

Privacy Notice

We Flash Fulfillment (M) Sdn. Bhd. ("Flash Fulfillment") (collectively "Flash", "we", "us" or "our") respect your concerns about privacy. Flash Fulfillment and all our employees, business partners, vendors or other third parties who perform work for or on behalf of us are fully committed to protecting your privacy and ensuring that your Personal Data will be processed in accordance with the Personal Data Protection Act 2010 (PDPA 2010). We will take necessary and relevant measures to safeguard your Personal Data in accordance with the PDPA 2010.

This Privacy Notice describes on how Flash Fulfillment collect, use, maintain and disclose your Personal Data through the use of Flash Fulfillment mobile applications and websites (respectively "Apps" and "Websites").

Collection of Personal Data

'Personal Data' means any personal information which you have disclosed to us as defined and described under PDPA 2010 which may identify you, or personal reference that has been or may be collected, stored, used and processed by Flash Fulfillment from time to time. Personal Data is provided on a voluntary basis. However, if such Personal Data is not provided, Flash Fulfillment may not be able to communicate with you or render any services to you. Here are some of the types of Personal Data that we collect:

- i) Personal Identification information for e.g name, gender, photo, age, date of birth, nationality, facial features, passport / identification card including the number, religious beliefs, racial or ethnic origin, and biometric data;
- ii) Contact information for e.g. residential address, email address and phone numbers;
- iii) Transaction information for e.g. information relating to your purchase of products or services made on the Website and Apps;
- iv) Payment information for e.g. credit or debit card information, including the name of cardholder, card number, card issuing bank, card issuing country, card expiry date and banking account details; and

- v)s Device information for e.g. IP address, hardware model and serial number.

We use your IP address to help diagnose problems with our server, and to administer our website. From your IP address, we may identify the general geographic area from which you are accessing our website. Generally, we do not link your IP address to anything that can enable us to identify you unless it is required by law and regulations.

Your Obligation

It is your obligation to supply your personal data to us in the most accurate manner. If you do not provide us with your personal data, we are unable to, process your personal data on your behalf, for the purposes stated in the Notice, or effectively render our services to you and all relationship created or to be created between us shall then be terminated and ceased to be in effect immediately.

Under some circumstances, you are required to provide your Personal Data in order to comply with legal requirements where it is necessary to conclude a contract. Failure to provide such Personal Data may constitute failure to comply with legal requirements or inability to conclude a contract with you. For reasons such as detection and prevention of fraud, we may also collect your Personal Data without consent, by relying on Legitimate Interests or other exemptions provided by the applicable data privacy laws.

If you do not wish for your personal data to be collected via cookies on this website, 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.

Purpose of Data Collection

Flash Fulfillment may use and process the Personal Data for the purposes connected with providing services as requested by you or for business activities which shall include, but not limited to:-

- i) Process your requested services;

- ii) Process upon payment transactions, delivery of notice, forms, letters and other documents necessarily required;
- iii) Verify your identity;
- iv) Monitoring, managing and administrating customers account in regard to collections, credit assessments and debt management;
- v) Communications with you and delivery of information by any communication methods including, but not limited to e-mail, telephone calls, facsimile, short message service, social media and other services;
- vi) Communications with service providers and business associates;
- vii) Conduct marketing surveys and customers' profiling activities in connection with the services;
- viii) Perform internal operations necessary to provide our services, including troubleshooting software bugs and operationa problems, conducting data analysis, testing and research, monitoring and analysing usage and activity trends;
- ix) We may also contact you via email or phone call regarding our services in order for us to respond to any of your enquiries. You may provide us your information by completing a form, or by corresponding with us by phone, email, live chat or such other means that are available. This includes information that you provide when you register to use our site, participate in social media functions, enter a competition, promotion or survey, including when you report of problem via our Website or Apps;
- x) Prevention, hindrance, reporting of any criminal activities including but not limited to fraud, bribery and/or money laundering;
- xi) Utilizing of personal data for any future marketing or promotional purposes; and

- xii) Any other purposes as and may be required under the relevant law and legislation.

and you agree and grant consent to Flash Fulfillment to use and process your Personal Data in the manner as stated in this Notice.

Disclosure of Personal Data

Flash Fulfillment may draw in service providers or business associates or individuals in Malaysia or abroad to perform functions on its behalf and in this manner might provide access or disclose your Personal Data to third parties, including but not limited to:-

- i) Information technology or data entry service providers;
- ii) Warehousing storage facility providers;
- iii) Business partners;
- iv) Financial institutions and insurance service providers;
- v) Business professional advisors and external auditor;
- vi) Payment network operators and credit card verification providers, (including but not limited to VISA, MasterCard and China Union Pay), governmental agencies, regulatory authorities, as and when required;
- vii) Bank, financial institution, insurance companies, land authorities, Malaysian Inland Revenue Board, Companies Commission of Malaysia, courts of law; and
- viii) Other entities within Flash Express Group.

You may receive marketing communication from us or from the aforementioned entities about products and services that may be of interest to you. If you no longer wish to receive these marketing communications, please notify us to withdraw your consent and we will stop

processing and sharing your personal data with these other entities for the purpose of sending you marketing communication.

