Data Protection Officer at [bepdpa@beintl.com](mailto:bepdpa@beintl.com)
- 7.2 We will respond to your request as soon as reasonably possible. Should we not be able to respond to your request within thirty (30) days after receiving your request, we will let you know the reason for the extension and inform you in writing within thirty (30) days of the time by which we will be able to respond to your request. If we are unable to make the correction or supplement requested by you, we shall generally inform you of the reasons why we are unable to do so (except where we are not required to do so under the applicable Data Privacy Laws).

## **8. HOW DO WE PROTECT YOUR PERSONAL DATA?**

- 8.1 Whilst we strive to protect your personal data, and are constantly reviewing and enhancing our information security measures, please note that no method of transmission over the Internet or method of electronic storage is completely secure. As such, we urge you to take every precaution to protect your personal data when you are on the Internet, when you browse our websites, or use our applications and/or digital services. We recommend that you change your passwords often, use a combination of letters, numbers, and special characters, and ensure that you use a secure browser.
- 8.2 If you believe that your personal data has been compromised in any way, please change your password immediately and/or contact our Data Protection Officer at [bepdpa@beintl.com](mailto:bepdpa@beintl.com)

## **9. FOR HOW LONG WILL WE RETAIN YOUR PERSONAL DATA?**

- 9.1 We will retain your personal data that is necessary for legal or business purposes for as long as it is necessary to (i) fulfil the purposes for which your personal data was collected; and/or (ii) fulfil the minimum personal data retention period required under the relevant laws of any jurisdiction.
- 9.2 We will cease to retain your personal data, or remove the means by which your personal data can be associated with you, as soon as it is reasonable to assume that such retention have fully satisfied the criteria under Clause 9.1 above.

## **10. MISCELLANEOUS**

- 10.1 If you have any enquiries or feedback on our personal data protection policies and procedures, you may contact our Data Protection Officer at [bepdpa@beintl.com](mailto:bepdpa@beintl.com)
- 10.2 This Privacy Notice applies in conjunction with any other notices, contractual clauses and consent clauses that apply in relation to the collection, use and disclosure of your personal data by us.

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