



## Privacy Policy Monitor ERP System Sdn. Bhd.

### 1. Introduction

- 1.1. At Monitor ERP System Sdn. Bhd., together with our holding, ultimate holding, subsidiaries, associates, and affiliates (collectively, "Monitor", "we", "us", or "our"), we value your privacy and strive to protect your personal information to provide a safe and secure user experience.
- 1.2. Monitor will only collect and use your personal information in accordance with the Personal Data Protection Act 2010, the applicable regulations, guidelines, orders made under the Personal Data Protection Act 2010, and any statutory amendments or re-enactments made of the Personal Data Protection Act 2010 from time to time (collectively, "PDPA), as well as this Privacy Policy ("Policy"), and the privacy terms in your agreement(s) that you may have contracted with Monitor.
- 1.3. We provide this Policy to help you understand how we collect, use, and disclose information, including personal information that you may provide to us or that we may obtain as you use and access our website ("Site").

### 2. Collection of Personal Data and Usage Purpose

- 2.1. "Personal Data" includes information in our possession or control that relates directly or indirectly to an individual to the extent that the individual can be identified or are identifiable from that and other information in our possession, such as name, telephone number, email address, etc. as well as Sensitive Personal Data as defined under the PDPA, if any.
- 2.2. The type of Personal Data collected depend on the purpose of collection. We may "process" your Personal Data by way of collecting, recording, holding, storing, using, and/ or disclosing it.
- 2.3. We may obtain your Personal Data from you during your course of dealings with us on our Site, in any way, or manner including pursuant to any communications made from/ with us. We may also collect your Personal Data from a variety of sources, including without limitation, at any events, road shows, trade shows, exhibitions, surveys, webinars organized by us, as well as from publicly available sources to which you have given your consent to disclose your Personal Data. Some examples of how personal data can be collected:
  - When you register your details on our Site and product-related system ("MONITOR");
  - When you communicate with us directly or indirectly in relation to our MONITOR and relevant services (in person, by email, telephone, direct mail or any other means);
  - When you enter, and when you interact with us during events, road shows, trade shows, exhibitions, seminars, webinars, or training (on-site or virtually);
  - Subscribe to any of our newsletter;
  - Participate in surveys; or
  - If you are a candidate for employment when you complete the forms in relation to the recruitment and selection process for the purpose of assessment. We may also collect information about you from your nominated referees where you have authorized us to do so.
- 2.4. We may also use the information that we collect for the fulfilment of the purposes at the time it was sought or collected may be processed for the following purposes ("Purposes"):
  - to communicate with you;
  - to monitor, review, develop, and improve our product, services, and/ or events;

- to improve customer relationship;
  - to assess, process, and provide product and services to you;
  - to establish your identity and background;
  - to provide you with information and/or updates on our products, services, and/or events organized by us;
  - to maintain and update internal record keeping;
  - to process and analyze your Personal Data either individually or collectively with other individuals;
  - to conduct market research or surveys, internal marketing analysis, customer profiling activities, analysis of customer behavior and patterns, and trend analysis in relation to our product and/ or services;
  - to send you the invitation to join our events and facilitate your participation in, and our administration of, any events including webinars, exhibition or campaigns;
  - for direct advertising and marketing purposes via SMS, phone call, email, fax, mail, social media and/ or any other appropriate communication channels, consistent with this Policy;
  - to share any of your Personal Data pursuant to any agreement or document which you have duly entered with us for purposes of seeking legal and/or financial advice and/or for purposes of commencing legal action; and/ or
  - to carry out verification and background checks as part of any recruitment and selection process in connection with your application for employment with us.
- 2.5. By providing your Personal Data to us and/or continuing access to our Site, you declare that you have read and understood this Policy and consent to the collection, processing, and use of the Personal Data by Monitor or third parties acting under Monitor's direction in accordance with the manner as set out in this Policy.

