



This Privacy Policy (“Policy”) describes how E.P. ONG ASSOCIATES SDN. BERHAD, its subsidiaries, affiliates, associated companies, and jointly controlled entities (collectively “EPO,” “we,” “us,” or “our”) collect, use, process, and disclose your Personal Data through the use of EPO’s Apps and Websites (including all mobile applications and websites operated by EPO) (respectively “Apps” and “Websites”), products, features, and other services globally (collectively, “Services”).

This Policy applies to our customers, passengers, agents, vendors, suppliers, partners (such as referral and business partners), contractors, and service providers (collectively “you,” “your,” or “yours”).

“Personal Data” is any information which can be used to identify you or from which you are identifiable. This includes but is not limited to your name, nationality, telephone number, bank and credit card details, personal interests, email address, your image, government-issued identification numbers, biometric data, race, date of birth, marital status, religion, health information, vehicle, and insurance information.

Collection of Personal Data

We collect your Personal Data when you voluntarily provide it to us. For example, you may provide your Personal Data to us when you:

- Fill up a user profile or registration forms.
- Provide information to assess your eligibility to provide services as an EPO referral-partner.
- Earn incentives and cashbacks.
- Interact with our social media pages.
- Participate in contests or events organized by us.
- Use biometric features to identify yourself.
- Fill up demographic information in surveys.

When our services are used

Personal Data may be collected through the normal operation of our Apps, Websites, Services. Some examples are:

- Your location (to detect driving locations and driving patterns).
- Feedback, ratings, and compliments.
- Transaction information (such as payment method and distance traveled).



- Information about how you interacted with our Apps, Website or services (such as features used and content viewed).
- Device information (such as hardware model and serial number, IP address, file names and versions, and advertising identifiers).
- Personal data you enter in messages when you use our in-app communication features.
- Vehicle data you enter to verify the vehicle for insurance purchase.

From other sources

When we collect Personal Data from other sources, we make sure that data is transferred to us in accordance with applicable laws. Such sources include:

- Referral programs.
- Our business partners, such as agent partners, payment providers, enterprise partners, and transport partners.
- Insurance and financial providers.
- Publicly available data.
- Governmental sources of data.
- When our users add you as an emergency contact.
- Marketing services providers or partners.

Personal Data about referral-partners

If you are a referral-partner, we may collect:

- Telematics data (such as your speed, acceleration, and braking data).
- Device data (such as accelerometer data, GPS location, your IMEI number, and the names of apps you have installed on your device).
- Your vehicle registration data.
- Your vehicle insurance policy.

Sensitive Personal Data

Some of the information that we collect is sensitive in nature. This includes information such as national ID numbers, race, marital status, and your health or religious beliefs. We only collect this information when it is necessary to comply with legal or regulatory requirements.



In-app image-taking

Some EPO partners may use mobile cameras to take personal information such as identification card and vehicle grant. The use of such a camera is not endorsed or prohibited by EPO. The collection, use, and disclosure of Personal Data obtained from personal mobile cameras are the responsibility of the relevant partner. Please check with the relevant partner if you have any queries about their use of personal cameras.

Personal Data of minors

As a parent or legal guardian, please do not allow minors under your care to submit Personal Data to EPO. In the event that such Personal Data of a minor is disclosed to EPO, you hereby consent to the processing of the minor's Personal Data and accept and agree to be bound by this Policy and take responsibility for his or her actions.

When you provide personal data of other individuals to us

In some situations, you may provide Personal Data of other individuals (such as your spouse, family members, or friends) to us. For example, you may add them as your emergency contact. If you provide us with their Personal Data, you represent and warrant that you have and you have obtained their consent for their Personal Data to be collected, used, and disclosed as set out in this Policy.

Use of Personal Data

EPO may use, combine, and process your Personal Data for the following purposes ("Purposes").

Providing services and features

Your Personal Data will be used to provide, personalize, maintain, and improve our products and services. This includes using your Personal Data to:

- Provide you with Services across our various business verticals.
- Engage you to provide Services.
- Create, administer, and update your account.
- Verify your identity.
- Validate your vehicle and process payments.
- Offer, obtain, provide, or facilitate insurance or financing solutions.
- Track your driving behavior and detect abnormal driving patterns.



- Enable features that personalize your App, such as lists of your favorite places and previous destinations.
- Perform internal operations necessary to provide our Services, including troubleshooting software bugs and operational problems, conducting data analysis, testing and research, monitoring and analyzing usage and activity trends.
- Protect the security or integrity of the Services and any facilities or equipment used to make the Services available.
- Process and manage your rewards.
- Enable communications between our users.
- Process, manage, or verify your application for subscription with EPO and to provide you with subscribers' benefits.
- Enable our partners to manage and facilitate insurance solutions.

Safety and security

We use your data to ensure the safety and security of our services and all users. This includes:

- Screening referral-partners before enabling their use of our Services.
- Identifying unsafe driving behavior such as speeding, harsh braking, and acceleration, and providing personalized feedback to partners.
- Verifying your identity when you log in to EPO.
- Using device, location, profile, usage, and other Personal Data to prevent, detect, and combat fraud or unsafe activities.
- Monitoring compliance with our terms and conditions, policies, and Referral's Code of Conduct.
- Detecting, preventing, and prosecuting crime.

Customer support

We use Personal Data to resolve customer support issues. For example, we may:

- Investigate and address concerns.
- Monitor and improve our customer support responses.
- Respond to questions, comments, and feedback.
- Inform you about steps taken to resolve customer support issues.

