

Optal Group Privacy Notice

1. About this Privacy Notice

1.1 This Privacy Notice applies to the Optal Group companies listed in Appendix 1 at the end of this Privacy Notice. It explains

- (a) what kinds of Personal Information we process;
- (b) how and when we collect Personal Information;
- (c) how we use your Personal Information;
- (d) when and with who we may share or transfer your Personal Information; and
- (e) choices you have regarding our use of that Personal Information, and your ability to access or correct that Personal Information.

If you have any queries regarding this Privacy Notice, you should contact our Data Protection Manager in the way specified in paragraph 14.

1.2 Each entity is herein referred to as **Optal, we, us** or **our**. Note that the main part of this Privacy Notice applies with respect to each and every Optal Group entity listed in Appendix 1. Any additional local law requirements which may apply to one particular entity due to its place of incorporation, place of business or area of activity are specified in Appendix 2 at the end of this Privacy Notice.

1.3 This Privacy Notice applies to data collected, submitted or processed:

- (a) via the [Optal](#) or [Invapay](#) websites;
- (b) when you subscribe or otherwise consent to receiving marketing materials or general information about Optal's services; or
- (c) when using any of our payment and execution services.

2. Personal Information

2.1 "**Personal Information**" is information which relates to a living individual who can be identified from that information or from that information and other information which is in our possession, or is likely to come into our possession and includes any expression of opinion about the individual and any indication of our intentions or the intentions of any other person in respect of the individual.

3. What Personal Information do we collect, use or process?

3.1 The types of Personal Information we may collect, use or process about an individual will depend upon the nature of our interaction with them. Personal Information that we collect, use or process may include (but is not limited to) the following (including copies of documents containing this information):

- (a) full name;
- (b) personal details such as your nationality, gender, age and/or date of birth;
- (c) personal or business contact details including telephone numbers (landline, fax number and/or mobile), email addresses and public social media IDs;
- (d) current residential address (including postal address);
- (e) payment details, such as your credit card or bank account details;
- (f) occupation and employment details including income details;

- (g) information from your curriculum vitae, resume or job application if you apply for a job with us;
- (h) identification documentation details (e.g. passport or national ID card number);
- (i) National Insurance, Social Security Number (**SSN**) (or equivalent) number;
- (j) criminal record check results;
- (k) shareholding/proprietorship in relevant companies/businesses; and
- (l) information about your usage of our website(s) and your interest in Optal's products and services, through web tracking software; and/or when you report a problem with our website(s). This may include the full Uniform Resource Locators (URL) clickstream to, through and from our website(s) (including date and time); products or services you viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page and any phone number used to call our customer service number. Also technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform(s).

3.2 We collect, use or process Personal Information about individuals such as:

- (a) our customers and their suppliers, potential customers and their representatives, employees, directors, partners, proprietors, shareholders, beneficial owners or individuals exercising control over the relevant counterparty;
- (b) our customers' clients;
- (c) our suppliers and potential suppliers and their representatives, directors, partners, proprietors, shareholders or other beneficial owners;
- (d) contractors and potential contractors and their representatives providing goods and services to us; and
- (e) any other person who comes into contact with Optal.

4. How and when do we collect Personal Information?

4.1 We collect your Personal Information to allow us to provide, market and sell our products and services and for the specified purposes set out in paragraph 6.2.

4.2 We may collect your Personal Information:

- (a) in the course of providing you with our products or services;
- (b) when you provide us, or you offer or apply to supply us, with goods or services;
- (c) when you contact or provide information to us in any way (including by completing a form, disclosing information over the phone, fax or via email, SMS or social media, providing us with a business card or when you browse or fill in a form on our website(s));
- (d) when you request information about us, our products or our services;
- (e) when you provide feedback to us;
- (f) when you visit premises from which we operate;
- (g) in the course of conducting or administering our relationship with you, or when you are carrying out activities in connection with our operations;
- (h) when you submit a job application to us;
- (i) when we carry out background verification checks on you, if you are registering to use our service and we conduct customer due diligence;

- (j) when you register or subscribe to use our services through our platform(s), website(s) or otherwise;
- (k) when you place or accept an order on our website(s) or platform(s);
- (l) when you report a problem with our service or our platform(s) or website(s);
- (m) through us working closely with third parties (including, for example, business partners, suppliers and subcontractors in technical, payment and fulfilment services, advertising networks, analytics providers, search information providers, credit reference agencies and fraud prevention agencies or other similar organisations - who may check the information against any particulars on the Electoral Register and any other databases) and may receive information about you from them; or
- (n) where we are otherwise required or authorised by law to do so.

- 4.3 Generally, when providing our products and services, dealing with our personnel, or obtaining goods and services from our service providers, suppliers or contractors, we collect Personal Information directly from the relevant individual where reasonable and practicable.
- 4.4 Our website(s) may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy and security policies and procedures and that we do not accept any responsibility or liability for these policies and procedures or for your or your Personal Information's security whilst you are visiting these websites. Please check these policies before you submit any Personal Information to these websites.
- 4.5 We may also collect Personal Information about you from your employer, if your employer has engaged us to provide services to them.
- 4.6 We may also collect Personal Information about you if you use any of the other websites or platforms we operate or the other services we provide. In this case, we will have informed you when we collected that data that it may be shared internally within the Optal Group of companies set out in Appendix 1 and combined with data collected on our websites. We work closely with third parties (including, for example, business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers, credit reference agencies) and may receive information about you from them for the purposes set out in paragraphs 4.1 and 6.2.
- 4.7 The Personal Information we collect may include sensitive Personal Information, including financial, criminal, health information and biometric information. We will ask for your consent to collect sensitive information, unless the law allows us to collect it without your consent.
- 4.8 It is voluntary for you to provide us with your Personal Information. However, in most cases, if you choose not to provide your Personal Information to us for the purposes set out in this Privacy Notice, or if we do not or are unable to collect the Personal Information we may not be able to provide you with access to Optal's services.
- 4.9 Where you provide Personal Information relating to others (e.g. beneficial owners' details, business representatives' details, supplier who is to be paid) you confirm that you have a lawful basis to do so and/or you will inform that person about us or are otherwise entitled to provide this information to us and for us to use it in accordance with this Privacy Notice.

5. Cookies

- 5.1 Please refer to our cookies notice for information about how we handle your Personal Information in relation to your activity on our website(s) and platform(s).

6. How do we use your Personal Information?

- 6.1 We use your Personal Information in order to operate our business efficiently, and to market our products and services.

