

PRIVACY NOTICE

At Modalku Ventures Sdn Bhd ("**Funding Societies**"), we respect your personal data and we strive to ensure that your personal data is protected. The security of your personal data is important to us and we shall maintain appropriate physical, technical and organisational measures needed to ensure the security and confidentiality of your personal data. This Privacy Notice outlines how Funding Societies collects, uses, maintains and discloses your personal data in respect of our services and how Funding Societies safeguards the personal data.

1. Collection of Personal Data

You may be asked, may have supplied and may continue from time to time, to provide any information, including but not limited to, information to establish your identity, background (including your images), addresses, contact numbers, email addresses, IP addresses, operating systems, browser types, contact details, financial data, creditworthiness information, audio recordings and other information and data generated or that you provide when you apply for any of our products and/or services ("**Personal Data**"). We may collect and obtain these Personal Data from yourself or from a variety of sources, including but not limited to from your submission of your Personal Data when you apply for any of our products and services; from your relationship with us; from recordings of closed circuit television (CCTV) installed at our premises; from any analysis of the way you use and manage your account/facility with us; from publicly available sources or registries; from government authorities, regulatory authorities and/or law enforcement agencies; from third parties or other sources in respect of which you have given your consent to disclose the Personal Data and/or where not otherwise restricted; from meetings, events, seminars, conferences, talks, road shows, surveys organised or sponsored by us; and/or from any information that is supplied and/or collected when you visit our websites which include your mobile device or computer's IP address or from any information that is collected via cookies on some of our websites. We use cookies for a number of purposes, including but not limited to, storing your preference for certain types of information or products, for further analysis to provide products and services to you, to improve our products and/or to personalize our services to you. You may adjust the settings on your browser and/or mobile device so that you will be notified when you receive cookie or other similar tracking tools. Please refer to your browser documentation to check if the tracking tools have been enabled on your computer and/or mobile device or to disable cookies if you do not wish to have information collected via the use of cookies. You have the choice, at any time, not to provide your Personal Data to us, however, failure to provide your Personal Data to us may result in Funding Societies being unable to provide you with our products and services.

2. Usage of Personal Data

During the course of our service, we may utilise, process and/or disclose your Personal Data for the following purposes in and/or outside Malaysia ("**Permitted Purpose**"):-

- i. to assess and process your applications for our products and/or services;
- ii. to communicate with you including responding to your enquiries and/or complaints and resolving disputes;
- iii. to manage and maintain your accounts/facilities with us;
- iv. to conduct credit checks to assess or verify your credit/financial worthiness and to assist other financial institutions to conduct credit checks;
- v. to evaluate your financial needs;
- vi. to utilise the same for strategic alliances, cross selling, marketing, and promotions;
- vii. to maintain your credit history for present and future references;
- viii. to detect crime or fraud, and to utilise and disclose the same for investigation, prevention, prosecution and compliance with sanctions, including know your customer (KYC) and regular politically exposed persons (PEP) screening purposes;
- ix. to respond to the requirements of a civil or criminal legal process and/or for regulatory compliance purpose and/or as required by law or regulation;
- x. to collect any debt due or owing and to enforce your obligations to us;
- xi. to utilise and disclose the same for market research and statistical analysis and surveys with the aim of improving our products and services and product development;
- xii. to provide you with the information on our and third-party products and services which may be of interest to you;
- xiii. to compare information/data for accuracy of our record, and to verify the same with third parties;
- xiv. to utilise the same for research, design and improvement of our products and services, operational and business processes;
- xv. to support our business, financial and risk monitoring, planning and decision making;
- xvi. to handle complaints and queries;
- xvii. to utilise and disclose the same for audit, compliance and risk management;
- xviii. to transfer or assign our rights and duties under any governing terms and conditions between us and yourself;
- xix. to utilise the same for our outsourcing of business and backroom operations;
- xx. to utilise and disclose the same for security reasons;
- xxi. to transfer your Personal Data to foreign jurisdictions to enable any cross-border transactions, for the performance of a contract, for the purposes of legal proceedings, upon written request from a foreign

regulatory or government authority or body, to protect your vital interest or where it is in the public interest to do so; and/or

xxii. for any other purposes that is required or permitted by any law, regulation, order and/or guidelines.