Research and development and security



We may use the Personal Data we collect for testing, research, analysis, and product development. This allows us to understand and analyze your needs and preferences, protect your personal data, improve and enhance the safety and security of our services, develop new features, products, and services, and facilitate insurance and finance solutions.

Legal purposes

We may use the Personal Data we collect to investigate and resolve claims or disputes, or as allowed or required by applicable law.

We may also use your Personal Data when we are required, advised, recommended, expected, or requested to do so by our legal advisors or any local or foreign legal, regulatory, governmental, or other authority.

For example, we may use your Personal Data to:

- Comply with court orders or other legal, governmental, or regulatory requirements.
- Enforce our Terms of Service or other agreements.
- Protect our rights or property in the event of a claim or dispute.
- We may also use your Personal Data in connection with mergers, acquisitions, joint ventures, sale of company assets, consolidation, restructuring, financing, business asset transactions, or acquisition of all or part of our business by another company.

Marketing and promotions

We may use your Personal Data to market EPO and EPO's partners' sponsors' and advertisers' products, services, events, or promotions. For example, we may:

- Send you alerts, newsletters, updates, mailers, promotional materials, special privileges, festive greetings.
- Notify, invite, and manage your participation in our events or activities.
- We may communicate such marketing to you by post, telephone call, short message service, online messaging service, push notification by hand, and by email.
- If you wish to unsubscribe to the processing of your Personal Data for marketing and promotions, please click on the unsubscribe link in the relevant email or



message. Alternatively, you may also update your preferences in our App settings.

Disclosure of Personal Data

We need to share Personal Data with various parties for the Purposes. These parties include:

Other users

For example, if you are a customer, we may share your locations with referrals.

If you are a referral, we may share your Personal Data with your customer including your name and photo; your average rating, full name, and age.

With third-parties

For example, we may share a customer name and information with third parties (insurers, reinsurers) when a customer uses Customer Service feature or activates the Renew Automatically.

With subsidiaries and affiliates

We share Personal Data with our subsidiaries, associated companies, jointly controlled entities, and affiliates.

With EPO's service providers and business partners

We may provide Personal Data to our vendors, consultants, marketing partners, research firms, and other service providers or business partners. This includes:

- Payment processors and facilitators.
- Background check and anti-money laundering service providers.
- Cloud storage providers.
- Marketing partners and marketing platform providers.
- Data analytics providers.
- Research partners, including those performing surveys or research projects in partnership with EPO or on EPO's behalf.
- Agents and referral partners.



- Insurance and financing partners.
- Vehicle solutions partners, vendors, or third-party vehicle suppliers.

With our legal advisors and governmental authorities

We may share your Personal Data with our legal advisors, law enforcement officials, government authorities, and other third parties.

Retention/Deletion/Disposal of Personal Data

We will retain personal data for as long as necessary to fulfill our business purposes, unless a longer retention period is required or permitted by law. Personal data that is no longer required will be securely and irreversibly deleted/disposed or anonymized in accordance with the deletion and disposal procedures.

International transfers of Personal Data

Your Personal Data may be transferred from country, state, and city (“Home Country”) in which you are present while using our services to another country, state, and city (“Alternate Country”). You understand and consent to the transfer of your Personal Data from your Home Country to the Alternate Country.

Cookies

EPO, and third parties with whom we partner, may use cookies, web beacons, tags, scripts, local shared objects such as HTML5 and Flash (sometimes called “flash cookies”), advertising identifiers (including mobile identifiers such as Apple’s IDFA or Google’s Advertising ID) and similar technology (“Cookies”) in connection with your use of the Websites and Apps. Cookies may have unique identifiers, and reside, among other places, on your computer or mobile device, in emails we send to you, and on our web pages. Cookies may transmit Personal Data about you and your use of the Service, such as your browser type, search preferences, IP address, data relating to advertisements that have been displayed to you or that you have clicked on, and the date and time of your use. Cookies may be persistent or stored only during an individual session.

EPO may allow third parties to use Cookies on the Websites and Apps to collect the same type of Personal Data for the same purposes EPO does for itself. Third parties may



be able to associate the Personal Data they collect with other Personal Data they have about you from other sources. We do not necessarily have access to or control over the Cookies they use.

Additionally, we may share non-personally identifiable Personal Data with third parties, such as location data, advertising identifiers, or a cryptographic hash of a common account identifier (such as an email address), to facilitate the display of targeted advertising.

If you do not wish for your Personal Data to be collected via Cookies on the Websites, you may deactivate cookies by adjusting your internet browser settings to disable, block, or deactivate cookies, by deleting your browsing history and clearing the cache from your internet browser. You may also be able to limit our sharing of some of this Personal Data through your mobile device settings.

Amendments and updates

EPO shall have the right to modify, update, or amend the terms of this Policy at any time by placing the updated Policy on the Websites. By continuing to use the Apps, Websites, or Services, purchase products from EPO, or continuing to communicate or engage with EPO following the modifications, updates, or amendments to this Policy, you signify your acceptance of such modifications, updates, or amendments.

If you have any queries about your personal data, please contact our Data Privacy Officer at:

E.P. ONG ASSOCIATES SDN. BERHAD

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TAMAN BUKIT CHERAS

KUALA LUMPUR

Email: enquiry@epongassociates.com

The original of this Privacy Statement is written in the English language. In the event of any conflict between the English and other language versions, the English version shall prevail.