

IP Track - QR Code Tracking Solution Privacy Policy

(Updated 06th May 2020)

1. Overview

1.1. IP Track - QR Code Tracking Solution ("IP Track", "we") might collect and process personal data of users of IP Track's web console and mobile app services. This Privacy Policy (the "Statement") (must be read together with our User Agreement and any other relevant policies and/or documents referred) applies to personal data we obtain from our customers and their representatives ("Users") through our web console or mobile app when the relevant User registers to IP Track's mobile app and web admin services (collectively, the "Services"). We are committed to the highest standard of protecting and respecting privacy and personal data in compliance with applicable laws and rules.

1.2. By appointing or engaging us to provide the services, when you access or use our services or interact with us, you consent to us using, collecting and processing your data in the manner as stipulated in this Statement.

1.3. Notwithstanding the above, you have control over your personal data including how it is shared with others. This includes contact and personal information and details of your jobs, tasks, clients and/or others. You control the sharing of that personal data when disclosing it to register or use the services and/or through any "Social Networks" including Facebook, LinkedIn, Twitter, Pinterest or Google+ privacy settings. We will not use or share your personal data with anyone, except as described in this Privacy Policy.

1.4. If you are under 18, please do not share or send any personal data about yourself to us without prior consent from your parent(s) and/or legal guardian.

2. Variation and Changes

This Statement may be amended or updated from time to time, with or without prior notice. You would have expressed your acceptance of the amendments by continuing to use or engage our services, including the use of our mobile app and web console.

3. Personal Data Collection

3.1. Personal Data in general means any information/data about individuals or persons who can be identified from that information/data. Your data is collected and processed by us at the commencement of engaging our services and interaction with us from time to time in the course of us carrying out our Services. The type of personal data collected and processed by us includes but not limited to:

a) name, date of birth, nationality, gender, national identification card number, passport number, residency status, correspondence address, contact details including mobile, office and residential telephone number and facsimile number, e-mail address, banking details, and/or other information that you provide when completing the registration form to use our Services, subscribing to our Services, posting material or requesting further Services. We may also ask you for further information at other times in connection with a promotion or when you lodge a problem with our Services including but not limited to;

b) details of the transactions you carry out through our Services and/or for the fulfillment of your orders or completing the said transactions;

c) such other information relevant or required for:

i) compliance with a legal and regulatory requirement

ii) conducting any transactions on our Services; and/or

iii) the engagement of our Services.

d) details of your visits to our Services and the resources that you access; and/or

e) any additional information provided by you or third parties about you.

3.2. We only retain personal data for so long as it is necessary for serving the fitting purposes.

4. Source of Personal Data

The main source of personal data collected will be from the user. However, some personal data may also be collated from other available sources including but not limited to Payment Provider or government agencies, public registries, websites, social media, publications, and/or events.

5. Use of the Personal Data

5.1. The purposes for which your data & information is collected may be used or processed by us in and/or outside Malaysia:

a) to communicate with the user including responding to inquiries;

b) for all other purposes related to or in connection with the engagement of our Services;

- c) to enforce or defend our legal rights and/or obtaining legal advice;
- d) to comply with legal and/or regulatory requirements in and outside of Malaysia, including, audits, reporting, investigation and/, etc.;
- e) to ensure that content from our site is presented most effectively to the user;
- f) to send materials and publication including alerts, newsletter, education materials, updates and/or information that are requested or signed up to or information about the event(s) that may be of interest;
- g) to promote, offer or market the current and/or future services, subject to the right to opt-out (please see further details on marketing venues in clause 5.2 below);
- h) to carry out the obligations arising from any contracts entered into between the user and IP Track;
- i) to assist in the prevention, detection or investigation of crime or possible criminal activities or for the administration of justice;
- j) for security and internal audit purposes;
- k) to allow to participate participation in interactive features of our Service when user elected to do so;
- l) designing and conducting surveys/questionnaires for client profiling/segmentation, statistical analysis, improving and furthering the provision of our products and services;
- m) researching, designing and launching services or products including seminars/events/forums;
- n) for such other purposes as may be directed or consented to by the user; and/or
- o) purposes directly related or incidental to the above.

5.2. The following personal data may also be used for direct marketing. Please note that:

- a) Your name, contact details (including address, contact number, email address), products and services information, transaction pattern and behavior, background and demographic data;
- b) Classes of services, products, and subjects engaged, included but not limited to the following:
 - i) services and products related to our Services (including affiliates programs);

ii) reward, loyalty or privileges programs, promotional offers and related services;

iii) invitations to events such as seminars/webinars/teleseminars, conferences, live programs or events; and

c) We may conduct direct marketing via fax, email, direct mail, telephone and other means of communication or send e-newsletters. You may choose not to receive promotional materials, by informing us (see below for contact details) and we will cease to do so, without additional charge.

