

Privacy Policy

1.0 Introduction

We take your privacy seriously and respect your right to privacy. As such, we are committed to complying with all applicable privacy and data protection laws. This Privacy Policy outlines how Vilor Academy Sdn Bhd & Vilor Partners Berhad, its subsidiaries, its affiliates, and its associated companies (collectively referred to as "Vilor," "we," or "us") collects, uses, and protects your personal data, and how you can contact us regarding your data.

We will process your Personal Data only in accordance with the Personal Data Protection Act 2010 ("the Act"), its regulations, guidelines, and any statutory amendments or re-enactments (collectively referred to as the "PDPA"), as well as this Policy. This commitment reflects the value we place on earning and maintaining the trust of our customers, business partners, and others who share their personal information with us.

By accessing our website, using any services provided by Vilor, signing up for products and services, submitting information to us, or otherwise showing agreement, you are deemed to have agreed and consented to the terms of this Privacy Policy. This Policy applies to all internet sites and mobile applications operated by or on behalf of Vilor. It also applies to personal information Vilor may collect through our products and services, interactions in person, by telephone, or at events, and from our customers, suppliers, vendors, and other business partners ("Business Partners").

2.0 Collection of Personal Data

- 2.1 In this Privacy Policy, "Personal Data" refers to any information in our possession or control that directly or indirectly relates to an individual, to the extent that the individual can be identified or is identifiable. This includes, but is not limited to name, address, telephone number, identification/passport number, email address, company name, job title, business information, interest, preferences, and other information available to us.
- 2.2 We have collected and will collect your personal data to be processed by us and/or on your behalf in the course of your present or future dealings with Vilor. Your personal data enables us to achieve the purposes outlined in this Privacy Policy in connection with our business. The types of Personal Data collected depend on the purpose of collection. We may process your Personal Data by collecting, recording, holding, storing, using, and/or disclosing it as outlined in this Privacy Policy.
- 2.3 While providing your Personal Data is optional, not doing so may limit our ability to offer our products or services, engage with you, or address your inquiries effectively. It's important to ensure that any Personal Data you share with us is accurate and complete to ensure a seamless experience and the best possible service tailored to your needs.
- 2.4 If you share any Personal Data about a third party (such as information about your spouse, children, parents, or employees) with us, please ensure that you have obtained their consent to do so. Your cooperation in obtaining such consent helps us ensure the protection and privacy of all Personal Data.

3.0 Description of Personal Data

We may collect the following types of personal information, whether it is required or optional.

3.1 Information You Provide

We collect personal information you provide us, which may include:

- a. Contact information, such as your name, company name, job title, address, e-mail address, and phone number.
- b. Additional information about you to help us get to know you better, such as your industry, size of business, number of employees, business tenure (duration of time your business has been operating or your position within the business), gender, age, nationality, professional associations and registration numbers, information about how you use our products or services, and demographic information.
- c. Comments, questions, requests, and orders you may make.
- d. Financial information needed for processing payments for purchases, such as credit card or account information or tax identification number.
- e. Information related to compliance requirements for fundraising activities, as needed to verify investor qualifications according to regulatory standards, including occupation/profession, financial worth and witness information.
- f. Responses to post-event or post-training questionnaires, market surveys and contests.
- g. Login information, including, if applicable, social media account information for login and registration purposes.
- h. Information about your preferences, such as your preferred methods of communication and product or service types in which you are interested.
- i. Camera or video footage that identifies individuals, installed at Vilor's premises and event venues as part of its security infrastructure and event recording purposes for future marketing ads and campaigns.

3.2 Information Automatically Gathered from Your Device

- a. Technical information about your device, such as device type, browser type, IP address, operating system, and device identifier, which is collected automatically from your device and web browser through cookies and similar technologies.
- b. Technical data about your usage of Vilor's internet sites and apps, including content viewed or downloaded, features used, links clicked, and dates and times of interactions, which is collected using cookies and similar technologies.

