

PRIVACY POLICY

Information We Collect From You

Speedpoint Sdn. Bhd. and its affiliates (collectively, "Speedpoint," "we," "us," or "our") are firmly committed to protecting the privacy of our customers and users ("you" or "your") and the Personal Information you entrust to us. This Privacy Policy explains what Personal Information we collect, how we use it, and to whom it may be disclosed.

"Personal Information" means information about an identifiable individual and includes information you have provided to us or that we have collected from other sources. Such information may include, without limitation, your name, address, age, gender, personal financial records, and identification numbers, to the extent permitted by applicable laws.

This Privacy Policy governs your use of the website located at www.Speedpoint.com and any other websites owned or operated by Speedpoint that reference this Privacy Policy (collectively, the "Speedpoint Sites"). Please read this Privacy Policy carefully. By accessing, using, or visiting the Speedpoint Sites, you acknowledge that you have read, understood, and agree to be bound by the terms of this Privacy Policy. If you do not agree with any provision of this Privacy Policy, you must immediately cease all use of, access to, and/or visitation of the Speedpoint Sites.

Why We Collect Data From You

Speedpoint collects data from you for the following purposes:

1. where it is necessary for the performance of our agreement with you to provide and deliver associated content and Services;
2. where it is necessary for compliance with legal obligations that we may be subjected to; and/or
3. where you have given consent to the same.

We Are Responsible For Children's Privacy

Protecting the privacy of young children is especially important. Speedpoint also does not market to, or knowingly collect personal information from, children under age of 13 on any sites of the company. If we become aware that we have collected personal information from a child under age 13 without verification of parental consent, we take steps to remove that information. In the event that personal data of a child under age 13 in your care is disclosed to Speedpoint, you hereby consent to the processing of the child's personal data and accept and agree to be bound by this Policy on behalf of such child.

When Can We Collect Your Personal Information?

We may collect personal information directly from you when you:

1. register and/or use our Services or Platform;
2. link your social media or other external accounts to register an account with us;

3. communicate with us (including but not limited to attending to you through our online customer service chats, letters, fax, calls (which may be recorded), face-to-face meetings, social media platforms, emails etc.);
4. register or subscribe for a specific Product and/or Service or our publications (for example, newsletters);
5. participate in any of our surveys;
6. enter into or participate in any competitions, contests or loyalty programs run/organized by Speedpoint;
7. register interest and/or request for information of (through our online portals or other available channels) or subscribe to our Products and/or Services;
8. respond to any marketing materials we send out;
9. visit or browse our websites;
10. lodge a complaint with us;
11. provide feedback to us in any way; and/or
12. submit your personal data to us for any reason.

Other than personal information obtained from you directly (as detailed above), we may also obtain your personal information from third parties we deal with or are connected with you (credit reference agencies or financial institutions), and from such other sources where you have given your consent for the disclosure of information relating to you, and/or where otherwise lawfully permitted.

How Can We Collect Your Personal Information?

Speedpoint collects information online by asking you for it, for example, when you order a service, apply for a job, or respond to a survey, offer or other promotion. A customer's name, address (postal and email) and telephone number are the most important pieces of information, but we might request other information, based on, for example, the service(s) being ordered or promoted.

Cookies: Speedpoint may also use "cookies" and similar technology to obtain information about your visits to our sites or your responses to email from us – both individually and in aggregated data that does not identify you. These reporting tools tell us the parts of our web sites or e-mails in which you showed an interest or took some action, and help us improve the quality and usefulness of our sites.

Content: You also provide us information in content you post to the website. Your content (such as reviews, photos and videos) and metadata about your content will be viewed by other users. Speedpoint can, but has no obligation, to monitor your content you post on the website. We can remove any information you post for any reason or no reason.

Payment Method: You will also be asked to submit Personal Information depending on the payment method you choose when accessing, purchasing or subscribing to one of our products or services. For example, if you choose to pay for a product/service by

credit card, you will be required to provide us the name of your credit card issuer, credit card number, billing address, CVV number, and expiration date.

Log Files: When you use the website, our servers automatically record certain information sent by your web browser. These server logs may include information such as your web request, Internet Protocol (“IP”) address, browser type, referring / exit pages and URLs, number of clicks and how you interact with links on the website, domain names, landing pages, pages viewed, mobile carrier, and other such information.

