

# PRIVACY POLICY

Version 1.0

## Owner and Data Controller

**MySiswaPlace** is a product fully owned by **Ministry of Higher Education Malaysia** and is developed by **Cubixi Worldwide (M) Sdn Bhd**.

**Office Address** : Jalan P5/6, Presint 5, 62200 Putrajaya, Wilayah Persekutuan Putrajaya

**Owner contact email**: [hello@mysiswaplace.my](mailto:hello@mysiswaplace.my)

**MySiswaPlace** ("**MySiswaPlace**" the "**Company**," "**we**," "**us**," and "**our**,") respect your privacy and are committed to protecting it through our compliance with this privacy policy.

This policy describes:

- the types of information that we may collect from you when you access or use our websites, applications and other online services (collectively, our "**Services**"); and
- our practices for collecting, using, maintaining, protecting and disclosing that information.

This policy applies only to information we collect through our Services, in email, text and other electronic communications sent through or in connection with our Services.

This policy DOES NOT apply to information that you provide to, or that is collected by, any third-party, such as restaurants at which you make reservations and/or pay through our Services and social networks that you use in connection with our Services. We encourage you to consult directly with such third-parties about their privacy practices.

Please read this policy carefully to understand our policies and practices regarding your information and how we will treat it. If you do not agree with our policies and practices, your choice is not to use our Services. By accessing or using our Services, you agree to



this privacy policy. This policy may change from time to time, your continued use of our Services after we make changes is deemed to be acceptance of those changes, so please check the policy periodically for updates.

## I. The information we collect and how we use it

We collect several types of information from and about users of our Services, including information:

- by which you may be personally identified; and/or
- about your internet connection, the equipment you use to access our Services and your usage details.

We collect this information:

- directly from you when you provide it to us; and/or
- automatically as you navigate through our Services (information collected automatically may include usage details, geo-location, IP addresses and information collected through cookies, web beacons and other tracking technologies).

### I.I Information You Provide to Us

The information we collect on or through our Services may include:

- **Your account information:** Your name, email address, postal code, address details, password and other information you may provide with your account, such as your gender, mobile phone number, encrypted IP address and website. Your profile picture that will be publicly displayed as part of your account profile. You may optionally provide us with this information through third-party sign-in services such as Facebook and Google. In such cases, we fetch and store whatever information is made available to us by you through these sign-in services.
- **Your preferences:** Your preferences and settings such as time zone and language.
- **Your content:** Information you provide through our Services, including your reviews, photographs, comments, lists, book ordering details and history, favorite publishers or books, special book requests, your book reservations through our



Services, names, and other information you provide on our Services, and other information in your account profile.

- **Your searches and other activities:** The search terms you have looked up and results you selected.
- **Your browsing information:** How long you used our Services and which features you used; the ads, items you clicked on.
- **Your communications:** Communications between you and other users or merchants through our Services; your participation in a survey, poll, sweepstakes, contest or promotion scheme; your request for certain features (e.g., newsletters, updates or other products); your communication with us about employment opportunities posted to the services.
- **Your transactional information:** If you make reservations or purchases through our Services, we may collect and store information about you to process your requests and automatically complete forms for future transactions, including (but not limited to) your phone number, address, email, billing information and credit or payment card information. This information may be shared with third-parties which assist in processing and fulfilling your requests, including PCI compliant payment gateway processors. When you submit credit or payment card information, we encrypt the information using industry standard technologies, as further described below under "Payment Card Information." If you write reviews about businesses with which you conduct transactions through our Services, we may publicly display information that you transacted with those businesses.
- **Your Public Posts:** You also may provide information (such as ratings, reviews, tips, photos, comments, likes, etc.) to be published or displayed (hereinafter, "**posted**") on publicly accessible areas of our Services, or transmitted to other users of our Services or third-parties (collectively, "**User Contributions**"). Your User Contributions are posted on and transmitted to others at your own risk. Although we limit access to certain pages, you may set certain privacy settings for such information by logging into your account profile. Please be aware that no security measures are perfect or impenetrable (see "Security" section below). Additionally, we cannot control the actions of other users of our Services with whom you may choose to share your User Contributions. Therefore, we cannot and do not guarantee that your User Contributions will not be viewed by unauthorized persons. We may display this information on the Services, share it with businesses, and further distribute it to a wider audience through third party sites and services. You



should be careful about revealing any sensitive details about yourself in such postings.

