

# DATA PRIVACY POLICY

We take the protection of your personal data very seriously and strive to make the use of our services as secure as possible. We are also committed to implementing and complying with data protection principles and all relevant provisions of the Personal Data Protection Act 2010 of Malaysia. This Data Privacy Policy describes which of your data we collect, use, disclose and store, the purposes for which we collect, use, disclose and store your data, and how we protect your data.

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## **1. Area of applicability**

This Policy applies to your operation as a Lyonet Marketer and to the use and access of our websites available at <http://www.lyonet.com>. Please note that this includes other websites, even those of other countries, to which other data protection regulations may apply.

As we continue to develop our websites to improve our services, we may need to amend and revise this Data Privacy Policy. Should this be the case, we will inform you by way of e-mail, announcement or any other means deemed appropriate by us after making the said amendments and revision. By choosing to continue to be a Lyonet Marketer and use our products and/or services upon receiving the said notification or announcement from us, you are deemed to agree to the amendment to this Data Privacy Policy, the contents of which shall binding on you. If you do not agree to the amendments to our Data Privacy Policy, you should discontinue to use our products and/or services and cease to be a Lyonet Marketer.

## **2. Which data do we collect?**

We collect, store and process personal data about you, including any information about material or personal information obtained from you in the course of your operation as a Lyonet Marketer, and that may be attributed to you directly or indirectly (e.g. via your membership). This includes your membership ID, your full name, title, gender, date of birth, postal address, address coordinates (longitude and latitude), your National Registration Identification Card Number (CRIC No.), your telephone number(s), e-mail address and bank details and, in the course of any myWorldmembership, data produced about your buying habits (date of purchase, place of purchase, time of purchase, amount of purchase, currency, shopping cart, sector, type of purchase – online/offline, from SME, from Key Account, with voucher, with myWorld card). If you have given us this information, we will process the number and type of ID document presented, full name on the ID document, your nationality, place of birth, if available your personal number, your height, date of issue and expiry as well as the issuing authority of the ID, signature on the ID, the machine-readable zone, ID photo, selfie and liveness of the selfie. In addition, we process your t-shirt size and food preferences if you have provided this information as part of an event participation,

## **3. Cookies and web tracking**

Our websites use so-called cookies, which are small text files saved on your computer that can be accessed each time you log on to our websites. Cookies enable you to log in to our services and help us customise our website for you in order for us to provide you with a better user experience.

You can also use part of our website without registering or logging in as a Lyonet Marketer. In this case, certain information will also be recorded/collected automatically to enable us to collect statistical data regarding the use and efficiency of our website and to adapt it to suit the needs of our users in order to enhance user experience. We therefore store, collect and process information such as your IP address, the time and length of your visit, the number of visits, your use of online forms, your search settings, your view setting, and your favourites setting on our website. Cookies are stored for a range of different periods, but the duration of storage is not longer than necessary and will not exceed one year in any case. The majority of the cookies we use are deleted automatically as soon as you leave the website ("Session Cookies"). We make a record of every time our website is accessed and every time a user opens any of the files stored on the website. The cookies on our websites are used exclusively for purposes as stipulated above and are processed by myWorld International AG (Grazbachgasse 87-91, 8010 Graz, Austria on behalf of Lyonet Malaysia Sdn. Bhd., Menara Maxis, Level 36, Kuala Lumpur City Centre, 50088 Kuala Lumpur, Malaysia for the purpose of analysing the data collected.

If permitted by your browser and/or its supporting service, you may manage cookies via browser settings. However, please note that if you reject or disable cookies, your user experience and efficiency may be affected under certain circumstances, for example you may not be able to save your preferences when using our website.

We use JavaScript to record your usage behaviour on our website in order to adapt our web services to the needs of our users. In doing so, we determine your browser type, location, time, and duration of your use, URL, page name, and the website that referred you to our page. You can stop us from recording this data by disabling JavaScript directly in your browser. However, please note that disabling JavaScript might limit the functionality of the website.

We also use the following tools:

#### **Google Analytics**

This is a web analytics tool by Google Inc., 1600 Amphitheatre Parkway Mountain View, CA 94043, USA, hereinafter referred to as "Google", to record your online activities on our website and to determine how many users are visiting us online, which content on our website are viewed, and how often. The evaluation is done anonymously. Google Analytics cookies, including the Google Analytics tool "anonymous IP address" and usage data, are usually transmitted to a Google server in the United States and stored there. For further information, please refer to <https://support.google.com/analytics/answer/6004245?hl=en>. At <https://tools.google.com/dlpage/gaoptout?hl=en>, Google Analytics offers the option to opt out of data collection.

