

Accordia Global Sdn. Bhd. Privacy Policy & PDPA

1. Introduction

- 1. This privacy policy (the "Privacy Policy") governs how we collect and process personal information through our websites including www.accordiasolution.com (the "Site"), our customer relationship management applications and related services, and through our normal business activities including when an individual or business registers to use our Services (a "Customer") or corresponds with us by post, phone, email or otherwise (collectively, the "Services").
- 2. In this Privacy Policy, "Accordia", "we", "us", "our" and other similar references mean Accordia Global Sdn Bhd, a company established in Malaysia with an office at Unit 15-3 (UG), UOA Business Park, No.1 Jalan Pengaturcara U1/51A, Seksyen U1, 40150 Shah Alam. Selangor Darul Ehsan.
- 3. The term "personal information" as used in this Privacy Policy shall mean any information that enables us to identify you, directly or indirectly, by reference to an identifier such as your name, identification number, location data, online identifier or one or more factors specific to you. Personal information excludes anonymous information or information that has had the identity of an individual permanently removed.
- 4. By registering for and using the Services, you accept the practices described in this Privacy Policy.
- 5. Pursuant to the requirements of the Personal Data Protection Act 2010 (hereinafter referred to as "PDPA"), this Notice is also issued to all our valued users and/or prospective users. Accordia is committed to the protection of your personal data and compliance of all applicable personal data protection laws and regulations in Malaysia. The following statements explain the general terms of Accordia regarding the collection and processing of your personal data by Accordia.
- 6. Please note that if you are a user on a team or enterprise account, then, regardless of the representations below, the team or enterprise administrator(s) may have access to your information.

2. Your Consent

By providing your personal data to Accordia, you have read and accepted the statements herein; and you have consented to the processing of your personal data by Accordia in the manner set out herein. If you provide personal data of third parties to Accordia, you warrant and represent to Accordia that you have obtained the required consent of the third parties for the processing of the relevant personal data by Accordia in the manner set out herein. If you do not agree to this, you must not use the Accordia site.



3. Information That We Collect.

1. Information Customers Provide to Us

We collect and store personal information, such as your name, address, email address, phone, usernames and passwords when you register to use our Services, ask a question, complete a form, conduct a transaction, send us an email or attend our events. If you do not provide the requested information, you may not be able to access or use some of the features and functions of our Services.

Furthermore, when you contact us (online or offline) in connection with a request for information or access the Services, we collect personal information (through correspondence, chats, dispute resolution, or shared by you from other social application, services or websites) necessary to fulfil your request, to grant you access to the Services and to provide you with support. In order to register to use our Services, payment and billing information will also be required and we will maintain purchase records and transactional information which will contain personal information about you and your use of the Services.

2. Information Processed on Behalf of Our Customers

When Customers use our Services, Accordia will collect personal information and other information ("Content") relating to third parties contained in mobile devices, email accounts and in other online, cloud or mobile services ("Authorized Sources") where our customers have authorized the Services to access such Authorized Sources. using the Services and providing us with access to Authorized Sources, Customers warrant they have the right to provide us with access to each Authorized Sources, as well as to the personal information and Content contained therein.

3. Information We Automatically Collect

We collect content or other information that you may provide or create when you interact with the Services. We may also automatically collect certain usage information when you access our Services, such as Internet Protocol ("IP") addresses, log files, unique device identifiers, pages viewed, browser type, any links you click on to leave or interact with the Services, and other usage information collected from cookies and other tracking technologies (described below). We also collect IP addresses from users when they log into the Services and may also, when you enable location-based Services, collect Global Positioning System (GPS) location data and/or motion data.

We collect general statistics to track user trends for our Services. The information that is collected in this manner does NOT provide us with any personal information about our users, unless combined with other information we hold. This allows us to improve the content and operation of the Services,



to determine the most effective ways to communicate with our users and to undertake research and analysis. We also use this technical information to prevent the introduction of viruses and hackers into the Services.