- We use the information you provide to us to enhance the functionality and improve the quality of our Services, and to personalize your experience while using our Services. We also use this information to display relevant advertising, provide support to you, communicate with you, and comply with our legal obligations.

## I.II Information About Your Friends

You have the option to request your friends to join the Services by providing their contact information. If you request a friend to join and connect with you on the Services, we will only use your friend's contact information to process your request.

## I.II Information About Your Messages

If you exchange messages with others through the Services, we may store them in order to process and deliver them, allow you to manage them, and investigate possible violations of our Terms of Service and wrongdoing in connection with the Services. If you send information from the Services to your mobile device via SMS text message, we may log your phone number, phone carrier, and the date and time that the message was processed. Carriers may charge recipients for texts that they receive.

## I.III Information We Collect Through Automatic Data Collection Technologies

We may automatically collect certain information about the computer or devices (including mobile devices) you use to access the Services, and about your use of the Services, even if you use the Services without registering or logging in.

- **Usage information:** Details of your use of our Services, including traffic data, location data, logs and other communication data and the resources that you access and use on or through our Services.
- **Computer and device information:** Information about your computer, Internet connection and mobile device, including your IP address, operating systems, platforms, browser type, other browsing information (connection, speed, connection



type etc.), device type, device's unique device identifier, mobile network information and the device's telephone number.

- **Stored information and files:** Our applications also may access metadata and other information associated with other files stored on your mobile device. This may include, for example, photographs, audio and video clips, personal contacts and address book information.
- **Location information:** Our applications collect real-time information about the location of your device, as permitted by you.
- **Last URL visited:** The URL of the last web page you visited before visiting our websites.
- **Mobile device IDs:** Unique mobile device identifier (e.g. IDFA or other device IDs on Apple devices like the iPhone and iPad), if you're using our Services on a mobile device, we may use mobile device IDs (the unique identifier assigned to a device by the manufacturer), instead of cookies, to recognize you. We may do this to store your preferences and track your use of our applications. Unlike cookies, mobile device IDs cannot be deleted. Advertising companies may use device IDs to track your use of our applications, track the number of advertisements displayed, measure advertising performance and display advertisements that are more relevant to you. Analytics companies may use mobile device IDs to track your usage of our applications.
- **Your preferences:** Your preferences and settings such as time zone and language.
- **Your activity on the Services:** Information about your activity on the Services, such as your search queries, comments, domain names, search results selected, number of clicks, pages viewed and the order of those pages, how long you visited our Services, the date and time you used the Services, error logs, and other similar information.
- **Mobile status:** For mobile application users, the online or offline status of your application.
- **Applications:** If you use the MySiswaPlace application, MySiswaPlace may collect information about the presence and/ or absence and/ or details pertaining to other



applications on your mobile phone. The applications we gather information for, may vary across categories including, without limitation, shopping, fashion, food and travel. This will help us understand you and your preferences better and enable MySiswaPlace to provide you with a personalised experience.

#### **I.IV Precise Location Information and How to Opt Out**

When you use one of our location-enabled services (for example, when you access Services from a mobile device), we may collect and process information about your mobile device's GPS location (including the latitude, longitude or altitude of your mobile device) and the time the location information is recorded to customize the Services with location-based information and features (for example, to inform you about restaurants in your area or applicable promotions). Some of these services require your personal data for the feature to work and we may associate location data with your device ID and other information we hold about you. We keep this data for no longer than is reasonably necessary for providing services to you. If you wish to use the particular feature, you will be asked to consent to your data being used for this purpose. You can withdraw your consent at any time by disabling the GPS or other location-tracking functions on your device, provided your device allows you to do this. See your device manufacturer's instructions for further details.

