

## **Privacy Statement**

**Last updated: 1<sup>st</sup> August 2024**

The Personal Data Protection Act 2010 ("PDPA") including any such amendments or revisions to the PDPA requires Altel Communications Sdn Bhd ("Altel") to inform you of your rights in respect of your personal data that is being processed or that is to be collected and further processed by us and the purposes for the data processing. Altel, together with its affiliates and related corporations are committed to the protection of your personal data. This Privacy Statement explains how Altel collects and processes your personal data in accordance with the PDPA.

The personal data and other information (collectively, "Personal Data") which you provide or have provided for the use of Altel Website and, if relevant, for the use of, or purchase of Altel services and/or products ("Services"), including any additional information you may subsequently provide, may be used and processed by us for the following purposes:

- (a) to assess and process your request for our products and/or services;
- (b) to establish your identity and background;
- (c) assessing your application to register for the use of the Altel website;
- (d) assessing your application;
- (e) to communicate with you;
- (f) to provide services to you
- (g) to process your payment transactions;
- (h) to respond to your inquiries;
- (i) to administer your participation in contests;
- (j) to conduct internal activities;
- (k) internal investigations, compliance, audit or security purposes including, without limitation, crime detection, prevention and prosecution;
- (l) market surveys and trend analysis;
- (m) to provide you with information on products and services of Altel and its affiliates and related corporations;
- (n) to provide you with information on products and services of our business partners;
- (o) other legitimate business activities of Altel and its affiliates and related corporations; and/or
- (p) such other purposes as set out in the Altel Website's Terms of Use.

(collectively "Purposes")

Further, please be informed that if required for any of the foregoing Purposes, your Personal Data may be transferred to locations outside Malaysia or disclosed to any affiliates and related corporations of Altel, licensees, business partners and/or service providers, who may be located within or outside Malaysia. Save for the foregoing, your Personal Data will not be knowingly transferred to any place outside Malaysia or be knowingly disclosed to any third party.

Altel maintains your Personal Data in our business records while you remain a user of Altel website. We also maintain your Personal Data for a period of time after you are no longer a user, customer or user of any of our products and/or services or a user of Altel website if the Personal Data is necessary for the Purposes for which the Personal Data was collected or to fulfil legal requirements.

In order to process your Personal Data, your consent is required. In most instances, it is necessary for us to process your Personal Data in order to provide the service that you had requested for. However, you may limit the processing of your Personal Data in the manner described in the paragraph below.

In relation to direct marketing, you may request by written notice (in accordance with the following paragraph) that we do not process your Personal Data for any of the following purposes: (i) advertising or marketing via phone any product or service of the affiliates and related corporations of Altel or our business partners, (ii) sending to you via post any advertising or marketing material relating to any product or service of the affiliates and related corporations of Altel or our business partners; (iii) sending to you via email or SMS any advertising or marketing material relating to any product or service of the affiliates and related corporations of Altel or our business partners, or (iv) communicating to you by whatever means any advertising or marketing material of the affiliates and related corporations of Altel or our business partners.

You may at any time hereafter make inquiries, complaints and, upon payment of a prescribed fee, request in writing for access to, or correction of, your Personal Data or limit the processing of your Personal Data by submitting such request to the named personnel via registered post or email (which must be sent from the email address registered with Altel) as set out below:

Group Head, Legal

Altel Communications Sdn Bhd, 2271, Jalan Usahawan 2, Cyber 6, 63000 Cyberjaya, Selangor  
[legal@altel.my](mailto:legal@altel.my)

If you are a past customer or user of any of our products and/or services, kindly be informed that we will continue to process your Personal Data in accordance with this Privacy Statement unless we hear otherwise from you. You may exercise your rights in respect of your Personal Data in the manner described above.

This Privacy Statement may be amended at any time from time to time. Any amendment to this Privacy Statement shall be published on the Altel Website or by other means as we deem fit. Your continued usage of any of our products and/or services or of Altel Website shall be deemed to be your agreement to the said amendment of this Privacy Statement.

## **Privacy Policy**

### **1. Statement**

- 1.1 The following statement explains our Privacy Policy (“Policy”) with respect to information including personally identifiable data (“Personal Data”) and other information that is collected by us when you access and/or use our Services. As you use our Services, we want you to be clear how we are using such Personal Data and the ways in which you can protect your privacy.
- 1.2 By voluntarily providing us with Personal Data, you are consenting to our use of it in accordance with this Policy. If you provide Personal Data, you acknowledge and agree that such Personal Data may be transferred from your current location to the offices and servers of Altel.
- 1.3 All words and phrases used in this Policy shall have the same meaning given to them in our Terms of Use. Specifically, the word “Authorised Third Party” shall mean contractors, agents and/or third-party supplier engaged by us from time to time for the purposes of providing certain Services.

