

# **PRIVACY POLICY**

Please be assured that we are committed in protecting your privacy and providing you with a pleasant experience on the eConfirm website including all other websites with sub- domain of eConfirm (hereinafter collectively referred to as “Websites” and the word “Websites” shall include the online bank confirmation platform available via the Website). This Privacy Policy applies to the Websites and describes the ways we collect, use, store and protect your personal information and any other information belonging to other individual or entity in which you are duly authorised to upload the same into the Websites. This Privacy Policy is issued pursuant to the requirements of the Personal Data Protection Act 2010.

In this Privacy Policy, the terms “**we**”, “**us**”, “**our**” refer to Extol Corporation Sdn Bhd. “**You**” and “**Your**” means the individual or legal entity accessing or using the Websites.

In addition to this Privacy Policy, you are also subject to the [Terms of Use](#) and any other agreement that you or your registered audit firm or bank entered into with us.

## **1. Information We Collect**

- (a) Personal data is the information that can be used to identify or contact you including but not limited to your name, email address, company’s name, and Practising Certificate Number’ (hereinafter referred to as “**PC**”) membership number (only applicable to certain users) (hereinafter referred to as “**Personal Data**”).
- (b) By accessing our Websites, you agree that we may also automatically collect certain information including without limitation your Internet Protocol address, browser type, internet service provider and information about your device’s operating system.
- (c) We may require you to provide us with additional information from time to time as you access and use the Websites.
- (d) We also collect and store Personal Data of a third party provided or uploaded by you into the Websites, where permitted by law.
- (e) The Personal Data and/or such additional information may be essential to us in order to allow you to access and use the Websites. You may choose not to provide such information but as a result you might not be able to utilise and use the features and functionalities provided on the Websites.

## **2. Ways of Collecting Information**

We obtain and collect your Personal Data or Personal Data of a third party in many ways including but not limited to:-

- (a) When you register, create and/or activate your account on the Website;
- (b) Through the process of requesting the bank confirmation and replying to the bank confirmation request between the audit firm user and the bank user on the Website;
- (c) If applicable, when you pay a certain fee for the confirmed bank confirmation reply that you received from the bank;
- (d) When you contact or reach out to us through any means for any matter including but not limited to technical assistance;
- (e) From publicly available sources.

## **3. Use of Information**

We may process the Personal Data and/or any information collected through the Websites for any of the following purposes: -

- (a) To present the Websites and its contents to you;
- (b) To provide you with the electronic bank confirmation platform made accessible through the Websites or the requested service such as creating a user account, activating or validating your account, sending bank confirmation request to the bank user, sending bank confirmation reply to the audit firm user who had made such request, and facilitating any communication between the users;
- (c) To develop, operate, administer and improve the Websites and its contents;
- (d) For internal training and for us to have a better understanding on how the Websites is being used by monitoring, tracking and analysing usage and your behavior in using the Websites, to conduct quality control and to fix any technical error or problem for better performance and functionality of the Website;

- (e) To protect the security of you and the Websites by verifying your identity before you use the Website;
- (f) To communicate with you, provide you with support and respond to your enquiries and complaints;
- (g) To send you billing reminders (if applicable) and notifications in respect of the Websites and/or our new products and services;
- (h) To carry out our obligations and enforce our rights as provided in the Terms of Use and/or any other agreement entered into between you or your registered audit firm or bank and us and to comply with all applicable laws, rules and regulations; and/or
- (i) For other purposes with your consent.

#### **4. Sharing and Disclosure of Information**

We may share your Personal Data and/or other information with the following entities:

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- (a) With our subsidiaries and affiliates as these entities need to have access to such Personal Data and/or other information in order to provide and/or perform the requested service, to manage risk, and other internal functions provided that they follow practices regarding personal data and/or information collected through the Websites as described in this Privacy Policy;
- (b) With the contractors and third-party service providers who we use to support our business by performing functions at our direction or otherwise on our behalf. Amongst the functions are hosting and developing the Websites, resolving errors and technical problem in relation to the Websites, processing payments, marketing, fraud prevention and/or for other purposes within the ordinary course of business. These third parties only have access to your Personal Data and/or other information needed to perform their functions and they are not allowed to use or share such Personal Data and/or other information for any other purpose that is not authorised for them to do so. They are required to follow practices at least as protective as those described in this Privacy Policy. We will not be liable for any act or omission of these third parties that contravenes with this Privacy Policy;
- (c) With other business entities in the event or merger and acquisition, restructuring, reorganisation, sale or transfer of business assets, liquidation or any other similar proceeding, in which your Personal Data and/or other information collected by us are among the things transferred;

- (d) With other companies if you give us permission to share your Personal Data and/or other information; and/or
- (e) With governmental and enforcement regulatory agencies as permitted or required by law where disclosure of your Personal Data and/or other information is necessary to comply with the law, court order, subpoena or other legal process.

