

## PRIVACY POLICY

### SCOPE OF THIS NOTICE

TCT Apps Solution Sdn. Bhd. Registration No. 201601034817 (1205758-D) and GoHub Groups of Companies including NSS IT Solutions Sdn Bhd (Reg No: 201101036416 (9064550-P)) and its subsidiaries, associated companies, affiliates, successors, assigns, and licensees (“GoHub”, “We”, “Us”) are committed to complying with the Personal Data Protection Act 2010 (“PDPA”). Please read this Privacy Notice (“Notice”) carefully to understand our policies and practices regarding your Personal Data and how we will treat it. This Notice applies to individuals who interact with GoHub services as consumers (“you” and “your” or any derivation thereof, as used herein refers to the individuals who is the data subject of the Personal Data). This Notice explains how your Personal Data are collected, used, and disclosed by Us. It also tells you how you can access and update your Personal Data and make certain choices about how your Personal Data are used.

GoHub shall retain the rights to modify, update or amend the terms of this Privacy Notice at any time by circulating an updated version of this Privacy Notice by publishing the same on its website, e-mail or such other manner of notification it deems fit, and you shall be deemed to have agreed and accepted such modifications, updates or amendments following such notification.

This Notice covers both our online and offline data collection activities, including Personal Data that We collect through our various channels such as websites, apps, third party social networks, Consumer Engagement Service, points of sale and events. Please note that We might aggregate personal data from different sources (website, offline event). As part of this, We combine Personal Data that were originally collected by different GoHub entities or GoHub partners. Please see Section 9 for further information on how to object to this.

If you do not provide essential Personal Data to us (We will indicate to you when this is the case, for example, by making this information clear in our registration forms), We may not be able to provide you with our goods and/or services to its fullest extent or at all. We reserve the rights to deny you our goods and/or services without the necessary Personal Data provided to us. This Notice may change from time to time (see Section 11).

This Notice provides important information in the following areas:

- 1) SOURCES OF PERSONAL DATA
- 2) PERSONAL DATA THAT WE COLLECT ABOUT YOU AND HOW WE COLLECT IT
- 3) PERSONAL DATA OF CHILDREN
- 4) COOKIES/SIMILAR TECHNOLOGIES, LOG FILES AND WEB BEACONS
- 5) USES MADE OF YOUR PERSONAL DATA
- 6) DISCLOSURE OF YOUR PERSONAL DATA
- 7) RETENTION OF PERSONAL DATA
- 8) STORAGE AND/OR TRANSFER OF YOUR PERSONAL DATA
- 9) ACCESS TO YOUR PERSONAL DATA
- 10) ACCOUNT DELETION
- 11) YOUR CHOICES ABOUT HOW WE USE AND DISCLOSE YOUR PERSONAL DATA
- 12) CHANGES TO OUR NOTICE
- 13) DATA CONTROLLERS & CONTACT

## DEFINITION

- i. Personal Data means any information in respect of commercial transactions, which—
  - (a) is being processed wholly or partly by means of equipment operating automatically in response to instructions given for that purpose;
  - (b) is recorded with the intention that it should wholly or partly be processed by means of such equipment;
  - or (c) is recorded as part of a relevant filing system or with the intention that it should form part of a relevant filing system,
- ii. Data subject means an individual who is the subject of the personal data.
- iii. Data controller means a person who either alone or jointly or in common with other persons processes any personal data or has control over or authorizes the processing of any personal data but does not include a data processor.
- iv. Data processor in relation to personal data, means any person, other than an employee of the data controller, who processes the personal data solely on behalf of the data controller, and does not process the personal data for any of his own purposes.
- v. Sensitive Personal Data means any personal data consisting of information as to the physical or mental health or condition of a data subject, his political opinions, his religious beliefs or other beliefs of a similar nature, the commission or alleged commission by him of any offence, biometric data or any other personal data as the Minister may determine by order published in the Gazette.



- vi. Biometric Data means personal data resulting from technical processing relating to the physical, physiological or behavioural characteristics of a person.