4. Information We Collect from Other Sources

We may also collect information from other companies or third parties or from various service providers to supplement the personal information and Content provided by our Customers to help us maintain the accuracy of personal information and improve our Services. We may combine some Non-Personal Information with the Personal Information we collect. Where we do so, we will treat the combined information as Personal Information if the resulting combination may be used to readily identify or locate you in the same manner as Personal Information alone.

4. Cookies

Cookies, web beacons and clear gifs are methods used to uniquely identify the device you are using to interact with the Services. We use these technologies to recognize you, optimize the Services for you and to gather information about how users use the Services. Any information provided to third parties through these technologies may provide general information for the enhancement of your user experience by providing more relevant advertising. If you block or refuse these technologies, you may not be able to access or use certain features or functions of our Services and may have a degraded experience.

5. Information Usage

Cookies, web beacons and clear gifs are methods used to uniquely identify the device you are using to interact with the Services.

We will use your personal information for the following purposes:

- To confirm your identity,
- To complete transactions,
- To provide, operate and maintain the Services,
- To operate our business, including internal business intelligence purposes, to conduct research, product development and enhancement,
- To respond to your requests and deliver the products and services you request,
- To provide support related to the Services and related customer services,
- To help us protect our Services, including to combat fraud and protect personal information,



- To inform you of changes made to our Site and Services,
- To ensure that our Services are presented most effectively for you and your device;
- To display content based on your interests;
- To conduct marketing and commercial activities and to notify you of promotions, updates, or special offers that we think may interest you, in line with your preferences.

6. Aggregating and Sharing Combined Information from Many Users

At no time would we aggregate and share information with other users in a manner that would allow you or any other person to be identified. However, we may prepare and share information about our Customers with third parties, such as advertisers or partners, for research, academic, marketing and/or promotional purposes. For example, we may share demographic data that describes the percentage of our Customers who use mobile services or who use a particular operating system. We or our third party partners may publicly report the aggregated findings of the research or analysis, but only in a way that would not allow you or any other person to be identified.

7. Disclosure of Information to Outside Parties

- In addition to the Aggregating and Sharing Combined Information section, above, Accordia may disclose personal information and Content we collect with the parties below for the purposes set out in this policy:
 - A member of our group or our affiliates,
 - Our professional advisors such as auditors, accountants and lawyers, etc., and
 - Companies that provide services to help us with our business activities, such as data storage, maintenance services, database management, web analytics and payment processing.
- 2. We may also disclose personal information and Content if required to do so by law or in good-faith belief that disclosure is necessary (a) to obey the law or comply with legal process served on us or our affiliates; (b) to protect and defend our rights or property or the rights or property of other users of our Service; or (c) to act in an emergency to protect the personal safety of users of our Services or the public.
- 3. As Accordia continues to develop its business, we might sell or buy lines of business or assets. If all or substantially all of Accordia's business (or a line of Accordia's business) or assets (or the assets of a line of Accordia's business) are acquired by a third party, personal information will generally be



one of the transferred business assets. We reserve the right to include your personal information, collected as an asset, in any such transfer to a third party. If so, you will be provided advance notice of the impending change of control, so that you may have the opportunity to terminate your access to the Service, if necessary.

- 4. We may share aggregate data with advertisers and other third parties. Accordia uses industrystandard encryption technologies when transferring and receiving consumer and transaction data exchanged with our site.
- 5. We require all third parties to respect the security of your personal information and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal information for their own purposes and only permit them to process your personal information for specified purposes and in accordance with our instructions.
- 6. If you have any inquiries or complaints in respect of the personal data, kindly communicate to Accordia in writing at the postal address: Unit 15-3 (UG), UOA Business Park, No.1 Jalan Pengaturcara U1/51A, Seksyen U1, 40150 Shah Alam. Selangor Darul Ehsan; or email address at enquiry@accordiasolution.com.

8. Storing of information

We use hosting provider Google Cloud and Alibaba Cloud services, therefore your information may be transferred to and stored on servers in various locations both in and outside of Malaysia. Accordia and/or The Company maintains control of your information. We protect your information using technical and administrative security measures to reduce the risks of loss, misuse, unauthorised access, disclosure and alteration. Some of the safeguards we use are firewalls and data encryption, physical access controls to our data centres, and information access authorisation controls.