Geo-Location Information: When you use the website by or through a mobile device, we may access, collect, monitor and/or remotely store “location data,” which may include GPS coordinates (e.g. latitude and/or longitude) or similar information regarding the location of your mobile device.

Device: When you use Speedpoint.com, we may collect information about your devices such has device type, device hardware information, operating system type and version, device time and timezone, and other information necessary.

Third Party Tools: Speedpoint uses third party analytics tools, to help understand use of the website. Many of these tools collect the information sent by your browser as part of a web page request, including cookies and your IP address. These analytics tools also receive this information and their use of it is governed by their privacy policy.

Other Data You Unequivocally Submit: When you post, comment or follow any of our content and services, or send messages through our built-in online chat system, or provide us information in respect of any request or support required from us or for the purchase of our products and services, or participate in our competitions, contests, and tournaments, we may collect such information from you.

What Personal Data Will We Collect?

Personal Information You Disclose to Us

The personal information that we collect depends on the context of your interactions with us and the Services, the choices you make, and the products and features you use. The personal information we collect may include the following:

1. name
2. email address
3. telephone number
4. date of birth
5. mailing and/or billing address
6. username
7. password
8. contact preferences
9. debit/credit card numbers

10. financial information (eg: last four digits of your debit or credit card number, billing history, billing address, card type, issuing bank, expiration date, card origin by country)
11. online survey records and details
12. interests in our marketing campaigns and products
13. cookie preferences

Sensitive Information. When necessary, with your consent or as otherwise permitted by applicable law, we process the following categories of sensitive information: - financial data

Payment Data. We may collect data necessary to process your payment if you make purchases, such as your payment instrument number, and the security code associated with your payment instrument. All payment data is stored by the respective payment channel partners. You may find our list of payment channel partners here: Speedpoint.com/pay

Social Media Login Data. We may provide you with the option to register with us using your existing social media account details, like your Facebook, Twitter, or other social media account. If you choose to register in this way, we will receive certain profile information about you from your social media provider. The profile information we receive may vary depending on the social media provider concerned, but will often include your name, email address, friends list, and profile picture, as well as other information you choose to make public on such a social media platform.

How Can We Use Your Information

Speedpoint uses the personally-identifiable information collected online principally to provide you with the following service(s):

1. processing orders and/or transactions you have made
2. manage and administer your use of our Services including but not limited to remembering your preferences
3. for identification, verification, due diligence or known your customer purposes
4. deal with or facilitate customer service, carry out your instructions, deal with or respond to enquiries made by you or on your behalf
5. contact you via voice call, text message, email and/or post or otherwise for the purpose of managing your relationship with us or your use of our Services. This includes allowing us to let you know about other offerings which may be of interest to you. Postal and e-mail address information, for example, enables communication about services offered and ordered, as well as the proper provisioning and billing of those services.
6. conduct research, analysis and development activities (including but not limited to data analytics, surveys, products and service development and/or profiling) to analyze how you use our Services, to recommend products and/or services relevant to your interest, to improve our Services and/or to enhance your customer experience

7. respond to legal processes or to comply with or as required by any applicable laws, governmental or regulatory requirements of any relevant jurisdiction, or where we have good faith to believe that such disclosure is necessary under any applicable law.

This includes but not limited to in response to subpoenas and other legal demands, and where we believe that disclosing this information is necessary to identify, contact or bring legal action against individuals who may be endangering public safety or interfering with Speedpoint services, or with our customers' or others' use of them.

8. deal with and/or facilitate asset sale transaction or potential asset sale transaction, where such transaction involves Speedpoint as a participant or involves a related company or affiliate of Speedpoint as a participant, and there may be other third party organizations who are participants to such transaction. An 'asset sale transaction' refers to the purchase, sale, lease, merger, amalgamation or any other acquisition, disposal or financing of an organization or a portion of an organization or of any of the business or assets of an organization.

9. necessary for the detection, investigation, and prevention of fraud, cheating and other violations. This data is used only for the purposes of detection, investigation, prevention, and where applicable, action on such violations, and is stored for the time necessary for this purpose. If such data displays signs of violation, we will store such data for the purpose of establishing, exercising or defending legal claims, where necessary.

10. any other purposes which we notify you of at the time of obtaining your consent. At any point of time, should you feel the need to opt-out future communications with Speedpoint, options are given within to exclude those communicated messages to you.

