



## **PRIVACY POLICY**

### **ELSA Privacy Policy**

This Privacy Policy is aim to inform how Centre For Entrepreneur Development And Research (CEDAR) Sdn Bhd (collectively referred to as “CEDAR”, “us” or “we”) collect, store and handle personal information of individuals. It also tells you how you can access and update your personal information.

### **What does this Privacy Policy apply to?**

This Privacy Policy applies to all personal information collected by us including, but not limited to :

- ELSA portal and ELSA mobile application, when you sign up with us, including login account details and ELSA assessment results;
- CEDAR websites, including any consumer-directed websites operated by CEDAR and pages that we run on third party social networks;
- Other ELSA sites and mobile applications;
- registration forms which we may collect from consumers, whether online or offline, including by post, during in-person events or campaigns;
- any of CEDAR’ events or campaigns;
- CEDAR Business Support, [support@cedar.my](mailto:support@cedar.my)

This Privacy Policy does not apply to information outside of our possession, control or power.



## **Type of Personal Information Collected**

If you choose to transact with ELSA for any products and / or services or use ELSA's Portal, you will be asked to provide your personal information such as (but is not limited to) name, identification card number, mailing address, phone number(s), email address(es), contact preferences and language preferences.

- Personal contact information – information that would allow us to contact you personally such as your name, home or mailing address, phone number or email address. In some cases, it would include information you give us about someone else (e.g. if you provide a friend's email address for a tell-a-friend programme).
- Account login information
- Demographic information (e.g. date of birth, age etc)
- Technical computer information (e.g. IP addresses, type of operating system, web browser type)
- Website Usage Information – information about how you use or navigate our websites, applications, online advertisements including which links you click, which pages you view and for how long, and other similar information and /or statistics such as date and time of visit, which site you came from, and site activities).
- Information from verification processes undertaken by us.
- Consumer generated content – This includes information that you create and voluntarily share with us (and perhaps others) by uploading it to one of our websites or applications, including on our social network sites such as but not limited to Facebook or Twitter.
- Social network information – this includes information that is part of your profile on a third-party social network (such as but not limited to Facebook) and that you allow the third-party social network to share with us,
- Other information which we might need to collect for a specific campaign, form, feature or other service that you use or request.



### **Accuracy of your information**

You hereby warrant and undertake that all information provided by you are true, accurate, current, and complete and You shall at all time maintain the accuracy of such information and from time to time immediately update such information with us. You further warrant that you own or you have the rights to submit all information and content provided by you and the same is not in violating any other party's rights.

### **Use of Personal Information Collected**

The purpose of collecting your personal information may include but not limited to the following and you unconditionally consented for us to use and/or process your personal information as follows: -

- Identity verification; please note that when we obtain information about individuals from third parties, we use reputable sources, including public repositories. CEDAR takes appropriate measures to assure the quality of information which we collect.
- Assessing your application;
- Notifying you about information newly captured or processed about you;
- To investigate, respond to, or defend claims made against, or involving ELSA;
- Responding to your enquiries;
- Investigation of complaints and suspicious transactions;
- Research for service or products improvement;
- To notify you about benefits and changes to the features of our Products and/or Services including new products and services;
- General operation and maintenance of the products and/or services provided including accounting (billing and auditing), statistical and marketing analysis, information systems management, system testing, maintenance and development, operational, support, customer surveys, customer relations and to improve and help us in any future dealings with you, for example by identifying your requirements and preferences
- To provide you with information about third party services and/or products, which may be of interest to or benefit you, except where otherwise requested or notified by you.
- For any other purposes that is required or permitted by any law, regulations, guidelines and/or relevant regulatory authorities.



### **Disclosure of Personal Information to Third Parties**

Whenever required by law, we will disclose your information to the government bodies, authorities or third parties pursuant to a subpoena or other legal process accordingly. Further, we may also use or disclose your information as permitted by law to protect the rights or property of ELSA, our customers, our website, or its users. We may also disclose your information, whether in part or in full, to our contracted or authorised companies such as our data processors.

If you choose to sign up with ELSA, your personal information may be shared where necessary and only on a need to know basis with companies within the CEDAR, so as to serve you in the most efficient and effective manner.

CEDAR may disclose your personal information to the following parties for the purposes stated below: -

- companies and/or organisations that act as our agents, contractors, service providers and/or professional advisers;
- companies and/or organisations that assists us in processing and providing you with products and/or services that you have subscribed or requested;
- law enforcement agencies;
- government agencies

In certain instances, we reserve the right to disclose your personal information to our preferred merchants and strategic partners. We take reasonable steps to ensure that agreements with our merchants and/or strategic partners include appropriate privacy and confidentiality obligations.

If you do not wish your personal information to be shared with these third parties, please e-mail us at [support@cedar.my](mailto:support@cedar.my) CEDAR Service Centre via the contact details provided below. Your latest written instructions to us will prevail.

Your personal information will not be disclosed to any unauthorized third party.

### **Transfer of your Personal Information outside of Malaysia (where applicable)**

For your information, in certain circumstances your personal information may be stored in a server which is located outside Malaysia. In this instance, we would endeavour to bind the service provider in an agreement that ensures a high standard of privacy protection.



## **Information Security: How We Protect Your Privacy**

CEDAR is committed to implementing the highest standards of information security to protect the privacy and confidentiality of your personal information. We limit access to your personal information to authorized employees. We also maintain physical, electronic, and procedural safeguards to protect the information against loss, misuse, damage or modification and unauthorized access or disclosure.

Some of the other central features of our security measures include:

- A dedicated group of Information Security specialists that designs, implements, and provides oversight to our information security programme
- The use of specialized technology such as firewalls
- Testing of the security and operability of products and services before they are introduced to the Internet, as well as on-going scanning for publicly-known vulnerabilities in the technology
- Internal and external reviews of our Internet sites and services
- Monitoring of our systems infrastructure to detect weaknesses and potential intrusions
- Implementing controls to identify, authenticate and authorise access to various systems or sites
- Protecting non-public communications through encryption or other means

## **Update of Privacy Policy**

We may review and update this Privacy Policy from time to time to reflect changes in the law, changes in our business practices, procedures and structure, and the community's changing privacy expectations. The latest version of the Privacy Notice will be made available on our official website. It shall not be our obligation to notify you on the changes of the Privacy Policy and you shall periodically review this Privacy Policy.



## Accessing your Personal Information

The following outlines the choices you have with respect to the collection and use of your personal information by us.

- **How to opt out**

If you do not want to receive communications and/or services from CEDAR website or brand, please do not opt-in for those communications or services at the time of registration. If you have opted-in and, at a later time, wish to opt-out, please log in to your profile on our website or application and amend your preferences by unchecking the box for marketing materials.

- **What if I receive an e-mail, message or another contact I am not expecting**

Along with every e-mail marketing communication sent to you, we provide you the opportunity to discontinue receiving future marketing communications (i.e., unsubscribe). Simply follow the unsubscribe process or directions provided in the email.

- **How do I know whether I am opted in**

You can always review or update any personal information that we may have collected about you. To do this, log in to your profile on our website or application and look for a checked box for marketing materials. If the box for marketing materials in your profile is unchecked but you continue to receive marketing materials from CEDAR, kindly write in to us at [support@cedar.my](mailto:support@cedar.my).

If you have questions or complaints about this Privacy Policy, or you would like to review or update any personal information that we may have collected about you, kindly contact us at (<https://www.cedar.my>) via our Contact Us page or you can either reach us via:

- Email : [support@cedar.my](mailto:support@cedar.my)