#### **I.V Cookies and Other Electronic Tools**

We, and third parties with whom we partner, may use cookies, pixel tags, web beacons, mobile device IDs, "flash cookies" and similar files or technologies to collect and store information in respect to your use of the Services and third party websites. A cookie is a small text file that is stored on your computer that enables us to recognize you (for example, as a registered user) when you visit our website, store your preferences and settings, enhance your experience by delivering content and advertising specific to your interests, perform research and analytics, track your use of our Services, and assist with security and administrative functions. Cookies may be persistent or stored only during an individual session. To understand more about cookies, click [here](#). A pixel tag (also called a web beacon or clear GIF) is a tiny graphic with a unique identifier, embedded invisibly on a webpage (or an online ad or email), and is used to count or track things like activity on a webpage or ad impressions or clicks, as well as to access cookies stored on users'



computers. SpeedGrocer uses pixel tags to measure the popularity of our various pages, features and services. We also may include web beacons in e-mail messages or newsletters to determine whether the message has been opened and for other analytics.

Most browsers are set to automatically allow cookies. **Please note it may be possible to disable some (but not all) cookies through your device or browser settings, but doing so may interfere with certain functionality on the Services.** Major browsers provide users with various options when it comes to cookies. Users can usually set their browsers to block all third-party cookies (which are those set by third-party companies collecting information on websites operated by other companies), block all cookies (including first-party cookies such as the ones SpeedGrocer uses to collect search activity information about its users), or block specific cookies. To modify your cookie settings, please visit your browser's help settings. You will need to opt out on each browser and each device you use to access the Services. Flash cookies operate differently than browser cookies and cannot be removed or blocked via web browser settings. By using our Services with your browser set to accept cookies you are consenting to our use of cookies in the manner described in this section. To view MySiswaPlace's Cookie Policy, please click [here](#)

Third parties whose products or services are accessible or advertised through the Services, including social media services, may also use cookies or similar tools, and we advise you to check their privacy policies for information about their cookies and other practices. We do not control the practices of such partners and their privacy policies govern their interactions with you.

## **I.VI Information from Third Parties**

We may collect, process and store your user ID associated with any social media account (such as your Facebook and Google account) that you use to sign into the Services or connect with or use with the Services. When you sign in to your account with your social media account information, or otherwise connect to your social media account with the Services, you consent to our collection, storage, and use, in accordance with this Privacy Policy, of the information that you make available to us through the social media interface. This could include, without limitation, any information that you have made public through your social media account, information that the social media service shares with us, or



information that is disclosed during the sign-in process. Please see your social media provider's privacy policy and help center for more information about how they share information when you choose to connect your account.

We may also obtain information about you from third parties such as partners, marketers, third-party websites, and researchers, and combine that information with information which we collect from or about you.

### **I.VII Anonymous or De-Identified Data**

We may anonymise and/or de-identify information collected from you through the Services or via other means, including via the use of third-party web analytic tools as described below. As a result, our use and disclosure of aggregated and/or de-identified information is not restricted by this Privacy Policy, and it may be used and disclosed to others without limitation.

## **II. How we use the information we collect**

We use the information we collect from and about you for a variety of purposes, including to:

- Process and respond to your queries
- Understand our users (what they do on our Services, what features they like, how they use them, etc.), improve the content and features of our Services (such as by personalizing content to your interests), process and complete your transactions, and make special offers.
- Administer our Services and diagnose technical problems.
- Send you communications that you have requested or that may be of interest to you by way of emails, or courier, or registered post, or telephone calls, or any other mode of communication. We may also share your preferences or the Services availed by you with your network followers on MySiswaPlace for marketing and other promotional activities of our Services.





- Send you questions from other users that you may be able to answer if you have registered with MySiswaPlace.
- Enable us to show you ads that are relevant to you.
- Generate and review reports and data about, and to conduct research on, our user base and Service usage patterns.
- Administer contests and sweepstakes.
- Provide you with customer support.
- Provide you with notices about your account.
- Carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collection.
- Notify you about changes to our Services.
- Allow you to participate in interactive features offered through our Services.
- In any other way we may describe when you provide the information.
- For any other purpose with your consent.

We may also use your information to contact you about our own and third-party goods and services that may be of interest to you. If you do not want us to use your information in this way, please check the relevant box located on the form on which we collect your data and/or adjust your user preferences in your account profile.