3. Disclosure of Personal Data

Your Personal Data held by us shall be kept confidential at all times. However, in order to provide you with effective and continuous products and services subject to any laws, regulations and guidelines and for the Permitted Purpose, we may need to disclose your Personal Data to the following parties:

- i. Funding Societies' agents, holding companies, subsidiaries, affiliates and associates;
- ii. professional advisers, contractors, service providers, debt collection agencies and our other agents with whom we have contractual agreements for some of our functions and services;
- iii. credit bureau, credit reporting agencies, credit reference agencies, rating agencies, insurers and/or insurance brokers;
- iv. financial service providers in relation to the products and services that you have with us;
- v. any actual or potential participants or assignee or transferee of our rights and/or obligations under any transaction between us and you;
- vi. any guarantor or security provider for the products and/or services granted by us to you;
- vii. any authorities or regulators, including foreign regulators for the performance of their functions, or any party as required by any law or any government, quasi-government, administrative, court or tribunal;
- viii. strategic/business partners with whom we have a relationship with for specific products and services;
- ix. any person connected to the enforcement or preservation of any of our rights under your agreements with us; and/or
- x. any party authorised and/or consented by you.

4. Changes to Personal Data

You are entitled to review the Personal Data that we have collected about you and request for corrections to the Personal Data. If there are any changes to your Personal Data or if you believe that the Personal Data we hold about you is inaccurate, incomplete, misleading or not up-to-date, kindly write in to us or email your request to our Data Officer (info@fundingsocieties.com.my) setting out your name and NRIC/Passport number/Company number, the details of your request, together with the supporting documents. A fee may be charged for this service. We shall correct or update the information/data as soon as possible. For the avoidance of doubt, the Data Officer may request information or documents from you to verify your identity and the authenticity of the request made and any other information relating to the corrections requested.

5. Removal of Personal Data

The consent that you have provided us for the collection, usage and disclosure of your Personal Data shall remain valid until such time it is being withdrawn by you in writing. We allow you the opportunity to remove your Personal Data (save for the information which is necessarily retained by us to comply with legal or regulatory requirements, storage purposes, or if there are valid grounds under the law to do so, such as legal claims etc.) from our database or to request for us to cease processing all or part of your Personal Data by giving a written instruction to our Data Officer. We will require a reasonable amount of time to process such notices. Please note that after deleting your Personal Data, we may not be able to provide the same level of service to you as we will not be aware of your preferences.

We reserve the right to take necessary actions if we feel that such removal or cessation would not allow us to provide our products and services or fulfill our obligations in a satisfactory manner. This includes our entitlement to refuse to provide or cease providing any facilities, products or our services to you.

Where you have requested that we remove or cease the usage of your Personal Data that we have made public and there are valid grounds for such removal or cessation, we will use reasonable and cost effective steps to inform others that are displaying your Personal Data or providing links to the Personal Data to remove the same.

6. Portability

You have the right to receive your Personal Data which you have provided to us in a structured, commonly used and machine-readable format and you have a right to request that we transfer such Personal Data to another party.

If you wish for us to transfer the Personal Data to another party, we can only do so where it is technically feasible. We are not responsible for the security of the Personal Data or the processing of the same once received by a third party. We reserve our rights to refuse the transfer if such transfer would interfere with another person's rights (e.g. where providing the Personal Data we hold about you would reveal information about another person).

7. Profiling

We may process some of your data automatically, with the goal of assessing certain personal aspects (profiling). For example, we may use the profiling due to certain legal and regulatory requirements, to combat money laundering, terrorist financing, fraud, assessment of risk and offences that pose a danger to assets.

8. Enquiries and Complaints

You have the right to object at any time to the processing of your Personal Data for direct marketing purposes, and profiling to the extent related to direct marketing and to the extent permitted under the Malaysian law, and to the processing of your personal data for the Permitted Purpose. Any queries, requests, concerns, complaints or exercise of your rights regarding the use of your Personal Data may be raised to the respective Data Officer below:-

Data Officer
(*Customer Experience*)
Tel: 03 2242 1018
Email: info@fundingsocieties.com.my

In applying for, using or continuing to use our services, including any other contractual relationship which you may have with us, you shall be deemed to have accepted and consented to the terms of this PDP Notice. If you do not consent to the terms herein, kindly contact us at the abovementioned contact details.

9. Changes to the Privacy Notice

Please note that we may update this Privacy Notice from time to time via posting on our website. You are advised to periodically view our website for any updates or the most current version of our Privacy Notice. Your continued usage of our services or continued relationship with us shall be deemed as acceptance of any updates, revisions or amendments made to our Privacy Notice.

10. Language

This Notice is issued in both the English and Malay languages. In the event of any inconsistency between these two versions, the English version shall prevail.

11. Consent and Acknowledgement

By providing us with your Personal Data, you hereby consent to the usage, processing and/or disclosure of your Personal Data in accordance with this Privacy Notice. If you are a corporation whereby you have provided/disclosed Personal Data of individual third parties including but not limited to your directors, individual shareholders, employees, authorized signatories, agents, representative or otherwise, you hereby represent and warrant to us that you have the consent of such third parties and are entitled to provide their Personal Data to us to be used, processed and/or disclosed in accordance with this Privacy Notice.

