



## PRIVACY POLICY STATEMENT

### GENERAL

We believe privacy is important and respect yours. This policy explains our privacy practices, including how we handle the information we collect and store the personal information of individuals in accordance with the Personal Data Protection Act 2012 (“the Act”) when you visit and use our Website, App and Services as defined in the Terms of Service. Please review carefully to understand how we use the personal information that we may collect from you. By providing your Personal Information to us, you are consenting to this Privacy Policy Statement and the collection, usage, access, transfer, storage and processing of your personal information as described in this Privacy Policy Statement.

This Privacy Policy (the “Policy”) sets out:-

- (a) the types of information we collect from you;
- (b) under what circumstances we share that information; and
- (c) what you can do to modify your profile so that you can manage your own privacy preferences within our Website, App and Services.

Terms not otherwise defined in this Policy have the meaning given to them in our Terms of Service.

### OUR ASSURANCE TO YOU

We treasure and value the trust placed in us by you and consequently, we are committed to protect your personal information. In ensuring that your decisions are informed and feel confident in furnishing your Personal Information to us when using our Services, we furnish you with this Privacy Policy Statement defining our practices and the options you have in relation to your Personal Information being collected and used by us

### MEANING OF PERSONAL INFORMATION

Personal Information refers to any information that relates directly to you. This includes any information that can be used to distinguish, identify or contact you. For the purposes of this Privacy Policy Statement, Personal Information includes but limited to delicate personal information including relating to your health, political opinions, religious beliefs and such other information. For avoidance of doubt, please note that this Privacy Policy Statement is applicable only if you are natural person/individual or in cases where you are acting or representing a company, organization or other entity in the usage of our Services.

### THE PERSONAL INFORMATION WE COLLECT

We collect the following Personal Information about you and your use of our Website or App or Services:-

- (a) your name, personal data such as Identification Card /Passport Number, address, email address, gender, nationality, race, preferred language, telephone number, mobile number etc;
- (b) if and when you are online using our Services from the Internet, your IP address, browser type, and related diagnostic and technical information;
- (c) the status of type of our Services that you have acquired or subscribed with us;

- (d) how you use our Website, App and Services and the usage information for statistical purposes;
- (e) the total amount of Data received and sent by you;
- (f) the equipment used to access our Website, App and Services for customisation process;
- (g) your personal interest and preferences to assist us to suit our best the Services for you;
- (h) if you are using location based services, your location may be shared with us as well as other Jran users and any third-party partners in a way that is consistent with your privacy preferences as set out in your profile;
- (i) if you broadcast information generated on our Website, App and Services to third-party sites, such as Facebook or Twitter, we may collect information regarding your accounts on such third-party sites to facilitate your use of these third-party sites with our Website, App and Services;
- (j) a list of your friends on our Services.

#### **WHEN WE COLLECT YOUR PERSONAL INFORMATION**

We may collect your Personal Information when:-

- (a) you communicate with us;
- (b) you register or subscribe to our Services and publications;
- (c) you respond to our marketing materials;
- (d) you conduct business with us; and
- (e) your personal information from third parties that we deal with or connected with you and such other sources where you have given your consent for disclosure of information relating to you and/or where otherwise is lawfully permitted.

#### **USAGE, STORAGE AND DELETION**

We may use your information to:

- (a) help you connect with people in your local community;
- (b) empower you to become more involved in your community;
- (c) notify you of community updates, safety alerts and related important news items;
- (d) ensure that our Website, App and Services evolve to suit yours and the other users needs;
- (e) research the effectiveness of the our Website, App and Services;
- (f) develop new services for the Community;
- (g) comply with legal and regulatory requirements;
- (h) maintain records for security, claims or other legal purpose;
- (i) detect and prevent fraudulent activity or misuse of our Website, App and Services;
- (j) to assess or verify credit worthiness;
- (k) engage in business transactions to be offered to you with respect to the usage of our Website, App and Services;
- (l) establish and better manage any business relationship we have with you;
- (m) process all communication send to us by you or other users or third parties;
- (n) keep you notified of the benefits, changes and updates to our Website, App and Services;
- (o) produce data, reports and statistic which shall be anonymised or aggregated in a manner that does not identify you as an individual;
- (p) investigate, respond, defend against or make claim for Jran My Network Sdn Bhd;
- (q) conduct marketing and research activities.

In terms of storing your information, we use reliable third-party hosting services that abide by industry-wide accepted best practices in relation to data security and integrity. You can permanently delete all your data at any time by clicking "Delete My Account" on your Settings page.

