

## PRIVACY POLICY

PLEASE READ THIS PRIVACY POLICY CAREFULLY. This Privacy Policy and/or similar statements available on Pamame websites and mobile applications allows you to understand how Pamame Sdn Bhd, its subsidiaries, affiliates and associated companies (“**Pamame**”, “**we**”, “**our**” or “**us**”) collect, use, disclose, transfer, store and process your Personal Data (as defined hereinbelow) through both online and offline activities including but not limited to the use of Pamame’s websites, our mobile applications, our social media channels (including but not limited to Facebook, Instagram, Whatsapp group and xiaohongshu) (“**social medias**”) and/or related services (collectively referred to as “**Platform**”), campaigns, contests and events.

By using and/or accessing the Platform, registering an account with us, engaging us for services or by otherwise giving us your Personal Data, you acknowledge that you have read and understood the terms of this Privacy Policy and that you agree and accept the practices outlined herein and you hereby consent to us collecting, using, disclosing, transferring, storing and processing your Personal Data in accordance with the manner hereinafter set out.

### 1. When we receive Personal Data from you

1.1. In the course of your dealings with us in any manner, we may receive Personal Data from you in the following scenarios :-

- a) when you sign up and/or register an account with us;
- b) when you browse our websites and/or social medias or use our mobile applications and/or Platform;
- c) when you fill up and submit demographic information in any form, whether online or by way of physical form, including but not limited to application forms, surveys or other forms relating to any of our products and services, promotions or competitions;
- d) when you participate in any campaigns, contests, road shows, lucky draws or events organised by us (both online and/or offline) as well as publicly available sources;
- e) when you log in to your account on the Platform or interact with us via the Platform or any external service or application;
- f) when you communicate with us via our employees and agents in relation to our products and services (whether in person, by email, telephone or any other means);
- g) when you subscribe to our publications and marketing contents;
- h) when you carry out transactions through our Platform; or
- i) when you submit your Personal Data to us by whatsoever means and/or in whatsoever reason.

For avoidance of doubt, the above list by all means does not purport to be exhaustive and merely sets out some common situations where your Personal Data may be collected.

- 1.2. Where it is obligatory for you to provide your Personal Data to us and you fail or choose not to provide us with such data or do not agree to this Privacy Policy or any amendments therein, we may not be able to render services and/or provide products to you or otherwise deal with you.

## 2. **Type of Personal Data which we may collect**

- 2.1. Personal Data which may be collected through the normal use of the Platform are as follows :-

- a) information relating directly or indirectly to you such as your name, identification card number, date of birth, contact information, email address, mailing address, phone numbers, your image, marital status, race, religion, family background, planning, development and household information, health information, financial or income data, employment information;
- b) specimen, digital or electronic signatures as recognised under applicable laws and regulations;
- c) technical information such as operating systems and platform, device information and account login information;
- d) marketing and transaction data such as your searches, habits, likes, preference, interests and orders through using our products and services;
- e) your opinions and feedback through survey and complaints;
- f) any information that is supplied and/or collected when you visit our Platform including your devices' IP address which was collected via cookies in our Platform;
- g) any details relating to any other person(s) who may be identified from any information, data or documents you submit to us; and/or
- h) any other personal information which you provide to us in the course of dealing.

(Collectively referred to as “**Personal Data**”)

## 3. **Purpose of Personal Data**

- 3.1. The Personal Data provided by you to us and/or received by us from you or through other sources may be necessary for fulfilment of purposes at the time it was collected or may be processed in a number of ways, including without limitation to the following purposes :-

- (a) to ascertain your identity and background;
- (b) to assess, understand and provide products and/or services to you;
- (c) to communicate, manage and maintain our relationship with you;
- (d) to furnish you with information, updates, launching, upcoming promotions, events and/or contests in respect of our products and/or services and selected third parties which may be of interest to you from time to time;
- (e) for direct marketing purposes via telephone call, messages, email, social media and/or such other appropriate communication channels;
- (f) to process any payments related to products and/or services requested by you;

- (g) to distribute samples and/or vouchers to you;
- (h) for internal record keeping and other administrative purposes;
- (i) to conduct analytics, market research, customer profiling activities, analyse customer patterns and choices, statistical and trend analysis in relation to our products and/or services;
- (j) to share any of your Personal Data with our affiliates, strategic business partners, merchants and/or agents to jointly develop products and/or services or organize campaigns;
- (k) to perform background checks and due diligence activities;
- (l) to operate, evaluate, develop and improve our business, products and/or services;
- (m) to determine the effectiveness of our marketing and promotional campaigns;
- (n) to comply with legal obligations and regulatory requirements under any applicable laws; and/or
- (o) for any other purposes which we notify you at the time of obtaining your consent.