We may use the information we have collected from you to enable us to display advertisements to our advertisers' target audiences. Even though we do not disclose your personal information for these purposes without your consent, if you click on or otherwise interact with an advertisement, the advertiser may assume that you meet its target criteria.

### **III. How we share the information we collect**

We may disclose personal information that we collect or you provide, as described in this privacy policy, in the following ways:

#### **III.I General Information Disclosures**



- To our subsidiaries and affiliates, which are entities under common ownership or control of our ultimate parent company Ministry of Higher Education.
- To contractors, service providers and other third-parties whom we use to support our business (e.g. books publisher and delivery service) and who are bound by contractual obligations to keep personal information confidential and use it only for the purposes for which we disclose it to them.
- To a buyer or other successor in the event of a merger, divestiture, restructuring, re-organization, dissolution or other sale or transfer of some or all of MySiswaPlace's assets, whether as a going concern or as part of bankruptcy, liquidation or similar proceeding, in which personal information held by SpeedGrocer about the users of our Services are among the assets transferred.
- To third-parties to market their products or services to you if you have consented to receive the promotional updates. We contractually require these third-parties to keep personal information confidential and use it only for the purposes for which we disclose it to them.
- To fulfill the purpose for which you provide it.
- For any other purpose disclosed by us when you provide the information.
- **Service Providers.** We may share your information with outside vendors that we use for a variety of purposes, such as to send you emails and messages on behalf of other SpeedGrocer members, push notifications to your mobile device on our behalf, provide voice recognition services to process your spoken queries and questions, help us analyze use of our Services, and process and collect payments. Some of our products, services and databases are hosted by third party hosting services providers. We also may use vendors for other projects, such as conducting surveys or organizing sweepstakes for us. We may share information about you with these vendors only to enable them to perform their services.
- **Legal Purposes.** We may share your information when we believe in good faith that such sharing is reasonably necessary in order to investigate, prevent, or take action regarding possible illegal activities or to comply with legal process. We may also share your information to investigate and address threats or potential threats to the physical safety of any person, to investigate and address violations of this Privacy Policy or the Terms of Service, or to investigate and address violations of the rights of third parties and/or to protect the rights, property and safety of SpeedGrocer, our employees, users, or the public. This may involve the sharing of your information with law enforcement, government agencies, courts, and/or other organizations on account of legal request such as subpoena, court order or government demand to comply with the law.



- **Social Networks.** If you interact with social media features on our Services, such as the Facebook Like button, or use your social media credentials to log-in or post content, these features may collect information about your use of the Services, as well as post information about your activities on the social media service. Your interactions with social media companies are governed by their privacy policies.
- If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of MySiswaPlace, our customers or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction.
- **Consent.** We may share your information in any other circumstances where we have your consent.

### III.II Information Shared with Restaurants

When you execute online book ordering transaction through our Services, your information is provided to us and to the publisher with whom you choose to buy from. In order to facilitate your book selection and purchase process, we provide your information to that publisher in a similar manner as if you had made a book purchase directly with the publisher. If you provide a mobile phone number, publisher or MySiswaPlace may send you text messages regarding your book's purchase status. Some publishers also require you to provide credit or debit card account information to secure your reservation. When you make a book purchase transaction through our Services and/or make a payment to a publisher through our Services, we may also share with the publishers additional information, such as information about your book genre preferences and history or information that we collect from third-parties.

Information you choose to share with a publisher when you make a purchase and/or pay a publisher through our Services may be used by the publisher for its own purposes. We do not control the privacy practices of publisher. Please contact the publisher directly if you want to learn about its privacy practices.

### III.III Payment Card Information

To use certain of our Services, such as to make purchases at certain publishers and to make payments to certain publishers, we may require credit or debit card account



information. By submitting your credit or debit card account information through our Services, you expressly consent to the sharing of your information with publisher, third-party payment processors, and other third-party service providers (including but not limited to vendors who provide fraud detection services to us and other third parties), and you further agree to the following terms:

- When you use a credit or debit card to secure a reservation through our Sites, we provide your credit or debit card account information (including card number and expiration date) to our third-party payment service providers and the applicable restaurant.
- When you initially provide your credit or debit card account information through our Services in order to use our publisher payment services, we provide your credit or debit card account information to our third-party payment service providers. As explained in our Terms of Use, these third parties may store your credit or debit card account information so you can use our publisher payment services through our Services in the future.
- For information about the security of your credit or debit card account information, see the “Security” section below.