## 1. SOURCES OF PERSONAL DATA

This Notice applies to Personal Data that We collect from or about you, through the methods described below (see Section 2), from the following sources:

### (a) GoHub websites

Consumer-directed websites operated by or for GoHub, including sites that We operate under our own domains/URLs and mini-sites that We run on third party social networks such as Facebook, Instagram and Tiktok.

### (b) GoHub mobile sites/apps

Consumer-directed mobile sites or applications operated by or for GoHub, such as smartphone apps.

### (c) E-mail, text and other electronic messages

Interactions with electronic communications between you and GoHub.

### (d) GoHub CES

Communications with our Consumer Engagement Centre (“CES”).

### (e) Offline registration forms

Printed or digital registration and similar forms that We collect via, for example, postal mail, in-store demos, contests, sampling activities, and other promotions, or events.

### (f) Advertising interactions

Interactions with our advertisements (e.g., if you interact with on one of our ads on a third-party website, we may receive information about that interaction).

### (g) Data We create

In the course of our interactions with you, we may create Personal Data about you (e.g. records of your purchases from GoHub and affiliated websites).

#### (h) Data from other sources

Third party social networks (e.g. such as Facebook, Google), market research (if feedback not provided on an anonymous basis), third party data aggregators, GoHub promotional partners, public sources and data received when we acquire other companies.

## 2. PERSONAL DATA THAT WE COLLECT ABOUT YOU AND HOW WE COLLECT IT

This Notice applies to Personal Data that We collect from or about you, depending on how you interact with GoHub (online, offline, over the phone, etc.), We collect various types of information from you, through the methods described below from the following sources:

#### (a) Personal contact information

This includes any information you provide to Us that would allow Us to contact you, such as your name, postal address, e-mail address, social network details, or phone number.

#### (b) Account login information

Any information that is required to give you access to your specific account profile. Examples include your login ID/email address, screen name, password in unrecoverable form, and/or security question and answer.

#### (c) Demographic information & interests

Any information that describes your demographic or behavioural characteristics. Examples include your year of birth, age range, gender, geographic location (e.g. postcode/zip code), favourite products, hobbies, interests, and household or lifestyle information.

#### (d) Information from computer/mobile device

Any information about the computer system or other technological device that you use to access one of our websites or apps, such as the Internet protocol (IP) address used to connect your computer or device to the Internet, operating system type, and web browser type and version. If you access a GoHub website or app via a mobile device such as a smartphone, the collected information will also include, where permitted, your phone's unique device ID, advertising ID, geo-location, and other similar mobile device data.



**(e) Websites/communication usage information**

As you navigate through and interact with our websites or newsletters, We use automatic data collection technologies to collect certain information about your actions. This includes information such as which links you click on, which pages or content you view and for how long, and other similar information and statistics about your interactions, such as content response times, download errors and length of visits to certain pages. This information is captured using automated technologies such as cookies and web beacons and is also collected through the use of third-party tracking for analytics and advertising purposes. You have the right to object to the use of such technologies; for further details on this please refer to Section 4.

**(f) Market research & consumer feedback**

Any information that you **voluntarily** share with Us about your experience of using our products and services.

**(g) Consumer-generated content**

Any content that you create and then share with Us on third party social networks or by uploading it to one of our websites or apps, including the use of third-party social network apps such as Facebook, Instagram and Tiktok. Examples include photos, videos, personal stories, or other similar media or content. Where permitted, We collect and publish consumer-generated content in connection with a variety of activities, including contests and other promotions, website community features, consumer engagement, and third party social networking.

**(h) Third party social network information**

Any information that you share publicly on a third-party social network or information that is part of your profile on a third-party social network (such as Facebook, Instagram and Tiktok) and that you allow the third party social network to share with Us. Examples include your basic account information (like name, e-mail address, gender, birthday, current city, profile picture, user ID, list of friends, etc.) and any other additional information or activities that you permit the third-party social network to share. We receive your third party social network profile information (or parts of it) every time you download or interact with a GoHub web application on a third party social network such as Facebook, Instagram and Tiktok, every time you use a social networking feature that is integrated within a GoHub site (such as Facebook Connect) or every time you interact with Us through a third party social network. To learn more about how your information from a third-party social network is obtained by GoHub, or to opt-out of sharing such social network information, please visit the Website of the relevant third-party social network.

