

PERWIRA SUPER APP – PRIVACY POLICY

1. WHO WE ARE

- 1.1 We are PERNAMA Network Sdn. Bhd. (“PERNAMA Network”, “we”, “us”, or “our”). The purpose of this Privacy Notice (“Privacy Notice”) is to explain how we collect, use, and protect your personal information in connection with our business. “Personal information” means information about a living individual who can be identified from that information (either on its own or when combined with other information).
- 1.2 This policy applies to your use of our website at perwira.com.my (“Site”), the PERWIRA application (“App”) and any of our services that are accessible through the Site or the App (collectively referred to as our “Services”). It sets out the basis on which any personal data we collect about you, or you provide to us, will be processed, and used by us. This Privacy Notice applies to all the information we collect, use and process about you as a customer or user in relation to the products/services you receive from us carried out by PERWIRA App.
- 1.3 It is important that you read this Privacy Notice, together with any other privacy or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about (or provided by) you so that you are fully aware of how and why we are using your (and their) data. This Privacy Notice supplements the other notices and is not intended to override them.
- 1.4 PERWIRA App is a data controller in respect of personal information that we process in connection with our business (including the products and services that we provide). We have appointed a data protection officer who is responsible for overseeing questions in relation to this Privacy Notice. If you have any questions, including any requests to exercise your legal rights, please contact us enquiries@perwira.com.my.

2. INFORMATION COLLECTION AND PROCESS

- 2.1 We collect and process various categories of personal and confidential information at the outset of, throughout the duration of, and following the conclusion of your relationship with us, for the purpose of providing and maintaining the Services. Please be assured that only information necessary to fulfill one or more legitimate purposes, as outlined in this Privacy Notice, will be collected and processed.
- 2.2 Personal and confidential information we may collect includes, but is not limited to, the following categories:
 - (a) Basic personal information, such as your name, residential address, date of birth, contact details;
 - (b) Information relating to your family, lifestyle, and social circumstances;
 - (c) Employment-related information;

- (d) Biometric and visual data, including photographs, video selfies, voice recordings, and fingerprints;
- (e) Online and digital profile information, including your interactions with us and our websites or applications. This may include App profile details, login credentials, IP address, smart device identifiers, geolocation data, security authentication data, mobile network information, search history, site visits, spending behavior, browser plug-in types and versions, as well as operating system and platform details;
- (f) Contact lists stored on devices you use to access our Services or on social media accounts you have linked to your account;
- (g) Information received from third parties, including identity verification and fraud prevention data, information from partner merchants, as well as identity and behavioral data from linked social media accounts.

2.3 We use cookies to distinguish you from other users. This enables us to provide you with an enhanced user experience and to improve our Services. Additionally, we may receive technical data about you when you visit third-party websites that incorporate our cookies.

2.4 We may also process certain special categories of personal data for specific and limited purposes, including but not limited to: detecting and preventing fraud and financial crime in the public interest (e.g., protecting customers' economic wellbeing), ensuring accessibility of our Services, and complying with regulatory reporting obligations in relation to complaints. We will only process such data where we have obtained your explicit consent or are otherwise lawfully permitted to do so, and strictly for the purposes outlined in Schedule A, hereinbelow.

2.5 For avoidance of doubt, special categories of personal data may include:

- (a) Racial or ethnic origin;
- (b) Religious or philosophical beliefs;
- (c) Political affiliations or opinions;
- (d) Biometric data used for identification and fraud prevention purposes, including physical, physiological, or behavioral characteristics;
- (e) Health-related information; and
- (f) Information concerning an individual's sex life or sexual orientation.

2.6 Where permitted by applicable laws, we may process information relating to criminal convictions, criminal offences, security-related information, alleged criminal activity (including unproven allegations), spent or previous convictions, and other relevant details provided through criminal background checks or similar screenings.

2.7 Where you have given your consent for us to process special category data, such as biometric information, you may withdraw or amend your consent at any time by contacting us.

3. RIGHTS, CORRECTION, INQUIRIES AND COMPLAINTS

3.1 Subject to exceptions under applicable laws, you have certain rights under applicable data protection laws in relation to your personal data. These rights include the following:

- (a) The right to request that we do not contact you or your Sub-account Users for marketing purposes, either prior to registration for the Services or after withdrawal from the Services;
- (b) The right to request at any time that we cease processing your personal data for direct marketing purposes;
- (c) The right to withdraw any consent you have previously provided to us;
- (d) Subject to applicable laws, the right to request access to the personal data we hold about you or your Sub-account Users (if any);
- (e) The right to request that we correct any personal data held by us that is inaccurate, incomplete, or outdated;
- (f) The right to request the deletion of your personal data where it is no longer necessary for the purposes for which it was collected or where we are no longer legally required to retain it. Where deletion is not technically feasible, we will ensure the data is put beyond reasonable use;
- (g) The right to request the transfer of your personal data to you or a third party. We will provide such data in a structured, commonly used, and machine-readable format. This right applies only to automated data you have provided to us with your consent or for the performance of a contract;
- (h) The right to object to the processing of your personal data where we rely on a legitimate interest (or those of a third party) and you believe your rights and freedoms override such interests. You may also request that we restrict the processing of your data under certain circumstances, including:
 - i) If you wish to verify the accuracy of the data;
 - ii) Where the data is being processed unlawfully but you do not wish for it to be erased;
 - iii) Where we no longer need the data, but you require it to establish, exercise, or defend legal claims;
 - iv) Where you have objected to our use of your data, but we need to verify whether we have overriding legitimate grounds to continue its use.
 - v) You may exercise this right by contacting us:

PERWIRA App Customer Service Department

PERNAMA Network Sdn. Bhd.

