

PRIVACY POLICY

1. General

- 1.1 The Personal Data Protection Act 2010 ("PDPA/Act") has been introduced by the Government of Malaysia to monitor the collection, processing and use of personal data in commercial transactions. The Act governs all companies and firms formed in Malaysia, hence it is compulsory for us to notify you about your rights as our client/potential client regarding your data that we have collected/been collecting and/or is in the process and/or will be processed and the purposes of the data processing. This Privacy Policy ("Policy") clarifies how we collect and process your personal data in accordance with the PDPA principles. This Policy applies to Jobers Online Services Malaysia Sdn. Bhd. (1317390-W) ("Jobers Online/the company"), its subsidiaries, associates, joint venture partners, related corporations, suppliers, contractors, relevant third-party companies and consultants whether in or outside Malaysia. Your privacy is crucial to Jobers Online and we will take all necessary measures to safeguard your data.

2. Data Collection and Processing

- 2.1 We collect personal data directly from you when you choose to engage any of the Jobers Online Services and/or to use the Jobers Online Websites/Job Sites/Mobile Apps. "Personal Data" means the data that we collect about you as stated below, including sensitive personal data including but not limited to the following:
- i. Introduction details such as your name, identification number, supporting identity documents such as identification card, gender, ethnic, race, nationality, date of birth, age, chosen language and marital status;
 - ii. Your contact details such as your personal address, house address, office address, delivery address for marketing material and product, phone number, email address and other contact details that you provide to us from time to time;
 - iii. Your occupation details such as your previous and current employers' name, your designation in the company, job descriptions, the company address, phone number, your salary range and professional qualification or other qualification;
 - iv. Your academic qualifications including documents given by your school/college/university/institute;
 - v. Your resume/curriculum vitae;
 - vi. Your personal interests or preferences;
 - vii. Your payment details such as bank account number and credit card or debit card details;

- viii. Recording conversation via telephone;
- ix. Retaining sms or other forms of communication;
- x. Your images;
- xi. The details of your spouse, dependency or any other third party;
- xii. If you choose to add referees to your Jobers Online Profile, Jobers Online will ask you for their names, telephone numbers, emails, designation and other relevant particulars. This information will be enclosed as part of your job application and Employers/Recruiters may contact them to get references for your applications;
- xiii. If you choose to use Jobers Online Services to tell a friend about its services or Jobers Online Websites/Job Sites/Mobile Apps, Jobers Online will ask for your friend's name and e-mail address. An e-mail inviting your friend to use the Jobers Online Services or to visit the Jobers Online Websites/Job Sites/Mobile Apps will be sent to him/her automatically;
- xiv. In addition, Jobers Online may ask your permission to post your testimonial or success story. If you agree to post your material on Jobers Online Websites/Job Sites/Mobile Apps, you should be aware that any personal information you submit can be read, collected, or used by other users of the Jobers Online Websites/Job Sites/Mobile Apps and could be used to send you unsolicited messages; and
- xv. Other additional information associated with a resume for job applications that you provide to us when you are dealing with us.

2.2 We may collect, use and/or process the Personal Data that you have provided to us in the following circumstances:

- i. Each time you register with Jobers Online for any of the Jobers Online Services, you will be asked to provide certain personal data about yourself in order to create a Jobers Online personal user account.
- ii. Some Employers/Recruiters may also require you to answer a list of questions selected by that Employer/Recruiter as part of your online application. By answering the Application questions you acknowledge that Jobers Online will provide your answers to that Employer/Recruiter and may use your answers to populate your Jobers Online Profile and enable Employers/Recruiters to access that information when using our services/websites. Jobers Online may also use your answers to improve our services, including but not limited to improving our search and matching capabilities.
- iii. From your use of the Jobers Online Services and/or the Jobers Online Websites/Job Sites/Mobile Apps.