(i) **Payment and Financial information**

Any information that We need in order to fulfill a booking, or that you use to make a purchase, such as your debit or credit card details (cardholder name, card number, expiration date, etc.) or other forms of payment (if such are made available). In any case, We or our payment processing provider(s) handle payment and financial information in a manner compliant with applicable laws, regulations and security standards such as PCI DSS.

(j) **Calls to Consumer Engagement Services**

Communications with a CES can be recorded or listened into, in accordance with applicable laws, for local operational needs (e.g. for quality or training purposes). Payment card details are not recorded. Where required by law, you will be informed about such recording at the beginning of your call.

(k) **Sensitive Personal Data**

We do not seek to collect or otherwise process sensitive personal data in the ordinary course of our business. Where it becomes necessary to process your sensitive personal data for any reason, we rely on your **prior express consent** for any processing which is **voluntary** (e.g., for marketing purposes). If we process your sensitive personal data for other purposes, we rely on the following legal bases: (i) detection and prevention of crime (including the prevention of fraud); (ii) establishment, exercise, or defense of legal claims; and (iii) compliance with applicable law (e.g. to comply with our diversity reporting).

### 3. **PERSONAL DATA OF CHILDREN**

We do not knowingly solicit or collect personal data from children below the age of 13. If we discover that we have unintentionally collected personal data from a child below 13, we will remove that child's personal data from our records promptly. However, GoHub may collect personal data about children below the age of 13 years of age from the parent or guardian directly, and with that parent's or guardian's **explicit consent**.

## 4. COOKIES/ SIMILAR TECHNOLOGIES, LOG FILES AND WEB BEACONS

### (a) Cookies/Similar Technologies

We use strictly necessary cookies and the purposes for which We use them is to allow us to manage this website and ensure it functions properly. They are essential to help you navigate around this website and provide you with an improved surfing experience. If these cookies are disabled, we will not be in a position to offer you our services.

We also use these cookies for fraud detection and prevention purposes. Furthermore, thanks to these cookies, you do not need to log in repeatedly to access different pages once you have logged into this website.

You can accept or decline our use of cookies at any time by managing and/or disabling all or some of the cookies from your browser settings. However, by doing so, you may not be able to enjoy the full functionality of this website.

Cookies settings can normally be found in the preference or settings menu from your browser, for example:

- Chrome: Settings -- Advanced -- Content Settings -- Cookies
- Safari: Preferences -- Privacy -- Cookies and website data
- Firefox: Preferences -- Privacy -- History
- Internet Explorer: Internet Options -- Privacy
- Opera: Settings -- Privacy & security -- Cookies

### (b) Log Files

We collect information in the form of log files that record website activity and gather statistics about your browsing habits. These entries are generated automatically, and help Us to troubleshoot errors, improve performance and maintain the security of our websites.

### (c) Web Beacons

Web beacons (also known as “web bugs”) are small strings of code that deliver a graphic image on a web page or in an email for the purpose of transferring data back to Us. The information collected via web beacons will include information such as IP address, as well as information about how you respond to an email campaign (e.g. at what time the email was opened, which links you click on in the email, etc.). We will use web beacons on our websites or include them in e-mails that We send to you. We use the web beacon information for a **variety of purposes**, including but not limited to, site traffic reporting, unique visitor counts, advertising, email auditing and reporting, and personalisation.

## 5. USES FOR YOUR PERSONAL DATA

The following paragraphs describe the various **purposes** for which We collect and use your Personal Data, and the different types of Personal Data that are collected for each purpose. Please note that not all of the uses below will be relevant to every individual.