3.3 Cookies and Similar Technologies

- a. We employ industry-standard tracking technologies, which include cookies and similar technologies (collectively referred to as "cookies"), web beacons, and embedded scripts. These are small pieces of information placed on your device when you visit a website, primarily for record-keeping purposes. Information collected through these tracking technologies does not constitute Personal Data, and you cannot be identified from this information. Cookies and similar technologies can enhance your user experience by saving your preferences, personalizing your online experience, holding items in your shopping cart, and sometimes providing you with information tailored to your interests.
- b. We require your consent to the use of cookies and similar technologies when you visit Vilor's internet sites. By continuing to browse our site, you consent to their use. You can adjust your browser settings to manage preferences for these technologies.
- c. Vilor uses third-party analytic services to better understand how users engage with Vilor's internet sites or apps, including services provided by Google and Facebook. Vilor allows selected third parties, including these analytics and advertising services, to place cookies on our internet sites. These third parties may collect information about your online activities over time and across third-party websites.

4.0 Purposes of collection of Personal Data

Generally, we collect, use, and disclose your Personal Data for the following purposes:

4.1 Service Provision

We may use personal information to provide services to you, which may include:

- a. Fulfilling your requests for products or services, such as checking payment, delivering services, ensuring you receive any relevant special offers or promotions, and meeting our obligations under the terms of service.
- b. Facilitating and processing your searches and requests for information when you contact us about our products and services.
- c. Resolving complaints, responding to, and handling requests and inquiries.
- d. Verifying your identity when you contact us.
- e. Maintaining and improving customer relationships.

4.2 Product or Service Development

We continually work to improve our products and services. Our efforts include developing products and services to better meet customer requirements, ensure data quality, develop identity management, and strengthen network and information security. We may use Personal Data for product and service development purposes, including:

- a. For staff training and quality assurance purposes, especially concerning our customer relations and sales staff across phone calls, emails, and other customer relationship management tools. For example, we may monitor and record your phone calls, instant messages, and customer-facing interactions.
- b. Measuring our performance, troubleshooting, enhancing our services, fixing errors, and gathering your opinions through post-event or post-training surveys.
- c. Carrying out research and development, statistical analysis, marketing research activities, creating and improving new and existing products and services, recommendations, advertisements, and other communications, and gaining insights into our customers in general.

4.3 Marketing

We use your Personal Data to offer products and services that may interest you, whether provided by us, our related companies, business partners, or service providers. If you receive electronic marketing communications from us, you can opt out by following the instructions provided.

Our marketing activities based on your legitimate interests include:

- a. Providing information and communications via various channels like post, email, telephone, text message, social network, or instant message, with your prior consent or as permitted by law. These communications include details about our latest products, special offers, and services.
- b. Organizing contests and promotional offers.
- c. Personalizing content, recommendations, and advertisements to improve your customer experience and effectively target Vilor's services, we may use your ID or cookies set by us or our third-party advertising partners, you should consult the privacy policy of the relevant service for more information about these settings.
- d. Creating anonymous, aggregated statistics about website, product, and service usage, which may be shared with third parties or made public.
- e. Using product reviews, comments, or content you have shared on our platforms for marketing purposes, including linking or publishing in our advertisements. We also track interactions to better understand our customers and tailor marketing communications.

4.4 Security, Fraud Prevention, and Investigation

- a. We utilize Personal Data collected from monitoring our websites, online services, and emails for security purposes. This includes analyzing, troubleshooting, investigating, and resolving security matters or vulnerabilities. Such information may be shared with law enforcement or other relevant authorities. We undertake these processes to safeguard you, our company, systems, employees, and

partners, based on our legitimate interests in protection or legal obligations to cooperate with authorities.

- b. Personal Data may be used to prevent, detect, and investigate commercial crimes, disputes, or fraud, including violations of our policies. Additionally, we conduct audits, due diligence, and analyze and manage commercial risks for Vilor. For instance, we may utilize your information to prevent fraudulent redemptions of promotions or campaigns and to verify payment authenticity. These actions are taken in our legitimate interest to prevent fraud and ensure benefits are provided only to genuine customers.
- c. We also use Personal Data to comply with applicable laws, regulations, court orders, and legal information requests. This includes enforcing or defending our company's legal rights, terms, and conditions of products or services, including obtaining legal advice and engaging in dispute resolution. This processing is based on legal obligations to Vilor or our legitimate interests in defending legal rights.

