

Privacy Notice

Atlas Vending (M) Sdn. Bhd. (Company No. 199101013731) (hereinafter referred to as “AVSB”) along with its related companies (hereinafter AVSB and its related companies shall be referred to as “the AVSB Group”) values your privacy and is committed to protecting your Personal Data (as defined in the Personal Data Protection Act 2020 (hereinafter referred to as “the Act”)) entrusted to us.

As part of the relevant activities organized by the AVSB Group and as a condition of your participation in the aforementioned activities you are requested to disclose certain Personal Data to us. This Privacy Notice is formulated in accordance with the requirements of the Act and sets forth how we collect, store and handle your Personal Data.

A. Use of the Personal Data Collected

Your Personal Data is being collected, used and/or processed by AVSB Group for, amongst others, the following purposes :-

- (1) To assess, process, administer and facilitate your participation in the activities organised by AVSB Group;
- (2) To organise and administer contests, competitions and other activities (e.g. lucky draws, redemption programmes), including the announcing and/or publicising of the results of the aforementioned contests, competitions and other activities, to identify and contact the winners of the aforementioned contests, competitions and other activities and to conduct advertising, publicising and marketing strictly the aforementioned contests, competitions and other activities;
- (3) To respond to your inquiries, complaints and/or feedbacks, to post your comments or statements on any blog, social networking or other online forum maintained on any websites owned by AVSB Group, or take any other action in response to your inquires, complaints and/or feedbacks;
- (4) To communicate with you on any of your request for information;
- (5) To communicate, direct market and to update you about AVSB Group’s brands, products, services, events, promotions or for other marketing and promotional purposes related to AVSB Group’s brands, products, services, events, promotions;
- (6) To communicate, direct market and to update you about brands, products, services, events, promotions offered by the affiliates and business/marketing partners of AVSB Group or for other marketing and promotional purposes related to brands, products, services, events, promotions offered by the affiliates and business/marketing partners of AVSB Group’s unless you have otherwise indicated that you do not wish for us to process your personal data for such purposes;
- (7) To create personalized promotions by combining your Personal Data with non-personal information about you (i.e. the amount and types of purchases made or any benefits received by you through our activities and programmes);
- (8) For internal purposes such as evaluating the effectiveness of AVSB Group’s marketing and promotional activities as well as for market research, profiling and statistical analysis;
- (9) To improve AVSB Group’s products and services and to assist AVSB Group in the development of new products and services;

- (10) To conduct market research, profiling and statistical analysis based on your purchases and preferences which will in turn assist us in evaluating the performance of AVSB Group or AVSB Group's products and services;
- (11) For the AVSB Group's internal record keeping;
- (12) To take such actions as is necessary to protect, carry out and enforce our contractual and legal rights and obligations;
- (13) For any other purpose that is required or permitted by any legal or regulatory requirements relating to and to make disclosure under the requirements of any applicable law, regulation, direction, court order, by-law, guideline, circular, code applicable to AVSB Group;
- (14) For the prevention of fraud or any criminal activity and to enable us to comply with any applicable law, regulation, direction, court order, by-law, guideline, circular, code or to assist in law enforcement and investigations by relevant authorities;
- (15) For any other purpose as may be consented to by you; and
- (16) For all other purposes incidental or associated with any of the above, including disclosure to and processing by any third party outsourced service providers and/or AVSB Group's marketing partners.

B. Types of Personal Data Collected

The precise details, type and nature of the Personal Data collected by AVSB Group will vary according to the specific purpose for which it is intended but will amongst others include the following Personal Data from or in relation to you :-

- (1) Name;
- (2) Correspondence Address;
- (3) Telephone Number (house and/or mobile);
- (4) E-mail Address;
- (5) NRIC or other identification number;
- (6) Age;
- (7) Occupation;
- (8) Income;
- (9) Marital Status;
- (10) Gender;
- (11) Race;
- (12) Nationality;
- (13) Date of Birth;

- (14) Interests and Hobbies; and
- (15) Such other information which AVSB Group may deem necessary from time to time depending on the events or promotions held and the products or services offered (e.g. frequency of visits, type of shops visited etc).

C. The Source of Your Personal Data

We may obtain your Personal Data from the following sources :-

- (1) Directly from you; and
- (2) Legitimately from third parties or other service providers, to which, you have consented to the disclosure of your Personal Data.

