

TIFE TECHNOLOGIES SDN BHD Privacy Notice

Last updated: **15 July 2018**

TIFE TECHNOLOGIES SDN BHD (Company No.1278244-P) registered in Malaysia (“**TIFE**”, “**we**”, “**our**” or “**us**”) is committed to ensure that the processing of personal data of its users (“**Users**”) by TIFE complies with the Personal Data Protection Act 2010 (“**PDPA**”). This notice is issued pursuant to the PDPA (“**Privacy Notice**”).

This Privacy Policy is to inform you what information we collect when you visit our website at <http://www.tife.com.my> and any additional websites owned and operated by TIFE (“**Site**”) and when you use our downloadable mobile application (“**App**”) and related public transportation information and additional services (collectively referred to as the “**Service**”). Capitalised terms which are not defined herein, shall have the meaning ascribed to them in our Terms of Use available at http://www.tife.com.my/terms_of_service.pdf which this Privacy Policy is incorporated thereto by reference (together, “**Terms**”).

You may access and/or use the service only if you fully agree to this Privacy Policy – and by accepting this Privacy Policy, accessing and/or using the service, you signify and affirm your informed consent to the collection and processing of your personal information as defined and explained below. If you disagree to any term provided herein, you may not use the service.

***Please note:** you are not obligated by law to provide us with any information. You hereby acknowledge, warrant and agree that any information you do provide us is provided of your own free will and consent, for the purposes and uses described herein.*

Information We May Collect

We may collect two types of data and information from our Users. The first type of information is non-identifiable and anonymous information (“**Non-Personal Information**”). We are not aware of the identity of the User from which we have collected only the Non-Personal Information. Non-Personal Information which is being gathered consists of technical information and behavioural data regarding the activity of the User on the Service, operation system and browser, type of mobile device, and operating system version and settings, User’s screen resolution, duration of usage of the Service, User’s ‘clickstream’ on the Site, keyboard language, etc.

The second type of information is individually identifiable information (“**Personal Information**”). This information may, in itself or taken together with additional information available to TIFE, identify an individual, or may be of a private and/or sensitive nature. Personal Information we collect includes: username, email address, phone number, your geo-location, your travel habits (such as routes, times of travel from one destination to another), your home address, office address or other favourite destinations, public transportation lines, stations and/or routes you may have saved or searched for, User’s search history on the Service, User’s most-used routes and stations, all User-generated data, User’s reports and reviews regarding the Service, your in-app settings, your rank and user profile including your nickname and avatar, in-app usage scores (“**points**”) you receive for using the Services, Facebook Access Token, Google Sign-In Token, Advertising ID, User IP address, and any additional information which the User actively chooses to provided.

The geo-location information we collect includes detailed location and route information, including GPS signals and other information sent by your mobile device for which the Service is installed and currently activated. TIFE uses this location and route information to create a detailed location history all of public transit trips.

We collect such information via your use of the Service and through information which you voluntarily provide and/or upload to the Service as further described in this Privacy Policy below, for purposes of providing the Service, enhancing the User's experience and personalising the Service and security purposes as further detailed below and.

If you choose to use the Services via a User Account you may create such User Account via Facebook Connect, Google Sign-In, personal Email address or other social networks. If you choose to use your social media network accounts then TIFE may also have access to your public profile, which includes your name, gender, profile picture, age group and residency.

For avoidance of doubt, any Non-Personal Information connected or linked to any Personal Information is deemed as Personal Information as long as such connection or linkage exists.

How We Collect Information On Our Users

Two main methods we use:

- a) **Use of the Service** – We collect Non-Personal and Personal Information when you access or use the Service. In other words, we are aware of your usage of the Service and may gather, collect and record the information relating to such usage. We also collect Non-Personal and Personal Information derived from information we receive from third party services and providers we work with.
- b) **Voluntarily Provided** – We may collect Personal Information which you voluntarily provide when you use the Service. We may also collect information provided via your social network account in the event that you voluntarily choose to create a User Account via such third party social networks (like Facebook or Google+).

How We Use Your Information

Your information is collected for the following purposes: (i) to provide you with and to operate the Service, including for statistical and research purposes and creation of aggregated anonymous data; (ii) to personalise the Service and content provided to you, to customise your experience with the Services, to suggest you with transport recommendations based on your preferences and to enable you to retrieve your information; (iii) to develop, improve and customise the Service, the experience of other users and the offering available through the Service; (iv) to be able to contact Users for the purpose of providing them with technical assistance, support, handle requests and complaints and collect feedback in connection with performance of the Services; (v) to send you updates, notices, announcements, and additional information related to the Service (vi) to be able to reply to User online queries in connection with performance of the Services; (vii) for customisation and improvement of the Service's accuracy and interface; (viii) to use such information for TIFE's commercial purposes; (ix) to display or send to you marketing and advertising material when you are using the Service, including in accordance with the section titled 'Direct Marketing' herein and (x) to comply with any governmental agencies' legal requests or court orders, and/or with any applicable law, rule or regulation. Any statistical, aggregated or anonymous data may be used by us at our discretion for any purpose.