- 6.2 We may collect, hold and use your Personal Information:

- (a) to administer the relationship between you and us or your employer, and to administer our business, for example managing your customer account, collecting, making and processing payments, providing support, and keeping you informed about changes to our products and services;
- (b) to carry out identity checks and customer due diligence, either in connection with the security of the products and services that we supply to you or you supply to us, or where we are required to do as part of our legal or regulatory obligations;
- (c) to identify which products and services are likely to be of interest to you, promote and market our products and services, and to provide you with information that we believe may be of interest to you;
- (d) to conduct research for the purposes of improving existing products or services, creating new products or services and marketing our products and services more effectively;
- (e) to carry out statistical analysis, provided that the information is aggregated and de-identified such that no individual may be identified from that information even when combined with other information;
- (f) to measure or understand the effectiveness of advertising we serve to you and others and to deliver relevant advertising to you
- (g) for business support purposes including maintenance, backup and audit;
- (h) to process any job application submitted by you;
- (i) to respond to any queries or complaints you may have;
- (j) to enhance the user experience of our website(s) by displaying more relevant information and options to customers;
- (k) to allow you to participate in interactive features of our service;
- (l) to administer our website(s) and other systems, including troubleshooting, data analysis, testing, research, statistical analysis and survey purposes;
- (m) to assist with keeping our platform(s) and website(s) safe and secure;
- (n) to comply with our statutory and legal obligations or requests from any court, authority or governmental body of any jurisdiction in which the Optal Group is subject to regulation; or
- (o) in order to establish, exercise, defend, protect, preserve or establish Optal's legal or other rights, or those of our customers' or others.

- 6.3 We may collect, use or disclose your Personal Information where the collection, use or disclosure is:

- (a) in accordance with this Privacy Notice or any agreement you enter into with us; or
- (b) required or authorised by applicable law.

7. When do we disclose your Personal Information?

- 7.1 Optal may disclose, transfer to, or provide access to, your Personal Information to third parties for the purposes described in paragraph 4.1 and 6.2.
- 7.2 We may share your Personal Information with other Optal Group entities as may be necessary to operate our business or provide you with services.
- 7.3 We may also disclose your Personal Information for the purposes described in paragraphs 4.1 and 6.2 to:
- (a) organisations to whom you send payments or from whom you receive payments via our products or services;
 - (b) other organisations or individuals who assist us in providing our products or services to you (for example, our payment processing providers, financial service providers and outsourced service providers);
 - (c) your nominated representatives;
 - (d) professional service providers and advisors who perform functions on our behalf, such as lawyers;
 - (e) representatives, agents or contractors who are appointed by us in the ordinary operation of our business to assist us in providing our products or services or administering our business (such as for data storage or processing, printing, mailing, marketing, planning and product or service development);
 - (f) analytics and search engine providers that assist us in the improvement and optimisation of our website(s); and
 - (g) government, regulatory authorities and other organisations as required or authorised by law, including in jurisdictions other than your own in which we operate.
- 7.4 We may also disclose your Personal Information to third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets in circumstances which may require the use or transfer of such Personal Information. This may also include, without limitation, in connection with any bankruptcy or insolvency event. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your Personal Data in the same way as set out in this Privacy Notice.

8. Overseas disclosures

- 8.1 Some of your Personal Information may be disclosed, transferred, stored, processed or used overseas by us, or by third party service providers for the purposes described in paragraphs 4.1 and 6.2. This may happen if:
- (a) our offices or related entities are overseas;
 - (b) we outsource certain activities overseas;
 - (c) transactions, information, services or products have an overseas connection; or
 - (d) our computer systems including IT servers are located overseas.
- 8.2 In particular, your Personal Information may be disclosed as outlined in paragraph 8.1 to persons in Australia, Hong Kong, the European Economic Area, the United Kingdom, Singapore, Malaysia and the U.S.A and such other countries in which: (i) those parties or their, or our, computer systems may be located from time to time, or (ii) any member of the Optal Group becomes licensed or establishes a place of business, in each case where it may be used for the purposes described in this Privacy Notice.

8.3 Where we transfer data to other jurisdictions, we will do so in accordance with applicable privacy law.

9. Other uses and disclosures

9.1 We may collect, use and disclose your Personal Information for other purposes not listed in this Privacy Notice. If we do so, we will make it known to you at the time we collect, use or disclose your Personal Information.

10. Marketing

10.1 You may receive marketing communication from us if you have requested information from us or if you have provided us with your details when you requested our newsletter or other products on our website(s) and, in each case, you have not opted out of receiving marketing.

10.2 We will get your express opt-in consent before we use or share your personal data with any company outside of the Optal Group for marketing purposes.

10.3 You can ask us to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by emailing us at any time at unsubscribe@optal.com.

11. Storage and security of Personal Information held by us

11.1 We aim to keep your Personal Information secure. Any Personal Information that is collected via our website(s) or which is held on our computer systems is protected by safeguards including physical, technical (data encryption) and procedural methods. Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your Personal Information, we cannot guarantee the security of your information transmitted to our site; any transmission is at your own risk. Once we have received your information we will use strict procedures and security features to try to prevent unauthorised access.

11.2 We will store Personal Information only for as long as it is reasonably necessary taking into consideration the term of your relationship with Optal, Optal's need to answer queries, resolve problems, provide improved and new services and comply with legal and regulatory requirements under applicable law(s) and regulatory requirements and those of our suppliers. This means that we may retain Personal Information for a reasonable period (in compliance with applicable law(s)) after you (or your employer) stop using Optal's services. After this period or when the Personal Information is no longer necessary for the purposes described in this paragraph (including any directly related purposes), we will take reasonable steps to destroy or permanently anonymise the Personal Information.

12. Access and updating your Personal Information

12.1 You are generally entitled to access or correct Personal Information that we hold about you. If you request access to your Personal Information we will give you a description of it; tell you why we are holding it; tell you who it could be disclosed to; and let you have a copy of the information in an intelligible form. Optal may charge for providing access to this information, however such a charge will not be excessive and will be in accordance with applicable law.

- 12.2 With regards to paragraph 12.1 there may be some legal or administrative reasons to deny access. If we refuse your request to access your Personal Information, we will provide you with reasons for the refusal where we are required by law to give those reasons.
- 12.3 A request for access or correction can be made by contacting our Data Protection Manager in the way specified in paragraph 14.
- 12.4 We take all reasonable and such practical steps as may be required to ensure that any Personal Information we collect and use is accurate, complete and up-to-date. To assist us in this, you need to provide true, accurate, current and complete information about yourself as requested, and properly update the information provided to us to keep it true, accurate, current and complete.
- 12.5 Please contact us in the way specified in paragraph 14 if you believe that the Personal Information is inaccurate, incomplete or out of date, and we will use all reasonable efforts and take such practical steps as may be required to correct the information.
- 12.6 It would assist us to ensure we properly understand your request, and allow us to respond more promptly, if requests are made in writing and include as much detail as possible.

13. How do we deal with complaints?

- 13.1 If you feel that we have not respected your privacy or that we have conducted ourselves inconsistently with this Privacy Notice, please contact our Data Protection Manager in the way specified in paragraph 14 and advise us as soon as possible. We will investigate your queries and complaints within a reasonable period of time and in accordance with applicable law and regulation depending on the complexity of the complaint.
- 13.2 We will notify you of the outcome of our investigation.

14. What to do if you have a question, problem or want to contact us about our use of your Personal Information or this Privacy Notice?