6. Disclosure of Personal Data & Information

6.1. Under certain circumstances, we may be required to disclose your personal data to third parties as follows:

a) any persons directed or consented by you;

b) any persons required for purposes of legal engagements and/or legal transactions including but not limited to counterparties, other advisors, financial institutions, Payment Providers, regulatory bodies etc.;

c) any person for the purposes of compliance with legal and regulatory requirements;

d) our overseas offices, affiliates, business partners and counterparts (if any);

e) persons under a duty of confidentiality to us;

f) our data processors i.e. the third party engaged to process personal data on our behalf including but not limited to archival storage, data entry service providers, computer backup services, disaster recovery services, Payment Provider, banks and financial institutions etc.;

g) actual or proposed transferees or participants of our Services in or outside our current operation and/or

h) our professional advisors including but not limited to legal advisors, tax advisors, financial advisors, auditors, insurance brokers etc.

6.2. We may also be required to transfer your data to such third parties outside Malaysia, for the purposes stated in this statement. The transfer of your personal data outside Malaysia would also be required if you are travelling, residing or based outside of the said territory.

7. Internet Protocol (IP) & Sessions

7.1. We collect Internet Protocol (IP) addresses of all visitors to our site. An IP address is a number assigned to your computer automatically when you use the Internet. This information is collected from all site visitors for monitoring site traffic patterns and to refine content according to Country of Origin.

7.2. Our site also uses sessions for some interactive features to distinguish one user from another. A session is a small file of letters and numbers that we store on your browser or the hard drive of your computer. This enables us to provide you with a good experience when browsing the site. Continued usage of the site would imply your consent in us utilising the sessions' features.

7.3. Sessions used are listed below:

a) Strictly necessary sessions: These are sessions that are required for the operation of our website. They include, for example, sessions that enable you to log into secure areas of our website, use a shopping cart or make use of e-billing services.

b) Analytical/performance sessions: Sessions that allow us to recognize and count the number of visitors and monitoring of visitors' movement when browsing the site for improvement purposes in assisting users to find what they are looking for easily.

c) Functionality sessions: These are used for the recognition of a returned user to enable us to personalize our content for the particular said user. Examples would include the site to greet them by name and remember their preferences such as choice of language or region.

7.4. Please note that third parties (including advertising networks and providers of external services such as web traffic analysis services) may also use sessions that are not within our control. These sessions are likely to be analytical/performance sessions or targeting sessions. Our website uses Google Analytics, a web traffic analysis service provided by Google Inc. ("Google"). Please refer to <http://www.google.com/policies/privacy/partners> to find out more about how Google uses data when you use our website and how to control the information sent to Google. You can prevent Google's collection and processing of data by using the Google Ads Settings page or downloading and installing their browser plug-in (<https://tools.google.com/dlpage/gaoptout>).

7.5. Users may elect to block these sessions via the setting option on your browser which allows them to refuse some or all of the said sessions. However, the user may not be able to access all or parts of our site if they block all sessions (including the essential sessions).

8. Security

8.1. All information provided is stored on secured servers. Any payment transactions will be encrypted using SSL technology. Where a password is given or chosen enables the user to access the site, it is his or her sole responsibility for keeping it confidential. We ask you not to share a password with anyone to ensure you are signed off after using our Services on a shared computer.

8.2. Absolute actions are taken to ensure maximum protection of your personal data. Strict procedures and security features are activated as soon as the user enters the site to prevent unauthorized access. However, there is no guarantee the security of data transmitted is completely secure. Any transmission is at your own risk and you agree not to hold us responsible for any breach of security while accessing the.

9. Changes to our Privacy Policies

Any changes made to the Privacy Policy in the future will be posted on this page and where possible, users will be notified via email. Your continued use of our Services constitutes your agreement to this Privacy Policy and any other relevant updates.

10. Obligation to Provide Personal Data

10.1. We acknowledge that you have the right in deciding the information you wish to provide to us. The provision of the information listed above is voluntary in nature. However, please note that if you do not provide the information above or limit the way such information is to be processed, it may result in us not being able to:

- a) communicate or correspond with you;
- b) undertake the engagement or complete transaction and/or provide our Services to you; and/or
- c) grant you access to our Services.

11. Disclaimer

11.1. The accuracy and completeness of your data depending on the information you provide. We assume that the information you have provided is accurate, up to date and complete unless you inform us otherwise

11.2. Where you provide any third party information to us, we assume that such information is accurate, up to date and complete and that you have obtained the necessary consent to disclose the same.

11.3. Where you have consented or allowed us to disclose personal data to the third party and/or other User when using our Services, you understand that PrimeGive no longer has any control or authority as to how the said third party and/or other User will use or process the personal data. Therefore, you agree that PrimeGive will not be responsible for the subsequent use of your data by the third party or other User. If you wish to stop them from further using your personal data, please contact them directly.

12. Governing law and jurisdiction

Nothing in this Statement shall limit your right under applicable local privacy law. This Privacy Policies Statement shall be governed by the laws of Malaysia. You agree to submit to the exclusive jurisdiction of the Malaysia courts.

13. Languages

This agreement is drafted in the English language. If this agreement is translated into any other language, the English language version shall prevail.