

Privacy Policy

1. General

- 1.1. This Privacy Policy (“**this Policy**”) applies to the My TouristPay App (“**App**”) owned by PayNet and operated by Finexus Cards Sdn Bhd, Company No. 200501024587 (706720-U) (“Finexus”, “us”, “we” or “our”).
- 1.2. This Privacy Policy describes how Finexus may collect, use, process and disclose your personal data/information in accordance with the relevant data protection laws.
- 1.3. If you are reading this Policy on behalf of a body corporate/business enterprise which maintains/maintained contractual relationship with us, this Policy shall be intended to be addressed to, including but not limited to, the individual officers, directors, shareholders, and beneficial owners.
- 1.4. By using the App, you shall be deemed to have accepted this Policy. If you do not accept this Policy, please immediately discontinue your access to the App.
- 1.5. Finexus reserves the right to change, restrict, vary, suspend or modify this Policy at any time and notice may be given by displaying on the screen upon access to the App and/or our website, via email or any other manner as Finexus deems fit. By your continued use or access of the App, you shall be deemed to have agreed to and accepted any changes in this Policy. You are advised to periodically review this Policy for changes.
- 1.6. In addition to this Policy, specific privacy provisions may apply to certain sections of the App. These specific privacy provisions must be read together with this Policy. In the event of any inconsistency between this Policy and the specific provisions, the specific provisions shall prevail.
- 1.7. For the purposes herein, all words and expressions shall have the same meaning as in the Terms (hyperlink), except where otherwise expressly stated.

2. Why We Collect Data From You

- 2.1 Finexus collects data from you for the following purposes:
 - a. where it is necessary for the performance of our agreement with you to provide and deliver associated content and services;
 - b. where it is necessary for compliance with legal obligations that we may be subjected to; and/or
 - c. where you have given consent to the same.

3. Collection of Information

- 3.1. Finexus is committed to ensure the privacy of the user of the App subject to the terms and conditions herein. The information collected by Finexus about you will depend on how you use the facilities and features on the App.
- 3.2. We may collect and hold a variety of information ("**Information**"), including:
 - a. **Account Information.** Your email address and password as login details.
 - b. **Personal Information.** Data such as name, email, contact number
 - c. **Payment Information.** Data such as bank card details and transactions facilitated via the App.
 - d. **Other Information You May Provide Us.** Any other information that you may provide Us for the purpose of using the App or customer support.
- 3.3. This information is necessary for us to provide the services you applied. By providing us the information we have requested, you shall be deemed to have consented to the use, process, and disclose of your information as set forth herein.

4. Use, Process and Disclosure of Information

- 4.1. The Information supplied by you to us shall be used in providing the App's services, including:
 - a. To facilitate your application in using the App and set up your payment card with the App;
 - b. For the purpose of processing your instruction(s) given through the App, including to process your payment transactions and for other operational and administrative purposes;
 - c. To communicate with you in terms of customer support, reach out to you about your transactions or account, recommend and/or market our products and services, provide other relevant information or request information or feedback;
 - d. For the purpose of security and fraud detection, investigation and/or prevention including sharing your information to your card issuer, transaction acquirer bank to determine eligibility and for anti-fraud purposes;
 - e. To share with any third-party service providers, contractors, agents who provide administrative, telecommunication, computer payment or securities clearing or other services to Finexus in connection with the operation of its business. In such cases, Finexus will require that such persons within their limits and control undertake to keep your information confidential;

- f. For the purpose of assessment, analysis and improvement of our services provided;
 - g. respond to legal processes or to comply with or as required by any applicable laws, governmental or regulatory requirements of any relevant jurisdiction, or where we have good faith to believe that such disclosure is necessary under any applicable law;
 - h. Deal with and/or facilitate asset sale transaction or potential asset sale transaction, where such transaction involves Finexus as a participant or involves a related company or affiliate of Finexus as a participant, and there may be other third party organizations who are participants to such transaction. An 'asset sale transaction' refers to the purchase, sale, lease, merger, amalgamation or any other acquisition, disposal or financing of an organization or a portion of an organization or of any of the business or assets of an organization; and
 - i. For such other purposes as set out in Terms and purpose made known to you at the time of collection of the information.
- 4.2. Demographic or statistical information collated from any information provided by you upon your use of the App may be divulged to any third party. Such demographic or statistical information shall be in the form of a summary or compilation of information, which is not personally identifiable.
- 4.3. Finexus will not use, process or disclose information collected about you, including information collected using cookies, other than for the purpose made known to you, a purpose you would reasonably expect, a purpose required, authorized or permitted by or under law, or a purpose otherwise authorized by you.
- 4.4. Finexus retains Information only for so long as necessary to fulfill the purposes for which it was collected, including as described in this Policy, the Terms, or as required by law.

5. Information Security and Data Confidentiality

- 5.1. You are responsible for maintaining the secrecy of your Login ID and Password for the App. Finexus will not be able to secure your information if you reveal your Login ID and Password to anyone. Finexus personnel are not authorized to ask you for your Password.
- 5.2. Finexus will take reasonable steps to protect any Information we received from you via our App from misuse and loss and from unauthorized access, modification or disclosure. We will also take reasonable care to ensure that the App are safe and secure. However, please be informed that no data transmission over the Internet can be guaranteed as fully secure. Finexus cannot guarantee or warrant the security of any information you submit to us. Therefore, you shall submit information at your own risk.

6. Access and Accuracy of Information

- 6.1. You may request access to any Information we hold by contacting us (see the Contact Us section below).
- 6.2. Keeping your data and information accurate and updated is very important to us. If you believe that your records with us are inaccurate, incomplete or not updated, kindly inform us with any changes or errors in your Information and we will process the matter accordingly.
- 6.3. You are responsible for ensuring that the Information you provide us is accurate, complete and not misleading and that such Information is kept up to date. In the event that the Information you have provided us is about someone else ("**Third Person**"), you hereby represent and warrant that you have obtained the consent of such Third Person or are otherwise entitled to provide us with their Information and to view or change their information. You agree to indemnify us in the event we suffer any loss or damage as a result of your failure to comply with the same.
- 6.4. Finexus is responsible to ensure that only authorized personnel have physical access to the Information in limited circumstances and they are prohibited from making any unauthorized disclosure of your Information. Employee access is only limited to authorized personnel who are fully trained in handling your information. These authorized personnel are required to ensure the confidentiality of your information and to respect your privacy at all times.

7. Use of "Cookies"

- 7.1. The App may send you a "cookie" or similar technology which is a package of data that allows our server to identify and interact more effectively with your device without identifying the individual users. These reporting tools tell us the parts of our App in which you showed an interest or took some action, and help us improve the quality and usefulness of our services. Most current browser program can be configured to refuse, reject or delete such cookies.

8. Links to other Sites

- 8.1. Third party links may be provided in the App. These links are provided as a courtesy only, and the sites they link to are not under our control in any manner whatsoever and you therefore access them at your own risk. Finexus advises you to read the privacy practices of those linked sites.

9. How Long We Store Your Data

9.1 We will keep your information for as long as is required to fulfill the purpose for which it has been collected and processed or if any applicable legislation requires longer storage as required by law. If you terminate your account with us, all personal data will be deleted except if it is required by legal process or any other legitimate reason as Finexus deems necessary.

10. Contact Us

10.1. You may address any queries, concern or complaints regarding the use of your Information or this Policy. You may withdraw consent at any time. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. You can exercise any your rights by contacting us using the contact information provided below:

- a. Telephone Number: +603-4051 9911
- b. Email: mytouristpay_help@finexuscards.com

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