4.5 Other Purposes

- a. We may use your Personal Data for purposes reasonably related to those mentioned above.
- b. When you apply for a job position at Vilor, we will process your Personal Data for recruitment purposes with your consent.
- c. If we have specifically informed you of additional purposes for collecting, using, or disclosing your Personal Data, we will process it accordingly, unless we have notified you otherwise.
- d. We may use your Personal Data for managing administrative and business operations at Vilor, including compliance with internal policies and procedures, based on our legitimate interests.
- e. Your Personal Data may be used to facilitate business asset transactions, such as mergers, acquisitions, or asset sales involving Vilor's related companies or affiliates, with your consent.
- f. We may use automated decision-making tools or artificial intelligence to process your Personal Data for the specified purposes, complying with local laws.
- g. Your Personal Data may be combined or linked through unique identifiers like cookies, account numbers, phone numbers, or email addresses for your and/or our convenience. This allows us to provide seamless customer support, personalized services, content, marketing, and advertisements to enhance your experience with us.

5.0 Sources of Personal Data

- 5.1 Your Personal Data may be collected from various sources throughout your interactions with us, including but not limited to transactions, communications, and engagements at any online or offline events, contests, customer satisfaction surveys, as well as from publicly available sources. These sources may include:

- a. Registering your details on our website or apps, which may include tracking referral leads and ad campaigns launched through social media that piqued your interest using cookies and similar technologies
 - b. Logging into your account on our website or apps, which may involve the use of login tokens for session management and personalized user experiences
 - c. Completing purchase orders, requests, or applications for our products or services (via phone, in person, or electronically)
 - d. Payment channels or gateways, including but not limited to financial institutions, for the purpose of assessing, verifying, effectuating, and facilitating payment of any amount due to us in connection with your purchase of our products and/or services
 - e. Financial institutions, merchants, and credit card organizations in connection with your commercial transactions with us
 - f. Direct communication with our sales personnel, referral agents, or co-workers regarding our products and services (in person, via email, telephone, direct mail, or other means)
 - g. Certain types of transactions such as refunds
 - h. Participation in promotions, competitions, contests, or special events
 - i. Subscription to membership programs
 - j. Participation in surveys and research activities
 - k. Submission of forms related to the recruitment and selection process if you are a job candidate, including information from authorized referees
- 5.2 Social network applications, pages or plugins that allow interaction relating to your social network accounts, from which we may receive details from your social network profile based on your account privacy settings, and content that you are viewing may be posted to your social network profile or feed.
- 5.3 Additionally, we may receive, store, and process Personal Data provided by third parties, credit reference bodies, regulatory authorities, and law enforcement agencies. This data may be utilized for purposes such as delivering products and services, fulfilling agreement conditions, and complying with legal and regulatory requirements.

6.0 Disclosure of Personal Data

- 6.1 Subject to applicable law provisions, we may disclose or transfer your Personal Data to the following parties for the purposes listed above:

- a. Vilor's subsidiaries or affiliates and their employees to provide content, products, and services to you. When we do so, these other Vilor's subsidiaries or affiliates will use your information in a manner consistent with this Policy and all applicable privacy and data protection laws.
 - b. Agents, contractors, or third-party service providers performing services on our behalf and treating your personal information in compliance with all applicable privacy and data protection laws.
 - c. Business partners, investors, assignees, or transferees (actual or prospective) to facilitate business asset transactions (including any merger, acquisition, or asset sale) involving any of Vilor's related companies or affiliates.
 - d. Professional advisers such as auditors, financial advisers, and lawyers.
 - e. Relevant government regulators, statutory boards or authorities, or law enforcement agencies to comply with any laws, rules, guidelines, regulations, or schemes imposed by any governmental authority.
 - f. Any other party to whom you specifically authorize us to disclose your Personal Data.
- 6.2 Some of the recipients may be outside of Malaysia. We use a variety of legal mechanisms, including consent or agreement, to ensure an adequate level of protection of your Personal Data. By using Vilor's products and services, you consent and agree to the transfer of your Personal Data outside Malaysia for any of the purposes listed above.
- 6.3 We may share your personal information with third parties when we have a good faith belief that disclosure is necessary:
- a. To comply with a law, regulation, court order, or other legal process.
 - b. To detect, prevent, and respond to fraud, intellectual property infringement, violations of our contracts or agreements, violations of law, or other misuse of Vilor's internet sites, apps, products, or services.
 - c. To protect Vilor's rights or property, or yours or others' health, safety, welfare, rights, or property.
 - d. Under similar circumstances. If such an event occurs, we will take appropriate steps to protect your personal information.
- 6.4 We may share anonymized or aggregated information internally and with third parties for any purpose. This information will not identify you individually.