### **2. Changes**

- 2.1 Our Policy may change from time to time. As a result, at times it may be necessary for us to make changes to this Policy. We reserve the right to update, revise or modify this Policy at any time and from time to time without prior notice. Please review this policy periodically, and especially before you provide us any of your Personal Data. This Policy was last updated on the

date indicated above. Your continued use of the Services after any changes, revisions or modifications to this Policy shall indicate your agreement with the terms of such revised Policy.

### **3. Parental Advisory**

- 3.1 One or more of our Services are not catered to User under the age of 18 as our Services may provide access to music or other content that contains explicit content including use of profane language and/or sexual references. If you are, please obtain your parent/guardian's permission before using and/or accessing our services. Please do not provide us with your personal data unless you have obtained permission from your parent/guardian. Parental discretion is advised for all users below 18. We encourage parent/guardian to monitor their children's internet usage and to help enforce our policy by instructing their children never to provide personal data through the service without your permission. If you have reason to believe that a child under the age of 18 has provided personal data to us through our services, please contact us and we will endeavour to delete that information from our database. Otherwise, all personal data provided by a user shall be deemed to have been submitted by a user above 18 or has obtained the relevant permission from their parent/guardian.

### **4. The Information We Collect**

- 4.1 Personal Data That You Provide to Us. We collect Personal Data (such as name, gender, postal address, birthdate, telephone number, facsimile number, email address, credit/debit card information, photos etc.) when you voluntarily provide such information to us as and when required.
- 4.2 Information We Get from Your Use of Our Services. When you interact with us through the Services, we may collect or receive and store certain personally non-identifiable information. Such information is collected passively using various technologies and cannot presently be used to specifically identify you. This information includes:
- (a) device-specific information including but not limited to operating system version, unique device identifiers, mobile network information, memory, sound card data, IP address.
  - (b) cookies that may uniquely identify your browser. This is described in detailed below.
  - (c) details of how you use our services such as your search queries.
  - (d) total number of visitors using our Services, the number of visitors to each page of our Services,
  - (e) how our users use and interact with our Services.
- 4.3 As an ongoing effort to better understand and serve the users of the Services, Altel often conducts research on its customer demographics, interests and behaviour based on the Personal Data and other information provided to us. This research may be compiled and analysed on an aggregate basis. We may share this non-identifiable and aggregate data with our affiliates, agents and business partners but this type of non-identifiable and aggregate does not identify you personally. We may also disclose aggregated user statistics in order to describe our services to current and prospective business partners and to other third parties for other lawful purposes.

### **5. Use of Your Personal Data and Information**

- 5.1 We use the Personal Data you provide in a manner that is consistent with this Policy. If you provide Personal Data for certain reason, we may use the Personal Data in connection with the

reason for which it was provided. Your Personal Data and Information may also be used by us, our affiliates or Authorised Third Parties for the following reasons:

- (a) For the purposes of technical administration of the Services;
- (b) For research and development;
- (c) Statistical analysis;
- (d) Customer administration;
- (e) Profiling services preferences;
- (f) Finance and marketing operations and activities and/or as required in the provision of our services including but not limited to credit control services;
- (g) In compliance with any regulatory, statutory or legal obligation imposed on us by any relevant authority;
- (h) To operate and provide the Services to you;
- (i) To support your questions about the use of the Services;
- (j) To detect and prevent fraudulent activity;
- (k) To provide other goods and services by us or its designated representatives and/or business partners to you or parties designated by you and matters ancillary thereto;
- (l) To verify and process payment when you use the Services;
- (m) To verify and record your personal particulars including comparing it with information from other sources and using the information to communicate with you;
- (n) To conduct market research of the users of the Services including the number of users, the frequency of use, profile of users and using such analysis for our business plans, the enhancement of our products and services; and
- (o) To send you information, promotions and updates including marketing and advertising materials in relation to our goods and services and those of third-party organizations selected by Us

5.2 If we intend on using any Personal Data in any manner that is not consistent with this Policy, you will be informed of such anticipated use prior to or at the time at which the Personal Data is collected.

## **6. Disclosure Of Your Personal Information**

6.1 We are not in the business of selling your information. We consider this information to be a vital part of our relationship with you. As such we will not sell or rent your Personal Data save and except as provided herein. There are, however, certain circumstances in which we may share your Personal Data with certain third parties without further notice to you, as set forth below.

Business Transfer. As we develop our business, we might sell or buy businesses or assets. In the event of a corporate sale, merger, reorganization, dissolution or similar event, Personal Data may be part of the transferred assets.

Affiliates and related corporations of ALTEL. We may also share your Personal Data with the affiliates and related corporations of ALTEL for purposes consistent with this Policy.

Legal Requirements. To comply with any order of court or directive from authorities investigating any alleged offence, misdeed and/or abuse or to enforce any of the terms in the Terms of Use, Privacy Notices or, where such action is necessary to protect and defend the rights or property of ALTEL.