3. Purposes of Personal Data

3.1 The purposes for which Jobers Online processes your Personal Data are as follows:-

- i. To verify your identity;
- ii. To assess and/or verify your employability and credit worthiness;
- iii. To provide the Jobers Online Services which you have requested (including using artificial intelligence (“AI”) and data analytics in relation to Personal Data in order to improve Jobers Online’s ability to provide these services);
- iv. To administer and manage the Jobers Online Services provided to you;
- v. To contact you in respect of Jobers Online Services;
- vi. To facilitate the provision to you of tailored educational offerings and improve your career prospects by supplying your information to our strategic partners;
- vii. To improve placement opportunities for you or for tailoring specific services to you;
- viii. To verify your academic and professional qualification by contacting the school/college/university/institute/ professional qualifying bodies;
- ix. To contact the referee and/or the guarantor whom details have been provided by you;
- x. To process your order for the Jobers Online Services which you have requested;
- xi. To investigate and resolve any of the Jobers Online Services, billing queries, complaints or other enquiries that you submit to Jobers Online regarding Jobers Online Services;
- xii. To manage staff training and quality assurance;
- xiii. To monitor and improve the performance of the Jobers Online Websites/Job Sites/Mobile Apps and the Jobers Online Services;
- xiv. To maintain and develop the Jobers Online Websites/Job Sites/Mobile Apps and Jobers Online Services;
- xv. To gain an understanding of your information and communication needs in order for Jobers Online to enhance and customize the Jobers Online Services;
- xvi. To conduct research and development and statistical analysis in connection with the Jobers Online Services to identify trends and develop new services that reflect your interests;

xvii. To assist Jobers Online in understanding your browsing preferences on the Jobers Online Websites/Job Sites/Mobile Apps so that Jobers Online can tailor content accordingly;

xviii. To detect and prevent fraudulent activity;

xix. To promote and market to you:

- Other Jobers Online Services; or
- Services of third parties which Jobers Online thinks may be of interest to you;

xx. To send you seasonal greeting messages and/or messages informing you of a critical performance error in the Jobers Online Websites/Job Sites/Mobile Apps and/or the Jobers Online Services.

xxi. To send you tips, advice and survey information to maximize your career development including but not limited to using the Jobers Online Services and/or the Jobers Online Websites/Job Sites/Mobile Apps.

3.2 In addition, Jobers Online may use and process your Personal Data for business and activities which shall include, but is not limited to the following: -

For the Jobseeker

Once you have activated your Jobers Online personal user account, Jobers Online shall submit your Registration Information to the Jobers Online Job Sites/Mobile Apps profiling engine to attempt to match your information with available job postings. Upon a match of your Registration Information with a job posting, Jobers Online will notify you via email if you have elected to receive such notifications. Upon reviewing a job posting, your Employment Information will be forwarded to that potential Employer/Recruiter only if you click on the "Apply" or "Submit" button, thereby instructing Jobers Online to forward the Employment Information to the potential Employer/Recruiter.

For the Employer/Recruiter

Jobers Online collects the company name, business address and billing address of potential Employers/Recruiters. It also collects the name, email address and phone number of a primary contact (also referred to on the Site as the 'administrator'). Employers/Recruiters can choose to add additional users to their account, in which case Jobers Online will collect the name and email address of those other users. Employers/Recruiters can change the company name, billing address, or any other details by contacting the designated Account Manager. Jobers Online uses these details to manage your account, including sending Employers/Recruiters applications

of Candidates, contacting Employers/Recruiters if there is an issue with their job advertisement and organizing payment and invoicing of the account.

Once you have signed up for an account with Jobers Online, the information you provided will be used to perform Jobers Online's obligations in respect of any contract entered into with you, to facilitate and/or provide you with any service you have requested and to process your information to create your Employer/Recruiter page with the Websites/Job Sites/Mobile Apps for jobseekers to gain basic information about the Employer/Recruiter. The information is also used to validate payment made by the Employer/Recruiter relating to services requested from the Websites/Job Sites/Mobile Apps and to process cancellations and/or refunds for the services that have not been rendered to you, where applicable, subject to other specific terms and conditions for the services. Jobers Online may use the information to understand and analyse our sales as well as your needs and preferences to improve Jobers Online's services to you, to develop, enhance and provide products and services to meet your needs or to contact you for product or customer satisfaction surveys and market research; and for all other purposes ancillary to any of the purposes stated above.

Third Parties

Jobers Online has contracted with a third party Application Service Provider (ASP) to implement and host the Jobers Online Websites/Job Sites/Mobile Apps Service. Information collected from you and potential Employers/Recruiters will be stored on the ASP's server and processed through its profiling engine. The ASP is not permitted to disclose your personally identifiable information to any third party without your consent.

