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2. Capital Dynamics Sdn Bhd ("CDSB") is committed to ensure that its mobile app is as useful and efficient as possible. For that purpose, CDSB reserves the right to make changes to the mobile app or to charge for its services, at any time. However, CDSB will not charge you for the mobile app or its services without informing you the purpose of your payment.
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  - 4.3 *i Capital* RM99 (Chinese) - 46 issues of Chinese language *i Capital* with corresponding access to [www.icapital.biz](http://www.icapital.biz) and eBook; and
  - 4.4 [www.icapital.biz](http://www.icapital.biz) RM49 (Chinese) - Access to Chinese language [www.icapital.biz](http://www.icapital.biz) and eBook for 365 days.
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8. No conversion of subscription package is allowed, except for the change in subscription language. Should you wish to change your subscription language, please email us at [myaccount@icapital.biz](mailto:myaccount@icapital.biz).
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13. CDSB reserves the right to discontinue the promotion without prior notice and/or explanation.
14. Payment for your subscription shall be subject to Goods and Services Tax ("GST") pursuant to the Goods and Services Tax Act 2014 at the prevalent standard rate. If payment received by us is insufficient to cover the entire amount of GST imposed, we reserve the right to suspend the processing of your subscription pending payment of the balance.
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## **Privacy Policy**

### **1. General Terms of Use**

This privacy statement is made on behalf of Capital Dynamics Sdn Bhd (Co. No. 171744-U) ("CDSB"). CDSB is committed to protecting your privacy and to comply with the Personal Data Protection Act 2010 ("Act"). This Privacy Policy is formulated in accordance with the Act, which describes how your information is collected and used and your choices with respect to your personal data. This Privacy Policy is applicable to the website and its mobile application. The following discloses CDSB's information gathering and dissemination practices for this website, [www.icapital.biz](http://www.icapital.biz) and mobile application, *i-Capital*.

### **2. Information Collected**

- 2.1 Our servers do not automatically recognize specific information about individual users on our website or mobile application. In addition, our servers do not automatically record information regarding a user's email address unless the user supplies it.
- 2.2 We collect information about users during the registration process for certain parts of our website and mobile application; and through the use of cookies. When you request pages from our server, it automatically collects some information about your preferences, including your IP address. We use this to help diagnose problems with our server, and to administer our website and mobile application.
- 2.3 The user-supplied information collected through subscriptions and promotions or other similar vehicles is used to improve the content of our website and mobile application, or used for our marketing purposes. It is not shared with other organisations for commercial purposes unless specifically stated.
- 2.4 Wherever applicable, we also collect information of your activities through our service particularly, screenshot capture, to track any infringement of copyright and trademark of our intellectual property available on our website and mobile application.

### **3. Purpose of Personal Data Collected**

- 3.1 The personal data that you have provided to us voluntarily either on our website, mobile application or other related channels will be processed for the following purposes:
  - a. To complete the transactions with you, manage and verify your subscription;
  - b. To understand and analyse our sales, and your needs and preferences;
  - c. To improve our services; and
  - d. To respond to requests or complaints.
- 3.2 We may also use and process your data for other purposes such as:
  - a. To directly market to you;
  - b. To develop, enhance, market and provide products and services to meet your needs; and
  - c. To enable you to participate in promotions and contests.
- 3.3 Although the precise details of the personal data collected will vary according to the specific purpose (such as subscriptions and promotions etc.) whether via online or otherwise, we may typically collect the following personal data from or in relation to you:
  - a. Name;
  - b. Address;
  - c. Phone number(s);
  - d. Date of birth;

- e. Email address;
- f. Gender;
- g. Identity card number or passport number;
- h. Industry; and
- i. Occupation

You agree and consent to CDSB using and processing your personal data in the manner as identified in this notice.

#### **4. Use and Disclosure**

- 4.1 We may disclose your personal data to other companies within the Capital Dynamics Group. These companies within our group will treat your personal data as confidential, in accordance with this Privacy Policy and with all applicable data protection legislation and will process such personal data only for the purposes and within the terms set out herein.
- 4.2 We use and disclose aggregated non-personally identifying information collected through this website and/or our mobile application as part of our organization's process of constantly improving the website and/or its mobile application and/or business.

#### **5. Impact of Non Provision of Personal Data**

Please note that in the event that sufficient personal data is not supplied, or is not satisfactory to us, then your subscription or request to us for any of the above purposes may not be accepted or acted upon or your request to browse some information on this website or our mobile application may be denied or we will not be able to provide the full range of services through the website and/or mobile application.

#### **6. Storage and Retention of Personal Data**

- 6.1 Your personal data shall be stored either in hard copies in our offices or stored in servers located in Malaysia or off-site in Singapore and operated by our service providers.
- 6.2 Any personal data supplied by you will be retained by our organization as long as necessary for the fulfilment of the purposes stated in Clause 3 above or is required to satisfy legal regulatory, accounting requirements or to protect our interests.
- 6.3 We do not offer any online facilities for you to delete your personal data held by us. Please refer to Clause 14 below for access to your personal data.

#### **7. Usage of Email and 'Contact Us' Messages**

- 7.1 We may preserve the content of any email or 'Contact Us' online feedback or other electronic message that we receive.
- 7.2 Any personal data contained in those messages will only be used or disclosed in ways set out in this Privacy Policy.
- 7.3 The message content may be monitored by our service providers or employees for purposes including compliance, auditing and maintenance of where email abuse is suspected.

