

## Personal Data Protection Act (2010) Notice

This Privacy Notice sets out how Cobra and its related and subsidiary companies, collect, store and handle personal data (as defined below) of individuals in accordance with the Personal Data Protection Act 2010 ("PDPA") and the laws of Malaysia.

Please read this Privacy Notice to understand how we use the personal data we may collect from you. By providing your personal data to us, you are consenting to this Privacy Notice and the collection, use, access, transfer, storage and processing of your personal data as described in this Privacy Notice.

### 1. What This Notice is All About

This Privacy Notice clarifies:

- What KIND of personal data we collect
- HOW we collect your personal data
- How we USE your personal data
- WHEN we disclose your personal data
- When we TRANSFER your personal data abroad
- Your RIGHT to access and correct your personal data

### 2. Our Commitment To You

We value your trust and are committed to protecting your personal data. To ensure that you can make informed decisions and feel confident about supplying your Personal Data to us when using any of our products and services, we provide you with this Privacy Notice outlining our practices and the choices you have concerning how your Personal Data is being collected and used by us.

### 3. What is Personal Data?

Personal data refers to any information which relates directly or indirectly to you. This includes any information that can be used to distinguish, identify or contact you.

For the purposes of this Privacy Notice, personal data encompasses sensitive personal data which relates to information relating to your health, political opinions, religious beliefs, etc. For the avoidance of doubt, please note that this Privacy Notice is applicable only if you are a natural person / an individual.

### 4. What Kind Of Personal Data We Collect

In order for us to provide you with our products and services and to operate in an efficient and effective manner by providing you with the best service possible, we need to collect relevant personal data from you. The personal data collected by us may include (but is not limited to) the following:-

- contact information such as your name, date of birth, identification supporting documents (including NRIC or passport number), current private and/or business address, installation address, telephone or mobile phone number, fax number, email address.
- your credit card information and bank account details.

- your mobile phone number and alternative contact numbers (to contact you in the event we are not able to reach you on your first number, in the event of theft verification).
- the status of the products and services you have acquired from us or subscribed to.
- how you use the products and service (for example traffic data such as SMS, emails and other communications made and received by you and the date, duration, time and cost of such communications).
- recording of calls placed by you to our Secure Operating Centre (SOC) for our service enhancement and improvement.

## 5. When And How We Collect Your Personal Data?

We may collect personal data directly from you when you:-

- communicate with us (for example when you submit an application form to become our customer, or when you contact us for any enquiries including by calling our Secure Operating Centre).
- register or subscribe for a specific product and/or service.
- lodge a complaint with us.
- provide feedback to us (for example via our application, websites or in hard copy)

Other than personal data obtained from you directly (as detailed above), we may also obtain your personal data from third parties we deal with or are connected with you, and from such other sources where you have given your consent for the disclosure of information relating to you, and/or where otherwise lawfully permitted.

## 6. How We Use Your Personal Data

We may collect and use personal data from you or from third parties identified in this Privacy Notice, for one or more of the following purposes:-

- to verify your identity.
- to assess and process your application(s) /request(s) for our products and services.
- to provide you with the products and services you have applied for.
- to administer and manage the products and services we provide you (including charging, billing, facilitating payments and collecting debts).
- to investigate and resolve any service issues, billing queries, complaints or other enquiries that you submit to us regarding our products and services with our SOC teams.
- to detect and prevent fraudulent activity.
- to keep in contact with you and provide you with any information you have requested.
- to engage in business transactions in respect of products and services to be offered and provided to you.
- to establish and better manage any business relationship we may have with you.
- to process any communications you send us (for example, answering any queries and dealing with any complaints and feedbacks).
- to help us monitor and improve the performance of our products and services, our SOC teams and service providers to manage staff training and quality assurance.
- to notify you about benefits and changes to the features of our products and services.
- to maintain records required for security, claims or other legal purposes.

- to comply with legal and regulatory requirements.
- for any other purposes that is required or permitted by any law, regulations, guidelines and/or relevant regulatory authorities.

## 7. Disclosure of Your Personal Data

As part of providing you with our products and services and the management operation thereof, we may be required or need to disclose information about you to the following third parties:-

- law enforcement agencies.
- government agencies.
- companies and/or organizations that act as our agents, contractors, service providers and/or professional advisers.
- companies and/or organizations that assist us in processing and/or otherwise fulfilling transactions and providing you with products and services that you have requested or subscribed for.
- our business associates and other parties for purposes that are related to the purpose of providing our product and services to you.
- other parties in respect of whom you have given your express or implied consent

## 8. What If Personal Data Provided By You Is Incomplete?

Where indicated (for example in registration/application forms), it is obligatory to provide your personal data to us to enable us to process your application to use our Products and Services. If you decline to provide such obligatory personal information, we may not be able to process your application and therefore unable to provide you with our products and services.

## 9. Your Rights To Access And Correct Your Personal Data

Where you wish to have access to your personal data in our possession, or where you are of the opinion that such personal data held by us is inaccurate, incomplete, misleading or not up-to-date, you may make a request to us by contacting our SOC via the contact details provided below. You should quote your name, vehicle registration number and client ID and provide brief details of the personal data you want to amend or update.

We will use reasonable efforts to comply with your request to access or correct your personal data within one calendar week.

Please note that we may have to withhold access to your personal data in certain situations, for example when we are unable to confirm your identity or where information requested for is of a confidential commercial nature or in the event we receive repeated requests for the same information. Nevertheless, we will notify you of the reasons for not being able to accede to your request.

## 10. Your Obligations

You are responsible for providing accurate and complete information to us about yourself and any other person whose personal data you provide us and for updating this personal data as and when it becomes incorrect or out of date by contacting the Secure Operating Centre via the contact details provided below.

This obligation is a condition to the provision of our products and services to you and/or any other person authorized or permitted by you or your organization/company to use the products and services.

In the event you may need to provide us with personal data relating to third parties (for example about your spouse or children or where you are the designated person in charge (from an organization or company) for dealing with us, if you are acquiring and are responsible for a service and/or product that they will use), you confirm that you have (i) obtained their consent or otherwise entitled to provide their personal data to us and for us to use accordingly, and (ii) informed them to read this Privacy Notice at our website at [www.cobra.com.my/pdpa/](http://www.cobra.com.my/pdpa/)

#### 11. Transfer Of Your Personal Data Outside Malaysia

Your personal data may be stored outside Malaysia as part of our global infrastructure in providing you the best and most efficient solution. In such circumstances, we assure you that those personal data are also governed in the same level of privacy, if not more stringent.

#### 12. Updates To Our Privacy Notice

We may amend this Privacy Notice from time to time and the updated versions shall apply and supersede any and all previous versions. These includes and are not limited to its equivalent hard copy versions. Please check our website for information on our most up-to-date practices.

#### 13. How to Contact Us

Should you have any queries, concerns or complaints in relation to this Privacy Notice, kindly contact us at:-

**Designation:** PDP Officer  
**Telephone:** 03.5888.0000  
**Fax No.:** 03.5888.0040  
**E-mail:** [pdpo officer@cse.com.my](mailto:pdpo officer@cse.com.my)

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