The use and the security of the data by Google cannot be checked and/or verified by us, and you may refer directly to Google for more information.

#### **Matomo Analytics Platform**

We record your online activities on our site and determine how many users visit us on the Internet and which content of our site is viewed and how often. The evaluation is anonymous. The cookies are stored on your computer. For more information, please visit [Privacy Policy - Analytics Platform - Matomo](#).

#### **Google AdWords**

This is used to record website visits for advertising purposes (remarketing) in Google and in the Display Network. When you visit a website, your browser saves cookies that allow you to be recognised as a visitor when you visit websites that belong to Google's advertising network. On these pages, ads relating to content that you previously viewed on other websites that use Google's remarketing function can be presented to you as a visitor. You can opt out of data collection by Google AdWords on the website <http://www.google.com/settings/ads>.

The transfer, use and the security of the data by Google cannot be checked and/or verified by us, and please refer directly to Google for more information.

#### **Google AdWords conversion tracking**

We use this to generate conversion statistics that measure the effectiveness of our online advertising campaigns. The conversion tracking cookie is set when a user clicks on an ad placed by Google. According to Google's privacy policy, no personal data is processed. If you do not wish to participate in tracking, you can opt out of this usage by disabling the Google conversion tracking cookie in the user settings of your Internet browser.

#### **Salesforce Marketing Cloud**

We use this to record your behaviour on our website to optimise our product offering. It helps us determine how many users visit us online, which content of our site is viewed, and how often. The analysis is done anonymously and is used automatically by predictive intelligence to improve the presentation of our product offering. For registered members, the user-related behaviour on the website is recorded to improve the user experience and is used to display the relevant content. Salesforce cookies are usually delivered to a Salesforce server in the United States and stored there.

The transfer, use and the security of the data by Salesforce cannot be checked and/or verified by us. In addition, the further use and security of the data cannot be checked and/or verified by us.

#### **Hotjar**

We collect non-personal data/information, including standard internet log information and details of your behavioural patterns when you visit our website. This is done to enable us to provide you with a better user experience, to identify preferences, to diagnose technical problems, to analyse trends and to improve our website.

The following information related to your device and browser may be collected: device's IP address (captured and stored in an anonymized form), device screen resolution, device type (unique device identifiers), operating system, and browser type, geographic location (country only) preferred language used to display our website. The following information is collected related to your user interaction: mouse events (movements, location and clicks), keypresses.

For a sampling of visitors, Hotjar also records information which is collected from our website: referring URL and domain, pages visited, geographic location (country only), preferred language used to display our website, date and time when the website pages were accessed.

By visiting the opt-out page <https://www.hotjar.com/opt-out> and clicking on "Disable Hotjar" you can at any time refuse/disallow Hotjar to collect your data from you when you visit our website.

You may opt-out from having Hotjar collect your data/information when visiting our website at any time by visiting the [Opt-out](#) page <https://www.hotjar.com/opt-out> and clicking 'Disable Hotjar'.

#### **Yandex Metrica**

This is a web analytics tool from YANDEX LLC, with a registered office located at 16 Lva Tolstogo St., Moscow 119021, Russia, and its affiliate, Yandex Oy, with a registered office at Moreenikatu 6, 04600 Mantsala, Finland. We use this tool to log your online activity on our website, to find out how many users visit us and to record the number of times they access each page. This process is anonymous. The cookies are stored on your computer. For more information, please visit [https://yandex.com/legal/metrica\\_agreement/](https://yandex.com/legal/metrica_agreement/)

#### **Functional Cookies**

Due to the dynamic structure of our website, additional cookies only for short-term use may be used, particularly for temporary promotions. These cookies are not personalised, but are exclusively functional in nature. To offer you full transparency, we use an external provider who regularly checks our websites and the respective active list can be pulled up [here](#).

Please note that the standard Internet browsers accept cookies according to the default settings. You can also set your browser to refuse or disable all or certain cookies or to seek consent from you before a new cookie is received. The relevant instructions are provided by most browsers under the "Help" menu item in the menu bar. Under the "Help" item, you may also find out how to delete and/or disable the cookies you have already received.

Please note that you may not be able to use all the features of our websites and your user experience may be affected if you do not accept any or some cookies.

By accessing, logging in and/or using our website, you agree that the cookies and tools mentioned above may be used and stored on your device(s) used to access and/or log in to our website.