What We use your Personal Data for	Our reasons	Our legitimate interests
<p><b>Consumer service</b></p> <p>We use your Personal Data for consumer service purposes, including responding to your enquiries. This typically requires the use of certain personal contact information and information regarding the reason for your inquiry (e.g. booking status, technical issue, product question/complaint, general question, etc.). Where you have provided your prior consent, your personal data may also be used to provide you with services that are personalized to you.</p>	<ul style="list-style-type: none"> <li>• Fulfilling contractual obligations</li> <li>• Legal obligations</li> <li>• Our legitimate interests</li> </ul>	<ul style="list-style-type: none"> <li>• Improving products and services and developing new ones</li> <li>• Being more efficient</li> </ul>
<p><b>Contests, marketing and other promotions</b></p> <p>With your consent (where required), We use your Personal Data to provide you with information about goods or services (e.g. marketing communications or campaigns or promotions). This can be done through various means such as email, ads, SMS, phone calls and postal mailings to the extent permitted by applicable laws. Some of our campaigns and promotions are run on third-party websites and/or social networks. This use of your Personal Data is <b>voluntary</b>, which means that you can <b>oppose or withdraw your consent</b> to the processing of your Personal Data for these purposes. For detailed information on how to modify your preferences about marketing communication, please see Sections 9 and 10 below.</p>	<ul style="list-style-type: none"> <li>• With your consent (where required)</li> <li>• Fulfilling contractual obligations</li> <li>• Our legitimate interests</li> </ul>	<ul style="list-style-type: none"> <li>• Working out which of our products and services may interest you and telling you about them</li> <li>• Defining types of consumers for new products or services</li> </ul>

<p>For more information about our contests and other promotions, please see the official rules or details posted with each contest/promotion.</p> <p><b>Third party social networks</b></p> <p>We use your Personal Data when you interact with third party social networking features, such as “Like” functions, to serve you with advertisements and engage with you on third party social networks. You can learn more about how these features work, the profile data that We obtain about you, and find out how to opt out by reviewing the privacy notices of the relevant third-party social networks.</p>		
<p><b>Personalization (offline and online)</b></p> <p><b>With your consent (where required),</b> We use your Personal Data (i) to analyze your preferences and habits, (ii) to anticipate your needs based on our analysis of your profile, (iii) to improve and personalize your experience on our websites and apps; (iv) to ensure that content from our websites/apps is optimized for you and for your computer or device; (v) to provide you with targeted advertising and content, and (vi) to allow you to participate in interactive features, when you choose to do so. For example, We remember your login ID/email address or screen name so that you can quickly login the next time you visit our site or so that you can easily retrieve the items you previously placed in your shopping cart. Based on this type of information, and <b>with your consent (where required),</b> We also show you specific GoHub content or promotions that are tailored to your interests. The use of your Personal Data is voluntary, which means that you <b>can oppose the</b></p>	<ul style="list-style-type: none"> <li>• With your consent (where required)</li> <li>• Our legitimate interests</li> </ul>	<ul style="list-style-type: none"> <li>• Working out which of our products and services may interest you and telling you about them</li> <li>• Defining types of consumers for new products or services</li> </ul>

<p><b>processing of your Personal Data for this purpose.</b></p> <p>For detailed information on how to opt-out please refer to Section 10 below.</p>		
<p><b>Other general purposes (e.g. internal or market research, analytic, security).</b></p> <p>In accordance with applicable laws, We use your Personal Data for other general business purposes, such as maintaining your account, conducting internal or market research and measuring the effectiveness of advertising campaigns. We reserve the right, if you have GoHub accounts, to reconcile these accounts into one single account. We also use your Personal Data for management and operation of our communications, IT and security systems.</p>	<ul style="list-style-type: none"> <li>• Fulfilling contractual obligations</li> <li>• With your consent (where required)</li> <li>• Legal obligations</li> <li>• Our legitimate interests</li> </ul>	<ul style="list-style-type: none"> <li>• Improving and developing new products and services</li> <li>• Being more efficient</li> <li>• Protect our systems, networks and staff</li> <li>• Compliance with legal obligations</li> </ul>
<p><b>Legal reasons or merger/acquisition.</b></p> <p>In the event that GoHub or its assets are acquired by, or merged with, another company including through bankruptcy, we will share your Personal Data with any of our legal successors. We will also disclose your Personal Data to third parties (i) when required by applicable law; (ii) in response to legal proceedings; (iii) in response to a request from a competent law enforcement agency; (iv) to protect our rights, privacy, safety or property, or the public; or (v) to enforce the terms of any agreement or the terms of our website.</p>	<ul style="list-style-type: none"> <li>• Legal obligations</li> <li>• Our legitimate interests</li> </ul>	<ul style="list-style-type: none"> <li>• Compliance with legal obligations</li> <li>• Protect our assets and staff</li> </ul>