4. Your Consent

- 4.1 By registering with Jobers Online, by managing your profile, or opting in when presented with choices, you have explicitly consented for us to use your information, subject to local law, in the following ways:
- i. to allow you to create an account; to create a profile for you based on information that you have provided to Jobers Online; to contact you about Jobers Online Websites/Job Sites/Mobile Apps updates, informational and service-related communications, including important security updates; to provide you additional communications, information, and promotions such as newsletters and career advice; to inform you of other services available from Jobers Online; to enable you to provide feedback, to contact us and for us to respond to you; to conduct surveys, questionnaires and promotions; to provide information about you and your potential interest

in job postings to potential Employers/Recruiters; to provide services to Employers/Recruiters to complete the recruitment and hiring process, such as accessing the searchable resume database; to provide services that enable users to network, post information on bulletin boards, view and compare profiles, and career background and experience; to generate internal reports about the use of our site; and to provide 'forward to a friend' features.

- ii. Some of our services, such as our searchable resume database and networking, enable third parties to see your personal information and to contact you. Profile information may be used for networking with other community members or may be visible to Employers/Recruiters who are using the Jobers Online Websites/Job Sites/Mobile Apps. In addition, portions of your searchable resume (but not your contact information) may be made public in your networking profile.
- iii. Information you post or share in public areas of the site or place in the searchable resume database will be accessed, used, and stored by others around the world, including those in countries that might not have legislation that guarantees adequate protection of Personal Data as provided in the PDPA. By providing your Personal Data for inclusion in our database, you acknowledge that you consent to your information being used as described here. While Jobers Online takes measures to safeguard your information from unauthorized access or inappropriate use by third parties, Jobers Online does not control these third parties and we are not responsible for their use of information you post or otherwise make available in public areas of the Jobers Online Websites/Job Sites/Mobile Apps.
- iv. Although we are committed to protecting your privacy, we do not promise, and you should not expect, that your Personal Data or private communications will always remain private. As a user of the Jobers Online Websites/Job Sites/Mobile Apps, you understand and agree that you assume all responsibility and risk for your use of the Websites/Job Sites/Mobile Apps, the internet generally, and the documents you post or access and for your conduct on and off the Websites/Job Sites/Mobile Apps. Accordingly, you should ensure that you do not post sensitive information, including personality profiles, to these sites.

5. Personal Data Disclosure and Transfer

5.1 Your Personal Data may be disclosed to the classes of third parties as follows in order for Jobers Online to effectively manage its business including to render the Jobers Online Services to you more effectively:

- a) The Employers/Recruiters;
- b) Third parties contracted by Jobers Online to assist Jobers Online in delivering all or part of the Jobers Online Services to you, including without limitation, to the following:-
 - i. Payment gateway services for optional services;
 - ii. Profiling/assessment services;
 - iii. Online advertising services;
 - iv. Mapping services;
 - v. Maintenance and repair services; and
 - vi. Market research and website usage analysis services.
 - vii. Strategic partners that work with Jobers Online to provide the Jobers Online Services or that help market and promote Jobers Online Services and/or Jobers Online Websites/Job Sites/Mobile Apps;
 - viii. Strategic partners that provide ancillary services such as education offerings for the purposes of improving your career prospects and/or professional qualifications.
 - ix. The school/college/university/institute you studied at and your referees so as to verify your academic qualification;
 - x. Professional qualifying bodies where you obtained your accreditation;
 - xi. Where you log in to a Jobers Online Websites/Job Sites/Mobile Apps using Facebook Connect – your Facebook friends who have also logged in to our site using Facebook Connect;
 - xii. Regulatory bodies, governmental 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;
 - xiii. Regulatory bodies, governmental bodies or other authorities for the purpose of detection or prevention of crime, illegal/unlawful activities or fraud or for the apprehension or prosecution of offenders, or for an investigation relating to any of these;

- xiv. Any party involved in or related to a legal proceeding (or prospective legal proceeding), for purposes of the legal proceedings;
- xv. Jobers Online's professional advisors on a need to know basis for the purpose of those advisors providing advice to Jobers Online;
- xvi. Other third party service providers, including but not limited to data analytics service providers, data storage and cloud service providers and/or any service providers that assist us in carrying out our business activities;
- xvii. Any third party which acquires all or part of the assets or business of Jobers Online (including accounts and trade receivables) for the purpose of that third party continuing to provide all or that part of the Jobers Online Services which it acquired; and
- xviii. Otherwise permitted under any data protection legislation.