**You can revoke your consent to the use, collection, storage and/or transfer of your data at any time. Such revocation must be made in writing (by letter or e-mail) to the following address:**

Lyconet Malaysia Sdn. Bhd.,  
Menara Maxis, Level 36,  
Kuala Lumpur City Centre,  
50088 Kuala Lumpur,  
Malaysia  
E-mail: [international@lyconet.com](mailto:international@lyconet.com)

#### **4. Conversion measurement using the Facebook visitor action pixel**

With your consent, we use the "Facebook Pixel" by Facebook Inc., 1601 S. California Ave., Palo Alto, CA 94304, USA ("Facebook") on our website. This is a cookie that is stored on your electronic devices and can be accessed again later. With this functionality, actions of users can be tracked after they have seen or clicked on a Facebook ad. This allows us to track the effectiveness of Facebook ads for statistical and market research purposes. The data collected in this way is anonymous to us, in other words, it does not include the identity of users. However, the data is stored and processed by Facebook, therefore a connection to the respective user profile is possible and Facebook can use the data for its own advertising purposes, according to the Facebook Data Policy (<https://www.facebook.com/about/privacy/>). You can allow Facebook and its partners to display ads on and off Facebook. A cookie may also be stored on your computer for these purposes. By accessing to, logging in and/or using the website, you agree to the use of the visitor action pixel. You can always reject the use of Cookies or delete existing cookies.

#### **5. Sharing**

The website contains "Share" buttons for the social networks **Twitter Inc.**, 795 Folsom St., Suite 600, San Francisco, CA 94107, USA, **XING**, which is operated by XING AG, Dammtorstrasse 30, 20354 Hamburg, Germany, **LinkedIn** Corporation, 2029 Stierlin Court, Mountain View, CA 94043, USA and **Facebook**, 1601 South California Avenue, Palo Alto, CA 94304, USA. In addition, there is also a "Share" button for e-mail. The "Share" buttons can be recognised by their respective logos.

A direct connection between your browser and the server of the operator of the respective social network is established only when you click on the respective "Share" button on this website (and only then). According to the operators of the aforementioned social networks, no personal data is collected by the social networks without a click on the respective "Share" button. Personal data, such as the IP address amongst others, are only collected and processed from members who have logged onto the respective social networks. If you do not wish to associate your visit to our website with your user account(s) of the respective social networks, please log out of the user account(s) of that social network(s).

We wish to point out that, as the provider of the website, we do not receive any information regarding the content of the data transmitted to the respective social networks stipulated above and its use by the respective social networks, and you shall be solely and fully responsible and liable for any consequences arising from the use of such social networks by you. For more information about the use of data by the social media networks stipulated above, please refer to the respective privacy policies of the respective social networks mentioned.

#### **6. Purpose of collecting data and use of data**

We use your personal data only in compliance with legal requirements. We collect and process the personal data you provide to us when you register as a Lyconet Marketer and in the course of your activity in connection with the Marketing Agency solely as part of our fulfilment of our contractual obligations to you, and furthermore, only in cases where you expressly give us your consent thereto.

Amongst others, we use your data to communicate with you to verify your identity, and to enable us to provide you with your personal login area on the Lyconet website, to process your enquiries and orders, and provide you with our services. In addition, we also use your data to determine the benefits due to you as a result of your operation as a Lyconet Marketer and allocate them to you.

If you have also given us your separate consent to do so, we will also use your data to inform you of offers and promotions by our Loyalty Merchants, for example.

We further take appropriate security measures to protect your data on the internet and to avoid cybercrime.

We may from time to time send you service-related announcements when we consider it necessary to do so (for example, emergency maintenance notice). Kindly note that you may not opt out of these service-related announcements since they are not for marketing and promotional purposes.

#### **7. Data security and transferring data**

To protect your personal data, we use measures that include encryption for data transmission (SSL encryption), firewalls, hacker defence programs, and other state-of-the-art security measures. For e-mail communication, we can only guarantee the security of the data according to the current state of the art. However, while we are committed to protecting your personal data, we do not guarantee there will be no instance of unauthorised or accidental access to such data.

Your personal data will generally be used by Lyconet Malaysia Sdn. Bhd. as the contractual partner of the Lyconet Marketers that use myWorld International AG, (Grazbachgasse 87-91, 8010 Graz, Austria) as their service provider. However, your personal data may be forwarded / transferred / disclosed to certain [service providers](#) listed below and within the [myWorld Group](#) and the [Lyconet Group](#).