### **3. Disclosure of Your Personal Data**

We will not sell, rent, transfer, or disclose any of your Personal Data to any third party without your consent. However, we may disclose your Personal Data to the following third parties where necessary, for one or more of the above Purposes:

- Monitor ERP System Sdn. Bhd. and our related corporations and affiliates either in Malaysia or overseas;
- successors in title to us;
- any person under a duty of confidentiality to which has undertaken to keep your Personal Data confidential which we have engaged to discharge our obligations to you;
- our agents, service providers, suppliers, vendors, business partners, lawyers, other professional advisers appointed in connection with our business on a strictly confidential basis, appointed by us to provide services to us;
- any party nominated or appointed by us either solely or jointly with other service providers, for purpose of establishing and maintaining a common database where we have a legitimate common interest;
- data centers and/or servers located within or outside Malaysia for data storage purposes or otherwise;
- payment channels including but not limited to financial institutions for purpose of assessing, verifying, effectuating and facilitating payment of any amount due to us in connection with your purchase of our product and/or services;
- government agencies, law enforcement agencies, courts, tribunals, regulatory bodies, industry regulators, ministries, and/or statutory agencies or bodies, offices or municipality in any jurisdiction, if

required or authorized to do so, to satisfy any applicable law, regulation, order or judgment of a court or tribunal or queries from the relevant authorities;

- our third-party product and/or service providers, suppliers, vendors, contractors, or data processors, that provide related products and/or services in connection with our business, or discharge or perform one or more of the above Purposes and other purposes required to operate and maintain our business
- the general public when you are featured on our Site and social media platforms by publishing your name, photographs and other Personal Data without compensation for advertising and publicity purposes;
- to third-party employment agencies as part of the recruitment and selection process and/or otherwise in connection with your application for employment with us;
- You hereby acknowledge that such disclosure and transfer may occur and permit us to disclose and transfer your Personal Data to such third party and its advisors/representatives and/or any other person reasonably requiring the same in order for us to operate and maintain our business or carry out the activities set out in the Purposes.

#### **4. Accuracy of Your Personal Data**

We aim to keep all Personal Data as accurate, complete, not misleading, up-to-date, and reliable as possible. Therefore, the accuracy of your Personal Data depends to a large extent on the information you provide. As such, it is a condition of us providing the products, services and/or facilities to you that you:

- warrant and declare that all your Personal Data submitted or to be submitted to us are accurate, not misleading, updated and complete in all respects for purposes of acquiring or using the relevant product and/ or services, and you have not withheld any Personal Data which may be material in any respect and that we are authorized to assume the accuracy and up-to-datedness of the Personal Data given by you when processing such Personal Data; and
- promptly update us as and when such Personal Data provided earlier to us becomes inaccurate, incomplete, misleading, outdated or changes in any way whatsoever by contacting us at the contact details below.

#### **5. Your Rights to Access**

- 5.1. Subject to the exceptions provided under the PDPA and relevant laws and regulations, you may exercise your choice in respect of the use or the extent of use of your Personal Data.
- 5.2. We can assist you to access and correct your personal information held by us. Where you wish to have access to or where you wish to correct any of your Personal Data. You may make a request to us by contacting us at the contact details given at the end of this Privacy notice.
- 5.3. In respect of your right to access and/or correct your Personal Data, we have the right to refuse your request to access and/or correct your Personal Data for the reasons permitted under the law, such as where the expense of providing access to you is disproportionate to the risks to your privacy, or where the rights of others may also be violated, amongst other reasons.
- 5.4. You have the right at any time to request us to limit the processing and use of your Personal Data (for example, requesting us to stop sending you any marketing and promotional materials or contacting you for marketing purposes).

#### **6. Retention of Your Personal Data**

Any of your Personal Data provided to us is retained for as long as the purposes for which the Personal Data was collected continues; your Personal Data is then destroyed from our records and system in the event your Personal Data is no longer required for the said purposes unless its further retention is required to

satisfy a longer retention period to meet our operational, legal, or regulatory requirements.