6, Solok Waja 1,

Bukit Raja,

41050 Klang, Selangor

3.2 You also have the right to lodge a complaint with the relevant data protection authority. If you have any concerns about how we handle your personal data, we encourage you to contact us directly so we can address your concerns. If you are not satisfied with our response, you may contact the Personal Data Protection

Commissioner's Office. For more information, please visit: <https://www.pdp.gov.my>.

4. DISCLOSURE TO THIRD PARTIES

4.1 We may engage third parties, including companies, service providers, or individuals, to carry out certain functions or services on our behalf. By accepting this Privacy Notice, you hereby expressly agree and consent to the disclosure and transfer of your Personal Data to such third parties, whether located within or outside of Malaysia, for the purposes of enabling them to perform the relevant services.

4.2 Such third parties may include, but are not limited to:

- (a) Banks and financial institutions;
- (b) Information technology (IT) service providers;
- (c) Data storage and cloud service providers;
- (d) Healthcare and insurance service providers;
- (e) Agents, bankers, external auditors, legal counsels, and other professional advisors;
- (f) Regulatory, supervisory, or governmental authorities, where such disclosure is required under applicable laws, regulations, or legal obligations.

5. TRANSFER OF PERSONAL DATA

5.1 As by our storage facilities, servers and online activities may involve other jurisdictions, by using our Services, you hereby acknowledge and consent that your Personal Data may be transferred, stored, used or processed in any other jurisdiction.

6. MARKETING INFORMATION

6.1 Where we have obtained the appropriate marketing consent from you, we may send you marketing communications that we believe may be of interest. This may include information about products or services offered by us, other companies within the PERNAMA group, or selected third parties. Such communications may be delivered via mail, telephone, email, SMS, in-app notifications, online platforms, or other forms of electronic communication.

6.2 If you wish to change your marketing preferences or no longer wish to receive marketing communications from us, you may do so at any time by contacting the PERWIRA App Customer Service Department. Contact details are available within the App or at www.perwira.com.my.

7. COMMUNICATIONS ABOUT YOUR ACCOUNT

7.1 We may contact you with information relevant to the operation, servicing, and maintenance of your account, including updates on how we process your personal

data. Such communications may be delivered through various channels, including via the App, email, SMS, postal mail, and/or telephone.

7.2 Should you update or change your contact details at any time, you are responsible for notifying us promptly to ensure uninterrupted communication and continued access to our Services.

7.3 We may monitor or record calls, emails, text messages, customer support teams or other communications in accordance with applicable laws for the purposes outlined in Schedule A – Purposes of Processing.

8. RETENTION PERIOD

8.1 Subject to applicable laws and regulations, the retention period for records is determined based on several factors, including the type of record, the nature of the activity, product, or service to which it relates, the jurisdiction in which the relevant entity operates, and any applicable legal or regulatory requirements.

8.2 As a general rule, we retain customer account records for a period of up to ten (10) years following the termination of the customer relationship. Other categories of records may be retained for shorter durations, depending on their nature and relevance.

8.3 Retention periods may be reviewed and revised from time to time to reflect changes in legal, regulatory, or business requirements.

8.4 In certain circumstances, we may retain your personal data for a longer period. This may include situations where retention is required to comply with a court order, to support ongoing or potential investigations by regulatory or law enforcement authorities, or to preserve evidence in the context of a legal dispute. In such cases, the destruction or disposal of data will be temporarily suspended as necessary.

8.5 If you require further information regarding our data retention practices, please contact us using the contact details provided in this Privacy Notice.

9. SECURITY

9.1 We implement a range of technical and organisational measures to safeguard your personal data against loss, misuse, unauthorised access, disclosure, alteration, or destruction. These measures may include, but are not limited to, encryption, access controls, secure storage, and other forms of data protection technology.

9.2 We also require all personnel, including employees and third-party service providers acting on our behalf, to adhere to strict data protection and confidentiality obligations. This includes compliance with applicable legal and regulatory standards, as well as the implementation of appropriate safeguards when accessing, using, storing, or transferring personal data.

10. AUTOMATED PROCESSING

10.1 In the course of delivering our products and services, we may process your personal data through automated means, including profiling. This involves the use of computer algorithms, machine learning models, or predictive analytics to assess your personal circumstances, identify potential risks, or forecast specific outcomes. Examples of such processing may include, but are not limited to:

- (a) Assessing account activity to detect and prevent fraudulent behaviour;
- (b) Identifying customers who may be in vulnerable situations, in order to offer appropriate support or protective measures; and
- (c) Providing personalised offers and generating market insights to better tailor our services to customer preferences.