We use certain service providers to handle our services, to communicate with members, and to manage our online presence. We certify that we have selected these service providers carefully to ensure that the data is processed lawfully and securely. In addition, we have also obligated the service providers to use your personal data in accordance with our specific instructions for specific purposes and in accordance with Personal Data Protection Act 2010 of Malaysia. Any other unauthorised use of your data by these service providers is strictly prohibited.

For purchases made on the website, the following data may be passed on to the payment service provider named in the respective payment process using the 3D Secure v2 process as part of fraud prevention when a selected payment method is processed by an external payment service provider: First name and last name, birthday, gender, last date on which changes were made to the member ID (limited to billing and delivery address changes), changes to account data or user data, registration date, whether a password for the member ID exists and when the password was last changed, data on purchasing activity on our website (number of payment attempts in the last 24 hours, number of payment attempts in the last year, number of purchases in the last 6 months), company data (company wording and tax identification number), contact data (email address, cell phone number, telephone number).

In order to carry out a know-your-customer (KYC) process, which is necessary in some cases, we use the Klippa App B.V., Lübeckweg 2, 9723 HE Groningen, Netherlands, as a service provider. These are OCR services (optical character recognition) for analyzing ID documents. Apart from the scanning process, Klippa does not store any of the transmitted personal data. For more information, see OCR Software - [Automatic Text Recognition for Receipts and Invoices \(klippa.com\)](#).

In addition, we will transfer your personal data while ensuring the required data security measures within the Lyconet Group, provided that this is necessary for the activity in connection with the Marketing Agency, the purpose of electronic processing and management or for the provision of a specific service for you. The companies of the Lyconet Group are also obligated to us to use your personal data only for the aforementioned purposes in each case and in accordance with data protection laws and regulations of Malaysia. In particular, the services concerned include contacts by ways of electronic messages (e.g. e-mail, SMS, or push notification), by telephone, or by letter informing about products and promotions of the Loyalty Merchants, identifying offers that may suit your interests, conducting satisfaction surveys, operating hotlines, and processing transactions.

The Lyconet Group operates internationally. Our business activities, management structures, and our technical infrastructure transcend national borders. Therefore, we may also transfer your personal data abroad, and in such cases, we will, as far as possible for us, make sure that your personal data is secured in other jurisdictions, in accordance with the respective laws and regulations.

We will not share your personal information with anyone other than the above-mentioned friendly Loyalty Merchants, service providers, and Lyconet companies, unless you have given us your consent.

**You can revoke your consent to the transfer of your data at any time. If you wish to revoke such consent, the revocation must be addressed in writing (by letter or e-mail) to the following address or email address (as the case may be):**

Lyconet Malaysia Sdn. Bhd.,  
Menara Maxis, Level 36,  
Kuala Lumpur City Centre,  
50088 Kuala Lumpur,  
Malaysia  
E-mail: [international@lyconet.com](mailto:international@lyconet.com)

#### **8. Right of withdrawal, information, changing data and contact details**

**You have the option, at any time, to withdraw your consent regarding the future use of your personal data used on this website without providing and/or stating a reason.**

**By withdrawing your consent, we shall no longer have the right to use your data. You must inform us in writing (by post or e-mail) of your wish to withdraw consent, to the following address or email address (as the case may be):**

Lyconet Malaysia Sdn. Bhd.,  
Menara Maxis, Level 36,  
Kuala Lumpur City Centre,  
50088 Kuala Lumpur,  
Malaysia  
E-mail: [international@lyconet.com](mailto:international@lyconet.com)

Please contact us at the address or email address stipulated above if you have any questions regarding the use of your personal data or if you wish to update or correct your data.

You are entitled contact us at the above address or email address to ask for information regarding your personal data or access your personal data that we currently store. In addition, you have the right to request for us to correct your personal data we hold about you that is inaccurate, incomplete, misleading or not up-to-date. You have the right to ask us to restrict, delete or remove any or all your personal data stored by us. However, please note that we may not be able to continue providing our products and/or services to you if you withdraw your consent or ask us to delete your personal data entirely.

You may also contact us at the above address or email address if you wish to withdraw consent from receiving any direct marketing and/or promotional communications from us.

#### **9. Consent is not required**

Please note that your prior consent is not required when Lyconet shares or discloses your personal data under the following circumstances:

- a. Issues relating to national security, public safety and national interests;
- b. Complying with court decisions, judgments or other legal processes, or complying with the requirements of relevant governmental authorities; and
- c. Personal data collected from legally and publicly disclosed information.

#### **10. Disclaimer**

This document was originally prepared in English. Should there be any discrepancy between the English and Malay versions, the English version shall prevail.