## **7. Security of Your Personal Data**

- 7.1. We are committed to ensuring that your Personal Data is stored securely. In order to prevent unauthorized access, disclosure or other similar risks, we endeavor, where practicable, to implement appropriate technical, physical, electronic and procedural security measures in accordance with the applicable laws and regulations and industry standard to safeguard against and prevent the unauthorized or unlawful processing of your Personal Data, and the destruction of, or accidental loss, damage to, alteration of, unauthorized disclosure of or access to your Personal Data.
- 7.2. We will make reasonable updates to its security measures from time to time and ensure the authorized third parties only use your Personal Data for the Purposes set out in this Policy.
- 7.3. The Internet is not a secure medium. However, we will put in place various security procedures with regard to the Site and your electronic communications with us. All our employees, business partners, agents, contractors, vendors, suppliers, data processors, third-party product and/or service providers, who have access to, and are associated with the processing of your Personal Data, are obliged to respect the confidentiality of your Personal Data.
- 7.4. Please be aware that communications over the Internet, such as emails are not secure unless they have been encrypted. Your communications may be routed through a number of countries before being delivered – this is the nature of the World Wide Web/Internet.
- 7.5. We cannot and do not accept responsibility for any unauthorized access or interception or loss of Personal Data that is beyond our reasonable control.

## **8. Personal Data from Minors and Other Individuals**

Our Site and Monitor's products are not directed at children and/ or minors. If you are under 18 years of age) or individuals not legally competent to give consent, you would be required to have parent or guardian consent to share information with Monitor, you should not send any information about yourself to us. As required by law, if a person under 13 submits information through any part of a Monitor Site, and we learn the person submitting the information is such a child, we will attempt to delete this information as soon as possible.

## **9. Transfer of Your Personal Data Outside of Malaysia**

Our information technology storage facilities and servers may be located in other jurisdictions outside of Malaysia. This may include, but not limited to, instances where your Personal Data may be stored on servers located outside Malaysia. In addition, your Personal Data may be disclosed or transferred to entities located outside Malaysia or where you access the Site from countries outside Malaysia. Please note that these foreign entities may be established in countries that might not offer a level of data protection that is equivalent to that offered in Malaysia under the laws of Malaysia. You hereby expressly consent to us transferring your Personal Data outside of Malaysia for such purposes. We shall endeavor to ensure that reasonable steps are taken to procure that all such third parties outside of Malaysia shall not use your Personal Data other than for that part of the Purposes and to adequately protect the confidentiality and privacy of your Personal Data.

## 10. Website

### 10.1. External links

- 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 those websites.
- Likewise, if you subscribe to content from our strategic partner and you subsequently provide your Personal Data directly to that third party, that 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.

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

### 10.2. [Cookies](#)

- We employ an industry standard technology called "cookies". The cookie is a small piece of information stored on the hard drive of your computer or device for record-keeping purposes and is used by us to track your visits to the Site. Cookies may be used to save your preferences for your ease and convenience when using the Site. Third party advertising networks may issue their separate cookies to your hard drive when serving advertisements.
- The type of anonymous clickstream data collected by us through the cookies may include your Internet Protocol address, web browser software, date and time of visit to the Site, and whether your requests (including search requests and clicking on links to parts of the Site) were met with success. All such information collected through cookies is not Personal Data and you cannot be identified from this information. Such information is only used for the purpose of managing and creating a better user experience and to identify areas for improvement on the Site.
- The use of cookies is now an industry standard, and you will find them used on most major websites. Most browsers are initially set up to accept cookies. If you prefer, you can reset your browser either to notify you when you have received a cookie or to refuse to accept cookies. You should understand that certain features on the Site will not function properly if you set your browser to not accept cookies.

## 11. Changes to Privacy Policy

11.1. We may modify, update and/or amend this Policy from time to time without prior notice. Any changes to the Policy will be uploaded onto our Websites and therefore, we encourage you to check/visit the Websites from time to time for any changes on a regular basis.

## 12. Contact Details

If you have any questions about this Policy, or have any further queries, or would like to make a complaint or data access or correction request in respect of your Personal Data, you may contact us at the contact details below:

Monitor ERP System Sdn. Bhd.

SSM No. 201301017105 (1046938-M)

Address: 3J-12-1, Wisma AIA, Jalan Seri Tanjung Pinang, 10470 Tanjung Tokong, Penang, Malaysia.

Contact No.: +604 371 7816

Email Address: [malaysia@monitorerp.com](mailto:malaysia@monitorerp.com)