## **5. Cookies**

A cookie is a piece of information sent from a website to your browser and then stored on your computer system. We may use cookies or such other technologies to store your preference, track your trend, record session information and/or any other purpose permitted in this Privacy Policy. This is to customise your experience in accessing and using the Websites and to personalise the Websites by remembering information about your activities on the Websites. We may use cookies to remember and save your user identification and login password for your future logins to the Websites.

You can adjust or change settings on your browser either to stop accepting cookies or to notify you when you receive such cookies. However, if you opt not to receive cookies, your access to and use of the Websites may be limited or restricted.

## **6. Protection of Information**

We maintain reasonable and appropriate physical, electronic, technical and organisational security measures to safeguard and protect your Personal Data and/or other information against any loss, misuse, unauthorised access or alteration, disclosure or destruction of your Personal Data and/or other information except such information allowed to be disclosed publicly as provided in this Privacy Policy. The security measures include but not limited to using Transport Layer Security (TLS) for secure transmission of data via the internet and using AES 256 and/or RSA 2048 encryption method to encrypt the sensitive data before storing in the server storage. In view of the aforesaid, any sensitive information entered or uploaded into the Website is encrypted. The servers that store all Personal Data and/or other information are in a secure environment in a hardened hosting facility. In fact, the Personal Data and/or other information stored by us are only strictly accessible to the authorised employees that need to have access to the same in order to perform their specific job duties.

Even though we do our best to secure and protect your Personal Data and/or other information against any of the abovementioned, we cannot guarantee that the transmission of your Personal Data and/or such other information to our websites is

free from any risk. You are responsible for keeping your own password and registration information safe and confidential.

In respect of the data retention, we will retain your Personal Data and/or other information as long as necessary to fulfil the purposes for which they are collected or to comply with the applicable legal, regulatory and/or internal requirements.

## **7. Limitation of Liability**

We take reasonable efforts to protect your Personal Data and/or other information collected through the Websites. Nonetheless, you are aware and acknowledge that we can only reduce, amongst others, the risk of loss, misuse, unauthorised access, or disclosure by any unauthorised individual or entity but we cannot completely eliminate all risks associated with your data or information.

You hereby expressly agree that we are not liable for any direct, indirect, punitive, incidental, economic, special, consequential or exemplary damages or losses of any type or kind arising from your use of the Websites including but not limited to transmitting your Personal Data and/or other information or Personal Data of any third party to the Websites. We are also not liable if such loss, misuse, unauthorised access to or unauthorised disclosure of such personal information occurs as a result of your intentional or negligent act or omission.

## **8. Notification of Amendment**

We may amend the Privacy Policy from time to time where the amendment notice will be posted on the Websites and will only be effective thirty (30) days after the date of posting, except as otherwise stated. Apart from posting the amendment notice on the Websites, we will also notify you of such amendment via email before it becomes effective. After the above period, your continuing access and use of the Websites shall constitute and be deemed to be your acceptance to such amendment. If you disagree with the amendment, you are advised to immediately stop accessing and using the Websites.

## **9. Links to Third Party Sites**

The Websites may include links to other website(s) whose privacy practices may differ from ours. If you submit any personal data to any of those websites, your information is governed by their privacy policies. We advise you to carefully read the privacy policy of any website(s) you visit.

## **10. Language**

This Privacy Policy is issued in both English and Bahasa Malaysia. In the event of any inconsistencies or discrepancies between the English version and the Bahasa Malaysia version, the English version shall prevail.

## **11. Our Contact**

If there are any changes to be made to your Personal Data or you have any questions to ask us about this Privacy Policy, you may contact us at [info@eConfirm.my](mailto:info@eConfirm.my) or write to us at: -

Extol Corporation Sdn Bhd  
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