## **EMAIL COMMUNICATIONS**

We may send administrative emails about account or service changes or new policies. You cannot opt out of them. You can always opt out of non-administrative emails such as daily digests. We will not email you to ask for your password or other account information. If you receive such an email, send it to us so we can investigate.

## **DATA SHARING PRACTICES AND PRINCIPLES**

To work with our civic and commercial partners so that they can provide community updates and other related services to you, we share:

- (a) information about your location;
- (b) information about your friends, social connections and community activities;
- (c) information in your user profile, including your email; and
- (d) other statistical information compiled based upon your use of successive versions of our Website, App and Services.

We reserve the right to disclose non-private, aggregated and anonymous statistical information about you and other Jran users. We respect your profile preferences and take them very seriously. However, we cannot be responsible for how other entities handle your personal information. In that connection, please be aware that:

- (a) third-party websites and services – such as Facebook and Twitter – may share your information more widely if you broadcast information generated on our Website and/or App to them; and
- (b) third-party developers may use our Application Programming Interface (“API”) to create new applications that are not subject to the strict privacy principles to which Jran adheres.

We use analytics tools and other third party technologies, to collect non-personal information in the form of various usage and user metrics when you use our Website, App and Services. These tools collect and analyse information, including cookies, IP addresses, device and software identifiers, referring and exit URLs, onsite behaviour and usage information, feature use metrics and statistics, usage and purchase history, MAC Address, mobile unique device ID, and other similar information.

The third party analytics companies who collect information on Jran and other online products and/or services may combine the information collected with other information they have independently collected from other websites and/or other online or mobile products and services relating to your activities across their network of websites as well as online and/or mobile products and services. Many of these companies collect and use information under their own privacy policies.

We do not automatically share information about your location, your preferences or your account generally with any third-parties. However, where we receive a warrant requiring us to turn over account information to a duly appointed law enforcement official, government agency or government institution, we will comply with the warrant in a timely fashion.

Regardless of any choices you make regarding your data, we may disclose your data and/or your communications on our systems if we believe in good faith that such disclosure is necessary:-

- (a) in connection with any legal investigation;
- (b) to comply with relevant laws or to respond to subpoenas or warrants served on us;
- (c) to protect or defend the rights or property of the company or users of the site or services;
- (d) to investigate any violation or potential violation of the law, this Privacy Policy or our Terms of Service.

In providing our Services, we may be required to furnish or disclose information about you to third parties such as:-

- (a) law enforcement agencies;
- (b) government agencies;
- (c) organisations or companies that act as our agents, contractors, service providers or professional advisors;
- (d) organisations or companies that assist in processing or otherwise fulfilling transactions and providing you with Jran's Website, App and Services that you have subscribed for;
- (e) our business associates and other parties for purposes that are related to the purpose of collecting and using the information.

#### **YOUR CONSENT**

By using our Website, App and Services, you consent to our collection of your information as set out in this Policy.

#### **NOTICE OF MODIFICATIONS**

From time to time, we may want to change our platform in a way that would alter the way we store, use or share your information. If we need to do that, we will send you an email that explains the changes and, whenever reasonably possible, we will provide a way for you to provide feedback in relation to these changes through our Website and/or App.

In the event that Jran is acquired or sells some of its assets, customer information is usually a type of asset that is transferred to the purchasing party. If Jran is acquired or in the event that the company enters into bankruptcy, the customer information would certainly be transferred to or acquired by a third party. Please be aware that such transfers do occur and that any party acquiring Jran may continue to use your information as set forth in this Policy.

#### **COOKIES**

We collect information about your usage of our Website, App and Services from cookies. Cookies are packets of information stored in your computer which assist your website navigation by customizing site information tailored to your needs. Cookies in themselves do not identify the user but just the computer used. You are not obliged to accept cookies. If you are concerned, you may set your computer to either accept all cookies, to notify you when a cookie is used or not to receive cookies at anytime. However, rejection of cookies may affect your usage of our Website as we will be unable to personalise aspects of your information with us at the Website.

Please be informed that this Privacy Policy Statement applies solely to Jran Website, App and Services and does not apply to third party websites that you may access from our Website. To determine how they deal with your Personal Information, you should read their privacy policies.

#### **OUR CONTACT DETAILS**

Should you have any queries, concerns or complaints in relation to this Privacy Policy Statement, you may contact our Team at support@jran.com.my.