

1. Preamble

- 1.1. WorkerzDirect Sdn Bhd (Malaysia), its subsidiaries and/ or affiliates, including but not limited to Swipe Company Limited (Hong Kong) (hereinafter collectively referred to as “SwipeCo”, “we”, “us” or “our”) undertake to fully meet the requirements of the respective data privacy law of the respective jurisdictions, including but not limited to the Personal Data Protection Act 2010 in Malaysia, the Personal Data (Privacy) Ordinance, Chapter 486 of the Laws of Hong Kong, and Law No. 11 of 2008 Electronic Information and Transaction, in Indonesia or whichever is stricter. In doing so, we will ensure our staff comply to the strictest standards of security and confidentiality in respect of all personal information and data submitted by you via our products (e.g. mobile application), services and website to maintain customer trust.
- 1.2. This Privacy Policy (the “Policy”) describes how SwipeCo collects, uses, maintains and shares information about you and the choices that you can make about the way your information is collected, used, maintained and shared.
- 1.3. This policy applies to all services available from SwipeCo. We strongly recommend you to read this policy before using any service of SwipeCo. By using SwipeCo services, you are agreeing to the current terms of this Privacy Policy and consenting to SwipeCo’s use of your Personal Data provided by you to SwipeCo.

2. Information collected

- 2.1. Personal Data is information and/or data that identifies you as an individual, such as your name, national identification number, date of birth, age, gender, nationality, mailing address, email address, mobile number, photo, employment information, income tax particulars, income level, credit card account number, bank account number, marital status, medical report/record, etc. When it is necessary, we may collect such other additional personal information from you to facilitate a transaction and/or to comply with all applicable anti-money laundering and/or counter-terrorist financing laws, other regulations and our internal policies. We may collect your sensitive personal data (including data related to your physical or mental health, the commission or alleged commission of offences etc) if it is required by another relevant authority to facilitate a transaction through any services provided by SwipeCo to you. We will only use your sensitive personal data to provide the service(s) you signed up for. For the avoidance of doubt, Personal Data as defined in this Clause 2.1 shall include the sensitive personal data as specified herein.
- 2.2. The Personal Data we collect from you can be either voluntary or obligatory. Voluntary personal data are those data that are not mandatory in order for us to provide you with our services and products. If you do not provide us with voluntary personal data, you can still sign up for our services and products. On the other hand, obligatory personal data are those data that we require in order to provide our services and products. If you do not provide us with the obligatory personal data, we would not be able to render you with our services and products. Voluntary and obligatory personal data may differ for each services and products and will be indicated in the relevant application forms.
- 2.3. You are not obliged to provide the Personal Data requested if you are not agreeable to this Privacy Policy. However, we may not be able to render certain services requested by you if you fail to do so and SwipeCo shall not be held liable for any loss, damage, cost or expenses whatsoever in connection to your rejection in providing the required Personal Data for us to continue rendering SwipeCo services to you.

3. Device and Connection Information

- 3.1. We automatically collect device information when you install, access and use our services. This includes information such as mobile carrier, mobile device model, operation system, browser type and version, IP address, device platform (Android/iOS), browsing platform...etc.

4. Usage and Log Information

4.1. We collect service-related, diagnostic, and performance information. This includes information about your activity, log files, diagnostic, crash, website, referral url and performance logs and reports.

5. Cookies

- 5.1. We use cookies to operate and provide our services, to remember your choices, such as your language preferences, and to customize our services for you.
- 5.2. We also use cookies to help us keep your account, data and the SwipeCo products and services safe and secure.
- 5.3. We use cookies to combat activity that violate our policies or otherwise degrades our ability to provide the SwipeCo products and services.
- 5.4. We use cookies to better understand how people use the SwipeCo products and services so that we can improve them and to provide you with the best experience possible.
- 5.5. You can adjust settings on your browser so that you will be notified when you receive a cookie. Please refer to your browser documentation to check if cookies have been enabled on your computer or to request not to receive cookies.

6. Status Information

6.1. We collect information about your online and status message changes on our services, such as whether you are online (your “online status”), when you last used our services (your “last seen status”), and when you last updated your status message.

7. Purpose for which we may process your personal data

7.1 To enable us to fulfil our obligation under the contract between us and for us to render the services you have requested, we need to process your Personal Data for purposes including the following:

- Processing your application for products and services, effecting transactions, payments and completing instructions or requests;
- Communicating with you including but not limiting to your enquiries;
- Providing products and services to you;
- Managing and maintaining your account with SwipeCo;
- Operational purposes;
- Conducting customer due diligence checks as required by law and regulations;
- Marketing and promotional purposes provided by us and/or our merchants;
- Statistical purposes;
- Establishment, continuation and management of your account with us;
- Handling and investigating complaints and/or resolving disputes.

