

PRIVACY NOTICE

At IIMMPACT Sdn Bhd (collectively referred to as "**IIMMPACT**", "**we**", "**us**", or "**our**"), we value your privacy and are committed to protect your Personal Information in compliance with the laws of Malaysia. This Notice applies to our users, agents, vendors, suppliers, partners, contractors and service providers (collectively referred to as "**you**", "**your**" or "**yours**").

Pursuant thereto, this Privacy Notice is designed to explain and elaborate upon some of our policies and principles pertaining to the privacy of your personal information, all of which we have adopted as a sign of our commitment to respecting, maintaining, protecting and safeguarding the privacy of your personal information.

We will only collect, record, hold, use, disclose and store (i.e. "process") your Personal Information in accordance with the Personal Data Protection Act 2010 (PDPA 2010) and other applicable data protection or privacy laws and regulations, this Privacy Notice and the privacy terms in your agreement(s) with us.

This Privacy Notice explains how we collect, use, process, disclose, and safeguard your Personal Information when you use our services, including our mobile application "every" (referred to as the "**App**"), our websites (the "**Websites**"), as well as related features, services, or products we offer (collectively, the "**Services**").

This Privacy Notice explains:

- The type of Personal Information we collect and how we collect it;
- How we use your Personal Information;
- The parties that we disclose the Personal Information to; and
- The choices we offer, including how to access and update your Personal Information.

Your privacy matters to us, so please take the time to get to know our practices and if you need further information, please email us at support@iimmpact.com.

For the purposes of this Privacy Notice, please note that:

"Personal Information" refers to any information that directly or indirectly identifies or relates to you, or your interactions with us. This includes both sensitive and non-sensitive information personal data and sensitive personal data, as defined under the Personal Data Protection Act (PDPA) Malaysia.

- Non-Sensitive Personal Information includes, but is not limited to, your name, identification number, nationality, address, date of birth, gender, occupation, employer details, contact information (phone number, email address), financial and banking details, transactional records, and other relevant information related to your engagement with our products and services.

- Sensitive Personal Information includes data related to your physical or mental health, religious beliefs, political affiliations, criminal records, biometric data, or any other information that may be classified as sensitive under the PDPA. We will only process such data in accordance with applicable legal requirements, including obtaining your explicit consent where necessary. This Privacy Notice applies solely to individuals and governs how we collect, use, disclose, and safeguard your personal data in accordance with the PDPA Malaysia.

By using our products and Services and providing to us your Personal Information, you hereby consent to the use, processing, transfer and storage of your Personal Information for the purposes outlined in this Privacy Notice. Please note that for certain processing activities, such as sending you marketing communications or sharing data for third-party marketing, we will obtain your specific consent as detailed in the relevant sections below.

Legal Basis for Processing Personal Information

We will only collect, use, disclose, store or otherwise process your Personal Information when one or more of the following legal bases are met:

1. you have explicitly consented to the processing of your Personal Information;
2. processing is necessary to enter into or perform a contract with you to provide Services;
3. the processing is required for compliance with a legal obligation; and/or
4. The processing is necessary for our legitimate interests (or those of a third party), provided that such processing does not override your fundamental rights and freedom. Legitimate interests may include improving our services, ensuring security, and detecting fraud.

WHAT KIND OF PERSONAL INFORMATION WE COLLECT AND HOW WE COLLECT IT

In order for us to provide you with our products and Services, open and operate an account for you, deal with your inquiries and/or to fulfil partly or all of the Services you request, we may need to and/or required to collect, use, disclose and store (i.e. “process”) Personal Information about you, including but not limited to:

- Personal information, which include but not limited to, your name, mobile phone number, government-issued identification numbers such as your national identification number, passport number or driver’s licence number, address details, date of birth, email addresses and bank account information (including bank name, bank account number and account holder name) when you apply for any of our products and Services;
- Personal information such as your, gender, age, ethnicity, marital status, educational level, occupation, salary range, interests, hobbies, precise location-based information and any other information you directly give us through written communication or on our App;
- Personal information including your account login credentials and authentication data (e.g. biometric data such as fingerprints or facial recognition) to establish your identity and background;

- Personal information related to you obtained indirectly through other sources (if any), in regards with which you have given your consent to them disclosing information relating to you and/or where they are not otherwise restricted.
- information which we may collect from written communications when you provide us complaints or requests for assistance. We use this information to communicate with you and efficiently manage your inquiries and resolve issues;
- information such as occupation, language, postcode, area code, unique device identifier, location and the time zone where our products and Services are used;
- Any personal information that you provide when applying for our products and services, including views or opinions made known through feedback or surveys; and
- Other electronic data or information such as IP addresses, cookies, activity logs, and online identifiers and location data when you use our products, Services, Websites, and App.

