

PRIVACY POLICY

1. The Nicol David Organisation Berhad (“NDO”) prioritises the protection of your personal data and will take the relevant measures to safeguard your personal data in accordance with the Personal Data Protection Act 2010 and Personal Data Protection Regulations 2013 including their revisions. This Privacy Policy (“**Policy**”) sets out how we use and protect the information you give us.
2. This Policy supplements our Terms of Use and explains how we handle the information collected and received when you visit our website [www.nicoldavidorganisation.org], and all the related sub-sites (“Website”). It also governs the collection, use and disclosure of your information.

For the purposes of this Policy, “we”, “our” or “us” shall refer to any of NDO’s associates and affiliates and “you” shall refer to yourself and such other persons or companies represented by you of which you are providing the personal data. Furthermore, the terms “personal data” and “processing” shall have the same meaning as prescribed in the Personal Data Protection Act 2010.

3. Collection of Personal Data

3.1 We may collect information from you in the following situations:

- (a) When you visit or browse our Website;
- (b) When you use our services; for example, when you make a donation (“Services”);
- (c) When you participate in any of our surveys, campaigns, contests, or promotions;
- (d) When you interact with us online, offline or through an external third party; and/or
- (e) from the public domain and third parties such as statutory bodies, government agencies and/or service providers.

3.2 The personal data that we may collect may include (but not limited to) the following:

- (a) Personal information such as your full name, username, email address, gender, date of birth, mobile number, NRIC number, passport number, bank account number and credit or debit card numbers;
- (b) Information generated from your visit or use of our Website (for example, information obtained from cookies, your IP address, the time and date you visit our Website, the pages you access, the used Services and other relevant information);
- (c) Any other information disclosed by you pursuant to the above-mentioned methods and/or usage of our Website.

3.3 By submitting your personal data to us including but not limited to the information stated above, you hereby give your consent to the processing of your personal data.

4. Purpose of Collection of Personal Data

4.1 Any information we collect from you may be used for any of the following purposes:

- (a) To facilitate your access to and use of the Website and Services, including to complete the registration and/or creation of your Account and to send you confirmations, updates, security alerts, additional information about the Website and Services, support and administrative messages;
- (b) To process applications for donation driven activities;
- (c) To acquire more donors;
- (d) To process any payments and/or arrange any shipping services in respect of the Services;
- (e) To process or resolve any dispute arising from or in connection with any transactions and/or your use of the Website, in accordance with our Terms of Use;
- (f) To respond to your comments, queries and resolve complaints;
- (g) To carry out polls, surveys, analysis and research on how our Services are being used and how we can improve them;
- (h) To provide you with promotional and/or marketing materials and information about our Website and/or Services available to you through NDO and third parties connected with us either as directed communications or newsletters;
- (i) To involve you in any initiatives or advisory projects that you have indicated interest in participation;
- (j) To provide information to any of our affiliates in and outside Malaysia who is /are connected to NDO;
- (k) To personalise your experience on our Website and customise the content shown to you;
- (l) To improve our Website and Services provided to you;
- (m) To identify visitors on the Website;
- (n) To facilitate our internal administration such as auditing, data analysis and maintaining database records;
- (o) To detect and prevent fraudulent activity and to comply with applicable Anti-Money Laundering and Countering the Financing of Terrorism regulations and other applicable laws and regulations; and/or
- (p) For all other purposes that is incidental, ancillary and/or in furtherance to the above.

4.2 Your personal data is necessary to us. If you do not provide and/or allow us to process all the personal data requested, we may not be able to accomplish the above stated purposes.

5. Disclosure of Your Personal Data

5.1 We may disclose your personal data to the following parties (including those outside Malaysia) for the purposes stated below:

- (a) affiliates, agents, advisers and third party service providers who assist us in performing certain aspects of our Services on our behalf, such as processing transactions, payment or shipping services, fulfilling requests for information, receiving and sending communications, updating marketing lists, analysing data, providing support services or in other tasks. Such service providers will only have access to your personal data to the extent necessary to perform their functions;
- (b) any person, who is under a duty of confidentiality who has undertaken the responsibility to keep such information confidential;
- (c) your agents and advisers (including but not limited to professional advisers) and any other person notified and authorised by you;
- (d) (i) governmental and other regulatory authorities or the courts in any jurisdiction; (ii) any third party claimants or potential third party claimants; or (iii) your card issuing bank, financial institution and/or payment service provider, to process or resolve any chargeback, payment reversal and/or dispute arising from or in connection with a transaction using our Services in accordance with our Terms of Service; and
- (e) our assignees or potential assignees and successors-in-title.

5.2 We may also disclose your personal data if required to do so by law or as is necessary or relevant in relation to any legal process, or if we believe that such action is necessary to prevent fraud or crime or to protect our property, rights and interests, or the rights, property or personal safety of any person.

6. Retention and Safety of Personal Data

6.1. NDO will store your personal data until it is no longer necessary to fulfil the purposes for which it was collected. This is a case-by-case determination that depends on various factors, such as the nature of data, why it was collected and processed and any relevant legal or operational retention needs. If you wish for any information about you to be removed from our database, please contact us through the contact information provided below in Section 9 this Policy.

6.2 The processing of your personal data will be done in accordance with all applicable laws. In processing your personal data, we shall take practical and reasonable steps to protect the personal data from any loss, misuse, modification, unauthorized or accidental disclosure, alteration or destruction.

6.3 Nevertheless, no data transmission over the internet can be guaranteed as completely secure. Therefore, while we strive to protect such personal data, we cannot ensure or warrant the security of any personal data transmitted to us and individuals do so at their own risk.

6.4 We do not sell, rent or lease the personal data and/or information collected to third parties.

7. Cookies

7.1 We use cookies on our Website which enable us to understand how you use our Website and Services which, in turn, helps us to provide and improve our Services.

- 7.2 Cookies are small data files sent from a website to your browser that is stored on your device. Cookies are used to display the most appropriate content based on your interests and activity on our Website and Services, estimate and report our Website's total audience size and traffic, and conduct research to improve our Website and Services.
- 7.3 You can configure your device's settings to reflect your preference to accept or reject cookies. If you reject all cookies, you will not be able to take full advantage of our Website and Services.

8. Third Party Websites and Resources

- 8.1 Our Website contains links to external websites or resources which are operated by third parties. We have no control over the content and privacy practices of such websites or resources. You are advised to review the privacy policies of these websites and resources operated by third parties and understand how your information may be used by those third parties.

9. Access and Update of Your Personal Data

- 9.1 If you would like to access, update, correct or delete your personal data, you may contact our Data Privacy Officer at admin@nicoldavidorganisation.org and provide your name, account information, contact information and provide brief details of your request. We will use reasonable efforts to comply with your request to access, update or correct your personal data within 21 days of receiving your request and such request may be subject to a fee pursuant to Personal Data Protection (Fees) Regulations 2013 (P.U.(A) 338/2013) and will be bound by data protection laws in Malaysia.

10. Changes to this Policy

- 10.1 We may review and change this Policy from time to time to reflect changes in the law, our organisational practices, processes or structure. While it is not generally feasible to notify you of the changes to this Policy, the latest version of this Policy will be available on our Website.

11. Conflict

- 11.1 In the event of any conflict between this English language Policy and its corresponding Bahasa Malaysia Policy, the terms in this English language Policy shall prevail.

This Privacy Policy Notice was last updated on 19th May 2022