

# Privacy and Cookie Policy

Effective 01 MAY 2023

## Definition within this policy

“Swittle,” “we,” “us” or “our” means Techarm Resources Sdn Bhd (Registration No: 202101001643 / 1401941-U);

“Merchant”, “you” or “your” means organization or individual or any authorised user using Swittle that is verified by Swittle.

“Personal data” refers to any information that can be used to identify or contact an individual, whether directly or indirectly. This includes sensitive personal data and expressions of opinion about the individual as well as any other information Swittle may have.

This Privacy and Cookie Policy is issued pursuant to the Personal Data Protection Act 2010 which outlines how Swittle collects, uses, maintains and discloses your personal data in respect of commercial transactions and how Swittle safeguards the Personal Data. It is part of Swittle’s values that all Personal data of our customers are treated with due care, diligence and respect.

## Privacy and Cookie Policy Consent

By registering a Swittle Account with us and/or using Swittle, you have authorized the use, disclosure and processes of your personal data for such purposes and may have otherwise been provided to Swittle by a third party for Swittle Services by these third parties.

We wish you to understand that it is important for you to provide the necessary personal data to us for the purpose of communication and promotion of our products or partners’ offer and for providing convenience to corporate customers, fleet management and to manage a loyalty programme for customers.

You have the right to decline at any time, to provide your personal data and/or sensitive personal data for the processing your personal data and/or sensitive personal data and Swittle cookies. Sensitive personal data may include such things as information on physical or mental health or medical condition, political opinions, religious or other similar beliefs, commission or alleged commission of any offence. However, declining or revoking your consent for us to process personal data and/or sensitive personal data provided or failure to provide such personal data and/or sensitive personal data and/or failure to accept cookies from Swittle may result in Swittle not being able to effectively and continuously provide you with Swittle Services.

## Personal Data Collection Type and Channels

Your name, address, other contact information, age, occupation, and marital status are among the types of personal data we may collect. We also get financial information like your income or tax information, where you were born, where you got your passport or identity card, credit history, and transaction history.

We can collect personal information on a voluntary or obligatory basis. Personal information that we need to provide you with Swittle Services is known as obligatory personal data. We would be unable to provide

you with Swittle Services if you did not provide us with the necessary personal information. Personal information that is not required for us to provide you with Swittle Services is considered voluntary. You can still sign up for Swittle Services even if you do not provide us with your voluntary personal information. Each Swittle Service has its own set of mandatory and voluntary personal data, which must be listed on the application forms.

The collection channels of your personal data includes but not limited to:

- i. Log in information and/or personal details and contact information you have provided when you register or sign up a Swittle Account;
- ii. When you get in touch with Swittle in a variety of ways, like through application forms, emails, letters, and phone calls. We may monitor or record the phone call for quality control, training, and security reasons if you contact us or if we call you;
- iii. Transactions done on Swittle and your participation in a survey or competition within the Platform;
- iv. Your application for special promotions;
- v. Third party application or website inclusive of public domains.

We also collect information about your IP address, which is given to your computer by default when you sign up with an Internet Service Provider. Your IP address is automatically logged into our server whenever you visit our website. We use your IP address to manage our website and assist in the diagnosis of server issues. We may be able to determine the general location from which you are accessing our website using your IP address. Unless it is required by law or regulation, we generally do not link your IP address to anything that enables us to identify you.

The above description of Personal Data is merely a general description of the various types of Personal Data that we collect from our customers. We wish to bring to your attention that the nature of Personal Data varies from customer to customer. However, depending on the nature of business and circumstances, we may only need to collect and process a more limited form of personal data from certain customers. In other situations, there may be a need to collect more personal data depending upon the nature of transaction, business and so forth. We do not believe in collecting excessive personal data and what we collect are the essentials that are required to ensure the efficacy of business and transactions.

## **Cookies from Swittle**

Swittle has subscribed to cookies and similar technologies in order to distinguish you from other users of our website and/or application in order to provide a better experience for you. The use of cookies and similar technologies is standard across websites and applications through which information is collected about your online activities. A cookie is a piece of information that can be sent to your browser by a website and stored on your computer. On some of our pages, we use cookies to keep track of the preferences of visitors and their sessions. The information we collect is then used to provide our customers with a more individualized service. You can change your browser's settings for cookie notification and if you want to know whether or not your computer is accepting cookies, please check the documentation for your browser.

Cookies on Swittle Portal includes, but not limited to:

- i. Mandatory session creation where it contains a session token only, no user data;
- ii. Mandatory cookies for the proper functioning of the RECAPTCHA verification;
- iii. Cookie created by the domain host to measure the domain performance.

## **Analytics Tools for Matrices**

We might utilize other analytical tools to process and examine your utilization of our site. We may use this information to better serve you as a customer and to present you with content or marketing campaigns that are specifically targeted or tailored to you, among other things. We may also collect "aggregate data," or group data without personal identifiers, during the process. We use this aggregate data to learn more about how people use the website and/or services and to make them better and easier to use.