We may obtain this information from yourself and from a variety of sources, including but not limited to:

- Through your relationship with us, for example when you register and operate your account and use our products or Services, when participating in programmes (e.g. surveys, promotions), when providing feedbacks or making complaints;
- through your verbal and written communications with us and/or our authorised agents via SMS, phone or mobile device, email, social media interactions or other appropriate communication channels;
- From an analysis of the way you use and manage your account with us, from the transactions you make and from the payments which are made/to from your account and use of our products or Services;
- Information received from refund, settlement or reconciliation claims or other documents;
- from any information that is supplied and/or collected when you visit our websites and/or download our mobile device applications which may include your device's IP address or from data that is collected via cookies;
- regulators and government agencies; and/or
- Information provided by third-party partners, service providers or public data sources where required or permitted by law.

Use of Cookies and Tracking Technologies

When you use our App and Website, we and our third-party service providers may automatically collect certain electronic data using cookies and similar tracking technologies (like web beacons, pixels, and device identifiers). Cookies are small text files stored on your device to keep track of your activity and information such as IP address, browser behaviour, and how you navigate within the website or mobile application.

We use these technologies for various purposes, such as:

- To provide the essential, basic functions of the use of our Websites, Services or Apps;
- To authenticate you, remember your user preferences, settings and login information;

- To analyse how users interact with our Websites, Services, or Apps, monitor site traffic and trends, measure the effectiveness of our content and diagnose technical issues; and
- To deliver and measure the effectiveness of advertising campaigns, serve you relevant advertisements based on your interests and online behaviour across our Services and potentially on other websites and apps owned by other companies (this may involve using data about your activity to infer your interests).

The information collected through these technologies may include your IP address, browser type, device information (e.g., device ID), operating system, referring URLs, pages viewed, clicks, time spent on pages, language preferences, and interactions within our Services. This data, particularly when combined with other information, may be considered Personal Information.

We may use third-party analytics and advertising service providers who use cookies and similar technologies to collect information about your online activities across different websites and over time for analytics and advertising purposes. Their collection and use of your information are governed by their own privacy policies. We encourage you to review the privacy policies of these third parties.

You may modify your web browser and/or mobile device settings to notify you when a cookie is being used, or to block, restrict, or delete cookies. Please refer to your browser or device's help section for instructions on how to do this.

Please note that if you choose to disable, block, or deactivate certain cookies, particularly those strictly necessary for the basic functioning of our Services, it may affect the availability, functionality, or usability of our Website, Services, or Apps. Disabling analytics or advertising cookies may mean you see less relevant advertisements or that we cannot effectively analyse service performance.

Third-Party Sites and Services

Our websites, products, applications and services may contain links to third-party websites, products and services. Our products and services may also use or offer products or services from third parties. Information collected by third parties, which may include such things as location data or contact details are governed by their privacy practices. This means, third party internet sites that you can link through our websites are not covered by our policy. Therefore, we encourage you to familiarise with those third parties' sites' privacy policies before using the links or applications and we urge you to be careful when you enter any Personal Information online. IIMMPACT accepts no responsibility or liability for those sites.

HOW WE USE YOUR PERSONAL INFORMATION

We may use your Personal Information for the one or more of following purposes (**"Purposes"**):

- to assess your application(s)/request(s) for our products and services;
- to manage and maintain your account(s) with us;
- to better manage our business and your relationship with us;

- to facilitate payments for our Services and products;
- to process refunds;
- to understand your current and future products, services and advertising needs;
- to provide you with information on and/or to market IIMPACT's products, services and offers which may be of interest to you;
- to improve our products and services and to test, research, analyse and develop new products/ new features of products and/or services;
- to study how you use the products and/or services (analysis for promoting product/service)
- to notify you about benefits and changes to the features of products and services;
- to administer our and/or our Partners offers, competitions and promotions;
- To respond to your enquiries and complaints and to generally resolve disputes;
- To update, consolidate and improve the accuracy of our records;
- To produce data, reports and statistics which have been anonymised or aggregated in a manner that does not identify you as an individual;
- To conduct research for analytical purposes including but not limited to information processing, management and enhancement of data, data mining and analysis of your transactions with us;
- To meet the disclosure requirements of any law binding on IIMPACT;
- To create and maintain risk related models relating to audit, compliance and risk management purposes or functions;
- To transfer or assign our rights, interests and obligations under any of your agreements with us;
- To conduct anti-money laundering checks;
- For crime detection, investigation, prevention and prosecution;
- To monitor compliance with our terms and conditions, policies and applicable laws;
- To enforce and/or defend our rights; and/or
- for any other purpose that is required or permitted by any law, regulations, guidelines and/or the order of any court and/or relevant regulatory authorities.