9. Rights for access and correction or modification of information

- a) Updated your personal information
 - In connection with your right to manage personal information you provide to us, you may
 access, update, change, correct or request deletion of your information either through the
 Services or through our customer support.
 - Additionally, you may request access to any personal information we hold about you at any time by contacting us at enquiry@accordiasolution.com.
 - There may be instances where we cannot grant you access to the personal information we hold. For example, we may need to refuse access if granting access would interfere with the



privacy of others or if it would result in a breach of confidentiality. If that happens, we will give you written reasons for any refusal.

- b) Managing Marketing Communications
 - We will honour your choices when it comes to receiving marketing communications from us.
 - You have the following choices if you have been receiving marketing communications from us that you no longer wish to receive:
 - Subject to your control, our mobile applications may send push notifications to your mobile device. If you are receiving push notifications and no longer wish to receive these types of communications, you may turn them off at the device level.
 - Remember that even if you choose not to receive marketing communications from us,
 we will continue to send you mandatory service or transactional communications.
- c) If you have any request in relation to the above-mentioned rights and/or for any inquiry in respect of your personal Information and/or Data, please write to and/or contact the following: -

Company : ACCORDIA GLOBAL SDN BHD

Contact No : +603-5569 9816

Email : enquiry@accordiasolution.com

Company Address: Unit 15-3 (UG), UOA Business Park, No.1 Jalan Pengaturcara U1/51A,

Seksyen U1, 40150 Shah Alam. Selangor Darul Ehsan

10. Social Media Features

Our Services may use social media features, such as Facebook sharing ("Social Media Features"). These features may collect your IP address and which page you are visiting within our Services, and may set a cookie to enable the feature to function properly. Social Media Features are either hosted by a third party or hosted directly on our Services. Your interactions with these features are governed by the privacy statement of the company providing the relevant Social Media Features.

11. Security of Your Personal Data

We use physical, electronic, and administrative safeguards to assist us in preventing unauthorized access, maintaining data accuracy, and correctly using your personal information and any Content. Accordia Global Sdn Bhd is certified under ISO 27001:2022, an internationally recognized standard for information security management, which reflects our commitment to maintaining robust security controls. We use reasonable efforts to avoid the presence of malware on our Site or as part of the Services. Except to the extent due to



our gross negligence or wilful misconduct, we expressly disclaim, and you release us from any liability associated with any technical issues caused by the Services, including any malware communicated to your computer or mobile device through any use of the Services. Except as specified in this Privacy Policy, we use commercially reasonable efforts to limit access to your personal information and any Content to the employees, agents, and officers of Accordia who need the information for their jobs.

12. External Links

Other companies or organizations may have links to their websites in our Services. We are not responsible for how these other companies or organizations collect, use, disclose, or secure the information that you provide them. If you choose to access a third-party website through a link provided as part of our Services, you do so at your own risk and subject to any terms of service or privacy policy (if any) associated with such third-party website. Similarly, we use third party-provided APIs and other tools to receive information from accounts to which you give us access (e.g., your email account(s)). We are not responsible for errors or other issues associated with the functionality of such APIs and other tools. Accordia will not be held responsible for events arising from third parties gaining unauthorised access to or third parties' theft of your personal information and/or data.

13. Changes to our privacy policy and PDPA

We may change this privacy policy and PDPA from time to time. Any updated versions of this privacy policy and PDPA will be posted on our website. We recommend to review the most updated version of this statement each time you provide your personal data to Accordia.

14. In Summary

Accordia is committed to protecting your privacy. The information collected from our Services helps us better understand our market and consumer interests. This allows us to serve our customers and business associates with the level of satisfaction they deserve.

If you have questions or suggestions regarding this Privacy Policy or our privacy practices, please send an email message to enquiry@accordiasolution.com.

This privacy policy was last updated on 15 May 2025.

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