## IV. Analytics and tailored advertising

To help us better understand your use of the Services, we may use third-party web analytics on our Services, such as Google Analytics. These service providers use the sort of technology described in the “Automatically-Collected Information” Section above. The information collected by this technology will be disclosed to or collected directly by these service providers, who use the information to evaluate our users’ use of the Services. We also use Google Analytics as described in the following section. To prevent Google Analytics from collecting or using your information, you may install the [Google Analytics Opt-Out Browser Add-on](#).

### IV.I Tailored Advertising

Third parties whose products or services are accessible or advertised via the Services may also use cookies or similar technologies to collect information about your use of the



Services. This is done in order to help them (i) inform, optimize, and serve ads based on past visits to our website and other sites and (ii) report how our ad impressions, other uses of ad services, and interactions with these ad impressions and ad services are related to visits to our website. We also allow other third parties (e.g., ad networks and ad servers such as Google Analytics, OpenX, Pubmatic, DoubleClick and others) to serve tailored ads to you on the Services, and to access their own cookies or similar technologies on your computer, mobile phone, or other device you use to access the Services. We neither have access to, nor does this Privacy Policy govern, the use of cookies or other tracking technologies that may be placed by such third parties. These parties may permit you to opt out of ad targeting. If you are interested in more information about tailored browser advertising and how you can generally control cookies from being put on your computer to deliver tailored advertising (i.e., not just for the Services), you may visit [the Network Advertising Initiative's Consumer Opt-Out Link](#), and/or [the Digital Advertising Alliance's Consumer Opt-Out Link](#) to opt-out of receiving tailored advertising from companies that participate in those programs. To opt out of Google Analytics for Display Advertising or customize Google Display Network ads, you can visit the [Google Ads Settings page](#). Please note that to the extent advertising technology is integrated into the Services, you may still receive ads even if you opt-out of tailored advertising. In that case, the ads will just not be tailored to your interests. Also, we do not control any of the above opt-out links and are not responsible for any choices you make using these mechanisms or the continued availability or accuracy of these mechanisms.

When accessing the Services from a mobile application you may also receive tailored in-application advertisements. Each operating system: iOS, Android and Windows Phone provides its own instructions on how to prevent the delivery of tailored in-application advertisements. You may review the support materials and/or the privacy settings for the respective operating systems in order to opt-out of tailored in-application advertisements. For any other devices and/or operating systems, please visit the privacy settings for the applicable device or operating system or contact the applicable platform operator.

#### **IV.II Do Not Track**

We are committed to providing you with meaningful choices about the information collected on our Services for third party purposes, and that is why we provide the above links to the NAI "Consumer Opt-out", DAA opt-out, and Google opt-out. However, we do



not currently recognize or respond to browser-initiated Do Not Track signals, as the Internet industry is still working on Do Not Track standards, implementations and solutions.

## V. Choices about how we use and disclose your information

We strive to provide you with choices regarding the personal information you provide to us. You can set your browser or mobile device to refuse all or some browser cookies, or to alert you when cookies are being sent. To learn how you can manage your Flash cookie settings, visit the Flash player settings page on Adobe's website. If you disable or refuse cookies, please note that some parts of our Services may then be inaccessible or not function properly. We do not share your personal information with any advertising agency.

## VI. Communications choices

When you sign up for an account, you are opting in to receive emails from other MySiswaPlace users, businesses, and MySiswaPlace itself. You can log in to manage your email preferences [here](#) and you can follow the "unsubscribe" instructions in commercial email messages, but note that you cannot opt out of receiving certain administrative notices, service notices, or legal notices from MySiswaPlace.

## VII. Reviewing, changing or deleting information

If you would like to review, change or delete personal information we have collected from you, or permanently delete your account, please use the "Contact Us" link at the bottom of every page (also located at the footer), or contact [assist@mysiswaplace.my](mailto:assist@mysiswaplace.my).