- 14.1 If you:
- (a) have a query or concern about this Privacy Notice or our Personal Information handling processes;
 - (b) wish to make a complaint in relation to a breach of your privacy;
 - (c) would like to access your Personal Information held by us; or
 - (d) would like to update or correct your Personal Information held by us,

please contact our Data Protection Manager who can be reached by email at compliance@optal.com.

This Privacy Notice was last updated on 25 May 2018. Any changes we may make to this Privacy Notice in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our Privacy Notice.

Appendix 1

Optal Group Companies

This is the Privacy Notice of the following Optal Group companies:

Company Name	Company number	Registered Address
Optal Limited	5531282	27-28 Eastcastle Street London W1W 8DH United Kingdom
Optal Financial Limited	8364883	27-28 Eastcastle Street London W1W 8DH United Kingdom
	F0021152	31/F Tower Two Times Square 1 Mathesons St Causeway Bay Hong Kong
Optal Asia Limited	2189337	31/F Tower Two Times Square 1 Mathesons St Causeway Bay Hong Kong
Optal Australia Pty Ltd	614 774 248	31 Queen Street Melbourne Victoria 3000 Australia
Optal Financial Europe Limited	612228	28 Fitzwilliam Place Dublin 2 D02 T292 Ireland
Invapay Payment Solutions Limited	6402512	27-28 Eastcastle Street London W1W 8DH United Kingdom
Invapay Australia Ltd	605 813 009	Level 14 1 Queen Street Melbourne Victoria 3000 Australia

Invapay Malaysia Sdn Bhd	1260786-K	Unit No. 17-2, Level 17 Wisma UOA II, No.21 Jalan Pinang Kuala Lumpur Wilayah Persekutuan 50450 Malaysia
Invapay Singapore Pte Ltd	201527677E	Level 34 77 Robinson Road Singapore 68896

Appendix 2

Local Law Addenda

England & Wales

(Relevant where references in this Privacy Notice to “Optal” mean Optal Limited, Optal Financial Limited and/or Invapay Payment Solutions Limited.)

With regards to what constitutes Personal Information in paragraph 2.1, pursuant to the General Data Protection Regulation (EU Regulation 2016/679), it includes any information relating to an identified or identifiable natural person who can be identified directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

For the purposes of UK data protection law, each of Optal Financial Limited, Optal Limited and Invapay Financial Services Limited are data controllers. Under UK data protection law, we may only process your information if we have a legal basis for doing so. Typically we will process your data on the basis that we have a legitimate interest in operating our business, to comply with our legal obligations, to establish or defend our legal rights, or you have given us your consent.

We only collect sensitive personal information about you if we have your consent or if we have a legal or regulatory obligation. For example the regulated financial services entities in the Optal Group may have to do background checks on individuals as part of our obligations to do customer due diligence.

With regard to your right to obtain a copy of the Personal Information we hold about you stated in paragraph 12.1, you may obtain a copy of such Personal Information for free.

In addition to the rights stated in paragraph 14, you have the right to:

- a) request certain information about how Optal processes your Personal Information;
- b) request a transfer of certain Personal Information from us to another data controller; and
- c) ask us to delete Personal Information we hold about you.

Any request to exercise one of these rights will be assessed by us on a case by case basis. There may be circumstances in which we are not legally required to comply with your request, for example because of relevant legal exemptions provided for in applicable data protection legislation.

With regards to the contact information stated in paragraph 14, should you wish to write to us, please do so at 17 Moorgate, London EC2R 6AR, for the attention of: Risk and Compliance.

In addition, you have the right to lodge a complaint to the UK’s Information Commissioner’s Office in respect of your data protection rights.

Ireland

(Relevant where references in this Privacy Notice to “Optal” mean Optal Financial Europe Limited.)

With regards to what constitutes Personal Information in paragraph 2.1, pursuant to the General Data Protection Regulation (EU Regulation 2016/679), it includes any information relating to an identified or identifiable natural person who can be identified directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

For the purposes of Irish data protection law, Optal Financial Europe Limited is the data controllers.

Under Irish data protection law, we may only process your information if we have a legal basis for doing so. Typically we will process your data on the basis that we have a legitimate interest in operating our business, to comply with our legal obligations, to establish or defend our legal rights, or you have given us your consent.

We only collect sensitive personal information about you if we have your consent or if we have a legal or regulatory obligation. For example the regulated financial services entities in the Optal Group may have to do background checks on individuals as part of our obligations to do customer due diligence.

With regard to your right to obtain a copy of the Personal Information we hold about you stated in paragraph 12.1, you may obtain a copy of such Personal Information for free.

In addition to the rights stated in paragraph 14, you have the right to:

- a) request certain information about how Optal processes your Personal Information;
- b) request a transfer of certain Personal Information from us to another data controller; and
- c) ask us to delete Personal Information we hold about you.

Any request to exercise one of these rights will be assessed by us on a case by case basis. There may be circumstances in which we are not legally required to comply with your request, for example because of relevant legal exemptions provided for in applicable data protection legislation.

With regards to the contact information stated in paragraph 14, should you wish to write to us, please do so at 28 Fitzwilliam Place, Dublin 2, D02 T292, Ireland, for the attention of: Risk and Compliance.

In addition, you have the right to lodge a complaint to Ireland’s Data Protection Commissioner in respect of your data protection rights.

Hong Kong

(Relevant where references in this Privacy Notice to “Optal” mean Optal Asia Limited and/or Optal Financial Limited in relation to its Hong Kong branch)

With regards to paragraph 4.9, replace paragraph 4.9 with the following:

"Where you provide Personal Information relating to others (e.g. beneficial owners’ details, business representatives’ details, supplier who is to be paid) you confirm that, on or before the collection of such Personal Information by you, you have informed that person about us and the purposes, and/or before providing such Personal Information to us, you have obtained their voluntary and express consent if such provision of Personal Information to us and/or our proposed purposes constitute a

new purposes beyond the purpose(s) notified to them at the time of collection, or you are otherwise entitled to provide this information to us and for us to use it in accordance with this Privacy Notice."

With regard to paragraphs 6.2(c), 6.2(d) and 6.2(f) and 10, we will only use your Personal Information (your name and contact details (email address, correspondence address and telephone number)) for direct marketing (in respect of financial services and payment services of the Optal Group) if you provide your voluntary and express consent or non-objection and have not subsequently withdrawn this. We will not provide your Personal Information to others for their use in directing marketing.

With regards to paragraph 8.2, the countries to which it may be transferred includes countries where your Personal Information may be subject to a lower standard of protection including to jurisdictions whose applicable law does not provide a comparable standard as the Personal Data (Privacy) Ordinance.

With regards to paragraph 9, your Personal Information collected will be used for the purpose for which the data is collected or for a directly related purpose. Otherwise, we will request you to provide a voluntary and express consent for a new purpose to us on or before your collected Personal Information is used.

With regards to paragraph 12.2, the reference to "administrative reasons" does not apply.

With regards to paragraph 12.5 the information to be corrected includes any of your Personal Information that has been disclosed by us to a third party as contemplated under this Privacy Notice if, at the time of such disclosure, the Personal Information concerned is materially inaccurate having regard to the purpose for which it is to be used. Optal shall take all practicable steps to correct information held by us and the third party.