You may withdraw your consent to receive marketing or promotional materials/communications by contacting us using the contact details provided below. Please be aware that once we have received confirmation that you wish to withdraw your consent for marketing or promotional materials/ communication, it may take up to fourteen (14) working days to reflect your withdrawal in our system. Therefore during this period of time you may still receive marketing or promotional materials, we may still contact you for other purposes in relation to the accounts, facilities or services.

Flash Fulfillment will not disclose the User's Personal Data to unaffiliated third parties without the User's consents unless such Personal Data is required by law or in good faith and such action is necessary to comply with any law enforcement agency requirements, court orders or legal processes. Flash Fulfillment will not sell, trade or rent users' Personal Data to others. If we disclose any of your Personal Data to our authorised agents or service providers, we will require them to appropriately safeguard the personal data provided to them.

Retention

Flash Fulfillment retains your Personal Data including from closed accounts for the period necessary to fulfil the purposes outlined in this Policy unless a longer retention period is required or allowed by law. Once your Personal Data is no longer necessary for the services or purposes, or we no longer have a legal or business purpose for retaining your Personal Data, we shall take reasonable steps to erase, destroy, anonymise or prevent access or use of such Personal Data for any purposes other than compliance with this Policy, or for the purposes of including but not limited to safety, security, fraud prevention, enforcement and detection, in accordance with the requirements of applicable laws.

Disposal of Records

We shall review and dispose any or all unwanted personal data recorded in the database to be disposed within fourteen (14) days except if/unless the data carry legal impact and/or requirements in relation to the commercial transaction. We shall prepare a personal data disposal schedule for any or all inactive data within twenty-four (24) months (Paragraph 6 of

Standard 2015) and shall seek prior approval for the disposal of records and keep a record of the documents which have been destroyed as follows:

- i) The description of documents;
- ii) The disposal action taken;
- iii) Who authorized the disposal; and
- iv) Who performed the disposal.

Protection of Personal Data

Flash Fulfillment will take reasonable legal, organisational and technical measures to ensure that your Personal Data is protected. This includes measures to prevent Personal Data from getting lost or used in an unauthorised way. Your Personal Data will only process in an authorised manner and are required to treat your information with confidentiality.

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 Personal Data transmitted through any online means, therefore, any transmission remains at your own risk.

Personal Data of Minors

We cannot distinguish the age of visitors to our Website and Apps. As a parent or legal guardian, please do not allow minor (below 18 years old) under your care to submit Personal Data to Flash Fulfillment. In the event that such Personal Data of a minor is disclosed to Flash Fulfillment, you hereby consent to the processing of the minor's Personal Data and accept and agree to be bound by this Notice and take responsibility for his or her actions. If your minor has provided us his/her Personal Data without your knowledge and consent, you may request that we remove such information by contacting us.

Your Rights in Respect with Your Personal Data

In accordance with applicable laws and regulations, you may be entitled to the following rights to:

- i) request for processing your Personal Data, including to be provided with a copy of your Personal Data;
- ii) request the correction of your Personal Data that is inaccurate, incomplete or out-of-date. We may verify your identity before fulfilling your request for access to your Personal Data. Do note that Flash Fulfillment has the right to refuse your request to access and/or make any correction to your Personal Data for reasons permitted by law;
- iii) request to erase your Personal Data under certain conditions as permitted by law;
- iv) request the restriction of the processing of your Personal Data, or object to that processing; and
- v) complain to the relevant data privacy authority if your data privacy rights are violated, or if you have suffered as a result of unlawful processing of your Personal Data; object to processing of your Personal Data under certain conditions.

Where you are given the option to share your Personal Data with us, you can always choose not to do so. If we have requested your consent to processing and later choose to withdraw it, we will respect that choice in accordance with our legal obligations.

However, if you refuse to share your Personal Data with us or withdrawing your consent to our use of your Personal Data, it could mean that we are unable to perform the necessary actions or you are unable to make use of the Services for the purposes stated herein.

Amendments

Flash Fulfillment reserves the right to modify, update or amend the terms in this Notice at any time. The user acknowledges and agrees that it is the user's responsibility to review this Notice periodically and be aware of future modifications. By continuing to communicate with Flash

Fulfillment or by continuing to use Flash Fulfillment's services following the modifications, updates or amendments to this Notice, it shall signify your acceptance of such modifications, updates or amendments.

We provide the Privacy Notice in both English and Bahasa Malaysia. In the case of any inconsistency between these two, the English version shall prevail. In case there is discrepancy on how we collect or use your personal data between this Privacy Notice and terms and conditions of your specific product or service, the terms and conditions of your specific product or service shall prevail.

Contact details

If you have any enquiries or complaints concerning this Notice, please contact us at:

Flash Fulfillment (M) Sdn. Bhd

15, Jalan Tiang U8/93, Taman Perindustrian Saujana Indah, 40150 Shah Alam. Selangor

Tel: 017-2599368

Email: phoebe_tan@flashexpress.my