

Document Reference	Version	Effective Date	Owner	Approved By
PP-EXT-003	Final	23 December 2025	HOC	BOD/CEO/RP

## **IMPAKRINTAS PRIVACY POLICY**

**Effective Date:** 23 December 2025

This Privacy Policy describes how Impakrintas (referred to as "we," "us," or "our"), a registered operator of a Social Exchange Platform (SEP) under the Securities Commission Malaysia (SC) Guidelines, collects, uses, processes, and protects the personal data of our users (NPOs, donors, visitors, "you") in compliance with the *Personal Data Protection Act 2010* ("PDPA") of Malaysia and relevant SC Guidelines.

By using the Impakrintas platform, you consent to the data practices described in this policy.

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### **1. The Personal Data We Collect**

We collect various types of personal data to operate our platform efficiently, facilitate donations, ensure regulatory compliance, and provide a secure environment.

#### **1.1 Data Collected from Donors:**

- **Identity Data:** Name, NRIC/Passport number (if required for enhanced verification or tax receipting purposes), email address, phone number.
- **Transaction Data:** Donation amounts, project IDs, date/time stamps, payment gateway reference IDs, and bank details (we receive confirmation from the gateway but do not store your full financial credentials, as transactions are pass-through).
- **Communication Data:** Records of any correspondence with our support or compliance teams.

#### **1.2 Data Collected from NPOs and Key Personnel (Directors, Staff):**

- **Identity and Contact Data:** Names, NRIC/Passport numbers, job titles, email addresses, phone numbers, and proof of address.

- **Organizational Data:** NPO registration details (SSM/ROS/BHEUU numbers), LHDN Section 44(6) approval letters, bank account details for fund routing/fee invoicing.
- **Due Diligence Data:** Resumes, background check results, "fit and proper" declarations, financial statements, and annual reports collected during the vetting process.

### 1.3 Automatically Collected Data (All Users):

- **Usage and Technical Data:** IP addresses, browser types, operating systems, pages visited, access times, and data collected via cookies and similar tracking technologies to improve platform functionality and security.

## 2. How We Use Your Data

We process your data primarily for the purposes of ensuring transparency, integrity, and robust governance and to ensure compliance with all the rules and regulations imposed on us as a registered social exchange operator.

- **To Operate the Platform:** To provide access to the platform's features, facilitate project listings, and manage donor transactions.
- **For Regulatory Compliance and Vetting:** To perform mandatory due diligence on NPOs, verify legal and tax statuses with Malaysian authorities (SSM, LHDN), conduct "fit and proper" assessments, and maintain records for SC audits.
- **To Facilitate Donations (Pass-Through Model):** To securely route funds directly to the intended NPO via our local payment gateway provider and issue official digital receipts for tax purposes.
- **For Security and Fraud Prevention:** To monitor for suspicious transactions (AML/CFT monitoring), investigate potential fraud (Procedure 8.3), and ensure adherence to our Community Guidelines/SEP Rulebook.
- **For Communication:** To send transactional receipts, project updates (e.g., delays via Procedure 8.4), respond to inquiries, and notify users of adverse circumstances.
- **For Service Improvement:** To analyze platform usage data and troubleshoot technical issues.

## 3. Disclosure and Sharing of Personal Data

We only share your personal data when necessary and in compliance with the PDPA and SC Guidelines:

- **With NPOs (for Donors):** We share necessary donor information (name, donation amount) with the recipient NPO so they can acknowledge the donation, maintain their own records, and issue appropriate documentation for tax purposes.

- **With Our Service Providers:** We share data with trusted third-party vendors who perform critical services for us, notably our local payment gateway provider for processing transactions and issuing receipts.
- **With Malaysian Authorities:** We must disclose data to the Securities Commission Malaysia (SC), the Inland Revenue Board (LHDN), PDRM (Police), or other regulatory/government bodies when required by law or during investigations into fraud, AML/CFT concerns, or regulatory breaches.
- **Legal Requirements:** When necessary to protect our rights, prevent harm, or respond to a court order or legal process.

#### 4. Data Retention

We retain personal data for as long as necessary to fulfill the purposes for which it was collected, comply with our legal and regulatory obligations (e.g., maintaining audit trails for the SC), and resolve disputes. Due diligence records for NPOs and transaction logs are maintained for a period mandated by Malaysian securities laws and Guidelines on Social Exchange Platforms.

#### 5. Data Security

We implement robust security measures, as detailed in our internal Technology Risk Policy, to protect your personal data from unauthorized access, loss, misuse, or alteration. These measures include encryption, access controls, and secure data storage practices that align with industry standards (e.g., Payment Card Industry Data Security Standard (PCI DSS) for payment handling).

#### 6. Your Rights Under the PDPA (Malaysia)

Under the Personal Data Protection Act 2010, you have the right to:

- **Access:** Request access to the personal data we hold about you;
- **Correction:** Request correction or updates to inaccurate or incomplete data;
- **Withdraw Consent:** Withdraw your consent to our processing of your personal data (subject to legal and contractual restrictions). This may affect your ability to use certain platform features;
- **Prevention of Processing:** Request that we stop processing your data for specific purposes (e.g., direct marketing).

To exercise these rights, please contact our Data Protection Officer using the details below.

## 7. Changes to this Privacy Policy

We may update this Privacy Policy periodically to reflect changes in our practices or legal requirements. We will notify users of any significant changes by posting the updated policy on our platform with a revised "Last Updated" date.

## 8. Contact Information

If you have questions about this Privacy Policy or our data handling practices, please contact us:

### **Data Protection Officer**

### **Impakrintas Social Exchange Platform**

Email: [sep@impakrintas.com](mailto:sep@impakrintas.com)

Address: B3-3-11, Solaris Dutamas, No 1, Jalan Dutamas, 50480 Kuala Lumpur, Malaysia.

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