

## **PRIVACY POLICY**

### **Personal Data Protection Act 2010 Notice**

#### **Collection, Recording, Storage and Retention of Personal Information**

This Privacy Policy (“**Privacy Policy**”) explains how Rentguard Sdn. Bhd. (Company No. 1198485-V) (“Rentguard,” “us,” “our,” and “we”) uses your information and applies to all who use our Website – www.rentguard.com.my, electronic services, social networking sites, interactive features, online services or any of our described online activities we own or control, including any online activities owned, controlled, or operated by Rentguard’s affiliates. In addition, please review the Website’s **Terms of Use** which governs your use of the service, and includes, among other things, grants of rights from you, limits on our liability and your remedies.

This Privacy Policy describes the types of information we may collect from you or that you may provide when you visit the website www.rentguard.com (“**Website**”) to view the content on the Website and/or utilize the interrelated “Interactive Services” on our Website which provides inputs for collecting information on rental applications, tenant screening and rent payments. This Privacy Policy covers our practices for collecting, using, maintaining, protecting and disclosing that information.

This Privacy Policy applies to information we collect:

- On this Website including on our interrelated platform.
- In e-mail, text and other electronic messages between you and this Website.

It does not apply to information collected by:

- us offline or through any other means, including on any other website operated by Rentguard or any third party (even if there is an apparent or actual affiliation); and/or
- any third party (including any affiliates and subsidiaries), including through any application or content (including advertising) that may link to or be accessible from or on the Website and the interrelated platform.

Please read this policy carefully to understand our policies and practices regarding your information and how we will treat it. **By accessing or using the Website** and/or the Interactive Services contained therein, **you agree to the terms of this Privacy Policy**. This policy may change from time to time. Your continued use of this Website and/or the interrelated platform after we make changes is deemed to be acceptance of those changes, so please check the policy periodically for updates. **If you do not agree with the practices described in this Privacy Policy, please do not provide us with your personal information or interact with the Website.**

This Privacy Policy is organized as follows:-

1. Information We Collect About You on our Website and How We Collect It
2. Information You Provide to Third Parties on our Platform
3. Information We Collect Through Automatic Data Collection Technologies
4. Third-party Use of Cookies and Other Tracking Technologies
5. How We Use Your Information
6. Disclosure of Your Information
7. Data Security

8. Accessing and Correcting Personal Information
9. Privacy Practices of Third Parties
10. Business Transfers and Corporate Changes

## 1. Information We Collect About You on our Website and How We Collect It

1.1 If you access our Website, including but not exclusively, our Interactive Services platform, we may collect several types of information from and about users of our Website, including information:

- a) by which you may be personally identified, such as name, postal address, e-mail address, telephone number, details of your banking account or any other identifier including potential information about and/or from third parties, (note: this information may be collected online or offline) ("**Personal Information**");
- b) that is about you but individually does not identify you, such as your location; and/or
- c) about your internet connection, the equipment you use to access our Website and usage details.

1.2 We may collect this information:

- a) Directly from you when you provide it to us.
- b) Automatically as you navigate through the Website. Information collected automatically may include usage details, IP addresses and information collected through cookies, web beacons and other tracking technologies.
- c) From third parties, for example, our business partners for audit verification purposes.
- d) You also may provide information to be published or displayed (hereinafter, "posted") on public areas of the Website, or transmitted to other users of the Website or third parties (collectively, "**User Contributions**"). Your User Contributions are posted on and transmitted to others at your own risk. Additionally, we cannot control the actions of other users of the Website with whom you may choose to share your User Contributions. Therefore, we cannot and do not guarantee that your User Contributions will not be viewed by unauthorized persons.

1.3 We know through our third party (either affiliated or not affiliated with RentGuard) collecting data utilizing our Interactive Services for rental applications, and/or tenant screening and rent payments that you are submitting information and that they are collecting information that you are providing, which will make you personally identified.

## 2. Information You Provide to Third Parties on our Platform

2.1 The information we collect on or through our Website may include:

- a) Information that you provide by filling in forms using Interactive Services. This includes information provided at the time of registering to use the Interactive Services and/or posting information or material, or requesting further services. We or third-party vendor or affiliate on our Interactive Services platform may also ask you for information when you enter a contest or promotion sponsored by us or a third party vendor or affiliate, and when you report a problem with our Website or Interactive Services platform.

- b) Records and copies of your correspondence (including e-mail addresses), if you contact us regarding your inputs on the Interactive Services platform.

### 3. Information We Collect Through Automatic Data Collection Technologies

3.1 As you navigate through and interact with our Website, we may use automatic data collection technologies to collect certain information about your equipment, browsing actions and patterns, including:

- a) Details of your visits to our Website, including traffic data, location data, logs and other communication data and the resources that you access and use on the Website.
- b) Information about your computer and internet connection, including your IP address, operating system and browser type.

3.2 The information we collect automatically is statistical data and may include personal information, or we may maintain it or associate it with personal information we collect in other ways or receive from third parties. It helps us to improve our Website and to deliver a better and more personalized service, including by enabling us to:

- a) Estimate our audience size and usage patterns.
- b) Store information about your preferences, allowing us to customize our Website according to your individual interests.
- c) Speed up your searches.
- d) Recognize you when you return to our Website.