What Legal Bases Do We Rely On To Process Your Information

If you are located in the EU or UK, this section applies to you

The General Data Protection Regulation (GDPR) and UK GDPR require us to explain the valid legal bases we rely on in order to process your personal information. As such, we may rely on the following legal bases to process your personal information:

Consent. We may process your information if you have given us permission to use your personal information for a specific purpose. You can withdraw your consent at any time.

Performance of a Contract. We may process your personal information when we believe it is necessary to fulfill our contractual obligations to you, including providing our Services or at your request prior to entering into a contract with you.

Legitimate Interests. We may process your information when we believe it is reasonably necessary to achieve our legitimate business interests and those interest do not outweigh your interests and fundamental rights and freedoms. For example, we may process your personal information for some of the purposes described in order to:

1. Send users information about special offers and discounts on our products and services

2. Develop and display personalized and relevant advertising content for our users

3. Analyse how our Services are used so we can improve them to engage and retain users
4. Support our marketing activities
5. Diagnose problems and/or prevent fraudulent activities
6. Understand how our users use our products and services so we can improve user experience

Legal Obligations. We may process your information where we believe it is necessary for compliance with our legal obligations, such as to cooperate with a law enforcement body or regulatory agency, exercise or defend our legal rights, or disclose your information as evidence in litigation in which we are involved.

Vital Interest. We may process your information where we believe it is necessary to protect your vital interests or the vital interests of a third party, such as situations involving potential threats to the safety of any person.

If you are located in Canada, this section applies to you

We may process your information if you have given us specific permission to use your personal information for a specific purpose, or in situations where your permission can be inferred. You can withdraw your consent at any time.

In some exceptional cases, we may be legally permitted under applicable law to process your information without your consent, for example:

1. If collection is clearly in the interests of an individual and consent cannot be obtained in a timely way
2. For investigations and fraud detection and prevention
3. For business transactions provided certain conditions are met
4. If it is contained in a witness statement and the collection is necessary to assess, process, or settle an insurance claim
5. For identifying injured, ill or deceased persons and communicating with next of kin
6. If we have reasonably grounds to believe an individual has been, is, or may be victim of financial abuse
7. If it is reasonable to expect collection and use with consent would compromise the availability or the accuracy of the information and the collection is reasonable for purposes related to investigating a breach of an agreement or a contravention of the laws of Canada or a province
8. If disclosure is required to comply with a subpoena, warrant, court order, or rules of the court relating to the production of records
9. If it was produced by an individual in the course of their employment, business or profession and the collection is consistent with the purposes for which the information was produced
10. If the collection is solely for journalistic, artistic or literary purposes
11. If the information is publicly available and is specified by the regulations

How Long We Store Your Data

We will keep your information for as long as is required to fulfil the purpose for which it has been collected and processed or if any applicable legislation requires longer storage as required by law.

If you terminate your account with us, all personal data will be deleted except if it is required by legal process or any other legitimate reason as Speedpoint deems necessary. If you remove the consent of processing personal data of your child, we will delete the personal data without delay based on the consent you have given. If you choose to object to the processing of your personal data, we will delete your data within a reasonable period, except if it is required by law to retain the same.

What We Request From You

We request you to provide us accurate and complete information about yourself and any other person whose personal information you provide us and for updating when it becomes incorrect or out of date by contacting us. This obligation is a condition to the provision of our Products and/or Services to you and/or any other person authorized or permitted by you or your organization/company to use the Products and/or Services.

We Promise Privacy & Security

Both of us together play an important role in protecting against online fraud. You should be careful that any information including your User ID, Password, Security Device and/or Security Code are not compromised by ensuring that you do not knowingly or accidentally share, provide or facilitate unauthorized use of it. Do not share your User ID, Password, Security Device and/or Security Code or allow access or use of it/ them by others.

At Speedpoint, we use encryption, firewalls and other technology and security procedures to help protect the accuracy and security of your personal information and prevent unauthorized access or improper use. For example, you will note that while using some features of the Speedpoint's website you will need to submit a password or some other type of authenticating information.

If you click a link to a third-party site, you will be leaving our Platform and we don't control or endorse what is on third-party sites.

Your Rights

Individuals located in certain countries, including the European Economic Area and the United Kingdom, have certain statutory rights in relation to their personal data. Subject to any exemptions provided by law, you may have the right to request access to your personal data, as well as to seek to update, delete or correct this information.

