

PHHP MARKETING (S) PTE. LTD.



PERSONAL DATA PROTECTION POLICY

1. THE POLICY

1.1 In compliance with the Personal Data Protection Act 2012, this Personal Data Protection Policy ("Policy") states the rights, interests, obligations and duties of all parties involved in the collection, recording, holding, storing or processing of personal information and data by PHHP Marketing (S) Pte. Ltd. ("PHHP", "we", "our" or "us") in commercial transactions and to safeguard your interests.

2. COLLECTION OF PERSONAL DATA

2.1 In the course of your dealings with PHHP as our valued customer, independent distributor and participant in any training/programs organized by PHHP, you may be asked to provide data and information about yourself ("Personal Data") to enable us to enter into a transaction with you or to deliver the necessary notices, services and/or products in connection with our line of business.

2.2 You warrant and represent to PHHP that the Personal Data disclosed to PHHP is accurate and complete. In circumstances where you have provided to us Personal Data of another person, you also warrant and represents to PHHP that you have been authorized by such person to disclose such Personal Data to us and that such Personal Data is accurate and complete.

3. NATURE OF PERSONAL DATA

3.1 The nature of Personal Data we collect may include the following Personal Data:-

3.1.1 Name, NRIC Number, Passport Number, nationality, age, date of birth, gender, race, marital status, address, occupation, contact information, email address, photograph and videos;

3.1.2 Bank account number, credit card details and income tax file number;

3.1.3 Name and particulars of spouse and beneficiary;

3.2 Your Personal Data will be collected directly from you when you apply to join as PHHP's independent distributor.

3.3 The provision of Personal Data is voluntary. We shall seek your consent before collecting any additional personal data and before using your personal data for a purpose which has not been notified to you (except where permitted or authorised by law). Unless otherwise stated, all Personal Data requested by PPHP, is obligatory and shall be provided by you. Failure to provide such obligatory information may result in PPHP not being able to register you as our independent distributor to further provide you with our products or services or in such situations whereby you stop providing such obligatory information, will result in us being :-

- 3.3.1 unable to provide you with the notices, services and/or products requested;
- 3.3.2 unable to update you on our latest product launches, promotions and events;
- 3.3.3 unable to process your application for our program and/or contest.

4. PURPOSE OF COLLECTING PERSONAL DATA

4.1 The Personal Data you provide will be collected, used and otherwise processed by us for, amongst others, the following purposes:

- 4.1.1 to process your application as independent distributor of PPHP;
- 4.1.2 to provide you with products and services under PPHP's business;
- 4.1.3 to process your payment transactions;
- 4.1.4 to process your bonus payment transactions;
- 4.1.5 to help you find an independent distributor to sponsor you and to facilitate your business activities as an independent distributor;
- 4.1.6 to send you information related to our products, promotions and events through various communication channels such as email, telephone calls, text messages or social media;
- 4.1.7 to deliver notices, services or products and the marketing of such services or products;
- 4.1.8 to assess your application for, and administer your participation in the program and/or contest organized by PPHP;
- 4.1.9 to conduct internal record keeping;
- 4.1.10 to conduct data analysis and identifying your sales performance and trends and determining the effectiveness of PPHP's promotional campaigns and sales strategy;
- 4.1.11 to facilitate communications between PPHP and you regarding your purchase and provide you with related customer service;
- 4.1.12 to publish in PPHP's media including websites and publications;
- 4.1.13 to respond to your queries;
- 4.1.14 to allow you to utilize features of the website, if and when you choose to do so;

4.1.15 to meet any legal or regulatory requirements related to our provision of services and products and to make disclosure under the requirements of any applicable law, regulation, direction, court order, by-law, guideline, circular or code applicable to us.

5. DISCLOSURE

5.1 Your Personal Data provided to us will be kept confidential but you, hereby, consent and authorize us to provide or disclose your Personal Data to the following categories of parties:-

- 5.1.1 other independent distributor to the extent necessary for them to contact you to fulfill your order or provide a service to you;
- 5.1.2 your upline distributors in your hierarchy group (line of sponsorship);
- 5.1.3 any person to whom we are compelled to do so under law;
- 5.1.4 our business partners and online affiliates that provide related services or products in connection with our business including our auditors, bankers, system provider, payment gateway provider, sms gateway provider and email gateway provider;
- 5.1.5 government agencies, statutory authorities and industry regulators;
- 5.1.6 our appointed service or product providers as may be necessary or appropriate.

6. WITHDRAWING YOUR CONSENT

6.1 The consent that you provide for the collection, use and disclosure of your personal data will remain valid until such time it is being withdrawn by you in writing. You may withdraw consent and request us to stop using and/or disclosing your personal data for any or all of the purposes listed above by submitting your request in writing or via email to our Data Protection Officer at the contact details provided below.

6.2 Upon receipt of your written request to withdraw your consent, we may require reasonable time (depending on the complexity of the request and its impact on our relationship with you) for your request to be processed and for us to notify you of the consequences of us acceding to the same, including any legal consequences which may affect your rights and liabilities to us. In general, we shall seek to process your request within ten (10) business days of receiving it.

6.3 Whilst we respect your decision to withdraw your consent, please note that depending on the nature and scope of your request, we may not be in a position to continue providing our goods or

services to you and we shall, in such circumstances, notify you before completing the processing of your request. Should you decide to cancel your withdrawal of consent, please inform us in writing in the manner described in clause 8 above.