10.2 Profiling is a valuable tool that enables us to better understand our customers and respond to their individual needs more effectively. It also allows us to customise marketing communications and ensure the delivery of fair and equitable customer outcomes.

10.3 However, we recognise that individuals have certain rights under applicable data protection laws in relation to automated decision-making and profiling. These rights are further detailed in Schedule A of this Privacy Notice. You also have the right to object to or opt out of profiling for direct marketing purposes at any time.

Schedule A – Schedule of Purpose of Processing

We will only use and share your information where it is necessary for us to carry out our lawful business activities. Your information may be used in detail below:

A. Contractual Necessity

We may process your personal data where such processing is necessary for the purpose of entering into a contract with you, or for the performance of our obligations under an existing contract for the provision of our Services. Please note that if you choose not to provide the requested information, we may be unable to operate your account or provide certain products or services to you.

Such processing may include, but is not limited to, the following activities:

- (a) Assessing and processing applications for our products or services;
- (b) Delivering the Services throughout the duration of your relationship with us, including the opening, maintenance, and closure of accounts, sub-accounts, or products; preparing and issuing relevant documentation; carrying out your instructions; processing transactions such as fund transfers and payments to third parties; addressing any enquiries or discrepancies; and effecting changes to your account.

Communications with our customer support team via mobile or website may be recorded and monitored for these purposes;

- (c) Managing and maintaining our relationship with you, including the provision of ongoing customer support and account servicing;
- (d) Communicating with you regarding your account(s), transactions, and the Services you receive from us.

B. Legal Obligations

We are legally required to collect and process certain personal data when you apply for a product or service and throughout your relationship with us. If you do not provide the required information, we may be unable to operate your account or provide services.

Such processing may include:

- (a) Verifying your identity using biometric or other identification methods (e.g., fingerprint or voice recognition, where legally permitted or with your consent);
- (b) Monitoring transactions and location data to detect and prevent crime, including compliance with laws on anti-money laundering, fraud, terrorism financing, bribery, corruption, and international sanctions (this may include processing data related to criminal convictions or offences);
- (c) Sharing data with banks or third parties to recover misdirected payments;
- (d) Disclosing information to law enforcement, tax authorities, or other regulatory bodies where legally required, including responding to court orders or suspicious activity reports;
- (e) Issuing legally mandated communications or updates to terms and conditions;
- (f) Investigating complaints, correcting account errors, or resolving service issues;
- (g) Conducting internal investigations into policy or conduct breaches;
- (h) Managing regulatory investigations, litigation, or other legal proceedings;
- (i) Assessing and improving data quality and accuracy;
- (j) Ensuring risk management and regulatory compliance frameworks are in place;
- (k) Responding to incidents or emergencies on our premises;
- (l) Coordinating responses to business disruptions and ensuring operational continuity.

C. Legitimate Interests

We may process your personal data where it is necessary to pursue our legitimate interests, or those of a third party, provided such interests are not overridden by your rights and freedoms.

(A) Business Operations and Security

We process your information to support the effective day-to-day running of our business, protect our assets, and safeguard our customers, employees, and infrastructure. This includes:

- (i) Monitoring, maintaining, and improving internal processes, systems, and

- (i) technologies (e.g. confirmation of payee);
- (ii) Ensuring business continuity, disaster recovery, and incident response;
- (iii) Maintaining network and information security, including monitoring access and preventing cyber threats and unauthorised use of systems;
- (iv) Reporting on material risks and ensuring internal oversight and regulatory compliance;
- (v) Performing general financial, legal, and regulatory reporting;
- (vi) Protecting our legal rights and interests;
- (vii) Monitoring our premises through CCTV for security, incident documentation, and training purposes;
- (viii) Facilitating potential or actual business transactions, including mergers, acquisitions, or reorganisations.

(B) Customer Relationship and Product Development

We also process your data to better serve you and improve our offerings, including to:

- (i) Identify new business opportunities and develop customer relationships;
- (ii) Send marketing communications about products and services from us, PERNAMA group companies, or selected third parties (delivered via app, email, SMS, post, or digital platforms). Please note, we do not share your data with third parties for their own marketing purposes;
- (iii) Analyse customer behaviour, preferences, transactions, and feedback to improve existing products and develop new ones;
- (iv) Conduct research and monitor service performance and customer experiences;
- (v) Assess service quality and support staff training (customer support communications may be recorded and monitored);
- (vi) Analyse customer complaints to prevent future errors or process failures;
- (vii) Compensate customers in cases of loss, inconvenience, or distress;
- (viii) Understand your use of third-party services to improve integration and service delivery;
- (ix) Combine your data with third-party sources (e.g. economic data) to enhance our understanding of customer needs and develop better services.

D. Contact Details

The PERWIRA App, Site and associated Services are owned and managed by PERNAMA Network Sdn. Bhd. a public company registered in Malaysia Co. Reg. No.: 1378110X / 202001021790

Contact Details:

6, Solok Waja 1, Bukit Raja,
41050 Klang, Selangor
Email: enquiries@perwira.com.my