7.2 For some purposes in connection with the service you have requested, we have a legal or regulatory obligation to process your personal data. These purposes include but are not limited to:

- The prevention, detection, investigation and/or prosecution of crime in any jurisdiction (including, without limitation, money laundering, terrorism, fraud and other financial crime);
- Identity verification, government sanctions screening and due diligence checks;
- To comply with the law, regulations, reporting requirements under financial transactions legislation, and demands of any authority or regulator.

8. How we collect information

8.1. We collect Personal Data when you provide information to us or through the use of web technology and/or SwipeCo products (e.g. mobile application).

9. To whom we may disclose personal data

9.1 Any member of SwipeCo, including our employees, agents and advisers, may disclose your Personal Data to any of the following parties for any of the purposes specified below:

- Professional advisers (including auditors), third party service providers, agents or independent contractors providing services to support SwipeCo's business;
- Our business alliance partners who may provide services to you;
- A payment gateway service provider where the disclosure is in connection with the use of a card;
- Any court, tribunal, regulator, enforcement agency or any other authority or their agents;
- Any authority to conduct anti-money laundering related checks, for fraud prevention and detection of crime purposes;
- Anyone we consider necessary in order to provide and improve the services that we provide you;
- Anyone reasonably in relation to the services and products that we may provide to you.

9.2 Personal data collected may be transferred, stored and processed in any country in which SwipeCo operates. You are deemed to have agreed to, consented to and authorized us to disclose and/or transfer your Personal Data under the circumstances stated above, without further notification to you.

10. Correction of your information

10.1. We are committed to ensure that Personal Data we hold about you is accurate, complete, not misleading and up-to-date. If there are any changes to your personal data or if you believe that the personal data we have about you is inaccurate, incomplete, misleading, or not up-to-date, you may correct factual errors in your personal information that we have collected by sending us a request that credibly shows the error.

10.2. To protect your privacy and security, we will take reasonable steps to verify your identity before making corrections. We reserve the right to charge you a reasonable fee if you request access to your data.

10.3. Your Personal Data will be stored by us until it is no longer necessary to provide our products and services or your account is deleted, whichever is the later. This is a case-by-case determination depending on the nature of the Personal Data and/or the necessary legal compliance by SwipeCo in accordance with the relevant law applicable to the country of service.

11. Security

11.1. Personal data may be transferred to, or stored at, a location outside of your country of residence, which may not have data protection law. The security of your personal data is important to us. We have technical and organisational security measures in place to safeguard your personal data. When using external service providers, we require that they adhere to security standards mandated by SwipeCo. We may do this through contractual provisions. Regardless of where personal data is transferred, we take all steps reasonably necessary to ensure that personal data is kept securely.

11.2. You should be aware that methods of transmission over the Internet or methods of electronic storage is not 100% secure. Therefore, while we strive to protect your personal data against possible unauthorized access, we cannot guarantee its absolute security.

11.3. Registered users should safeguard his/her unique password by keeping it secret and confidential and never share these details with anyone.

11.4. We may use third party payment gateway service providers to facilitate electronic transactions. You shall take note of the privacy notice prepared by the third party payment gateway service provider before completing your transaction. In view that the web browser and third-party payment gateway are not within the control of SwipeCo, SwipeCo will not be held liable for any loss, damage, cost and expenses arising from your use of the web browser and/or third-party payment gateway.

12. Retention

12.1. We retain your Personal Data in line with our legal and regulatory obligations and for business and operational purposes. Unless otherwise stated herein, the personal information and other data will be retained by us after deactivation of the relevant service within a certain period subject to the legal requirements. After the legal required period, we will destruct or permanently delete your personal data within reasonable and practicable period.

13. Marketing

13.1. We may use your personal data:

- To conduct market research and surveys with the aim of improving our products and services;
- For marketing purposes, promotions and events.

We process your personal data for these purposes because it is in the interest of our business to do so with the intention of improving our products and services and generating our business.

14. Contact us

14.1. All requests regarding correction of your personal information should be made in writing to:

The Information Security Officer
Workerz Direct Sdn Bhd
Level 2, Tower 7, Avenue 5, The Horizon, Bangsar South
No. 8 Jalan Kerinchi, 59200 Kuala Lumpur, Malaysia
Tel: +60 1 49429935

Alternatively, you may contact our Information Security Officer via the contact information above. Please **do not** send your personal information directly to the contacts listed above.

14.2. If you have questions regarding this Policy, please contact our Customer Service at +60 1 49429935 or email us at support@SwipeWorkers.com

15. Changes to this Policy

15.1. We reserve the right to update, revise, vary, modify, delete and/or amend this policy at any time as we deem necessary. We shall notify you if we make any changes to the Privacy Policy and give you the opportunity to review the revised Privacy Policy before you choose to continue using SwipeCo services. A copy of the latest revised Privacy Policy will be posted on our website at <https://swipeworkers.com> and/or other places we deem appropriate.