Australia

(Relevant where references in this Privacy Notice to "Optal" mean Optal Australia Pty Limited and/or Invapay Australia Ltd.)

With regards to paragraph 8.2, note that this is without us being responsible under the Privacy Act 1988 (Cth) for such use (or for any breach). Where such parties are located overseas, you may have rights to enforce such parties' compliance with applicable data protection laws, but you may not have recourse against those parties under the Australian Privacy Act in relation to how those parties treat your Personal Information. However, we will take all steps reasonably necessary to ensure that your Personal Information disclosed to third parties in the countries referenced above (outside of Australia) is treated securely and in accordance with this Privacy Notice.

U.S.A

(Relevant where references in this Privacy Notice to "Optal" mean Optal Financial Limited in relation to its business operations and money transmission activity in the U.S.A. or with respect to U.S. persons)

Optal's products and services are not for use by individual consumers and are, instead, provided to only business entities. However, our business clients may share consumer Personal Information with us and therefore, we adhere to the requirements of Financial Services Modernization Act, (aka Gramm-Leach-Bliley Act, 15 U.S.C. §§6801-6827 (**GLB**) in respect of that information.

What Personal Information do we collect and hold?

With respect to paragraph 3.1, we may collect your Social Security Number or tax identification number (**SSN**).

We do not collect Personal Information on persons under 14 years of age unless they are provided by a parent or guardian and are necessary for the supply of our services.

When do we disclose your Personal Information?

With respect to paragraph 7, if the assets of Optal are sold or Optal goes bankrupt, your Personal Information may be transferred to the successor in interest to Optal. Prior to such occurrence, you shall be notified of such transfer and any opt-out rights you may have in that regard.

If you believe we are in possession of information concerning a person who is less than 14 years of age, please contact our Data Protection Manager at the contact information set out in paragraph 14.

Overseas disclosures:

With respect to paragraph 8.2, if you are a U.S. federal, state or local government or you send us Personal Information concerning any such government or any agency of any of them, you do so in the knowledge that such information may be transmitted to the foreign locations identified in this paragraph.

Marketing:

With respect to paragraph 10, we will not share your financial account information with any third party for marketing purposes.

Marketing opt-out right:

With respect to paragraph 10, if you prefer that we limit sharing your Personal Information with other Optal Group entities or non-affiliated third parties as described above, you may opt-out of those disclosures by contacting the Data Protection Manager at the contact information set out in paragraph 14. If you are a new consumer or customer, we can begin sharing your information 30 days from the date we provided this notice. When you are no longer our consumer or customer, we continue to share your information as described in this notice. However, you can contact us at any time to limit our sharing.

Opt-out does not prevent us from making disclosures permitted or required by law or disclosures to prevent fraud or other illegal activities.

Optal SSN Compliance:

Optal's Data Protection Policy complies with its obligations governing the collection, use, protection, security and disclosure of SSNs which are provided to Optal in relation to the acceptance and provision of Optal's services to its clients. The Data Protection Policy protects the confidentiality of such SSNs and reduces reliance on SSNs for identification and authentication purposes.

Optal will collect individual clients' and/or entity clients' owners' and key employees' SSNs as required by law, for the purposes of:

- performing sanctions list screening, identity verification, and any other screening and checks required by law and applicable to the business in which Optal is engaged;
- meeting any government agency reporting requirements; and

- as otherwise permitted, authorized or required by state or federal law.

Optal will limit access to records containing SSNs to only those who need to see the SSNs for the performance of their duties, including:

- Optal personnel in Sales, Finance, Legal, Risk and Compliance and Information Technology;
- third parties, provided they have a contractual requirement or legal duty to protect the SSN such as:
 - providers of identity verification services, sanctions list screenings, and legal, accounting and other advisory services; and
 - government agencies requiring such information.

As a U.S. MSB, Optal is required to perform certain screenings and checks on potential and existing clients and certain of their owners and key employees. If clients and such owners and key employees decline to provide their SSN, Optal may be unable to meet its legally required obligations in respect thereto and might not be able to offer or continue to provide services to such clients.

Singapore

(Relevant where references in this Privacy Notice to “Optal” mean Optal Singapore Pte Ltd and/or Invapay Singapore Pte Ltd)

Accessing your Personal Information

With regard to paragraph 12.2, Singapore law permits Optal to refuse your request to access your Personal Information in certain instances, including where:

- (a) your Personal Information is subject to legal privilege;
- (b) your Personal Information would, if disclosed, reveal confidential commercial information that could, in the opinion of a reasonable person, harm the competitive position of an Optal entity;
- (c) your Personal Information is contained in any document related to a prosecution if all proceedings related to the prosecution have not been completed;
- (d) your request(s) unreasonably interfere with our operations because of the repetitious or systematic nature of the requests;
- (e) the burden or expense of providing access would be unreasonable to Optal or disproportionate to your interests;
- (f) your request is for information that does not exist or cannot be found, or that is trivial;
or
- (g) your request is otherwise frivolous or vexatious.

Please see the Fifth Schedule to the Personal Data Protection Act 2012 for the full list of situations where Optal would not be obliged under Singapore law to grant you access to your Personal Information.

Malaysia

(Relevant where references in this Privacy Notice to “Optal” mean Invapay Malaysia Sdn Bhd)

A Bahasa Malaysia language version of this Privacy Notice is attached at Appendix 3. In the event of a conflict between the terms of this Privacy Notice in the English language and its corresponding version in Bahasa Malaysia, the terms of the English language version shall prevail.

Appendix 3
Bahasa Malaysia translation of the Optal Group External Privacy Notice

Notis Privasi Kumpulan Optal

1. Tentang Notis Privasi ini

1.1 Notis Privasi ini terpakai kepada semua syarikat Kumpulan Optal yang tersenarai di Lampiran 1 di Notis Privasi ini. Ia menerangkan

- (a) jenis Maklumat Peribadi yang kami proses;
- (b) bagaimana dan bila kami mengumpul Maklumat Peribadi;
- (c) bagaimana kami menggunakan Maklumat Peribadi anda;
- (d) bila dan dengan siapa kami mungkin berkongsi atau memindah Maklumat Peribadi anda; dan
- (e) pilihan yang anda miliki mengenai penggunaan Maklumat Peribadi itu oleh kami, dan keupayaan anda untuk mengakses dan membetulkan Maklumat Peribadi itu.

Jika anda mempunyai apa-apa pertanyaan mengenai Notis Privasi ini, anda harus menghubungi Pengurus Perlindungan Data kami mengikut cara yang dinyatakan di perenggan 14.

1.2 Setiap entiti di sini dirujuk sebagai **Optal** atau **kami**. Sila maklum bahawa bahagian utama Notis Privasi ini terpakai kepada setiap entiti Kumpulan Optal yang tersenarai di Lampiran 1. Mana-mana keperluan undang-undang tempatan tambahan yang mungkin terpakai kepada satu entiti tertentu disebabkan oleh tempat pemerbadanan, tempat perniagaan atau kawasan aktiviti adalah dinyatakan di bawah.

