

## **PRIVACY NOTICE**

### **A. General**

This Privacy Notice is provided by **arvato Systems Malaysia Sdn Bhd (Company No. 707776-M)** and its holding company, subsidiaries and related companies (collectively referred to as “we”, “our”, “us” and “arvato”). This Privacy Policy describes how and when we collect your personal data, what that personal data may be used for, who uses it, when it may be disclosed to other parties, how you can access to your personal data, how you can seek correction of your personal data and how you can contact us with regard to all of the above.

### **B. Notice**

This Privacy Notice serves as a notice pursuant to the Personal Data Protection Act 2010 (**PDPA**). By communicating or interacting with us, engaging us to provide services or responding to our request for services or continuing to do so, you consent to the Processing of your Personal Data by us and all persons involved in the Purposes.

### **C. Personal Data Collection**

We may have or may collect, store, use and process (**Processing**) personal data which may include your name, address, telephone number, NRIC, passport number, email address, your personal preferences, particulars of your spouse or family members and bank account information or any information which may identify you, your spouse or family members by way of written form (ie; via email and post) and telephone conversation. (**Personal Data**).

In addition to the Personal Data you provide to arvato directly (i.e. during your communications with us and/ or when you engage us to provide services and/ or when you are engaged to provide services to us), arvato may also collect your Personal Data from a variety of sources, including without limitation, recruitment agencies or head hunters, referrals specified in the job application forms or referrals specified in the list of your past projects [and/ or from the cookies used on arvato’s website].

You are responsible to ensure that the Personal Data provided by you to us is accurate, complete and not misleading and that such Personal Data is kept up to date.

The provision of your Personal Data is voluntary. However, if you do not provide your Personal Data, arvato may not be able to:-

1. Communicate with you or engage you as an employee;
2. Provide you with the services you require; or,
3. Engage you for the services arvato requires.

### **D. Purpose of Personal Data Processing**

We may use and Process your Personal Data for one or more of the following circumstances or for one or more of the following purposes:-

1. To communicate with you;
2. For administrative, operational, marketing, planning, product or service development purposes;
3. To provide information to regulatory and governmental authorities in order to comply with statutory and government requirements;
4. To comply with its obligations under the law;
5. To allow us to make payment or reimbursement to you;
6. To send you information on products and services, special or promotional offers, newsletters and questionnaires;
7. To provide you with information on products and services of our business partners;
8. Such other purposes as set out in the Terms of Use or any other contract entered between arvato and you;

(collectively “**Purposes**”) and you agree and consent to us Processing your Personal Data in the manner as identified in this Privacy Notice.

If you do not consent to us Processing your Personal Data for any or all of the Purposes, please notify us using the contact details at Section G. below.

#### **E. Transfer of Personal Data**

As our holding company, related company and subsidiary and our information technology storage facilities and servers may be located in other jurisdictions, your Personal Data may be Processed in a jurisdiction other than Malaysia for the Purposes. You understand and consent to the transfer of your Personal Data out of Malaysia as described herein.

#### **F. Disclosure of Personal Data to Third Parties**

We may engage other companies, service providers or individuals to perform functions on our behalf and consequently, may provide access or disclose to your Personal Data to the third parties such as those listed below:-

1. Information technology (IT) service providers;
2. Data entry service providers;
3. Storage facility providers;
4. Banks and financial institutions;
5. Insurance providers;
6. Any professional advisors and external auditors;
7. Regulatory and governmental authorities in order to comply with the statutory and government requirements;

8. To other third parties with whom we have commercial relationships unless you have indicated that you do not wish for us to disclose to such third parties for marketing and advertising purposes.

#### **G. Access & Correction Requests and Inquiries**

Subject to any exceptions under applicable laws, you may at any time:-

1. Request for access to, or for correction or rectification of your Personal Data;
2. Request to limit the Processing of your Personal Data;
3. Seek further information or clarification from us regarding this Privacy Notice;

by contacting us at:-

PDPA Officer: HR Department, Chloe Gan

ADDRESS: Level 25, Menara IMC, No. 8, Jln Sultan Ismail, 50250 Kuala Lumpur.

EMAIL: [hr.sea@arvato-systems.asia](mailto:hr.sea@arvato-systems.asia), [chloe.gan@bertelsmann.de](mailto:chloe.gan@bertelsmann.de)

TELEPHONE NUMBER: +603 23301988

FAX NUMBER: +603 23301989

We may to the extent not limited by the law:-

1. Charge a fee for processing your request for access or correction to the Personal Data;
2. Refuse to comply with your request for access or correction of the Personal Data and give you a reason for our refusal.

#### **H. Miscellaneous**

In the event of any inconsistency between the English version and other language versions, the English version shall prevail. We have the right to modify, update or amend the terms of the Privacy Notice at any time by placing the updated Privacy Notice on arvato's website titled as Privacy Policy.