(collectively referred to as the “**Purposes**”)

#### **4. To whom we disclose Personal Data**

4.1. We may share, disclose and/or transfer your Personal Data to various parties including but not limited to the following for one or more of the above Purposes :-

- (a) our subsidiaries, affiliates, collaboration partners, strategic business partners;
- (b) service provider such as agents and merchants in areas such as customer service, website hosting, information technology, shipping and logistics, marketing and research;
- (c) your successors in title to us;
- (d) data centres and/or servers located within or outside Malaysia for data storage purposes or otherwise;
- (e) legal advisors, courts, tribunals, government agencies or regulatory bodies having jurisdiction over Pamame;
- (f) general public when you become a winner in contests, giveaways, lucky draw and/or events organized by us by publishing your name, photographs, videos and other Personal Data without compensation for advertising purposes; and
- (g) other users of the Platform.

4.2. We endeavour to ensure that our affiliates and/or third parties keep your Personal Data secure from unauthorised use, access, collection, processing and disclosure and retain the same only for as long as your Personal Data is required to achieve the aforesaid Purposes.

## **5. Personal Data of Minors and Other Individuals**

- 5.1. To the extent that you have provided (or will provide) Personal Data of other individuals (for example, your spouse, children, parents, relatives or friends) to us, you hereby represent and warrant that you have obtained their consent and permission for their Personal Data to be collected, used, stored, disclosed and processed in accordance with this Privacy Notice.
- 5.2. In respect of individuals under the age of eighteen years or individuals legally incompetent to give consent, you confirm that they have appointed you to act for them and to consent on their behalf to process, disclose and transfer their Personal Data according to this Privacy Notice.

## **6. Protection of Personal Data**

- 6.1. While we strive to safeguard your Personal Data by enhancing technical and organisational security measures from time to time to prevent lost data, unauthorised use or access or similar risks during your usage of the Platform, we wish to advise that transmission over the internet or storage through electronic means is not fully secured and we do not guarantee or accept responsibility in any manner for any unauthorized access, interception or loss of Personal Data that is beyond our reasonable control. Hence, kindly exercise precaution when sharing and/or disclosing your Personal Data and your security details (such as passwords, login credentials, transaction details) through any online means. Any transmission shall remain solely at your own risk.

## **7. Retention of Personal Data**

- 7.1. We will retain your Personal Data for so long as it is required to meet our business purpose, legal and regulatory requirements or relevant for the Purposes for which it was collected.
- 7.2. In the event your Personal Data is no longer required for the Purposes, we will take steps to securely dispose or destroy your Personal Data from our database.

## **8. Third Party Sites**

- 8.1. Our Platforms may provide links to other websites or social media platform that we do not own or operate, including those of our affiliates, merchants, business partners, sponsors and advertisers. The linked websites have separate and independent privacy policies, notices and terms of use, which we recommend you to read carefully. We do not have any control over such websites, and therefore we assume no responsibility or liability for the manner in which the organizations that operate such linked websites may collect, use or disclose, secure and otherwise treat your Personal Data.

## **9. Requesting Access and Correction of Personal Data**

- 9.1. You hereby agreed that you shall only submit Personal Data which is true and accurate and you agree to keep us informed of any changes or inaccuracy.
- 9.2. You may request to access and/or correct your Personal Data currently in our possession or control by submitting a written request to the contact details as provided in Clause 11 below. We reserve the right to refuse your request to access and/or correct your Personal Data (to the extent permissible by law) and may require further documentary evidence from you relating to your request and/or new information provided for verification purpose.

## **10. Revisions and Updates to this Privacy Notice**

- 10.1. We shall have the absolute discretion to vary, amend and/or update this Privacy Notice from time to time to ensure compliance with relevant legal and statutory provisions. The latest version of our Privacy Notice can be found on our Platforms and/or such other means of communication deemed suitable by us. By continuing to use or access the Platform and our services after notice of our latest Privacy Notice, you are deemed to have read, understood and consented to the revision and update therein contained.

## **11. Opting Out of Marketing and Promotional Communications**

- 11.1. You can unsubscribe from our marketing and promotional communications at anytime by contacting us using the details provided herein.

## **12. Inquiries and Contact**

- 12.1. In the event you have any questions regarding personal data protection or privacy practices and wish to exercise any rights you may have under applicable law, kindly contact us at: [assistme@pamame.com.my](mailto:assistme@pamame.com.my)