PRIVACY POLICY

The Personal Data Protection Act 2010 (“the Act”) is an Act in Malaysia which regulates the processing of personal data in a commercial transaction. To comply with the Act, Paygap Sdn Bhd (“PSB” or “we” or “us” or “our”) are required to inform you of your rights with regards to your personal data that we collect from you and has been and / or will be processed by us and how you can contact us.

Please read this Privacy Policy carefully. By accessing the Sites (as defined in our Terms of Use) belonging to us, creating an account with us, using any services provided by us, registering or signing up for any products and services provided by us, submitting any information to us or otherwise showing your agreement thereon, you will be deemed to have agreed to and consented to the terms of this Privacy Policy. For avoidance of doubt, any capitalised references made herein which is undefined shall mean the same as defined in our Terms of Use.

1. Collection of Personal Data

1.1. Personal Data Collected
In order for us to provide you with our services and to operate efficiently, we may need to collect and process relevant personal information from you either manually or through the Sites. The personal data collected by us may be in the form of but is not limited to the following:

- Any data provided to us, whether true or false, which can be related to a specific identifiable individual;
- Your remuneration and compensation history and records, including other details relating to your remuneration whether it is your employment records, employment experience, remuneration / compensation details, or identified by our products and / or services;
- Your personal details, including details relating to other person(s) who may be identified from the data;
- Other information which is available to us included in the input, file uploads, and / or feedback that you provide within the Sites.

1.2. Methods of Collection
Your Personal Data may be collected in a variety of ways whether directly or indirectly. We may collect them:

- Whenever you interact with our Sites, and / or mobile applications.
- We may require you to create an account and when creating your accounts, we may ask you to provide a range of information, such as your name, date of birth, contact details, remuneration / compensation information, location, race, occupation, employment details, and gender.
- When you contact our customer service centres for assistance, we may keep information about the conversation, including your name, contact details, the reason to why you contacted us and the advice we gave you.
- When you use our products or services or interact with the Sites, we may receive

content that you choose to upload, such as employment reports, remuneration / compensation reports, and details of past / current place of employment.
- When you submit your Personal Data to us for any other reasons.

1.3. Aggregated or De-identified Data
Your Personal Data may be aggregated or de-identified so that it may no longer be used to identify you. Such information may still be used to analyse the effectiveness of our products, services and / or our Sites, to improve and add features to our products, services and / or our Sites, to conduct research, generate research papers, content, reports, and for other similar purposes.

1.4. Requirement to Provide Data
You are not required to provide the Personal Data. However, if you do not do so, we may not be able to provide you with our products or services, communicate with you or respond to your enquiries. You should ensure that all Personal Data submitted to us is complete, accurate, true, and correct because it may result in our inability to provide you with the products and services you have requested.

1.5. Third-Party Data
If you provide us with any Personal Data relating to a third party (e.g., information of your spouse, children, parents, grandparents), by submitting such Personal Data to us, you represent to us that you have obtained the required consent of the third party to provide us with their Personal Data and that the data provided to us is complete, accurate, true, and correct.

1.5.1. Employee Data Provided by Employers
When an employer uses Paygap Benchmarking, it may provide employment and compensation information about its employees through file uploads or authorised HR system integrations. This information may include job titles, job levels, work locations and compensation details.

Paygap processes these records to enable the employer's authorised users to conduct internal compensation analysis, including salary band reviews. Paygap also uses the records to calculate market salary benchmarks for the platform. Paygap shares those benchmarks with other platform users only as anonymised, aggregated statistics that do not identify individual employees.

Before providing employee data, the employer is responsible for ensuring that it is authorised to share the data for the purposes described above, providing any required privacy notices to affected employees, and obtaining any required consent.

Employees may contact their employer about its use of their records. They may also contact Paygap using the details at the end of this Privacy Policy to ask about Paygap's use of their personal data or to request access to or correction of that data.

1.6. Data Accuracy Commitment
We are committed to ensure the confidentiality, protection, security and accuracy of your personal data provided to us. It is your obligation to ensure that all Personal Data provided to us and retained by us are accurate, not misleading, updated and complete in all aspects. We and / or our employees or authorised agents will not be held responsible for any personal data submitted to us that is inaccurate, misleading, incomplete and not updated.

2. Purpose for Collection of Personal Data

2.1. General Purposes
In general, we collect, use, and disclose your Personal Data for the following purposes:

2.1.1. Service Provision
When we use your personal information to offer our products and / or services to you, the processing is based on an agreement between you and PSB. We may use personal information to provide services to you including:

- To provide you with a product and / or service you have requested and interactions with our Sites.
- To resolve complaints, respond, and handle requests and enquiries.
- To verify your identity when you contact us.
- To carry out research and development and statistical analysis and marketing research activities to create content, reports, and / or analysis of any kind, and to learn more about the Users in general.