7.0 Security of Personal Data

- 7.1 We implement appropriate and commercially reasonable technical, physical, and administrative measures to safeguard your Personal Data from misuse or accidental, unlawful, or unauthorized destruction, loss, alteration, disclosure, acquisition, or access, in compliance with applicable laws. These measures include:
- a. Limiting access to information and employing identity and access management technologies to control access to systems where information is processed and stored.
 - b. Implementing physical, electronic, and procedural safeguards aligned with industry standards.
 - c. Ensuring all employees adhere to information security guidelines.
 - d. Regularly monitoring and reviewing our practices against our policies and industry best practices.
- 7.2 While we employ security measures to protect your personal information from unauthorized disclosure, misuse, or alteration, like all computer networks connected to the Internet, we cannot guarantee the security of information transmitted over the Internet and will not be liable for breaches of security beyond our reasonable control.

8.0 Use of Cookies and Links to Other Websites

8.1 Use of Cookies

- 8.1.1 Our websites and/or applications utilize cookies, which are small text files stored on your device to enhance your browsing experience. These cookies are associated only with anonymous users and their devices, and they do not provide personal data about users. The purpose of these cookies is to improve website functionality, personalize content, and analyze website traffic to understand user preferences and behaviors.
- 8.1.2 These cookies serve to track referral leads and ad campaigns launched through social media. The cookie information embedded in the registration links enables us to identify the source of the referral leads and the specific ad campaigns that drove user interest. Additionally, cookies store login tokens which are essential to maintain user sessions, enhancing user convenience and experience. However, these cookies do not collect personal data that could identify a specific user.
- 8.1.3 While users cannot opt out of certain essential cookies necessary for specific functionalities, such as login tokens, they have the option to configure their browser settings about cookies and prevent the installation of non-essential cookies on their devices.

8.2 Links to Other Websites

- 8.2.1 If any part of the site links you to other websites, those websites do not operate under this Policy, and we do not accept any responsibility or liability arising from them.
- 8.2.2 Likewise, if you subscribe to an application, content, or a product from our affiliated companies or partner organizations and subsequently provide your Personal Data directly to

that third party, your Personal Data will be subject to that third party's privacy/personal data protection policy (if they have such a policy) and not to this Policy.

- 8.2.3 We recommend that you read and understand the privacy/personal data protection statement/policy posted on those other websites to comprehend their procedures for collecting, processing, using, and disclosing personal data before submitting your Personal Data to them.

9.0 Transfer of Personal Data

- 9.1 We are committed to ensuring that your Personal Data is handled with utmost care and in compliance with applicable privacy and data protection laws. The transfer of your Personal Data may occur as outlined in Section 6.0 regarding the disclosure of Personal Data. These transfers may involve various parties, including Vilor's subsidiaries or affiliates, agents, contractors, third-party service providers, business partners, investors, assignees, or transferees, as well as relevant government regulators, statutory boards, or law enforcement agencies.
- 9.2 We take necessary measures to ensure that when transferring your Personal Data outside of Malaysia, it receives a level of protection comparable to our local standards. Any personal data provided to Vilor may be transferred to, stored by, or disclosed to an overseas recipient. For example, Vilor may use a server hosted overseas to store data, including your Personal Data. We make reasonable efforts to ensure that third parties abroad use your Personal Data only for its intended purposes, safeguarding its confidentiality and privacy.
- 9.3 We are very serious about providing a comparable level of protection for Personal Data should the information be processed or used by our agents, vendors, business partners, contractors, or service providers performing services on our behalf. By using Vilor's products and services, you consent and agree to the transfer of your Personal Data outside Malaysia for the purposes outlined in this Privacy Policy.

