

### **PDPA Compliance Policy & Information Security Policy**

Elite Education App (“EEA”) is committed towards protecting the privacy of our affiliates/ members/ customers Personal Information\* in accordance with the Personal Data Protection Act 2010 (PDPA) and Information Security Management System (ISMS) ISO 27001:2013 compliance policy.

\*Personal Information in this PDPA Compliance Policy & Information Security Policy refers to any information which relates directly or indirectly to you and/or your transaction with us which is hereinafter explained.

We believe this PDPA Compliance Policy & Information Security Policy enables you to understand the following:

- Types of Personal Information which we collect;
- How we use your Personal Information;
- Your right to access and update the Personal Information.

**When you subscribe to our products and/or services, purchase of any third party’s products and/or services distributed by us, you may be required to provide us with your Personal Information. In doing so, you consent the use of the Personal Information by us in accordance with this Privacy Policy.**

#### **(a) Types of Personal Information which we collect**

The types of Personal Information which we collect includes of email address, first name, and last name, use certain Services, contact us with inquiries, or respond to one of our surveys. Wherever EEA collects personal data, we make an effort to provide a link to this PDPA Compliance Policy & Information Security Policy.

Device, Usage Information, and Transactional Data. We collect information about how you use our Services and the computers or other devices, such as mobile phones or tablets, you use to access our Services. Some examples include:

- ✓ IP address
- ✓ Unique device identifiers and device attributes, like operating system and browser type
- ✓ Usage data, such as: web log data, referring and exit pages and URLs, platform type, number of clicks, domain name, landing pages, pages and content viewed and the order of those pages, the amount of time spent on particular pages, the date and time you used our Services, the frequency of your use of our Services, error logs, and other similar information

#### **(b) How we use your Personal Information**

Information that we collected from you is solely used to develop and improve the user experience and the product or website. No personal information is collected and all information is anonymized and aggregated before use. We neither rent nor sell any information that we collect.

**(c) Your obligation to supply Personal Information**

For us to process your application for products and/or services offered by EEA, you are required to provide the necessary Personal Information as indicated in the application or service request forms. Notwithstanding that, you may opt to limit the disclosure, retention and use of your Personal Information by contacting us through the avenues provided under Clause (f). However, should you decline to provide any such obligatory Personal Information, we may not be able to process your application/request or provide you with our products and/or services.

**(d) Your right to access and correct the Personal Information**

You are responsible to ensure that the Personal Information which you provide to us is accurate, complete, not misleading and up to date. If you wish to have access to your Personal Information in our possession, or where you are of the view that such Personal Information held by us is inaccurate, incomplete, misleading or, not up-to-date, you may make a request to us through the avenues provided under Clause (f).

We will use our reasonable efforts to comply with your request to access and/or correct your Personal Information within 21 days of receiving your duly completed relevant forms and processing fee.

**(e) Revisions to PDPA Compliance Policy & Information Security Policy**

We reserve our right to revise and/or modify this PDPA Compliance Policy & Information Security Policy from time to time. The updated version shall apply and supersede any and all previous versions, including but not limited to, booklets, leaflets or hard copy versions. By continuing to subscribe to our products and/or services after the communication of such revision and/or modification, you are accepting and consenting to such revision and/or modification. Please visit this website for information on our most up-to-date practices.

In the event of any inconsistency between the English Language version and the National Language version of this PDPA Compliance Policy & Information Security Policy, the English Language version shall prevail.

**(f) Our Contact Details**

If you have any requests, inquiries or feedback to EEA on this PDPA Compliance Policy & Information Security Policy, kindly contact our Customer Support team at +603 5891 0995 or [cs@elite.com.my](mailto:cs@elite.com.my).