Mandatory Service Communications

Certain standard communications (such as account statements, transaction alerts, or essential service updates) are necessary to ensure proper function and security of your account. These may include updates or notifications about new IIMPACT products or services.

Opting out of these communications is not possible without impacting essential account functionality or affecting the provision of our Services.

Consent for New Purposes

We will obtain your explicit consent before using your Personal Information for any new purposes not listed in this Policy, unless this use is otherwise required or permitted by law.

DISCLOSURE OF YOUR PERSONAL INFORMATION

To provide, manage and operate our products and Services and/or for any of the purposes as outlined in this Privacy Notice, you consent and authorise us to disclose your Personal Information and/or your account to the following parties, as necessary:

- IIMMPACT including the directors, officers and representatives;
- companies and/or persons acting on our behalf as agents, contractors, affiliates, service providers, merchants, suppliers, strategic/business partners and/or professional advisers (including the sub-contractors, employees, directors, service providers, agents and professional advisors of all the aforesaid companies and/or persons);
- IIMMPACT's advisers (including but not limited to accountants, auditors, lawyers, financial advisers, consultants or other professional advisers);
- companies and/or organisations that assist us with processing and/or otherwise fulfilling transactions that you have requested;
- Companies and/or organisations that assist us in providing value added services;
- Any other person legally obligated to uphold confidentiality standards and has undertaken to keep such information confidential;
- Any other person notified by you as authorised to give instructions or to use the account or products or Services on your behalf;
- any third-party service provider, agent or contractor who has been appointed by us to provide services to us whether in or outside Malaysia subject to sufficient security controls over the information;
- Any party we may deem necessary to facilitate any investigation related to fraud and/or illegal activities;
- any person connected to the enforcement or preservation of any of our rights under your agreement(s) with us, subject at all times to any laws (including regulations, guidelines and/or obligations) applicable to IIMMPACT (whether in or outside Malaysia); and/or
- any law enforcement, government, courts, dispute resolution bodies and regulatory bodies including Bank Negara Malaysia and their appointed personnel or party.

When we transfer your Personal Information outside of Malaysia as part of these disclosures, we will take reasonable steps to ensure that the recipient provides a standard of protection for your Personal Information that is comparable to the protection under the PDPA 2010, such as by entering into contractual agreements requiring the recipient to adhere to specified data protection standards or relying on other legally approved mechanisms.

We treat your Personal Information as private and confidential and will not disclose your information to anyone outside IIMMPACT except:

- where you have given your explicit consent pursuant and/or pursuant to your consent and authorisation as contained in this Privacy Notice and/or in the terms and conditions governing the products and services you have with us;
- where we are required or permitted to do so by law;
- where required or authorised by an order of a court, tribunal, or government authority with jurisdiction over IIMMPACT, whether governmental or quasi-governmental in nature;

- where we may transfer rights and obligations under an agreement; and/or
- where we are required to meet our obligations to any relevant regulatory authority (whether in or outside Malaysia).

Marketing and Communications

We may use your Personal Information to send you marketing and promotional communications and offer you customised products and services based on your interest and profile. These communications may be sent by various mediums and modes (including electronic direct mail, push notifications, telephone calls, text messages via messaging platforms, social media, and in-app features) and may relate to products and/or services offered by IIMPACT, or in collaboration with our business partners and/or service providers.

Marketing communications may include:

- Personalised offers, promotions, or product recommendations;
- Alerts or updates regarding events, news, services, or promotional activities;
- Direct mailers and newsletters; and
- Invitations to participate in events, competitions, activities or other promotional opportunities.

We will obtain your consent to send you marketing communications as required by applicable law.

We may analyse your Personal Information (such as transaction history and service usage) to understand your interests and provide you with relevant marketing for IIMPACT's own products and services.

Sharing Data for Third-Party Marketing

We will only disclose your Personal Information to third parties (such as our business partners) for direct marketing purposes where we have obtained your separate, express prior consent for such disclosure.

Opting Out of Marketing Communications:

If you wish to stop receiving marketing or promotional communications from IIMPACT, you may opt out by:

1. Clicking the "unsubscribe" link in the relevant email or message;
2. Adjusting your communication preferences via the settings within our App; or
3. Informing us at any time via email at support@iimpact.com.

Note: Opting out of marketing communications will not affect our ability to send you important service-related notifications, such as those related to your account, payment transactions, rewards, or essential security alerts (e.g., two-factor authentication 2FA).

SECURITY OF YOUR PERSONAL INFORMATION

Your Personal Information is our asset and therefore IIMPACT places great importance on ensuring the security of your Personal Information. We implement up-to-date technical and

organisational security measures to ensure the protection, integrity and security of your data during its storage, processing and transfer.