10.0 Marketing and Promotional Purposes

Upon subscribing to our services, you will receive marketing and/or promotional messages or calls from us, including information about promotions and upcoming events. If you prefer not to receive promotional news or calls, you can opt out by following the provided instructions or by contacting us using the details below.

11.0 Data Subject's Obligations

To ensure the accuracy and reliability of your Personal Data, it is essential for Vilor to collect and maintain accurate records. Therefore, it is imperative for you to provide Personal Data to us accurately and truthfully. We strive to maintain all Personal Data as accurate, complete, non-misleading, up-to-date, and reliable as possible. Consequently, the accuracy of your Personal Data significantly relies on the information you provide.

As a condition for us to provide products, services, and/or facilities to you, you agree to:

- a. Guarantee and affirm that all Personal Data submitted or to be submitted to us are accurate, not misleading, updated, and complete in all respects for the purpose of acquiring or using the relevant

products, services, and/or facilities. You confirm that you have not withheld any material Personal Data, and we are authorized to assume the accuracy and timeliness of the Personal Data provided by you when processing such information; and

- b. Promptly inform us when the Personal Data provided earlier becomes inaccurate, incomplete, misleading, outdated, or changes in any way by contacting us using the contact details provided below.

12.0 The Rights of Data Subject

- 12.1 You have the right, subject to exceptions under the PDPA, to request access to, a copy of, or updates and corrections to your Personal Data held by us.
- 12.2 While you can request access or corrections to your Personal Data, we may refuse such requests under circumstances permitted by law. This includes situations where providing access or corrections is disproportionately costly compared to the privacy risks involved or where it could infringe on the rights of others.
- 12.3 You can request us to limit the processing and use of your Personal Data at any time. For example, you may ask us to stop sending you marketing materials or contacting you for marketing purposes.
- 12.4 You also have the right to withdraw your consent, either partially or fully, for us to use your Personal Data. However, please note that withdrawing consent may have legal consequences. Depending on the extent of your withdrawal, it may impact on our ability to maintain our relationship with you or fulfill contractual obligations. We will strive to accommodate your withdrawal within a reasonable timeframe, considering any legal or contractual constraints.

13.0 Changes to Privacy Policy

Changes to this Privacy Policy will be posted on this site, including details of any material changes. Vilor reserves the right to update or modify this Policy at any time and without prior notice. Any modifications will apply only to personal information collected after the updated Policy is posted.

This Policy was last revised in May 2024.

14.0 Acknowledgement and Consent

By communicating, engaging with Vilor, or using our products and services, you acknowledge that you have read and understood the Policy. You agree and consent to the collection, use, processing, disclosure, and transfer of your Personal Data by Vilor as described in this Policy.

You may choose whether to provide your Personal Data, and, if you have already provided it, you retain the right to object, block, or request removal of such data in accordance with applicable laws. Should you wish to exercise these rights, please contact Vilor using the provided contact details.

However, please note that opting out may limit our ability to provide you with the requested assistance or services.

Upon your objection, blocking, or withdrawal of consent, Vilor will cease processing your personal data, except wherever allowed or required by law.

For any updates, corrections, or access requests regarding your personal data, please reach out to us using the contact details below.

15.0 Inquiries and Complaints

If you have any questions about this Policy, further queries, or would like to make a data access or correction request regarding your Personal Data, please contact us using the details below:

Contact No. : +604-638 3666

Email Address : info@vilor.com

Address : Unit 1-3A-25, Southbay Plaza, Changkat Batu Maung 1, 11960 Bayan Lepas, Penang.

** Updated on 17-July-2025*