1.3 Notis Privasi ini terpakai kepada data yang dikumpul, dikemukakan atau diproses:

- (a) melalui laman web [Optal](#) atau [Invapay](#);
- (b) apabila anda melanggan atau bersetuju untuk menerima bahan-bahan pemasaran atau maklumat am tentang perkhidmatan Optal; atau
- (c) apabila anda menggunakan mana-mana perkhidmatan pembayaran dan pelaksanaan kami.

2. Maklumat Peribadi

2.1 “**Maklumat Peribadi**” adalah maklumat yang berhubungan dengan seorang individu hidup yang boleh dikenalpasti daripada maklumat itu atau daripada maklumat itu dan maklumat lain yang kami miliki, atau mungkin menjadi milik kami dan termasuk apa-apa pernyataan pendapat tentang individu itu dan sebarang tanda niat kami atau tanda niat orang lain mengenai individu itu.

3. Apakah Maklumat Peribadi yang kami kumpul, guna atau proses?

3.1 Jenis-jenis Maklumat Peribadi yang mungkin kami kumpul, guna atau proses tentang seorang individu akan bergantung kepada sifat interaksi kami dengan mereka. Maklumat peribadi yang

kami kumpul, guna atau proses mungkin termasuk (tetapi tidak terhad kepada) yang berikut (termasuk salinan dokumen yang mengandungi maklumat ini):

- (d) nama penuh;
- (e) butiran peribadi seperti kewarganegaraan, jantina, umur dan/atau tarikh lahir;
- (f) butiran maklumat perhubungan peribadi dan perniagaan termasuk nombor telefon (talian tetap, nombor faks dan/atau bimbit), alamat emel dan pengenalan sosial media awam;
- (g) alamat kediaman semasa (termasuk alamat pos);
- (h) butiran pembayaran, seperti kad kredit atau butiran akaun bank;
- (i) butiran pekerjaan dan penggajian termasuk butiran pendapatan;
- (j) maklumat daripada vitae kurikulum anda, *resume* atau permohonan pekerjaan jika anda memohon pekerjaan dengan kami;
- (k) butiran dokumen pengenalan (seperti paspot atau nombor kad pengenalan nasional)
- (l) nombor Insuran Nasional, nombor Keselamatan Sosial (“SSN”) (atau yang setara)
- (m) keputusan pemeriksaan rekod jenayah;
- (n) pemegangan saham/keempunyaan dalam syarikat/perniagaan yang berkenaan; dan
- (o) maklumat tentang penggunaan laman web kami oleh anda dan minat anda dalam produk-produk dan perkhidmatan-perkhidmatan Optal, melalui perisian pengesan web; dan/atau apabila anda melaporkan satu masalah dengan laman web kami. Ini mungkin termasuk ‘Uniform Resource Locators’ (URL) yang diklik kepada, melalui dan daripada laman web kami (termasuk tarikh dan masa); produk-produk atau perkhidmatan-perkhidmatan yang anda lihat atau cari; masa tindak balas halaman, ralat muat turun, tempoh lawatan halaman tertentu, maklumat interaksi halaman (seperti *scroll*, klik, dan gerakan tetikus), dan cara-cara yang digunakan untuk layar keluar daripada halaman dan mana-mana nombor telefon yang digunakan untuk menghubungi nombor perkhidmatan pelanggan kami. Juga maklumat teknikal, termasuk alamat protokol Internet (IP) yang digunakan untuk menghubungi komputer anda kepada Internet, maklumat log masuk anda, jenis dan versi pelayar, penetapan zon waktu, jenis dan versi pelayar pasang, sistem pengendalian dan pelantar.

3.2 Kami mengumpul, mengguna atau memproses Maklumat Peribadi tentang individu-individu seperti:

- (a) pelanggan-pelanggan kami dan pembekal-pembekal mereka, bakal pelanggan dan wakil-wakil mereka, kakitangan, pengarah, rakan kongsi, pemilik, pemegang-pemegang saham, benefisiari atau individu-individu yang mempunyai kawalan ke atas parti yang berkaitan;
- (b) pelanggan kepada pelanggan-pelanggan kami;
- (c) pembekal dan bakal pembekal kami dan wakil mereka, pengarah, rakan kongsi, pemilik, pemegang saham atau benefisiari lain;
- (d) kontraktor dan bakal kontraktor lain dan wakil mereka yang membekalkan produk-produk dan perkhidmatan kepada kami; dan
- (e) orang lain yang berhubung dengan Optal.

4. Bagaimana dan bila kami mengumpul Maklumat Peribadi?

- 4.1 Kami mengumpul Maklumat Peribadi anda untuk membolehkan kami membekalkan, memasarkan dan menjual produk-produk dan perkhidmatan-perkhidmatan kami dan untuk tujuan-tujuan yang dinyatakan di perenggan 6.2.
- 4.2 Kami mungkin mengumpul Maklumat Peribadi anda:
- (a) ketika kami membekalkan anda dengan produk-produk dan perkhidmatan-perkhidmatan kami;
 - (b) apabila anda membekalkan kami, atau anda menawar atau memohon untuk membekalkan kami, dengan barang atau perkhidmatan;
 - (c) apabila anda menghubungi atau membekalkan maklumat kepada kami melalui apa-apa cara (termasuk dengan melengkapkan borang, menzahirkan maklumat melalui telefon, faks atau melalui emel, SMS atau media sosial, membekalkan kami dengan kad perniagaan atau apabila anda melayari atau melengkapkan borang di laman web kami);
 - (d) apabila anda meminta maklumat tentang kami, produk-produk dan perkhidmatan-perkhidmatan kami;
 - (e) apabila anda membekalkan maklum balas kepada kami;
 - (f) apabila anda melawat premis yang mana kami beroperasi;
 - (g) ketika melaksanakan atau mengendalikan hubungan kami dengan anda, atau ketika anda menjalankan aktiviti-aktiviti berhubung dengan operasi kami;
 - (h) apabila anda mengemukakan permohonan pekerjaan kepada kami;
 - (i) apabila kami menjalankan pengesahan latar belakang mengenai anda, jika anda mendaftar untuk menggunakan perkhidmatan kami dan kami menjalankan segala usaha yang wajar terhadap pelanggan;
 - (j) apabila anda mendaftar atau melanggan untuk menggunakan perkhidmatan-perkhidmatan kami melalui pelantar, laman web atau sebaliknya;
 - (k) apabila anda menempatkan atau menerima satu tempahan di laman web atau pelantar kami;
 - (l) apabila anda melaporkan satu masalah dengan perkhidmatan kami atau pelantar kami atau laman web;
 - (m) melalui kerjasama rapat kami dengan pihak-pihak ketiga (termasuk, seperti contoh, rakan-rakan kongsi perniagaan, pembekal-pembekal dan sub-kontraktor dalam perkhidmatan teknikal, pembayaran dan pencapaian, rangkaian pengiklanan, pembekal-pembekal analitik, pembekal-pembekal carian maklumat, agensi-agensi rujukan kredit dan agensi pencegah penipuan atau organisasi lain yang serupa – yang mungkin memeriksa maklumat dengan mana-mana butiran di Pendaftaran Pilihanraya dan pangkalan data yang lain) dan mungkin menerima maklumat tentang anda daripada mereka; atau
 - (n) di mana kami dikehendaki atau dibenarkan oleh undang-undang untuk berbuat demikian.
- 4.3 Secara amnya, apabila membekalkan perkhidmatan atau produk kami, berurusan dengan kakitangan kami, atau menerima perkhidmatan atau produk kami daripada pembekal perkhidmatan, pembekal atau kontraktor, kami mengumpul Maklumat Peribadi secara langsung daripada individu yang berkaitan di mana munasabah dan praktikal.
- 4.4 Laman web kami mungkin, dari semasa ke semasa, mengandungi pautan kepada dan daripada laman web rangkaian rakan kongsi kami, pengiklan dan rakan-rakan sekutu. Jika anda mengikuti satu pautan kepada mana-mana laman web ini, sila maklum bahawa laman-laman