## 6. DISCLOSURE OF YOUR PERSONAL DATA

In addition to the GoHub entities mentioned in the data controllers & contact section (see Section 12), We share your Personal Data with the following types of third-party organizations:

### (a) Service providers

These are external companies that We use to help Us run our business (including but not limited to booking, fulfilment, payment processing, fraud detection and identity verification, website operation, market research companies, support services, promotions, advertising providers, website development, data analysis, CRC, etc.). Service providers (including but not limited to third party service providers such as hotel, campsites, tour providers, car rental, bus and ferry operators, and travel insurance) , and their selected staff, are only allowed to access and use your Personal Data on Our behalf for the specific tasks that they have been requested to carry out, based on our instructions, and are required to keep your Personal Data confidential and secure.

### (b) Credit reporting agencies/debt collectors

To the extent permitted by applicable law, credit reporting agencies and debt collectors are external companies that We use to help Us to verify your creditworthiness (in particular for bookings with invoice) or to collect outstanding invoices.

### (c) Third party recipients using Personal Data for legal reasons or due to merger/acquisition

We will disclose your Personal Data to third parties for legal reasons or in the context of an acquisition or a merger (see Section 5 for details)

## 7. RETENTION OF YOUR PERSONAL DATA

In accordance with applicable laws, We will use your Personal Data for as long as necessary to satisfy the purposes for which your Personal Data was collected (as described in Section 5 above) or to comply with applicable legal requirements. Personal data used to provide you with a personalized experience (see Section 5 above for details) will be kept for a duration permitted by applicable laws.

## 8. DISCLOSURE, STORAGE AND/OR TRANSFER OF YOUR PERSONAL DATA

We use appropriate measures (described below) to keep your Personal Data confidential and secure.

### (a) People who can access your Personal Data

Your Personal Data will be processed by our authorized staff or agents, on a need-to-know basis, depending on the specific purposes for which your Personal Data have been collected (e.g. our staff in charge of consumer care matters will have access to your consumer record).

### (b) Measures taken in operating environments

We store your Personal Data in operating environments that use reasonable security measures to prevent unauthorized access. We follow reasonable standards to protect Personal Data. The transmission of information via the Internet is, unfortunately, not completely secure and although We will do our best to protect your Personal Data, We cannot guarantee the security of the data during transmission through our websites/apps.

### (c) Measures We expect you to take

It is important that you also play a role in keeping your Personal Data safe and secure. When signing up for an online account, please be sure to choose an account password that would be difficult for others to guess and never reveal your password to anyone else. You are responsible for keeping this password confidential and for any use of your account. If you use a shared or public computer, never choose to have your login ID/email address or password remembered and make sure to log out of your account every time you leave the computer. You should also make use of any privacy settings or controls We provide you in our website/app.

### (d) Transfer of your Personal Data

Because of the international nature of our business, we may need to transfer your personal data within the Go Hub group, and to third parties as noted in Section 6 above, in connection with the purposes set out in this Privacy Notice. For this reason, we may transfer your personal data to other countries that may have different laws and data protection compliance requirements to those that apply in the country in which you are located.

## 9. YOUR RIGHTS

### (a) Access to Personal Data

You have the right to access, review and request a physical or electronic copy of information held about you. You also have the right to request information on the source of your Personal Data.

These rights can be exercised by sending Us an e-mail to our Data Protection Officer as per in Section 13 below by attaching a copy of your ID or equivalent details, where requested by Us and permitted by law. If the request is submitted by a person other than you, without providing evidence that the request is legitimately made on your behalf, the request will be rejected. Please note that any identification information provided to Us will only be processed in accordance with, and to the extent permitted by applicable laws.

