



INSTAREM PRIVACY POLICY

Nov 2017

PRIVACY POLICY

INSTAREM MALAYSIA SDN BHD (INSTAREM) RESPECTS YOUR RIGHTS TO PRIVACY. INSTAREM DEALS WITH PERSONAL INFORMATION COLLECTED IN ACCORDANCE WITH THIS PRIVACY POLICY (POLICY). WHEN USED IN THIS POLICY, "PERSONAL INFORMATION" REFERS TO ANY INFORMATION OR OPINION, WHICH RELATES DIRECTLY OR INDIRECTLY TO YOU. THIS INCLUDES ANY INFORMATION THAT CAN BE USED TO DISTINGUISH, IDENTIFY OR CONTACT YOU.

WHAT KINDS OF PERSONAL INFORMATION DO WE COLLECT AND HOLD?

The types of personal information that we collect and share depend on the product or service you avail from us. This information can include, without limitation:

- Government identification numbers, such as National identification card information, driver's license, state identification, passport, visa, tax identification, etc.
- Name, address, email address, mobile and home telephone number, age, date of birth, gender, citizenship, salary range, occupation and other relevant contact information.
- Information involving your account information, bank account details including debit, credit and transaction history with Instarem.
- Computer and mobile device information, such as the domain and host you use to access the Internet; your computer's IP address; mobile device geolocation, number and other information from and about your device (such as device properties, settings, applications, stored information and usage) and carrier; the browser and operating system software you use; websites you have visited or later visit, social profile and network information; the date and time you access our website, the internet address used to link to our website when you visit us and cookie information

Instarem is required to collect and hold certain personal information under the Anti-Money Laundering and Counter-Terrorism Financing rules and other subordinate instruments (AML/CTF Laws).

You consent to our collection, transfer and storage of information by computers or other transfer or storage devices in the Malaysia and elsewhere, whose laws on holding personal data may be less stringent.

WHY DO WE COLLECT YOUR PERSONAL INFORMATION?

We collect most personal information directly from you through the access and use of the Instarem website or mobile application. We may share the information with our affiliates to assist us in our business activities. We may also share the information if required by the governing law for the purpose of cooperation with government investigations. In addition, we may use or share your personal information in the following ways:

- to comply with any applicable legal and/or regulatory requirements;☒
- to notify you about changes in our Services;☒
- as part of our efforts to keep our Services safe and secure;☒
- to administer our services and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;☒
- to provide you with information about other similar goods and services we offer;☒
- to provide you, or permit selected third parties to provide you, with information about goods or services we feel may interest you; or☒

HOW DO WE COLLECT PERSONAL INFORMATION?

We collect most personal information directly from you by the following means:

- Through the access and use of the Instarem website or mobile application
- Through your registration for our services and/or by setting up an account with us
- Through your response to our loyalty program, a contest or claim to a prize announced by us
- From any financial transaction you make with Instarem
- Through your subscription to our electronic publication such as newsletters, rate broadcast
- From 3rd party connected with you and/or dealing with us

WHO DO WE DISCLOSE YOUR PERSONAL INFORMATION TO, AND WHY?

We may share your personal information with other companies in the Instarem Group.

Sometimes we may disclose your personal information to organizations outside the Instarem Group such as:

1. to our contractors or service providers for the purposes of conducting business and providing their services or products to you, including web hosting providers, IT systems administrators and payment processors,
2. to our intermediary banks in order to process certain transactions on your behalf, for example, by disclosing your name and address;
3. to any of our partners, agents or intermediaries who are a necessary part of the provision of our products and services;
4. to international intermediaries to complete your transactions;
5. to credit reporting bodies, if you are a client of Instarem for the purpose of identifying you, in which case the information will be limited to your identity particulars, including but not limited to your name, gender, address, date of birth and driver's license number;
6. to any government regulatory bodies that normally require it or may request it;

SECURITY OF INFORMATION COLLECTED

To help protect your personal information from unauthorized access and use, we endeavor to use reasonable security measures. These measures can include physical, electronic and procedural safeguards such as computer safeguards and secured files and buildings. We also endeavor to limit access to personal information to only employees, agents and representatives that need to know. Despite our efforts, third parties may unlawfully intercept or access your personal information, transmissions to us, or may wrongly instruct you to disclose information to them by posing as Instarem or by misinforming you about our services. Always use caution and good judgment when sending money and when using internet and mobile technologies.

DO WE DISCLOSE PERSONAL INFORMATION OVERSEAS?

We may disclose your personal information to recipients located outside Malaysia. These entities may include:

- Instarem Group companies
- Instarem Group service providers; and
- International Intermediaries

To effect, administer and complete transactions or deliver products or services including, but not limited to:

- Companies which help us run or improve the running of our business or which help us deliver products and services to you and to banks, card companies, reference agencies, etc.
- In order to comply with legal, regulatory, security and processing requirements, government (domestic and international) requirements, applicable to us or our affiliates or service providers, including but not limited to anti-money laundering laws; and
- To organizations which help us process transactions, validate customer information, and prevent debt, fraud, theft or loss.

We may disclose Information about current and former customers to perform marketing, business analysis and advertising services to companies with whom we have contractual or joint marketing arrangements upon notice that you have provided unambiguous consent (opt-in) for the use of Information for these purposes.

DO WE USE OR DISCLOSE PERSONAL INFORMATION FOR MARKETING?

We will use your personal information to offer you products and services that we believe may interest you. We will not do this if you tell us not to. Unless you tell us not to, we will disclose your personal information to companies within the Instarem Group so that they can market their products and services to you.

We also have relationships with advertising companies, who may use cookies, pixels, web beacons, app or device information or related information to display advertising tailored to your interests or location. To opt-out of tailored advertising delivered by other advertising companies, you should choose the appropriate settings in your browser(s) (e.g., block cookies), device (e.g., turn "Location" off) and app(s). Please note that if you do not accept cookies or change your device or app settings, you may experience some inconvenience in your use of our website or app and some online or mobile products and services.

ACCESS TO AND CORRECTION OF PERSONAL INFORMATION

You can request access to the personal information we hold about you. You can also ask for corrections to be made. To do so, please contact us on the details provided under "Contact us".

CHANGES IN THE PRIVACY POLICY

Instarem reserves the right to modify this Privacy Statement. We urge you to review this Privacy Statement when you visit to obtain the most current statement.

RESOLVING YOUR PRIVACY CONCERNS AND COMPLAINTS - YOUR RIGHTS

If you are concerned about how your personal information is being handled or if you would like to make a complaint, please contact us on the details provided under 'Contact us'.

You may request (by contacting us in the manner set out below) details of the information we hold and request us to correct or erase any erroneous or out-of-date information. We reserve the right to independently verify any claims made.

To protect your privacy, we shall take reasonable steps to verify your identity before correcting any information per request. Where permitted by law, we reserve the right to collect a service charge for providing you any information in connection with your request.

CONTACT US

You can contact us by writing to us at support@instarem.com or calling us on +60392126306. Our Privacy Officer can also be contacted in relation to privacy concerns by writing to privacy@instarem.com



**THANK
YOU**
