

## **Personal Data Protection Act**

### **PERSONAL DATA PROTECTION ACT 2010 NOTICE**

1. FBM Crowdtech Sdn Bhd ("Alixco P2P / ECF", "we", "our" or "us") hereby notify you that this notice is served on you pursuant to the Personal Data Protection Act 2010 ("The Act"). We require your personal data to understand your needs and provide you with a better service. For the purpose of this written notice, the terms "personal data" and "processing" shall have the same meaning as prescribed in the Act.

#### **WHAT KIND OF PERSONAL DATA WE COLLECT AND HOW WE COLLECT IT**

2. When you choose to register account, establish a finance business/ employment / business/ relationship with FBM Crowdtech Sdn Bhd , we will acquire personal data about you through several methods, which include but not limited to,:
  - personal data such as name, address, e-mail address, telephone number, occupation, date of birth, IC (identity card) and passport numbers and particulars, assets and income from your applications or other forms, bank details, employment details
  - Selfies, photos, pictures and biometric data provided
  - personal data about your transactions with us or third parties, such as account balances, payment history and account activity;
  - personal data from credit bureau reports, credit reporting agencies, authorities and/or corporations;
  - personal data obtained during the appointment/ engagement session with us or during assessment session; and
- (e) other written communications with us or documents provided to us prior to and during the course of our business conduct.

(collectively, "Personal Data").

#### **HOW WE USE YOUR PERSONAL DATA**

3. The purposes in relation to the usage and processing of your Personal Data depend on the nature of the engagement/ relationship you have with us or which you intend to establish with us. The purposes of usage and processing of your Personal Data may include:

- for purposes of establishing P2P or ECF business relationships for both investments and funding opportunities (investors and issuers) and updating our records;
- risk assessment in granting financing and hosting investment notes and investment opportunities
- inclusion on legal agreements such as investment note, letter of guarantor, offer letters, reports etc.
- debt recovery;
- detection / prevention / prosecution of fraud, fraud or any other similar cases;
- managing and updating the account information if your account is with us (if any);
- for balance top and withdrawal purposes;
- for assessing, processing and investigating risks and claims;
- to enable a party to evaluate any actual or proposed assignment, participation, sub-participation, and/or novation of our rights and/or obligations;
- to maintain and protect our business and other clients if investment/funding relationships exist
- carrying out our surveys and analysis as appropriately required for our products and services enhancement;
- promoting and marketing our banking products and services;
- perfection of documents including for stamping purpose and any other purposes related thereto;
- where relevant, for the purposes of the contract of service or contract for service or such other contract as may have been entered into between you and us; and
- for all other purposes incidental and associated with any of the above.

(collectively, "Purposes").

## **DISCLOSURE OF YOUR PERSONAL DATA**

4. When using and processing your Personal Data for purposes stated above, your Personal Data may be disclosed to the following authorized parties ("Authorized Parties") whether within or outside Malaysia:
  - within FBM Crowdtech Sdn Bhd , including individuals undergoing practical training or internship program with FBM Crowdtech Sdn Bhd and our employee of whom you are connected to;
  - auditors, lawyers, advisers, agents, contractors, vendors, service providers such as AML/CTF screening providers, credit rating agencies or our products and services strategic partners who are under the duty of confidentiality with us;
  - any relevant government or regulatory authorities including Malaysian Anti-Corruption Commission, Bank Negara Malaysia, Securities Commission, Credit Guarantee Corporation Malaysia Berhad, Central Credit Reference Information System (CCRIS), Companies Commission of Malaysia, Malaysia Department of Insolvency, Inland Revenue Board of Malaysia and etc;
  - any relevant authorities governmental involved in the evaluation, assessment and monitoring of our products and services
  - any law enforcement bodies conducting any investigation;

- any authorized person to whom disclosure is permitted under the laws of Malaysia, regulation, governmental directive or request.
- 5. We may report your financial account information to Inland Revenue Board of Malaysia (IRB) as required under Section 132B of the Income Tax Act 1967 (ITA), Income Tax (Automatic Exchange of Financial Account Information) Rules 2016 and Income Tax (Automatic Exchange of Financial Account Information) (Amendment) Rules 2017.

## **PERSONAL DATA PROTECTION PRINCIPLES WE ADHERE**

### *6. Security Principle*

At FBM Crowdtech Sdn Bhd , we emphasize on the security of data subjects' Personal Data and will take practical steps to protect your Personal Data from any loss, misuse, modification, unauthorized or accidental access or disclosure, alteration or destruction.

### *7. Disclosure Principle*

All Personal Data provided by you shall be processed and used in Malaysia. However, if your Personal Data is to be transferred out of Malaysia for the purpose related to the financing application by you/ employment/ business as authorized by you, we shall ensure that the Personal Data shall only be transferred to countries which have data protection laws equivalent to PDPA or provide better protection from the provisions of PDPA. If your Personal Data need to be transferred to other countries which do not have data protection laws or laws which do not provide protection equivalent to the provisions of PDPA, we shall ensure that all processors and data users shall comply with all provisions of PDPA.

### *8. Retention Principle*

We:

- (a) will only process your Personal Data in accordance with the instructions given by you and in accordance with the PDPA;
- (b) take appropriate measures in terms of management and technical services to protect the Personal Data from (i) any processing or usage of Personal Data which is not authorized or (ii) the loss or destruction of the Personal Data caused from our negligence;
- (c) will not keep your Personal Data longer than is necessary for the fulfillment of the lawful purposes which are permitted by law.

9. *Data Integrity Principle*

Reasonable steps will be taken to ensure that your Personal Data is accurate and relevant only to the lawful purposes to which it was obtained for. Kindly notify FBM Crowdtech Sdn Bhd by contacting us or visiting our nearest branch when the Personal Data provided earlier becomes incorrect or inaccurate.

10. *Access Principle*

Subject to payment of a fee you may request access to and correction of your Personal Data which is held by us. The request can be sent to us via email.

11. If you have reason to believe that we have violated the principles set out in this PDPA Notice, we urge you to raise this matter to us by requesting a form from us which enable you to explain and express your concerns to us.

12. Where indicated (for example in any application form or account opening forms), it is obligatory to provide your Personal Data to us to enable us to process your application. If you elect to withhold any Personal Data this may adversely affect your application and / or for us to continue with our services provided to you or to establish the banking business / employment/ business relationship with you.

13. We may review and update this PDPA Notice from time to time and will place notice of such amendments on FBM Crowdtech Sdn Bhd 's website accessible via [www.alixco.com](http://www.alixco.com) or FBM Crowdtech Sdn Bhd 's branches or via any other mode FBM Crowdtech Sdn Bhd deemed suit. By continuing your banking business/ employment/ business relationship after communication of the revision and update you are deemed to have accepted and consented to such revision and update.

14. *Notice and Choice Principle*

By providing your address, email address, telephone number or other contact methods you agree and consent that we may contact you through letters, emails, phone calls or such other methods. Kindly be informed that you have the right to withdraw the consent granted to us for the above matters at any time by visiting our nearest branch by completing the prescribed form.

15. How to contact FBM Crowdtech Sdn Bhd :

**FBM Crowdtech Sdn Bhd Compliance Division**

Address: Suite 3116, Level 31, Menara Prestige, No. 1,  
Jalan Pinang, 50450 Kuala Lumpur, Malaysia

Phone No: +603 2728 1216

E-mail: [report.misconduct@alixco.com](mailto:report.misconduct@alixco.com)

Thank you

FBM Crowdtech Sdn Bhd ("Alixco")