6.4 Please note that withdrawing consent does not affect our right to continue to collect, use and disclose personal data where such collection, use and disclosure without consent is permitted or required under applicable laws.

7. ACCESS TO AND CORRECTION OF PERSONAL DATA

7.1 If you wish to make (a) an access request for access to a copy of the personal data which we hold about you or information about the ways in which we use or disclose your personal data, or (b) a correction request to correct or update any of your personal data which we hold about you, you may submit your request in writing or via email to our Data Protection Officer at the contact details provided below.

7.2 Please note that a reasonable fee may be charged for an access request. If so, we will inform you of the fee before processing your request.

7.3 We will respond to your request as soon as reasonably possible. Should we not be able to respond to your request within thirty (30) days after receiving your request, we will inform you in writing within thirty (30) days of the time by which we will be able to respond to your request. If we are unable to provide you with any personal data or to make a correction requested by you, we shall generally inform you of the reasons why we are unable to do so (except where we are not required to do so under the PDPA).

8. PROTECTION OF PERSONAL DATA

8.1 To safeguard your personal data from unauthorised access, collection, use, disclosure, copying, modification, disposal or similar risks, we have introduced appropriate administrative, physical and technical measures such as up-to-date antivirus protection, encryption and the use of privacy filters to secure all storage and transmission of personal data by us, and disclosing personal data both internally and to our authorised third party service providers and agents only on a need-to-know basis.

8.2 You should be aware, however, that no method of transmission over the Internet or method of electronic storage is completely secure. While security cannot be guaranteed, we strive to protect the security of your information and are constantly reviewing and enhancing our information security measures.

9. ACCURACY OF PERSONAL DATA

9.1 We generally rely on personal data provided by you (or your authorised representative). In order to ensure that your personal data is current, complete and accurate, please update us if there are changes to your personal data by informing our Data Protection Officer in writing or via email at the contact details provided below.

10. RETENTION OF PERSONAL DATA

10.1 We may retain your personal data for as long as it is necessary to fulfil the purpose for which it was collected, or as required or permitted by applicable laws.

10.2 We will cease to retain your personal data, or remove the means by which the data can be associated with you, as soon as it is reasonable to assume that such retention no longer serves the purpose for which the personal data was collected, and is no longer necessary for legal or business purposes.

11. TRANSFERS OF PERSONAL DATA OUTSIDE OF SINGAPORE

11.1 We generally do not transfer your personal data to countries outside of Singapore. However, if we do so, we will obtain your consent for the transfer to be made and we will take steps to ensure that your personal data continues to receive a standard of protection that is at least comparable to that provided under the PDPA.

12. DATA PROTECTION OFFICER

12.1 You may contact our Data Protection Officer if you have any enquiries or feedback on our personal data protection policies and procedures, or if you wish to make any request, in the following manner:

Telephone : +65-6238 8336
Email : pdp.sg@phhp.com.my

Address : 10 Anson Road #16-02, International Plaza, 079903 Singapore.

13. SAFEGUARDS

- 13.1 We will need to validate the identity of anyone making an access request, to ensure that we do not provide your information to anyone who does not have the right to that information.
- 13.2 PHHP reserves the right not to entertain any request for withdrawal of consent, access or correction of any Personal Data in the following circumstances:-
 - 13.2.1 where insufficient information has been provided by you or any party making a request to enable PHHP to positively locate and identify the Personal Data in question;
 - 13.2.2 where there is reasonable doubt surrounding your identity or the identity of the person making the request or where PHHP feels that you or the requesting party is not in fact the owner or the subject of the Personal Data in question and is not lawfully entitled to make any requests in relation to the Personal Data;

14. EXCLUSION OF LIABILITY

- 14.1 Notwithstanding the above, PHHP shall not be held liable for any purported violation, breach or non-compliance with any precepts of privacy or the protection of Personal Data in the following circumstances:-
 - 14.1.1 where an act of nature or event outside the control of PHHP results in the damage or malfunction or destruction in any equipment or machinery used to secure, store or process Personal Data;
 - 14.1.2 where the Personal Data is readily available or able to be found in public domain;
 - 14.1.3 where despite PHHP's best efforts, there is unauthorised access, modification, alteration, misuse, tampering or abuse of Personal Data caused by the malicious or fraudulent or criminal acts or conduct of a third party not being under the control or direction of PHHP.

15. NOTICES

- 15.1 All notifications or other communications from you to PHHP must be made in writing, legible and contain your full name, address, NRIC number and contact details. PHHP reserves the right not to respond to any notices or communications which do not contain the foregoing particulars, are illegible, incomprehensible or where the party concerned cannot be contacted or where the contact particulars are found to be incomplete, inaccurate or in error.
- 15.2 All notifications must be sent in the manner stated in Clause 12 above.

16. YOUR CONSENT

- 16.1 By agreeing to be or continuing to be our customer or independent distributor, you agree to let us collect and process your Personal Data in accordance to this Policy.
- 16.2 This Notice applies in conjunction with any other notices, contractual clauses and consent clauses that apply in relation to the collection, use and disclosure of your personal data by us.
- 16.3 Our Policy may be updated, revised or amended at any time as and when we deem necessary. You are strongly recommended to review this Policy frequently. This Policy also covers the websites - www.php.com.my, global.php.com.my, crm.php.com.my, php2u.com and phpsuccess.com ("Sites") - and all online forms on the Sites used to collect Personal Data. Your continued use will signify your agreement to such revision, amendment or modification.