2.1.2. Products and services development
We work constantly to improve our products and services. We either base this processing on our legitimate interests to develop our products and services to better meet customer requirements, to ensure data quality, to develop identity management, and to strengthen network and information security, or on your prior consent. We may use Personal Data for product and service development purposes such as:

- To measure our performance, troubleshoot, improve and enhance our products and services and effectiveness, fix errors.
- To carry out research, development, statistical analysis, and marketing research activities to create and improve our new and existing products and services, to create content, reports, and / or analysis of any kind, and learn more about the Users in general.
- To customise our products and services according to your interests and to better understand your needs as our User.
- For security and fraud prevention purposes. We may further use your Personal Data to analyse, troubleshoot, investigate, handle, or resolve any security matters or vulnerabilities. This information may be passed to the police or to other appropriate authorities. This is to protect you and our company, systems, corporate clients and partners, or on a legal obligation to cooperate with competent authorities.

(collectively, “the Purposes”)

3. Processing of Data belonging to a Minor

3.1. We do not knowingly seek or collect Personal Data from or about minors without the consent of a parent or guardian wherein minors shall be defined by the Majority Act 1971 in Malaysia.

3.2. If we become aware of Personal Data which was submitted to us relates to a child without the consent of a parent or guardian, we will use reasonable efforts to:

- Delete that Personal Data from our records as soon as possible;
- Where deletion is not possible, ensure that their Personal Data is not used further for any purpose, nor disclosed further to any third party; and
- Any parent or guardian with queries regarding our processing of personal information relating to their child should contact us using the details provided at the end of this Privacy Policy.

4. Retention of your Personal Data

4.1. We will only retain your Personal Data for as long as it is reasonably necessary for the various purposes set out in this Privacy Policy or to otherwise comply with any applicable laws and regulations concerning the mandatory retention of certain types of information.

5. Disclosure of Personal Data

5.1. We may disclose your personal data to our affiliates or third parties that perform services on our behalf and in doing so we will comply with all applicable laws, regulations and industry standards. We will not otherwise disclose the confidential information obtained unless required to do so by law.

6. Security Measures

6.1. We implement suitable and practical technical, physical, and administrative safeguards to secure your Personal Data against mishandling, misuse or accidental, illegal or unauthorised destruction, loss, modification, alteration, disclosure, procurement, or access in compliance with the applicable laws in Malaysia. These processes and systems encompass:

- Restricting access to the Personal Data and employing identity and access management solutions to manage access to systems where the information is processed and stored.
- Implementing physical, electronic, and procedural measures that align with industry standards.
- Conducting ongoing surveillance and periodic evaluations of our methods in comparison to our established policies and industry benchmarks.

7. Cookies

7.1. A cookie is a small data file that our web server transmits to your web browser when you visit specific sections of our site, aimed at aiding our understanding of your interest in our site. The cookies may be used to tailor the content, recommendations, adverts, and messages to be more pertinent to your interests. You have the option to prevent cookies from being saved on your computer by modifying your browser settings. However, disabling cookies might lead to a restricted experience of our features and services and, in some instances, may prevent us from providing you with certain services or parts of the services you have requested. Some of our business associates, whose content is included in or linked to and / or from the Sites and any integrated platforms might also use cookies. We, however, do not have control over or access to these cookies or the Sites.

8. Withdrawal of Consent

8.1. Notwithstanding anything to the contrary, you may at any time after the submission of your personal data to us, withdraw your consent to us by sending a written notice of withdrawal to us at the email address set out below within the period prescribed under the PDPA. We shall take all necessary measures to give effect to your withdrawal of consent, to the extent that such withdrawal does not conflict with any of our other legal obligations. However, depending on the nature of your request, we may not be able to continue to provide our products and / or services to you.

8.2. Furthermore, you may at any time after the submission of your personal data to us, submit your request for access to your personal data by submitting such request to us at the email address stated below in the event where:

- You require access to and/or wish to make corrections to your personal data subject to compliance of such request for access or correction not being refused under the provisions of the Act and/or existing laws; and
- You wish to enquire about your personal data.

8.3. Definition of "Access"
For the avoidance of doubt, “access” for the purposes of the provision above shall mean notification of such personal data of yours that is processed by or on our behalf and to have a copy of such personal data communicated or conveyed to you in a form of our choosing.

9. Updates

9.1. We reserve the right to amend, alter, change or modify our Privacy Policy from time to time without any reference or prior notice to you. All updates will be posted on the Sites, any integrated platforms, and other platforms.

Personal Data Protection Officer
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