## **Your Personal Data Utilization**

Your personal data that was collected and consumed are utilized for several specific processes in our system and are used to provide you with our services that is included in your subscribed scheme. The utilization of the data includes, but not limited to, the processes for:

- i. Bill presentment and dissemination;
- ii. Application for specific schemes within Swittle Services;
- iii. Identification and personalisation of any communications to enable us to communicate with you efficiently including responding to your enquiries, meeting or complying with any legal, regulatory or statutory requirements relating to our provision of services and products and to make disclosure under the requirements of any applicable law, legislation, rule, ruling, regulation, direction, court order, by-law, guideline, circular, code (collectively referred to as "**laws**") applicable to Swittle;
- iv. Verification of your banking account, limits, authority and other required financial processes from Financial Institutions including your accounting purposes;
- v. Determining your financial requirements and carry out the responsibilities stipulated in your contract with Swittle;
- vi. For internal purposes, including fraud prevention and assessing marketing effectiveness through market research, statistical analysis and modeling, reporting, audit, and risk management;
- vii. To comply with any regulatory requirements and to carry out any commercial transactions you have entered into with Swittle and provide you with the services you require;
- viii. To serve as a reference point when responding to your enquiries and complaints and to resolve disputes;
- ix. Subject to the extent of consent obtained from you, to process, facilitate, administer and provide you with our products and services, to carry out, manage and maintain your relationship with us, your commercial transactions and dealings with us, to send you promotional materials relating to our products and services, or promote products and services of our partners or such third parties which we think may be of interest to you; and/or
- x. Other reasons that are required or permitted under the laws.

## Marketing Campaigns and Linking

You may receive marketing materials about products and services that may be of interest to you from us or from these other entities, as Swittle deems appropriate. We may share your personal data with other entities within Swittle, our agents or strategic partners, and other third parties ("**other entities**"). It is your right to withdraw your consent from receiving marketing or promotional materials. We will stop processing and sharing your personal data with these other entities if you notify us via email to [my.marketing@swittle.com](mailto:my.marketing@swittle.com) to withdraw your consent to receive these communications. Please be aware that it may take up to fourteen (14) working days for your withdrawal to be reflected in our system. Please also be aware that there are instances where you may still be contacted by Swittle for other purposes regarding the accounts, facilities, or services you have subscribed to with Swittle.

Links to third-party websites and services may be present on the Swittle website or services. How third-party websites and services use your personal information is beyond our control. We don't audit outsider sites and administrations, and we are not answerable for such outsider sites and administrations or their protection rehearses. Reading the privacy policies of any third-party websites or services you access through our websites or services is highly recommended.

Although we assure to keep your personal information confidential, we may, however, be required to disclose your personal data in order to provide you with efficient and continuous Swittle Services and comply with any legal and regulatory requirements. We may disclose your personal data to:

- i. Other entities within Swittle and/or our agents and service providers, including business partners and providers of research and analytics, with whom we have contractual agreements for some of our functions, services, and activities;
- ii. Credit reference agencies and Financial Institutions;
- iii. Our merchants and strategic partners;
- iv. Your Authorized User(s);
- v. Enforcement administrative and legislative organizations required by law or legally necessary, approved by court order or to meet obligations to regulatory authorities

By providing us with your personal data, you consent to such a transfer where it is necessary to provide you with the services you have requested and for the performance of any contractual obligations you have with Swittle, including for storage purposes. Disclosure of your personal data may be required for the transactions to locations outside of Malaysia.

## Your Personal Data Retention and Protection

In accordance with the User Agreement, we will keep your personal information for as long as it is necessary to safeguard Swittle's interests or as long as your relationship with us dictates. Our databases and other records may also contain residual personal data that will not be removed to meet our operational, legal, regulatory, tax, or accounting requirements.

Our top priority is keeping your personal information safe. Swittle takes every organizational, appropriate administrative, technical and physical precaution to safeguard personal data confidentiality against any loss, misuse or unauthorized access, disclosure, alteration or destruction of personal data you provide to us in accordance with applicable laws. We will require our authorized agents and service providers to appropriately safeguard your personal data if we disclose any of it to them.

We aim to keep our records as up-to-date and accurate as possible. You can review, change or delete the details supplied to us through this Website and/or Application and verification confirmation for such changes and/or amendments will be sent to the phone number and email address which you have registered with us. You can also request that the personal information in your account be updated if it is incorrect or out-of-date. However, your request to update your details may take some time as we need to review on the changes. Additionally, we may deny your request for the update. Send us an email to [my.support@swittle.com](mailto:my.support@swittle.com) if you have any questions, comments, concerns, or feedback about this Privacy Policy or any other privacy issue.

## **Changes to Privacy Notice**

This Privacy and Cookie Policy may be amended at any time we deem appropriate. The amendment shall take effect immediately upon upload and publishing on the Swittle Website. The revised Privacy and Cookie Policy will be considered accepted if you continue to use Swittle services. It is your responsibility to check the Privacy and Cookie Policy on a regular basis for new information or changes.

## **Language**

In accordance with the requirement of Personal Data Protect Act 2010, this Privacy and Cookie Policy is issued in both English and Bahasa Malaysia. However, in the event of any inconsistencies or discrepancies between the English version and the Bahasa Malaysia version, the English version shall prevail.