6. Security

- 6.1 Jobers Online is committed to keeping Personal Data secure. Jobers Online has the appropriate technical, administrative and physical procedures in place to protect Personal Data from loss, theft and misuse, as well as against unauthorized access, disclosure, alteration and destruction. Sensitive information (such as a credit card number) entered on our payment gateway services are encrypted during the transmission of that information using secure socket layer technology (SSL).
- 6.2 We have implemented commercially reasonable technical and organizational measures designed to secure your personal information from accidental loss and from unauthorized access, use, alteration or disclosure. However, no method of transmission over the Internet, or method of electronic storage, is 100% secure, however. Therefore, we cannot guarantee its absolute security.

7. Retention

- 7.1 Jobers Online will retain your Personal Data in our business records as long as you are our client. We also will retain your Personal Data for a certain period of time after you are no longer a client of Jobers Online if it is necessary to serve legal purposes. We will not retain your Personal Data longer than necessary. However, relevant Personal Data may be retained subject to the conditions below:
 - i. as and when required under any applicable laws or legislation of Malaysia;
 - ii. where legal actions have arisen and are pending; and
 - iii. for commercial and/or operational purpose of Jobers Online. Jobers Online shall take all reasonable steps to ensure that all Personal

Data is destroyed or permanently deleted when no longer required for the abovementioned purposes.

- 7.2 We store your information to make your interaction with Jobers Online more efficient, practical, and relevant. You may review, update, or delete the Personal Data you share with us at any time by accessing your account. When you delete your Personal Data, we will retain logs and non-personal information about you along with an archival copy of your information, which is not accessible by you or third parties on the Internet. If your Personal Data was previously accessed by others using Jobers Online Services or Jobers Online Websites/Job Sites/Mobile Apps, we are unable to delete the information from their systems. You may turn off cookies. This will adversely affect your use of Jobers Online Services and Jobers Online Websites/Job Sites.

8. Your obligations

- 8.1 You are responsible for providing accurate, not misleading, complete and up-to-date information to Jobers Online about yourself and any other person whose Personal Data you provide to us and for updating this Personal Data as and when it becomes inaccurate, misleading, incomplete and out-of-date by contacting Jobers Online.
- 8.2 In the circumstances you may need to provide to Jobers Online personal information about someone other than yourself (for example, your referee or guarantor). If so, we rely on you to inform these individuals that you are providing their personal information to Jobers Online, to make sure they consent to you giving us their information and to advise them about where they can find a copy of this Privacy Policy (on our website at [Privacy Policy](#)).
- 8.3 If you wish to stop Jobers Online from processing this type of Personal Data about you, kindly contact Jobers Online. In such an event, Jobers Online will no longer be able to provide the relevant services to you.
- 8.4 It may not be possible to limit the processing of your Personal Data for the purposes set out in Clause 3 above. Whilst the provision of your Personal Data to us is voluntary, if you do not consent to Jobers Online processing your Personal Data for the said purposes, you must terminate your relevant agreement with Jobers Online for the Jobers Online Services and stop using the Jobers Online Websites/Job Sites/Mobile Apps.

9. Jobers Online Websites/Job Sites/Mobile Apps

- 9.1 When you visit any Jobers Online Websites/Job Sites/Mobile Apps our web servers automatically collect information about your visit to these websites, including your Internet Protocol (IP) address, the time, date and duration of your visit. Your IP address is a unique identifier for your computer or other access device.

- 9.2 Jobers Online may track your visits to any Jobers Online Websites/Job Sites/Mobile Apps by placing a “cookie” on your computer or other access device when you enter. Cookies are small text files that are placed on your computer or other access device by websites that you visit. They are widely used in order to make websites work, or work more effectively, as well as to provide information to the owners of the websites.
- 9.3 You can remove cookies by following directions provided in your internet browser’s “help” file. You should understand that areas of certain websites will not function properly if you set your internet browser to not accept cookies.
- 9.4 Jobers Online also uses clear gifs in its HTML-based emails in order to find out which emails have been opened by the recipients. This allows Jobers Online to gauge the effectiveness of certain communications and the effectiveness of its marketing campaigns.
- 9.5 Our partners and service providers use cookies to collect information about the usage of Jobers Online Websites/Job Sites/Mobile Apps. The use of cookies by our partners and service providers is not covered by our privacy policy. We do not have access or control over these cookies.

10. Update and Amendment

- 10.1 This Policy may be amended at any time from time to time. Any amendments will be made on our website or through other methods that we consider appropriate. Continued use of our services or our website will be considered as your agreement to such amendments.