To the extent that the processing of your Personal Data is subject to the General Data Protection Regulation (or applicable laws covering the processing of Personal Data in the United Kingdom), Speedpoint relies on its legitimate interests, described above, to process your data. Speedpoint may also process your personal data for direct marketing

purposes, and you have a right to object to our use of your personal data for this purpose at any time.

Disclosure of Your Information (If Needed)

In addition to the above, when you have provided Personal Information to us for a particular purpose, we may share your data with third-party vendors, service providers, contractors or agents (“**third parties**”) who perform services for us or on our behalf and require access to such information to fulfill your request. The categories of third parties we may share personal information with are as follows:

1. Affiliate Marketing Programs
2. Cloud Computing Services
3. Communication & Collaboration Tools
4. Data Analytics Services
5. Data Storage Service Providers
6. Finance & Accounting Tools
7. Order Fulfillment Services Providers
8. Payment Processors
9. Performance Monitoring Tools
10. Social Networks
11. Ad Networks
12. Testing Tools
13. User Account Registration & Authentication Services
14. Website Hosting Service Providers
15. Products Engineering & Design Tools
16. Sales & Marketing Tools

We may also disclose any of your Personal Information to law enforcement or other appropriate third parties in connection with criminal investigations, investigation of fraud, infringement of intellectual property rights, or other suspected illegal activities, or as otherwise may be required by applicable law, or, as we deem necessary in our sole discretion, in order to protect the legitimate legal interests of Speedpoint.

We also may need to share your personal information in the following situations:

1. **Business Transfers.** We may share or transfer your information in connection with, or during negotiations of, any merger, sale of company assets, financing or acquisition of all or a portion of our business to another company.
2. **Affiliates.** We may share your information with our affiliates, in which case we will require those affiliates to honor this privacy notice. Affiliates include our parent company and any subsidiaries, joint venture partners or other companies that we control or that are under common control with us.
3. **Business Partners.** We may share your information with our business partners to offer you certain products, services or promotions.

International Transfer of Data

Speedpoint operates internationally. You therefore accept and understand that we may store your data in different countries depending on applicable data localisation regulations, or share your Personal Data with recipients (such as the Payment Channels, or Speedpoint affiliates/subsidiaries) who are located in countries other than the country in which your Personal Data was originally collected, in order to provide the services to you, process and complete the transactions you wish to make on our Platform, or for any other purposes set out in this Policy.

In such circumstances, we take steps to ensure that overseas recipients shall provide a standard of protection to the Personal Data transferred that is comparable to the protection under the EU General Data Protection Regulations as well as the local data protection laws applicable in your jurisdiction.

Withdrawing Consent or Requesting Access to Correct Information

Withdraw Consent

To withdraw consent, you may email us at helper@Speedpoint.com or dpo@Speedpoint.com. You may also withdraw your consent by deleting your account by choosing the menu items My Account -> Edit -> Delete Account. We will process such requests accordingly. You agree that by your withdrawal of consent, you may not be able to continue using our Services in full or have full access to our Platform and we may terminate the contract you have with us. We will liaise with you if we are unable to verify your identity or understand your instructions.

Requesting Access and/or Correcting Personal Data

If you have an account with us, you may access your personal data currently in our possession by visiting the **My Account** section of our Platform. Alternatively, you may submit a written request for access or correction of your personal data to our Data Protection Officer at dpo@Speedpoint.com.

Please note that we require sufficient information from you in order to process any request for access or correction. This is necessary to verify your identity and ensure the security of your personal data.

Requests for the correction of personal data will be processed within the timeframes prescribed by applicable data protection laws, provided that we are furnished with adequate information to support the requested changes and to verify the accuracy of the corrections.

For general inquiries or assistance, you may also contact us at helper@Speedpoint.com.

Notices to the Changes in Privacy Policies

Speedpoint reserves the right to change this Privacy Policy at any time by notifying registered users via e-mail of the existence of a new Privacy Policy and/or posting the new Privacy Policy on Speedpoint. All changes to the Privacy Policy will be effective when posted, and your continued use of Speedpoint, product or service after the

posting will constitute your acceptance of, and agreement to be bound by, those changes.

Contacting Speedpoint

Please feel free to contact us if you have any questions about this Privacy Policy, or if you are seeking to exercise any of your statutory rights. We will respond within a reasonable timeframe. You may contact us

at helper@Speedpoint.com or dpo@Speedpoint.com.

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