## **VIII. Accessing & correcting your personal information**

We will take reasonable steps to accurately record the personal information that you provide to us and any subsequent updates. We encourage you to review, update, and correct the personal information that we maintain about you, and you may request that we delete personal information about you that is inaccurate, incomplete, or irrelevant for legitimate purposes, or are being processed in a way which infringes any applicable legal requirement.

Your right to review, update, correct, and delete your personal information may be limited, subject to the law of your jurisdiction: (i) if your requests are abusive or unreasonably excessive, (ii) where the rights or safety of another person or persons would be encroached upon, or (iii) if the information or material you request relates to existing or anticipated legal proceedings between you and us, or providing access to you would prejudice negotiations between us or an investigation of possible unlawful activity. Your right to review, update, correct, and delete your information is subject to our records retention policies and applicable law, including any statutory retention requirements.

## **IX. Security: How we protect your information**

We have implemented appropriate physical, electronic, and managerial procedures to safeguard and help prevent unauthorized access to your information and to maintain data security. These safeguards take into account the sensitivity of the information that we collect, process and store and the current state of technology. We follow generally accepted industry standards to protect the personal information submitted to us, both during transmission and once we receive it, including the use of vault and tokenization services from third party service providers. The third party service providers with respect to our vault and tokenization services and also our payment gateway and payment processing are all validated as compliant with the payment card industry standard (generally referred to as PCI compliant service providers). However, no method of transmission over the Internet or via mobile device, or method of electronic storage, is 100% secure. Therefore, while we strive to use commercially acceptable means to protect your personal information, we cannot guarantee its absolute security and thereby usage in a manner that is inconsistent with this Privacy Policy.

We assume no liability or responsibility for disclosure of your information due to errors in transmission, unauthorized third-party access, or other causes beyond our control. You play an important role in keeping your personal information secure. You should not share your user name, password, or other security information for your MySiswaPlace account with anyone. If we receive instructions using your user name and password, we will consider that you have authorized the instructions.

## **X. Children Under 13**

The Services are not intended for users under the age of 13. We do not knowingly collect any personal information from children under 13 or market to or solicit information from anyone under the age of 13. If we become aware that a person submitting personal information is under 13, we will delete the account and any related information as soon as possible. . If you believe we might have any information from or about a child under 13, please contact us at [assist@mysiswaplace.my](mailto:assist@mysiswaplace.my).

## **XI. Third party links and services**

The Services may contain links to third-party websites. Your use of these features may result in the collection, processing or sharing of information about you, depending on the feature. Please be aware that we are not responsible for the content or privacy practices of other websites or services which may be linked on our services. We do not endorse or make any representations about third-party websites or services. Our Privacy Policy does not cover the information you choose to provide to or that is collected by these third parties. We strongly encourage you to read such third parties' privacy policies.

## **XIII. Compliance with data protection regulations**

The information we obtain from or about you may be processed and stored in Malaysia and our other various servers located across the globe, which may provide for different data protection rules than the country in which you reside. We comply with generally





accepted industry standard regulations regarding the collection, use, and retention of data. Each location may provide for different data protection rules than the country in which you reside. By using the Services, you consent to the collection, transfer, use, storage and disclosure of your information as described in this Privacy Policy, including to the transfer of your information outside of your country of residence. If you have any questions relating to your personal data, please write to us on [assist@mysiswaplace.my](mailto:assist@mysiswaplace.my)

## **XIV. Data retention and account termination**

You can close your account by visiting your profile settings page on our website. We will remove your public posts from view and/or dissociate them from your account profile, but we may retain information about you for the purposes authorized under this Privacy Policy unless prohibited by law. Thereafter, we will either delete your personal information or de-identify it so that it is anonymous and not attributed to your identity. For example, we may retain information to prevent, investigate, or identify possible wrongdoing in connection with the Service or to comply with legal obligations.

## **XV. Changes to this privacy policy**

We reserve the right to amend this Privacy Policy from time to time to reflect changes in the law, our data collection and use practices, the features of our services, or advances in technology. Please check this page periodically for changes. Use of information we collect is subject to the Privacy Policy in effect at the time such information is used. If we make any material changes to this Privacy Policy, we will post the changes here. Please review the changes carefully. Your continued use of the Services following the posting of changes to this Privacy Policy will constitute your consent and acceptance of those changes.