Authorised Third Party. Where services from such Authorised Third Party is required, we will share your Personal Data on a strictly confidential basis. Authorised Third Party will not be

allowed to use your personal information disclosed to them except for the limited purpose of providing the particular service.

## **7. Cookies**

### **7.1 What is a Cookie?**

When you use our Services, your Device will automatically be issued with a cookie. Cookies are text files that are placed in your Device's hard drive to identify your Device to our server. Generally, cookies themselves only record those areas of the site that have been visited by the Device in question, and the duration. Many websites and/or Software Application do this whenever a user visits their site in order to track traffic flow.

Depending upon the type of Device you are using, you may set your Device to accept all cookies, to notify you when a cookie is issued, or not to receive cookies at any time. The last of these, of course, means that certain personalised Services cannot then be provided to you.

We use "cookies" to store and track information about you and your use of our Services.

Our cookie and information retrieved from our cookie is used in line with the uses set out in in this Policy and more specifically:

- (a) to help save and retrieve passwords used on our Services. This way, you will not have to re-enter information upon every new visit to our Services.
- (b) to track information such as the frequency and duration of your use of our Services, your click-stream as you go through our Services, your preferred sites, and help us determine whether you came to our Services from a particular Internet link or banner advertisement;
- (c) to analyse the profile of visitors and users to helps us in providing you with better Services and to enhance our Services;
- (d) to personalize the content, banners and promotions that you will see on our Services.

You are always free to decline cookies if your Device permits, although in that case you may not be able to use certain features of our Services and you may be required to re-enter your password more frequently during a session.

### **7.2 Third Party Cookies**

We may use other third-party advertising companies to serve ads when you access and/or use of Services. In the course of serving advertisements, our third-party advertisers may place or recognize a unique cookie in your Device. These companies may use information retrieved from their cookies to provide advertisements on our Services and other services about goods and services that may be of interest to you.

WE HAVE NO ACCESS TO OR CONTROL OVER THIRD-PARTY COOKIES AND THEY ARE NOT SUBJECT TO OUR POLICY. PLEASE REVIEW THE PRIVACY POLICY OF THESE THIRD-PARTY WEBSITES RESPECTIVELY FOR DETAILS. If you want to prevent one of these third-party companies from sending and reading cookies on your Device, you will need to visit each of their websites individually to request that you be removed from that system.

## **8. Opting-Out, Change, Update of And Access To Your Information**

- 8.1 You may be able to access and/or use our Services without providing us any Personal Data. If you choose not to provide any Personal Data, you may not be able to access and/or use certain

Services. However, when you choose to provide us with such Personal Data, we may also use your Personal Data and Information to contact you in the future to tell you about our services we believe will be of interest to you. If we do so, each communication we sent you will contain instructions permitting you to “opt-out” of receiving future marketing communications. In addition, if at any time you wish not to receive any future communications or you wish to have your name deleted from our mailing lists, please contact us or you may opt-out by replying UNSUBSCRIBE in the subject line in the email sent or by emailing us.

8.2 You can write to us at any time to obtain details of the Personal Data we hold about you. It would be helpful if you also provide brief details of what information you want a copy of. We may charge a reasonable sum permitted by existing laws to cover our administration costs.

8.3 We reserve the right to refuse to provide our Users with a copy of their Personal Data, but will give reasons for our refusal.

## **9. Security**

9.1 The internet is not a secure medium, and communications over the internet may be subject to third-party interception. Altel cannot accept responsibility for any unauthorised access or loss of personal information, save in accordance with the Terms of Use. We have implemented security policies, rules and technical measures to protect your Personal Data from unauthorised access, improper use or disclosure, unauthorised modification, unlawful destruction or accidental loss. All our employees and data processors, who have access to and are associated with the processing of Personal Data, are obliged to respect the confidentiality of your information.

9.2 While we cannot guarantee that loss, misuse or alteration of data will not occur; we make reasonable efforts to prevent such unfortunate occurrences.

9.3 Personal Data that we collect from you will be stored and backed up securely in an environmentally-controlled location. Only authorized people with user ID and password from our company have access to the information.

9.4 You must remember to log off after accessing and/or using our Services and/or close the browser window after use so that no unauthorized party can have access. You must not, at any time, divulge your Personal Data to any third party.

## **10. Transferring Your Information Outside of Malaysia**

10.1 The Internet is not a secure medium, and communications over the Internet may be subject to third-party interception. Altel cannot accept responsibility for any unauthorised access or loss of personal information, save in accordance with the Terms of Use.

10.2 It may be necessary to transfer your personal information to other group companies or services providers located in countries outside Malaysia. This may happen where the Authorised Third Parties are based outside Malaysia or where you use our Services and/or Services from countries outside Malaysia. By continuing usage of our Service and access to our Services, you hereby consented to such transfer.

## **11. Contacting The Website**

11.1 If you have any questions about your dealings with the Services, please write to: [ask@altel.my](mailto:ask@altel.my)