# **Privacy Policy**

As part of NetPay.my compliance to The Personal Data Protection Act 2010 (PDPA) and commitment towards protecting of our member's personal information, NetPay.my has put in place a personal data protection and compliance principles which NetPay.my stands guided by in the provision of our products and services to our members/customers.

Please read NetPay.my Privacy Statement to understand how we use the personal data which we may collect from you. By providing your Personal Information to us, you are consenting to this Privacy Statement, and the collection, the use, the access, the transfer, the storage, and the processing of your personal information as describe in this Privacy Statement.

**NetPay** ("us", "we", or "our") operates **www.netpay.my** (hereinafter referred to as **"Service"**). We may amend this policy at any time by posting a revised version on our website. The revised version will be effective at the time we post it.

#### 1. Collection of Personal Data

- a) Personal data is any information which relates directly or indirectly to you. This includes any information which can be used to identify or contact you.
- b) We collect information about you from our services that you use, the information that we collected from our subscribers when you provide it to them for the purpose of using our services and products, and information that we collected from other parties when we process transactions in order to deliver our services to you.

# 2. Types of Information Collected

Personal data that we may collect:

- a) Contact information such as your full name, date of birth, identification, supporting documents (including MyKad/NRIC/Passport, bill statement of utility bills or statements which indicates your fullname, address, etc), gender, nationality and race, preferred language, current private and/or business address, fixed line telephone (home and office), fax number, email address
- b) Credit card details;
- c) Bank account number;
- d) The equipment you use when accessing or performing transaction in our website (such as your handphone, your computer system, and platform).

#### 3. Use of Information we collected

- a) Enter into relevant sale and purchase agreement;
- b) Communication of services, sale and purchase transactions;
- c) Payment transaction processing;
- d) Settlement of fund, Refund or Cancellation, Dispute and/or Chargeback of the payment transaction;
- e) Recurring payment service and/or tokenization;
- f) General administration;
- g) Manage and maintain your account(s) and facility(ies) with us;
- h) Respond to your enquiries and complaints and to generally resolve disputes;
- i) Update, consolidate and improve the accuracy of our records;
- j) Produce data, reports and statistics which have been aggregated in a manner that does not identify you as an individual;
- k) Conduct research and survey, which solely for analytical purposes including but not limited to data mining and analysis of your transactions with us;
- I) Meet the disclosure requirements of any law binding on us;
- m) For audit, compliance and risk management purposes;
- n) For performance of credit checks;

o) Any other purpose that we deem necessary and/or as required or permitted by any law, regulations, guidelines and/or relevant regulatory authorities.

# 4. Disclosure of your personal information

As a part of providing, you with our Products and/or Services and the management and/or operation of the same, we may be required or need to disclose information about you to the following third parties:

- law enforcement agencies
- government agencies
- companies and/or organizations that act as our agents, contractors, service providers and/or professional advisers
- Banks, financial institutions, card associations
- other parties in respect of whom you have given your express or implied consent
- customer inquiry and other customer related services (including telemarketing);
- data processing services
- information technology services
- market research and website usage analysis services

subject at all times to any laws (including regulations, guidelines and/or obligations) applicable to Interbase Resources Sdn Bhd.

# 5. If your personal information provided is incomplete

- Result in us being unable to enter into a service contract or agreement with you;
- Result in us being unable to communicate notices, value added services and updates to you;
- Affect our capacity to accomplish the above stated purposes.

#### 6. Data security

We take precautions including administrative, technical, and physical measures to safeguard your personal information against loss, theft, and misuse, as well as against unauthorized access, disclosure, alteration, and destruction. We limit access to your personal data on a need-to-know basis. Nevertheless, please understand that the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted through any online means, therefore, any transmission remains at your own risk.

We undertake the following security steps:

- a) Implementation of a formal information security policy and necessary technology controls such as firewall, password controls, physical security, logging, and monitoring, etc;
- b) Process controls such as segregation of duties, defined roles, and responsibilities, and needs to know basis for staff;
- c) Third-party providers and contractors storing or processing personal data have implemented similar acceptable standards of security.

# 7. Retention of personal information

We retain your Personal Information for the period as necessary to fulfill the purposes stated above unless a longer retention period is required or allowed by law. Once your Personal Information is no longer necessary for the Services or Purposes, or we no longer have a legal or business purpose for retaining your Personal Information, we proceed to erase, destroy, anonymize or prevent access or use of such Personal Information for any purpose other than compliance with this policy, or for purposes of safety, security, fraud prevention and detection, in accordance with the requirements of applicable laws.

# 8. Access to your personal data

We can assist you to access and correct your personal information held by us.

If you wish to have access to your personal information in our possession, or where you are of the opinion that such personal information held by us is inaccurate, incomplete, misleading or where relevant, not up-to-date, you may make a request to us by email our Support department. You should quote your full name, email address, mailing/billing address and handphone/ fixed phone number and provide brief details of the information you want a copy of in any such request. We shall charge a processing fee for searching for and providing you with access to your personal information to cover administration costs.

We will use reasonable efforts to comply with your request to access or correct your personal information within 21 days of receiving your request and the relevant processing fee.

Please note that we may have to withhold access to your personal information in certain situations, for example when we are unable to confirm your identity or where information requested for is of a confidential commercial nature or in the event we receive repeated requests for the same information. Nevertheless, we will notify you of the reasons for not being able to accede to your request.

# 9. Use of cookies

A "cookie" is a piece of information, that are stored in a computer's browser directory, like a tag. We use "cookie" in accordance with our Privacy Policy to detect and prevent fraud. The use of "cookies" includes the following assurances:

- No information regarding your telephone number, an account or payment details included in the cookie or can be accessed using it; and
- They do not collect any personal information regarding the use of your PC or internet browsing in any way.

You may deactivate cookies by adjusting your internet browser settings to disable, block or deactivate cookies, by deleting your browsing history and clearing the cache from your internet browser. Please bear in mind that some personalized services on our websites may not be available if you choose to disable cookies.

#### 10. Our commitment to your privacy

To make sure your personal information is secure, we communicate our privacy to Interbase Resources Sdn Bhd employees and strictly enforce privacy safeguards within the company.

#### 11. Changes to this Privacy Policy

We may change this Privacy Policy from time to time to reflect changes in law, our business practices, procedures and structure, and the community's changing privacy expectations. And when such a change is made; we will post a revised version on this Website and/ or by such means of communication deemed suitable by Interbase Resources Sdn Bhd including by way of sending such amendment via e-mail and/ or SMS to you.

#### 12. Contact us

Should you have any queries or concerns in relation to this Privacy Statement, kindly contact us at <a href="mailto:support@netpay.my">support@netpay.my</a>

Last reviewed November 2021