## **8. Communication or Utilization**

- 8.1 Through your use of telecommunications services to access this website, your communications data (e.g. Internet Protocol address) or utilization data (e.g. information on the beginning, end and extent of each access, and information on the telecommunications services you accessed) are technically generated and could conceivably relate to Personal Data.
- 8.2 To the extent that there is a compelling necessity, the collection, processing and use of your communications or utilization data will occur and will be performed in accordance with the applicable data privacy protection legal framework.

## **9. Automatic Collection of Non-Personal Data**

- 9.1 When you access this website and/or use our mobile application, we may automatically (i.e. not by registration) collect non-personal data (e.g. your computer's or mobile device's Internet Protocol (IP) address, type of Internet browser, and your device's operating system, domain name of the website from which you came, number of visits, average time spent on the site or app, pages viewed). We make use of Google Analytics to keep track of how visitors make use of our website and our mobile application.
- 9.2 We use the information we collect and it is to be shared with the rest of the Capital Dynamics Group, including information from your use of our website and mobile application to improve our services, develop new offerings and enhance and personalize your experience on our website as well as mobile application.
- 9.3 We may use your personal data to send you important messages regarding our services, as well as marketing materials that we think may be of interest to you. If you decide at any time that you no longer wish to receive marketing communications from us, please let us know.

## **10. Cookies**

- 10.1 When you view this website or use our mobile application, we may store some data on your computer and/or mobile device in the form of a "cookie" to automatically recognize your device next time you visit. A cookie is a small data file that we transfer to your computer's or mobile's hard disk for record-keeping purposes and to understand how the website and our mobile application are being used. We may use "persistent cookies" to save your username and login password for future logins to our website or mobile application. We may also use "session ID cookies" to enable certain features of our website and mobile application to better understand how you interact with our services.
- 10.2 We may use technologies that are similar to cookies like pixel tags (pixels, web beacons, clear GIFs), local storage or other similar means in order to achieve our above mentioned objective. A pixel tag is generally an image, typically a single pixel that is not visible to the user but can be associated with a cookie on the user's hard drive.
- 10.3 If you do not wish to receive cookies, please configure your internet browser to erase all cookies from your device's hard drive, block all cookies or to receive warning before a cookie is stored. Certain internet browsers have a "Do Not Track" option but our website does not respond to them because there is no accepted standard on how to respond to this option.
- 10.4 If you do not accept cookies, however, you may not be able to use all aspects of the website and/or mobile application. Cookies placed on your device may remain stored on your computer or mobile device until you remove them.

- 10.5 By accepting this Privacy Policy and by using our website and/or mobile application, you are consenting to permit the use of cookies by us.

## **11. Confidentiality**

- 11.1 Personal data held by us will be kept confidential in accordance with this Privacy Policy pursuant to any applicable law that may from time to time be in force.
- 11.2 Any questions, comments, suggestions or information other than personal data sent or posted to this website and/or our mobile application, or any part thereof by visitors and/or users will be deemed voluntarily provided to us on a non-confidential and non-proprietary basis.

## **12. Security**

- 12.1 This site has security measures in place to protect the loss, misuse and alteration of the information under our control. When a user is asked to provide his/her credit card information, we provide a secure environment for this purpose.
- 12.2 Standard lock icon on the browser to indicate that the page that the user is viewing is secured. This is applicable only to our website.
- 12.3 For the internet, unfortunately, no data transmission over the internet can be guaranteed as completely secure. So while we strive to protect such personal data, we cannot ensure or warrant the security of any personal data transmitted to us and individuals do so at their own risk. Once any personal data comes into our possession, we will take reasonable steps to protect that information from misuse and loss from unauthorized access, modification or disclosure.
- 12.4 We do not encourage users to submit any personal data through our website and/or mobile application using an unsecure computer or mobile device as the security of the devices could have been compromised. It is your responsibility to keep your device(s) and access to the website and/or mobile application secure.
- 12.5 A username and password may be essential for you to use some sections of this website and/or its mobile application. For your own protection, we require you to keep these confidential and to change your password regularly (if required).
- 12.6 We do not store credit card information such as credit card and CVC numbers. The credit card data is forwarded to the payment gateway through secured connection when the user made a payment.
- 12.7 User's password is encrypted as a standard industrial practice.

## **13. Website Links**

This site contains link to other sites. CDSB is not responsible for the privacy practices or the content of such sites. By clicking on such links, you will be directed to the third party's website or services which have different rules on the use of personal information and you are advised to read the third party's policy on privacy and data protection.

## **14. Right to Access to Personal Data**

Under the Act, you have the right of access to your personal data held by us on payment of a prescribed fee and to request correction of the personal data that is inaccurate, incomplete, misleading or not up-to-date. If you have any questions regarding this Privacy Policy or if you wish to request access to your personal data or if you wish to correct your personal data or if you wish to withdraw your consent to us for the processing of your personal data for the purposes as set out in Clause 3 above or for the transfer of your personal data to the parties stated in Clause 4 above, you may send your request in writing to the following address:

Capital Dynamics Sdn Bhd  
16.01A, 16<sup>th</sup> Floor, Plaza First Nationwide  
No. 161, Jalan Tun H. S. Lee  
50000 Kuala Lumpur, Malaysia.  
Email: [myaccount@icapital.biz](mailto:myaccount@icapital.biz)

**15. Changes to Privacy Policy**

We reserve the right to amend this Privacy Policy from time to time without prior notice. We advise that you check this Privacy Policy on a regular basis.