D. Disclosure of Your Personal Data

AVSB Group will keep your Personal Data confidential but from time to time we may disclose your Personal Data to the following parties :-

- (1) Other entities within the AVSB Group including those to be incorporated in the future;
- (2) AVSB Group's authorised agents and service providers with whom any of the entities of the AVSB Group has contractual agreements for any of AVSB Group's functions, services and activities;
- (3) AVSB Group's merchants, vendors, suppliers, contractors and strategic partners;
- (4) AVSB Group's auditors, consultants, lawyers, accountants or other professional advisers appointed in connection with AVSB Group's business and other related matters;
- (5) Parties authorised by you;
- (6) If you participate in any of the AVSB Group's websites or other social networking sites, any Personal Data posted by you may be shared with other participants and visitors of the websites or social networking sites;
- (7) In the event of a merger, acquisition, financing or sale of assets or any other situation involving the transfer of some or all of AVSB Group's business assets, AVSB Group may disclose the Personal Data to those involved in the negotiation or transfer; and
- (8) Enforcement, regulatory and/or governmental agencies as permitted or required by law, authorised by any order of court or to meet obligations to any such enforcement, regulatory and/or governmental agencies.

E. Period of Retention of Your Personal Data

AVSB Group will retain your Personal Data for such period of time as is necessary to enable us to fulfil the purposes as set out in Item A above.

F. Your Responsibility

You are responsible for ensuring that the Personal Data provided to us is accurate and complete and for updating the Personal Data in the event of any changes or as and when it becomes inaccurate, outdated or incomplete.

G. Access To and Correction Of Your Personal Data

It is your right as a Data Subject (as defined in the Act) and upon the payment of a processing fee to have access to and to correct your Personal Data provided to AVSB Group (subject always to certain exemptions).

H. Security of Your Personal Data

AVSB Group will use its best endeavours to keep and process your Personal Data in a secure manner. We will implement the appropriate and necessary security safeguards and procedures to prevent the unauthorized and accidental access, use, modification, processing, loss, destruction of or damage to your Personal Data.

I. Links to Third Party Websites

This Privacy Notice does not apply to third party websites that you may access from AVSB Group's websites. These third part websites may have their own privacy policy in place.

J. Cookies

We may use cookies in AVSB Group's website for the processing of your Personal Data. The cookies may be used to obtain your IP address and to collect and store the following information:-

- (1) Your preferences;
- (2) The date and time you accessed each page in AVSB Group's website;
- (3) The URL of any third party website from which you accessed AVSB Group's website;

AVSB Group's website may also require you to provide a limited amount of Personal Data to be able to enjoy full access to all areas of AVSB Group's website (e.g. system login credentials, e-mail address, contact number). The aforementioned Personal Data will only be used for its intended purpose.

K. Consent

In order for AVSB Group to collect, use, transfer, store and/or otherwise process your Personal Data, we are required to obtain your consent. If you are below the age of 18, kindly bring this notice to the attention of your parent or legal guardian.

By providing your Personal Data to us, you are consenting and agreeing to the collection, use, transfer, storage and processing of your Personal Data by us in accordance with this Privacy Notice.

Should you no longer wish to allow us to collect, use, transfer, store or process your Personal Data kindly inform us accordingly and we shall ensure the removal, destruction and/or deletion of your Personal Data from our records.

In the event that you have provided the Personal Data of a third party to AVSB Group, we may request your kind assistance in obtaining the consent and agreement of the aforementioned third party to the use of their Personal Data and you hereby agree to use your best endeavours to do so. You are to indemnify AVSB Group in the event that we suffer any loss or damage as a result of your failure to comply with the same.

L. Personal Data Protection Officer

Should you wish to have access to your Personal Data or to update or make any corrections thereto or should you wish to withdraw your consent to any use of your Personal Data or should you have any questions, queries or complaints relating to the use of your Personal Data you may contact AVSB Group at the following :-

Designation of Contact Person	:	Personal Data Protection Officer
E-mail Address	:	personaldata@atlasasia.co
Contact Number	:	03-7455 5330

M. Changes and Updates to this Privacy Notice

You are advised to regularly check AVSB Group's website regularly for any changes and/or updates to this Privacy Notice.

N. Inconsistency

In the event of any inconsistency between the English version and the Bahasa Malaysia version of this Privacy Notice, the English version shall prevail.