web ini mempunyai polisi dan prosedur privasi dan keselamatan mereka sendiri dan kami tidak menanggung tanggungjawab atau liabiliti kepada polisi-polisi dan prosedur-prosedur ini atau untuk anda atau keselamatan Maklumat Peribadi anda ketika anda melawat laman-laman web ini. Sila menyemak polisi-polisi ini sebelum anda mengemukakan apa-apa Maklumat Peribadi di laman-laman web ini.

- 4.5 Kami juga mungkin mengumpul Maklumat Peribadi tentang anda daripada majikan anda, jika majikan anda telah mengupah kami untuk membekalkan perkhidmatan kepada mereka.
- 4.6 Kami juga mungkin mengumpul Maklumat Peribadi tentang anda jika anda menggunakan laman web atau pelantar lain yang dikendalikan oleh kami atau perkhidmatan lain yang kami bekalkan. Dalam keadaan ini, kami telah memaklumkan kepada anda apabila kami mengumpul data bahawa ia mungkin dikongsi secara dalaman antara syarikat-syarikat Kumpulan Optal seperti yang dinyatakan di Lampiran 1 dan akan digabungkan dengan data yang dikumpul daripada laman web kami. Kami bekerjasama secara rapat dengan pihak-pihak ketiga (termasuk, seperti contoh, rakan-rakan kongsi perniagaan, sub-kontraktor dalam perkhidmatan teknikal, pembayaran dan penghantaran, rangkaian pengiklanan, pembekal analitik, pembekal carian maklumat, agensi-agensi rujukan kredit) dan mungkin menerima maklumat tentang anda daripada mereka untuk tujuan-tujuan yang dinyatakan di perenggan 4.1 dan 6.2.
- 4.7 Maklumat Peribadi yang kami kumpul mungkin termasuk Maklumat Peribadi yang sensitif, termasuk maklumat kewangan, jenayah, kesihatan dan maklumat biometrik. Kami akan mendapatkan persetujuan anda untuk mengumpul maklumat sensitif ini, melainkan undang-undang membenarkan kami untuk mengumpulnya tanpa persetujuan anda.
- 4.8 Anda boleh membekalkan kami dengan Maklumat Peribadi anda secara sukarela. Walaubagaimanapun, dalam kebanyakan keadaan, jika anda pilih untuk tidak bekalkan kami dengan Maklumat Peribadi anda untuk tujuan-tujuan seperti yang dinyatakan dalam Notis Privasi ini, atau jika kami tidak atau tidak boleh mengumpul Maklumat Peribadi anda, kami mungkin tidak dapat membekalkan anda dengan akses kepada perkhidmatan kami.
- 4.9 Di mana anda bekalkan Maklumat Peribadi berkaitan dengan orang lain (seperti contoh, butir-butir benefisiari, butir-butir wakil perniagaan, pembekal yang harus dibayar), anda mengesahkan bahawa anda mempunyai dasar yang sah untuk berbuat demikian dan / atau anda akan memaklumkan kepada orang tersebut atau setidaknya, anda berhak untuk membekalkan maklumat ini kepada kami dan untuk penggunaan kami selaras dengan Notis Privasi ini.

5. Cookies

- 5.1 Sila rujuk kepada notis cookies kami untuk maklumat tentang bagaimana kami menangani Maklumat Peribadi anda berkenaan dengan aktiviti anda di laman web dan pelantar kami.

6. Bagaimana kami menggunakan Maklumat Peribadi anda?

- 6.1 Kami menggunakan Maklumat Peribadi anda untuk mengendalikan perniagaan kami dengan cekap, dan untuk memasarkan produk-produk dan perkhidmatan-perkhidmatan kami.
- 6.2 Kami mungkin mengumpul, memegang dan menggunakan Maklumat Peribadi anda:
- (a) untuk mengendalikan hubungan antara anda dengan kami atau majikan anda, dan untuk mengendalikan perniagaan kami, seperti contoh, untuk menguruskan akaun

pelanggan anda, mengumpul, membuat dan memproses bayaran, memberi sokongan, dan memastikan anda dimaklumkan tentang perubahan kepada produk-produk dan perkhidmatan-perkhidmatan kami;

- (b) untuk menjalankan pemeriksaan identiti dan usaha yang wajar mengenai pelanggan, sama ada berhubungan dengan keselamatan produk-produk dan perkhidmatan-perkhidmatan yang kami bekalkan kepada anda atau yang anda bekalkan kepada kami, atau di mana kami dikehendaki berbuat demikian sebagai sebahagian daripada kewajipan perundangan atau kawal selia kami;
- (c) untuk mengenalpasti produk dan perkhidmatan yang mungkin menarik minat anda, menggalak dan memasarkan produk-produk dan perkhidmatan-perkhidmatan kami, dan membekalkan anda dengan maklumat yang mana kami percaya mungkin menarik minat anda;
- (d) untuk menjalankan penyelidikan dengan tujuan meningkatkan produk-produk atau perkhidmatan-perkhidmatan sedia ada, mencipta produk-produk atau perkhidmatan-perkhidmatan baru dan memasarkan produk-produk dan perkhidmatan-perkhidmatan dengan lebih berkesan;
- (e) untuk menjalankan analisis statistik, jika maklumat itu telah diagregatkan dan dinyahperibadikan supaya individu tidak dapat dikenalpasti daripada maklumat itu walaupun digabungkan dengan maklumat lain;
- (f) untuk mengukur dan memahami keberkesanan pengiklanan yang kami sampaikan kepada anda dan orang lain dan untuk menghantar pengiklanan yang berkaitan kepada anda;
- (g) untuk tujuan-tujuan sokongan perniagaan termasuk penyelenggaraan, sandaran dan pengauditan;
- (h) untuk memproses apa-apa permohonan pekerjaan yang dikemukakan oleh anda;
- (i) untuk membalas sebarang pertanyaan atau aduan yang anda mungkin ada;
- (j) untuk meningkatkan pengalaman pengguna mengenai laman web kami dengan memaparkan maklumat dan pilihan yang lebih berkaitan kepada pelanggan-pelanggan;
- (k) untuk membolehkan anda mengambil bahagian dalam ciri-ciri interaktif perkhidmatan kami;
- (l) untuk mengendalikan laman web dan sistem lain kami, termasuk *troubleshooting*, analisis data, pengujian, penyelidikan, analisis statistik dan tujuan-tujuan kaji selidik;
- (m) untuk membantu dalam memastikan pelantar dan laman web kami selamat;
- (n) untuk mematuhi kewajipan berkanun dan perundangan kami atau permintaan daripada mana-mana mahkamah, pihak berkuasa atau badan kerajaan mana-mana bidang kuasa di mana kawalselia ke atas Kumpulan Optal terpakai; atau
- (o) untuk menubuhkan, menjalankan, mempertahankan, melindungi, memelihara atau menubuhkan hak-hak perundangan atau hak lain Optal, atau hak-hak pelanggan kami atau yang lain.