### (b) Additional rights (e.g. modification, deletion of Personal Data).

Where provided by law, you can (i) request deletion, the portability, correction or revision of your Personal Data; (ii) limit the use and disclosure of your Personal Data; (iii) revoke consent to any of our data processing activities; and (iv) object to the processing of your Personal Data, including the right to lodge a complaint with the Personal Data Commissioner.

## 10. ACCOUNT DELETION

If you wish to delete your account, please follow the steps below:

- Log in to our mobile app using your email or a connected social media account.
- Go to the 'My Profile' section.
- Select the 'Request Account Deletion' option.
- Click 'Proceed' to confirm your request.

Once the deletion request is processed, all your personal data will be permanently removed from our system, in accordance with our data retention policy. If you have any questions or need assistance, please contact our support team at [helpdesk@gohub.com.my](mailto:helpdesk@gohub.com.my)

Please note that, in certain circumstances, We will not be able to delete your Personal Data without also deleting your user account. We may be required to retain some of your Personal Data after you have requested deletion, to satisfy our legal or contractual rights and/or obligations. We may also be permitted by applicable laws to retain some of your Personal Data to satisfy our business needs.



Where available, our websites have a dedicated feature through which you can review and edit the Personal Data that you have provided. Please note that We require our registered consumers to verify their identity (e.g. login ID/email address, password) before they can access or make changes to their account information. This helps prevent unauthorized access to your account.

We hope that We can satisfy queries you may have about the way we process your Personal Data. However, if you have unresolved concerns, you also have the right to complain to competent data protection authorities.

## 11. YOUR CHOICES ABOUT HOW WE USE AND DISCLOSE YOUR PERSONAL DATA

We strive to provide you with choices regarding the Personal Data that you provide to Us. The following mechanisms give you the following control over your Personal Data:

### (a) Cookies/Similar Technologies

You manage your consent via (i) our consent management solution or (ii) your browser so as to refuse all or some cookies/similar technologies, or to alert you when they are being used. Please see Section 4 above.

### (b) Advertising, marketing and promotions

You can consent for your Personal Data to be used by GoHub to promote its products or services through tick-box(es) located on the registration forms or by answering the question(s) presented by our CES representatives. If you decide that you no longer wish to receive such communications, you can subsequently unsubscribe from receiving marketing-related communications at any time, by following the instructions provided in each such communication. To unsubscribe from marketing communications sent by any medium, including third party social networks, you can opt-out at any time by unsubscribing through links available in our communications, logging into the websites/apps or third-party social networks and adjusting your user preferences in your account profile by unchecking the relevant boxes or by calling our CES. Please note that, even if you opt-out from receiving marketing communications, you will still receive administrative communications from Us, such as booking or other transaction confirmations, notifications about your account activities (e.g. account confirmations, password changes, etc.), and other important non marketing related announcements.

### (c) Personalization (offline and online)

Where required by law, if you wish to have your Personal Data used by GoHub to provide you with a personalized experience/targeted advertising & content, you can indicate so through the relevant tick-box(es) located on the registration form or by answering the question(s) presented by our CES representatives. If you decide that you no longer wish to benefit from this personalization, you can opt-out at any time by logging into the websites/apps and adjusting your user preferences in your account profile by unchecking the relevant boxes or by calling our CES.

## 12. CHANGES TO OUR NOTICE

If We change the way We handle your Personal Data, We will update this Notice. We reserve the right to make changes to our practices and this Notice at any time, please check back frequently to see any updates or changes to our Notice.

## 13. DATA CONTROLLERS & CONTACT

To ask questions or make comments on this Notice and our privacy practices or to make a complaint about our compliance with applicable privacy laws, you may reach us through our Contact Us page.

You can also contact our Data Protection Officer [dataprotection@gohub.com.my](mailto:dataprotection@gohub.com.my)

We will acknowledge and investigate any complaint about the way we manage Personal Data (including a complaint that we have breached your rights under applicable privacy laws).