We take precautions including administrative, technical and physical measures to safeguard your Personal Information against loss, theft and misuse, as well as against unauthorised access, disclosure, alteration and destruction.

Our employees are trained to handle Personal Information securely and with the utmost respect. Any employee failing to comply with our privacy protocols may be subject to disciplinary action.

Our agents, clients, service providers, professional advisers and business partners are required to handle Personal Information in accordance with the Personal Data Protection Act 2010. This serves to ensure that your Personal Information is safeguarded from unauthorised or accidental loss, misuse, modification, disclosure or destruction.

RETENTION OF YOUR PERSONAL INFORMATION

We will retain your Personal Information in compliance with this Privacy Notice and/or the terms and conditions of your agreement(s) with IIMMPACT for the duration of your relationship with us or for as long as your account is active or as needed to provide you with our services and products, or as necessary to perform our obligations to you or to enforce or defend the interests of IIMMPACT, or as required by applicable law and IIMMPACT's policies in relation to data retention.

Once your Personal Information is no longer necessary for the Services or Purposes, or we no longer have a legal or business purpose for retaining your Personal Information, we take steps to erase, destroy, anonymise or prevent access or use of such Personal Information for any purpose other than compliance with this Privacy Notice, or for purposes of safety, security, fraud prevention and detection, in accordance with the requirements of applicable laws.

What Happens If Personal Information Is Incomplete?

Where indicated, it is obligatory to provide your Personal Information to us to enable us to process your application for our products or services. Should you decline to provide such obligatory Personal Information, we may not be able to process your application or registration, your requests and complaints or provide you with our products or services. You shall update us on any changes to your Personal Information recorded with us to keep your Personal Information accurate, complete and up to date.

YOUR RIGHTS TO ACCESS AND CORRECT YOUR PERSONAL INFORMATION

We can assist you to access and correct your Personal Information provided to us.

Accessing Your Personal Information

You have the right to access your Personal Information in IIMMPACT's possession by making a written request to us via email. We will make a reasonable effort to respond to requests for access or corrections within twenty-one (21) days of receiving your duly completed written request.

Please note that IIMPACT may have to withhold access to your Personal Information in certain situations, for example when we are unable to confirm your identity or where information requested for is of a confidential commercial nature or in the event we receive repeated requests for the same information. Nevertheless, we will notify you of the reasons for not being able to accede to your request.

Correcting/Updating Your Personal Information

Please ensure your Personal Information (such as your mailing address(es), e-mail address(es) and telephone number(s) recorded with us are current, complete and accurate. Please notify us of any change in your personal particulars via email to ensure that all correspondence and/or communication reach you in a timely manner and to enable us to serve you better.

Please also note that IIMPACT may use its discretion in allowing the corrections requested and/or may require further documentary evidence of the new information to avoid fraud and inaccuracy.

If you wish to request that we no longer use your personal data or limit the usage of your personal data in anyway whatsoever, you may contact us at support@iimpact.com. However, please note that IIMPACT may not be able to proceed with the provision of the relevant product or services and you may not be able to use such product and services thereafter.

The personal data requested by IIMPACT are mandatory for the relevant product or services which you must provide and agree to the processing of such personal data. Should you decide not to provide any or all of the personal data, IIMPACT may not be able to proceed with the provision of the relevant product or services and you may not be able to use such product and services thereafter.

Exercising Your Choice Over Disclosure, Retention and Use Of Your Personal Information

Subject to our contractual rights and obligations under relevant laws and regulations, you may exercise your choice in respect of the disclosure, retention and use of your Personal Information. Should you wish to exercise these rights, please contact us at support@iimpact.com

Enquiries

Should you have any query, concerns or requests in relation to this Privacy Notice or how we handle your Personal Information, kindly contact us at support@iimpact.com.

Complaints

Should you have any complaints on how your Personal Information is managed, please reach out to our Privacy Officer at dataprivacy@versa.com.my.

Data Breach Notification

In the event of a data breach that exposes your Personal Information, we will take immediate steps to notify relevant authorities in compliance with applicable laws.

If the breach results in a significant risk to your Personal Information (e.g., unauthorised access, disclosure, or loss), we will also notify you as soon as possible, but without undue delay.

We will work to mitigate the damage caused by such a breach, including conducting a full investigation and implementing the required measures to prevent future occurrences.

REVISIONS TO THE PRIVACY NOTICE

Our Privacy Notice may be revised from time to time. Where the Privacy Notice is revised, the revised Privacy Notice will be posted on our website <https://www.iimmpact.com/> and/or communicated to you via any other means of communication deemed suitable by us. If you continue to use our services/products, you shall be deemed to have agreed to accept such changes unless you inform us otherwise.

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24 April 2025