6.3 Kami mungkin mengumpul, mengguna atau menzahirkan Maklumat Peribadi anda di mana pengumpulan, penggunaan atau penzahiran adalah:

- (a) selaras dengan Notis Privasi ini atau perjanjian lain yang anda meterai dengan kami; atau
- (b) dikehendaki atau dibenarkan oleh undang-undang terpakai.

7. Bila kami menzahirkan Maklumat Peribadi anda?

- 7.1 Optal mungkin menzahirkan, memindah ke, atau memberi akses kepada, Maklumat Peribadi anda kepada pihak-pihak ketiga untuk tujuan-tujuan yang dinyatakan di perenggan 4.1 dan 6.2.
- 7.2 Kami mungkin berkongsi Maklumat Peribadi anda dengan entiti-entiti Kumpulan Optal lain setakat mana diperlukan untuk mengendalikan perniagaan kami atau membekalkan perkhidmatan kepada anda.
- 7.3 Kami juga mungkin menzahirkan Maklumat Peribadi anda untuk tujuan-tujuan yang dinyatakan di perenggan 4.1 dan 6.2 kepada:
- (a) organisasi-organisasi yang mana anda menghantar bayaran atau dari mana anda akan menerima bayaran melalui produk-produk atau perkhidmatan-perkhidmatan kami;
 - (b) organisasi-organisasi atau individu-individu lain yang membantu kami dalam membekalkan produk-produk atau perkhidmatan-perkhidmatan kami kepada anda (seperti contoh, pembekal pemprosesan pembayaran, pembekal perkhidmatan kewangan dan pembekal perkhidmatan pihak ketiga);
 - (c) wakil-wakil anda yang dinamakan;
 - (d) pembekal perkhidmatan profesional dan penasihat yang menjalankan tugas-tugas bagi pihak kami, seperti peguam;
 - (e) wakil-wakil, agen-agen atau kontraktor-kontraktor yang dilantik oleh kami dalam pengendalian biasa perniagaan kami untuk membantu kami dalam membekalkan produk-produk atau perkhidmatan-perkhidmatan kami atau mengendalikan perniagaan kami (seperti untuk penyimpanan data atau pemprosesan, pencetakan, pengeposan, pemasaran, perancangan dan pembangunan produk atau perkhidmatan);
 - (f) pembekal analitik dan enjin pencarian yang membantu kami dalam peningkatan dan pengoptimuman laman web kami; dan
 - (g) kerajaan, badan berkuasa kawal selia dan organisasi-organisasi lain yang dikehendaki atau dibenarkan oleh undang-undang, termasuk bidang kuasa selain daripada bidang kuasa anda, di mana kami beroperasi.
- 7.4 Kami juga mungkin menzahirkan Maklumat Peribadi anda kepada pihak-pihak ketiga yang mana kami mungkin pilih untuk menjual, memindah atau bergabung sebahagian daripada perniagaan atau aset-aset kami dalam keadaan yang memerlukan penggunaan atau pemindahan Maklumat Peribadi tersebut. Ini juga mungkin termasuk, tanpa had, berhubungan dengan mana-mana perihal kebangkrapan atau insolvensi. Secara alternatif, kami mungkin mengambil alih perniagaan lain atau bergabung dengan mereka. Sekiranya perubahan berlaku kepada perniagaan kami, pemilik yang baru boleh menggunakan Maklumat Peribadi anda dalam cara yang sama seperti yang dinyatakan dalam Notis Privasi.

8. Penzahiran Luar Negeri

- 8.1 Sebahagian daripada Maklumat Peribadi anda mungkin dizahirkan, dipindah, disimpan, diproses atau digunakan di luar negara oleh kami, atau oleh pembekal perkhidmatan pihak ketiga untuk tujuan-tujuan yang dinyatakan di perenggan 4.1 dan 6.2. Ini mungkin berlaku jika:
- (a) pejabat atau entiti-entiti yang berkaitan kami adalah di luar negara;
 - (b) kami menggunakan perkhidmatan pihak ketiga yang di luar negara untuk aktiviti-aktiviti tertentu;

- (c) transaksi, maklumat, perkhidmatan atau produk-produk yang mempunyai hubungan di luar negara; atau
- (d) sistem komputer kami termasuk pelayan IT terletak di luar negara.

8.2 Khususnya, Maklumat Peribadi anda mungkin dizahirkan, seperti yang dinyatakan di perenggan 8.1, kepada Australia, Hong Kong, Kawasan Ekonomik Eropah, United Kingdom, Singapura, USA dan/atau negara-negara lain di mana: (i) parti-parti itu atau sistem komputer mereka, atau kami mungkin terletak dari semasa ke semasa, atau (ii) mana-mana ahli Kumpulan Optal dilesenkan atau menubuhkan satu tempat perniagaan, dalam setiap kes ia mungkin digunakan untuk tujuan-tujuan yang dinyatakan dalam Notis Privasi ini.

8.3 Di mana kami memindah data ke bidang kuasa lain, kami akan berbuat demikian selaras dengan undang-undang privasi yang terpakai.

9. Penggunaan dan penzahiran lain

9.1 Kami mungkin mengumpul, mengguna dan menzahirkan Maklumat Peribadi anda untuk tujuan-tujuan lain yang tidak disenaraikan dalam Notis Privasi ini. Jika kami berbuat demikian, kami akan memaklumkan kepada anda apabila kami mengumpul, mengguna atau menzahirkan Maklumat Peribadi anda.

10. Pemasaran

10.1 Anda mungkin menerima komunikasi pemasaran daripada kami jika anda telah meminta maklumat daripada kami atau jika anda telah membekalkan kami dengan butiran anda apabila anda melanggan kepada surat berita atau produk-produk lain di laman web kami dan, dalam setiap keadaan, anda tidak memilih keluar daripada menerima maklumat pemasaran.

10.2 Kami akan mendapatkan kebenaran nyata anda untuk “pilih-masuk” sebelum kami menggunakan atau berkongsi data peribadi dengan mana-mana syarikat di luar Kumpulan Optal untuk tujuan-tujuan pemasaran.