Sharing Information With Third Parties

TIFE will not share any Personal Information it collects with any third party, except in the following cases: (i) to satisfy any applicable law, regulation, legal process, subpoena or governmental request; (ii) to enforce this Privacy Policy and/or the Terms of Use, including investigation of potential violations thereof; (iii) to communicate with its Users regarding our service; (iv) to detect, prevent,

or otherwise address fraud, security or technical issues; (v) to respond to User's support requests; (vi) respond to claims that any content available on TIFE's Service violates the rights of third parties; (vii) to respond to claims that contact information (e.g. name, e-mail address, etc.) of a third-party has been posted or transmitted without their consent or as a form of harassment; (viii) to protect the rights, property, or personal safety of TIFE, its Users, or the general public; (ix) when TIFE is undergoing any change in control, including by means of merger, acquisition or purchase of all or substantially all of its assets; or (x) to collect, hold and/or manage your Personal Information through TIFE's authorised third party service providers, as reasonable for business purposes, which may be located in a country other than the country of your residency or location, that may not have the same data protection laws as your jurisdiction, as listed below; (xi) pursuant to your explicit approval prior to the disclosure; (xii) cooperate with third parties for the purposes of adding operational features to the Service, enhancing and personalising the User's experience, monetisation and commercialisation; or (xiii) to authorised third party service providers solely for the purpose of providing you with the Service. For avoidance of doubt, TIFE may transfer and disclose or otherwise use Non-Personal Information or information which is linked to anonymous random identifiers or information that is aggregated in a non-identifiable way, at its own discretion.

Deletion or Modification of Personal Information

TIFE retains Personal Information for such a period of time as is necessary in order for TIFE to be able to use the Personal Information for the sole purposes described in this Privacy Policy and for the purpose of providing its Services under the Terms of Use. If for any reason you wish to modify or delete your Personal Information, please contact us at: support@tife.com.my and we will make reasonable efforts to modify anonymised or delete any such Personal Information pursuant to any applicable privacy laws.

Third Party Software/Service

While using the Service we may be using third party software and/or service for various needs, inter alia, in order to collect and/or process the information detailed herein ("**Third Party Service Provider**"). Note that these are independent software and/or service providers and TIFE does not take any liability about the information collection policies of these providers, or about any kind of issue, legal or otherwise, relating thereto.

TIFE may also provide additional transit-related services, including on-demand transit services, provided by its third party operational service partners (as they may evolve from time to time at TIFE's discretion). Such third party providers' services include Grab, MULA and any other party, all of which are subject to a respective terms of use and privacy policies.

Creating an Account Using Social Networks

By signing onto TIFE using your social network account (such as your Facebook account), you agree to provide TIFE with information (including personal information) obtained from the social networks, for the purposes provided under this Privacy Policy. In the event that you create a User Account via your Facebook or Google social network account, TIFE may have access to your public profile namely your name, gender, email address, photo, age group and residency. Your use of social networks to create your account is subject to the privacy policies and term of use of such third party social networks.

Use of Cookies

To make the Site work properly, when you visit or access our Site we use industry-wide technologies such as “cookies” (or similar technologies) in order to improve your user experience by enabling us to ‘remember’ you, either for the duration of your visit (using a ‘session cookie’) or for repeat visits (using a ‘persistent cookie’). In addition, we may use cookies in order to deliver ads relevant to you. By using or accessing our Site, you agree to our use of cookies. Most browsers will allow you to erase cookies from your computer’s hard drive, block acceptance of cookies, or receive a warning before a cookie is stored. Please note that by deleting or disabling future cookies, your user experience may be affected and you might not be able to take advantage of certain functions of our Site, therefore, your online experience may be limited.

Direct Marketing

You hereby agree that we may use your contact details for the purpose of informing you regarding our products and Service, which may interest you, and to send to you other marketing material, transmitted to the email address or to the mobile device. You may withdraw your consent contacting us at: support@tife.com.my. We may also permit, solicit or contract certain authorised partners of TIFE to conduct advertising campaigns on the Services. In addition, TIFE may display advertisements via the Service. Such advertisements that you see when accessing the Service may be targeted based on your geographic location and language. It is clarified that TIFE is not responsible for the content of said advertisements and the products delivered or services rendered thereby by third parties and you irrevocably and unconditionally agree that we shall not be held responsible or liable in connection thereof.

Security

We take a great care in implementing and maintaining the security of TIFE's Service and its User's Personal Information. TIFE employs industry standard procedures and policies to ensure the safety of its Users' Personal Information, and prevent unauthorised use of any such information. We cannot, however, guarantee that unauthorised access will never occur.

Where We Store Your Information

The Information that we collect from you is stored in the Cloud Storage but for the purposes of providing support and handling the Services may be accessed transferred to, and stored at, a destination outside of your country. By submitting or permitting us to collect your Information, you agree to this transfer, storing or processing. Information transferred will be treated in accordance with this Privacy Policy.

Changes to the Privacy Policy

The terms of this Privacy Policy will govern the use of the Service and any information collected therein. TIFE reserves the right to change this policy at any time, so please re-visit this page frequently. In the event of any substantial change of this policy, we will make reasonable efforts to post a clear notice on the Site. Such substantial changes will take effect **Seven (7) days** after such notice was provided on our Services or sent by email. Otherwise, all other changes to this Privacy Policy are effective as of the stated “Last Updated” date and your continued use of the Service after the Last Updated date will constitute acceptance of, and agreement to be bound by, those changes.

Additional Information, Complaints and Contacting Us

If you have any questions (or comments) concerning this Privacy Policy, you are welcome to send us an email at: support@tife.com.my and we will make an effort to reply within a reasonable

timeframe. In the event that you wish to make a complaint about how we process your personal data, please contact us in the first instance at support@tife.com.my and we will endeavour to deal with your request as soon as possible. This is without prejudice to your right to launch a claim with your supervisory authority. By contacting TIFE you warrant and agree that you are free to do so, and that you do not provide TIFE with information which violate any third party intellectual rights . Without degrading from the aforesaid, all rights, including intellectual property, arising from your communication with us will be owned by TIFE and will be considered as TIFE's confidential material. It is clarified that any use of the information you are providing us will be done in TIFE's sole discretion, and TIFE is not obligated to use all or part of such information

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