

DATA PROTECTION AND PRIVACY POLICY

Pursuant to the Personal Data Protection Act 2010, this Privacy Policy outlines the rights, interests, obligations and duties of all parties involved in the collection, gathering, recording, holding, storing or processing (as defined below) of personal information and data as may be protected by the Act.

1.0 General

By providing your personal data to VC TELECOMS, you have read and accepted the statements herein; and you have consented to the processing of your personal data by VC TELECOMS in the manner set out herein. If you provide personal data of third parties to VC TELECOMS, you warrant and represent to VC TELECOMS that you have obtained the required consent of the third parties for the processing of the relevant personal data by VC TELECOMS in the manner set out herein.

2.0 Purpose of Collecting Data

The personal data provided by you to VC TELECOMS may be processed by VC TELECOMS for the following purposes:

- 1) To process your application for the Services;
- 2) To conduct credit checks on you or establish the existence of any previous or outstanding breaches, indebtedness, defaults whatsoever that the individual concerned may have with any third party;
- 3) To update and maintain VC TELECOMS's internal records, filing, systems and operations for the management and administration of the Services including but not limited to the purpose of billing you;
- 4) To enforce any of your obligations in respect of the Services, including collection of the outstanding amounts due from you;
- 5) To activate, manage or administer payment or credit facilities with third party financial institutions as may from time to time be instructed by a subscriber of Services;
- 6) To investigate and resolve any service issues, billing queries, complaints, fraudulent activity or other enquiries that you submit to us regarding our network, monitor and improve the performance of our network, services, customer relations teams and any related purposes;
- 7) To notify you on any updates, developments, or changes or new offerings of any Services including but not limited to any promotions, special offers and/or marketing launch;
- 8) To comply with any legal or regulatory requirements applicable to VC TELECOMS, and to make disclosure under the requirements of any law, regulation, direction, court order, by-law, guideline, circular or code applicable to VC TELECOMS; and
- 9) Other incidental and associated purposes relating to any of the above.

3.0 Disclosure

Personal data shall not without your consent be disclosed for any purpose other than the purpose for which the personal data was to be disclosed at the time of collection of the personal data or a purpose directly related to it, or be disclosed to a third party other than that specified in the “Purpose of Collecting Data” section above otherwise as required or permitted under Malaysian law, including without limitation, the Personal Data Protection Act 2010.

4.0 Security

- 1) VC TELECOMS shall ensure that all Personal Data collected by it shall be stored and/or filed in such manner as to ensure that the Personal Data maintains its accuracy, integrity, remains confidential, is protected against loss, misuse, modification and unauthorised or accidental access, disclosure, alteration, destruction or manipulation; and
- 2) VC TELECOMS retains personal data for as long as necessary for its legitimate business purposes, and as otherwise permitted by virtue of any applicable law that may from time to time be in force.

5.0 Exceptions & Exclusions

VC TELECOMS reserves the right to refuse to entertain any request for withdrawal of consent, access or correction in the following circumstances:

- 1) Where there is an insufficiency of information provided by you or any party making a request to enable VC TELECOMS to positively locate or identify the Personal Data;
- 2) Where there is reasonable doubt surrounding your identity or the identity of the person making the request or where VC TELECOMS 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; and
- 3) Where access is regulated by another law.

In the area of Personal Data protection, VC TELECOMS shall not be liable for any purported violation, breach or non-compliance with any precepts of privacy or the protection of Personal Data in the following circumstances:

- 1) Where an act of nature or event outside the control of VC TELECOMS results in the damage or malfunction or destruction in any equipment or machinery used to secure, store or process Personal Data;
- 2) Where Personal Data is readily available or able to be found in the public domain; and
- 3) Where despite VC TELECOMS's best efforts, there is unauthorized 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 VC TELECOMS.

6.0 Data Integrity

- 1) Personal data supplied by you to VC TELECOMS shall be accurate, complete, and not misleading; and
- 2) You shall by notice in writing to VC TELECOMS inform VC TELECOMS of any changes to the personal data supplied by you to VC TELECOMS to ensure the personal data is kept up-to-date. Please refer to the "Access" section below for the communication methods available.

7.0 Access

- 1) You have the right to request access to your personal data processed by VC TELECOMS;
- 2) You hereby accept that VC TELECOMS may be required to revise and/or modify this Privacy Policy from time to time. In the event of such revision and/or modification, VC TELECOMS will communicate such revision and/or modification at our Web Site or such other mode as VC TELECOMS may deem appropriate. In this regard, you agree that by continuing to use the Services after such notification, that you have agreed to be bound by, accepted, and/or consented to such revision and/or modification;
- 3) You may at any time make a written request to VC TELECOMS to correct any Personal Data of yours that is inaccurate, incomplete, misleading or out-of-date and VC TELECOMS shall, upon receipt of your written request for correction(s) and within the period prescribed under the Act, take all necessary measures to give effect to such correction(s);
- 4) You may send your request to VC TELECOMS at the following address or e-mail:

Address:

No.1&3, Jalan 6C/13C, Kompleks Permis Usahawan SME Bank
Bangi, Taman Perusahaan IKS Seksyen
16, 43650 Bandar Baru
Bangi, Selangor Darul Ehsan

Email:

info@vcsb.com.my