10.3 Anda boleh minta kami untuk berhenti menghantar mesej pemasaran kepada anda pada bila-bila masa dengan mengikuti pautan pilih-keluar di mana-mana mesej pemasaran yang dihantar kepada anda atau dengan menghantar emel kepada kami pada bila-bila masa di unsubscribe@optal.com.

11. Penyimpanan dan keselamatan Maklumat Peribadi yang dipegang oleh kami

11.1 Kami berusaha untuk menyimpan Maklumat Peribadi anda dengan selamat. Mana-mana Maklumat Peribadi yang dikumpul melalui laman web kami atau yang disimpan dalam sistem komputer kami adalah dilindungi oleh perlindungan termasuk kaedah-kaedah fizikal, teknikal (enkripsi data) dan prosedural. Malangnya, penghantaran maklumat melalui internet adalah tidak benar-benar selamat. Walaupun kami cuba sebaik mungkin untuk melindungi Maklumat Peribadi anda, kami tidak boleh menjamin keselamatan maklumat anda yang dihantar ke laman kami; sebarang penghantaran adalah atas risiko anda sendiri. Sebaik sahaja kami menerima maklumat anda, kami akan menggunakan prosedur dan ciri-ciri keselamatan yang ketat untuk menghalang akses yang tidak diberikuasa.

11.2 Kami akan menyimpan Maklumat Peribadi hanya selama yang munasabah dengan mengambil kira syarat-syarat perhubungan anda dengan Optal, keperluan Optal untuk menjawab pertanyaan, menyelesaikan masalah, membekalkan produk dan perkhidmatan yang dipertingkatkan dan mematuhi kehendak perundangan dan kawal selia di bawah undang-

undang yang terpakai dan kehendak kawal selia dan oleh pembekal-pembekal kami. Ini bermakna bahawa kami mungkin menyimpan Maklumat Peribadi untuk satu tempoh yang munasabah (selaras dengan undang-undang yang terpakai) selepas anda (atau majikan anda) berhenti untuk menggunakan perkhidmatan Optal. Setelah tempoh ini atau apabila Maklumat Peribadi anda tidak lagi diperlukan untuk tujuan-tujuan seperti yang dinyatakan di perenggan ini (termasuk untuk tujuan-tujuan yang berkaitan secara langsung dengannya), kami akan mengambil langkah-langkah yang munasabah untuk memusnahkan atau memastikan Maklumat Peribadi itu tidak boleh mengenalpasti seseorang individu secara kekal.

12. Akses dan kemaskini Maklumat Peribadi anda

- 12.1 Anda berhak secara amnya untuk mengakses atau membetulkan Maklumat Peribadi yang kami pegang tentang anda. Jika anda meminta akses kepada Maklumat Peribadi kami akan memberi satu perihalan mengenainya; memberitahu anda kenapa kami memegangnya; kepada sesiapa ia boleh dizahirkan; dan membekalkan anda satu salinan maklumat tersebut dalam satu bentuk yang dapat difahami. Optal mungkin mengenakan bayaran untuk membekalkan akses kepada maklumat ini, tetapi bayaran ini akan tidak berlebihan dan akan selaras dengan undang-undang terpakai.
- 12.2 Berkenaan dengan perenggan 12.1, mungkin terdapat sebab-sebab perundangan atau pentadbiran untuk kami menafikan akses. Jika kami menafikan permintaan anda untuk mengakses Maklumat Peribadi anda, kami akan membekalkan anda dengan sebab-sebab untuk penafian tersebut sepertimana kami dikehendaki berbuat demikian di bawah undang-undang.
- 12.3 Satu permintaan untuk akses atau pembedulan boleh dibuat dengan menghubungi Pengurus Perlindungan Data kami mengikut cara yang dinyatakan di perenggan 14.
- 12.4 Kami mengambil semua langkah-langkah yang munasabah dan praktikal seperti mana yang diperlukan untuk memastikan bahawa mana-mana Maklumat Peribadi yang dikumpul dan digunakan oleh kami adalah tepat, lengkap dan terkini. Untuk membantu kami dalam hal ini, anda perlu membekalkan maklumat tentang anda yang benar, tepat, terkini dan lengkap seperti yang diminta dan mengemaskini maklumat yang dibekalkan kepada kami dengan sepatutnya untuk memastikan bahawa maklumat tersebut adalah benar, tepat, terkini dan lengkap.
- 12.5 Sila hubungi kami melalui cara yang dinyatakan di perenggan 14 jika anda percaya bahawa Maklumat Peribadi adalah tidak tepat, tidak lengkap atau bukan yang terkini, dan kami akan menggunakan usaha yang munasabah dan mengambil langkah-langkah yang praktikal seperti mana yang diperlukan untuk membetulkan maklumat itu.
- 12.6 Ia akan membantu kami untuk memastikan kami memahami permintaan anda yang sepatutnya, dan membenarkan kami untuk menjawab balas dengan segera, jika permintaan adalah dibuat secara bertulis dan merangkumi sebanyak maklumat terperinci yang mungkin.

13. Bagaimana kami menangani aduan?

- 13.1 Jika anda rasa bahawa kami tidak menghormati privasi anda atau di mana kami telah bertindak dalam cara yang bertentangan dengan Notis Privasi ini, sila hubungi Pengurus Perlindungan Data kami seperti yang dinyatakan di perenggan 14 dan menasihati kami dengan secepat mungkin. Kami akan menyiasat pertanyaan dan aduan anda dalam tempoh yang munasabah

dan selaras dengan undang-undang dan kawal selia yang terpakai bergantung kepada kerumitan aduan tersebut.

13.2 Kami akan memaklumkan hasil penyiasatan kami kepada anda.

14. Apa yang boleh dilakukan jika anda mempunyai pertanyaan, masalah atau ingin menghubungi kami tentang penggunaan kami mengenai Maklumat Peribadi anda atau Notis Privasi ini?

14.1 Jika anda:

- (a) mempunyai satu pertanyaan atau kebimbangan tentang Notis Privasi ini atau proses pengendalian Maklumat Peribadi kami;
- (b) ingin membuat satu aduan mengenai pelanggaran privasi anda;
- (c) ingin mengakses Maklumat Peribadi anda yang dipegang oleh kami; atau
- (d) ingin mengemaskini atau membetulkan Maklumat Peribadi yang dipegang oleh kami,

Sila hubungi Pengurus Perlindungan Data kami yang boleh disampai melalui emel di compliance@optal.com.

Notis Privasi ini dikemaskini terakhirnya pada 25 May 2018. Sebarang perubahan yang kami mungkin buat terhadap Notis Privasi ini akan dipaparkan di halaman ini dan, di mana yang sesuai, dimaklumkan kepada anda melalui emel. Sila semak dari semasa ke semasa untuk apa-apa kemaskini atau perubahan kepada Notis Privasi kami.

Sekiranya terdapat sebarang konflik antara terma-terma dalam versi Notis Privasi dalam Bahasa Inggeris dan versi Bahasa Malaysia yang sepadan dengannya, terma-terma dalam versi Bahasa Inggeris akan terpakai.