3.3 The technologies we use for this automatic data collection may include:

- a) **Cookies (or browser cookies).** A cookie is a small file placed on the hard drive of your computer. You may refuse to accept browser cookies by activating the appropriate setting on your browser. However, if you select this setting you may be unable to access certain parts of our Website. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you direct your browser to our Website.
- b) **Flash Cookies.** Certain features of our Website may use local stored objects (or Flash cookies) to collect and store information about your preferences and navigation to, from and on our Website. Flash cookies are not managed by the same browser settings as are used for browser cookies.
- c) **Web Beacons.** Pages of our the Website and our e-mails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags and single-pixel gifs) that permit RentGuard, for example, to count users who have visited those pages or opened an e-mail and for other related website statistics (for example, recording the popularity of certain website content and verifying system and server integrity).

3.4 We currently do not collect personal Information automatically, but we may tie this information to personal information about you that we collect from other sources or you provide to us.

#### **4. Third-party Use of Cookies and Other Tracking Technologies**

- 4.1 Some content or applications, including advertisements, on the Website are served by third-parties, including advertisers, ad networks and servers, content providers, service providers and application providers. These third parties may use cookies alone or in conjunction with web beacons or other tracking technologies to collect information about you when you use our website. The information they collect may be associated with your personal information or they may collect information, including personal information, about your online activities over time and across different websites and other online services. They may use this information to provide you with interest-based (behavioral) advertising or other targeted content.
- 4.2 We do not control these third parties' tracking technologies or how they may be used. If you have any questions about an advertisement or other targeted content, you should contact the responsible provider directly.

#### **5. How We Use Your Information**

- 5.1 We use information that we collect about you or that you provide to us, including any personal information:
- a) To present our Website including possibly our Interactive Services platform and its contents to you.
  - b) To provide you with information, products or services that you request from us.
  - c) To fulfill any other purpose for which you provide it.
  - d) To provide you with notices about your potential or actual account/subscription now or in the future, including expiration and renewal notices.
  - e) To carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collection.
  - f) To notify you about changes to our Website or any products or services we offer or provide through it.
  - g) To allow you to participate in Interactive Services on our Website.
  - h) In any other way we may describe when you provide the information.
  - i) For any other purpose with your consent.
- 5.2 We may use the information we have collected from you to enable us to display advertisements to our advertisers' target audiences. Even though we do not disclose your personal information for these purposes without your consent, if you click on or otherwise interact with an advertisement, the advertiser may assume that you meet its target criteria.

#### **6. Disclosure of Your Information**

- 6.1 We may disclose aggregated information about our users, and other information that does not identify any individual, without restriction.
- 6.2 We may disclose personal information that we collect or you provide as described in this Privacy Policy:
- a) To our subsidiaries and affiliates.

- b) To contractors, service providers and other third parties we use to support our business.
- c) To a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution or other sale or transfer of some or all of RentGuard's assets, whether as a going concern or as part of bankruptcy, liquidation or similar proceeding, in which personal information held by RentGuard about our Website users is among the assets transferred.
- d) To third parties to market their products or services to you if you have consented to/not opted out of these disclosures.
- e) To fulfill the purpose for which you provide it. For example, if you provide information regarding your application which you believe was not processed, we can then check into the status and/or the issue.
- f) For any other purpose disclosed by us when you provide the information.
- g) With your consent.

6.3 We may also disclose your personal information:

- a) To comply with any court order, law or legal process, including to respond to any government or regulatory request.
- b) To enforce or apply our Terms of Use and other agreements, including for billing and collection purposes.
- c) If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of RentGuard, our customers or others.

## **7. Data Security**

7.1 Most if not all of the information you provide is provided to third-party providers using the Interactive Services contained on our Website in a platform. As we are not collecting the data, we DO NOT implement measures designed to secure your personal information from accidental loss and from unauthorized access, use, alteration, and disclosure.

7.2 The safety and security of your information also depends on you. Where we have given you or where you have chosen a password for access to certain parts of our Website, you are responsible for keeping this password confidential. We ask you not to share your password with anyone. We urge you to be careful about giving out information in public areas of the Website through User Contributions. The information you share in public areas may be viewed by any user of the Website.

7.3 Unfortunately, the transmission of information via the internet is not completely secure. Although we do our best to protect your personal information, we cannot guarantee the security of your personal information transmitted to our Website. Any transmission of personal information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on the Website.

## **8. Accessing and Correcting Personal Information**

8.1 You can access, update and delete your personal information that has been provided to us, by managing this information through your online account.

- 8.2 If you would like to deactivate your Rentguard account or have other questions or requests, please contact us. While we are ready to assist you in managing your subscriptions, deactivating your account and removing your active profile, we cannot always delete records of past interactions and transactions. For example, we are required to retain records relating to previous booking on the Website for financial reporting, compliance reasons and record purposes.
- 8.3 We will retain your personal information for so long as your account is active or as needed to provide you services and to maintain a record of your transactions for financial reporting purposes. Please contact us if you wish to deactivate your account. We will retain and use your personal information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

## **9. Privacy Practices of Third Parties**

This Privacy Policy only addresses the use and disclosure of information by Rentguard through your interaction with the Website. Other websites that may be accessible through links from the Website and other programs may have their own privacy policy and personal information collection, use, and disclosure practices.

## **10. Business Transfers and Corporate Changes**

Rentguard and our business partners or affiliates reserve the right to disclose, transfer, or license any and all information related to the Website, including personal information:

- a) to a subsequent owner, co-owner or operator of one or more of the websites or any portion or operation related to part of one or more of the websites; or
- b) in connection with a corporate merger, consolidation, or restructuring, the sale of substantially all of our stock and/or assets, or other corporate change, including, without limitation, during the course of any due diligence process.