

# **Privacy Policy**

This privacy statement sets out the Privacy Policy and practices of McOcean International Group of companies (the "Mc-Ocean"), its subsidiaries, associate companies and affiliates wherever in the world (together, the "Mc-Ocean Group") that will be followed in regards to the collections, uses, maintain and/or disclosure of personal data in respect of commercial transactions we receive from our customers, distributors and/or users of website and/or mobile application. Please note that this Privacy Policy complements, and does not limit or replace, the purposes for which you provide the Mc-Ocean Group with your personal data which may be expressly stated in any form for submission of personal data to the Mc-Ocean Group.

McOcean recognises that your privacy is very important and we respect the privacy of individuals with regards to personal data and is committed to protecting the privacy of our customers, distributors and users, and strives to provide a safe and secure experience. This Privacy Policy is formulated in accordance with the Personal Data Protection Act 2010 (the "Act"), which describes how your information is collected and used and your choices with respect to your Personal Data.

#### (1) Personal Data That Mc-Ocean Collect

Mc-Ocean may collect your personal data (including sensitive personal data), whether obtained from you directly or indirectly, or from any other sources, for the purposes set out below and /or any other administrative or operational purposes and/or purpose of managing your relationship (whenever applicable) as a customer, distributor and/or user of website and mobile application with Mc-Ocean Group.

Although the precise details of the personal information collected will vary according to the specific purpose and circumstances (application forms, contests, seminars, forums, surveys, audio and/or video recording etc) whether in person, via online or otherwise, personal data collected includes but not limited to, below:

- Name
- Address
- Phone/mobile numbers(s)
- Identity card (or passport) number
- Date of birth
- Email address
- Bank account number
- Spouse

#### (2) Purpose of Personal Data Collected

Personal data duly collected are for the following purposes without limitation:

- a) To process application and complete sales transaction with customers, distributors and users, manage and verify membership in Mc-Ocean Group.
- b) For the maintenance of membership database (if applicable) and customer service related processes.
- c) To investigate complaints and suspected transactions and any violations of legal regulations and Mc-Ocean Member Policy and Procedures.

- d) For administrative, operational, financial and debt collection purposes.
- e) To understand and analyse sales data, and your needs and preferences so as to improve the services provided by Mc-Ocean.
- f) For maintaining a regular communications in relation to the Mc-Ocean Group business and activities, sending information and updates on products and services, news and events, and other marketing and promotional activities and updates.
- g) For meeting any legal and statutory requirements and obligations, including tax filing purposes.
- h) For other purposes incidental or associated with the above or with Mc-Ocean Group's business and activities.

#### (3) Non-Provision of Personal Data

Failure to provide or disclose such personal data will result in:

- i) Mc-Ocean is unable to provide customers, distributors and users with notices, services and/or information as and when required and requested.
- ii) Affect the ability of the parties in administrative and operational processing in relation to sales transactions.
- iii) Unable to communicate and update on any products and services, news and events, and other marketing and promotional activities of Mc-Ocean Group.

#### (4) Storage and Retention of Personal Data

Personal data collected by Mc-Ocean Group shall be stored either in hard or soft copies or in digital format, in our offices or stored in servers operated by us or our service providers located in Malaysia or any part of the world. Personal data will be retained by Mc-Ocean Group for as long as necessary for the fulfilment of the purposes stated above or is required to satisfy legal regulatory, accounting requirements or to protect Mc-Ocean business interests.

## (5) Security

Mc-Ocean will process and store the personal data collected in a secured manner by adopting the appropriate measures and procedures in compliance to legal personal data protection requirements under the Act.

#### (6) Disclosure of Personal Data

Personal data collected by Mc-Ocean Group will be kept confidential but such data may be disclosed to the following parties for the purposes set out above:

- a) Any person to whom Mc-Ocean are compelled or required to do so under the law or in response to a competent or government agency.
- b) Government agencies, statutory authorities and industry regulators.
- c) Business vendors, service providers or business agents as appointed by Mc-Ocean Group including those located overseas, in relations to Mc-Ocean Group business activities.

- d) Third parties (including those located overseas) appointed by Mc-Ocean Group who provide data processing services.
- e) Any person appointed by Mc-Ocean Group who is under a duty of confidentiality who has undertaken to keep such data confidential.

#### (7) Information Collected by Mc-Ocean Website and Mobile App

a) While accessing or using Mc-Ocean website or mobile app (referred to as "Site"), we may ask the users to provide us with certain personally identifiable data that can be used to contact or identify you. Personally identifiable data may include, but is not limited to your name. Apart from those personal data stated in (1) above, the Site shall also collect the following data.

#### b) Log Data and IP Address

Like many other site operators, the Site collects information (i.e. Log Data) that a user's browser sends whenever you visit our Site.

This Log Data may include information and utilisation data such as your computer's Internet Protocol ("IP") address, operating system, browser type, browser version, pages of our Site that you visit, the time and date of your visit, the time spent on those pages and other statistics, like your preferences.

In addition, third party services such as Google Analytics may be used to collect, monitor and analyse these information.

The Log Data section is for businesses that use analytics or tracking services.

## c) Cookies

Cookies are sent to user's browser from our Site and stored on your computer's hard drive or mobile memory. You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to use some portions of our Site.

#### d) Security Over Internet or Mobile Data Connection

McOcean recognises that your privacy is very important, but we must understand that no method of data transmission over the Internet or mobile data connection, or method of electronic storage, is completely secure. While we strive to use commercially acceptable means to protect your personal data and information, Mc-Ocean cannot guarantee its absolute security.

We cannot ensure or warrant the security of any personal data transmitted to us and users do so at their own risk. Once any Personal Data comes into our possession, we will take reasonable steps to protect that information from misuse and loss and from unauthorised access, modification or disclosure.

## (8) Changes to Privacy Policy

Mc-Ocean reserves the right to update or change our Privacy Policy at any time without prior notice. As Mc-Ocean customers, distributors and users you should check this Privacy Policy periodically. Your continued use of our service after

we post any modifications to the Privacy Policy on this page will constitute your acknowledgment of the modifications and your consent to abide and be bound by the modified Privacy Policy.

This Privacy Policy is effective as of Last Updated Date and will remain in effect except with respect to any changes in its provisions in the future, which will be in effect immediately after being posted on this page.

#### (9) Access and Corrections of Personal Data

Mc-Ocean takes reasonable measures to ensure that any personal data collected is accurate, current, complete, and reliable for its intended use. If the owner of the personal data wishes to update or otherwise correct the personal data that are collected by us, you may edit your information online or contact us by sending your written request or inquiries about this policy to us at email: feedback@mcocean.com

We will be glad to assist you. An administrative fee may be chargeable for any correction or access of personal data as and when it may deemed fit and necessary to do so.

## (10) Contact Us

Any questions about this Privacy Policy, please contact us:

Via email: <a href="mailto:feedback@mcocean.com">feedback@mcocean.com</a>, or , <a href="mailto:mcocean.care@mcocean.com">mcocean.care@mcocean.com</a>

Or,

Visit our website at: www.mcocean.com

Last Updated: 2017-Jan-01

Mc-Ocean Holding Sdn Bhd

(871579-X, AJL931963) (PDPA: SB08032014-0069/1)