

## Privacy Policy & Personal Data Protection Policy For Users of ATLAS PAY

**Last Updated Date : 2 November 2020**

**Important** - Please read the following personal data protection statements relating to all users of the ATLAS's digital wallet or virtual mobile wallet ("**ATLAS PAY** ") carefully.

By using ATLAS PAY operated by Fass Payment Solutions Sdn. Bhd. (Registration No.: 201201032773; 1017261-P) ("**Fasspay**" / "**we**" / "**us**") in the ATLAS Auto mobile application ("**ATLAS Auto**") which is owned and operated by ACO TECH SDN. BHD. (Company Registration No.: 201901028783 (1338112W)) ("**ACO TECH**"), you agree that you have read, understood, accepted and agreed this Privacy Policy and Personal Data Protection Policy for Users of ATLAS PAY ("**Wallet Privacy Policy**") and the ATLAS Auto Privacy Notice which you accepted when registering to use ATLAS Auto. If you do not agree with or fall within this Terms of Use and/or the Wallet Privacy Policy, please stop using ATLAS PAY and/or do not use ATLAS PAY.

This Wallet Privacy Policy constitutes a legally binding contract between you, the user of ATLAS PAY ("**User**") and, Fasspay in respect of Fasspay's processing of your data in connection with the ATLAS PAY. ACO TECH and Fasspay are each a data controller in respect of your Personal Data and ACO TECH's processing of your data in connection with the Wallet is set out in the ATLAS Auto Privacy Notice.

This Wallet Privacy Policy and the Terms of Use can be viewed, accessed or retrieved using the following web address, [http://public-assets.fasspay.com/ew/partner/acotech/privacypolicy\\_en.html](http://public-assets.fasspay.com/ew/partner/acotech/privacypolicy_en.html). Please review this Wallet Privacy Policy and the Terms of Use from time to time. You are aware and agree that Fasspay may, at its sole discretion, update or revise the Wallet Privacy Policy at any time. We will give you at least twenty-one (21) days' prior notice through (i) announcements on our website; (ii) email; (iii) ATLAS PAY; or (iv) any other appropriate means, before making any amendments to this Wallet Privacy Policy.

### PRIVACY POLICY & PERSONAL DATA PROTECTION POLICY

- 1 For the purposes of this Agreement, "**Personal Data**" means information about you, from which you are identifiable, including but not limited to your name, identification card number, birth certificate number, passport number, nationality, address, telephone number, credit or debit card details, race, gender, date of birth, postal address, email address, other contact details, identification details, payment details, IP address, network information, device and user identifiers, financial account details and any information about you which you have provided to Fasspay in registration forms, application forms or any other similar forms in connection with the ATLAS PAY and/or any information about you that has been or may be collected, stored, generated as a result of your use of the ATLAS PAY.
- 2 This Wallet Privacy Policy also serves as a Personal Data Protection Notice pursuant to the Malaysian Personal Data Protection Act 2010.
- 3 The provision of your Personal Data to Fasspay is voluntary. However, if you do not provide Fasspay your Personal Data, your request for ATLAS PAY may be incomplete and Fasspay will not be able to process your Personal Data for the Purposes outlined below and Fasspay may not be able to allow you to use ATLAS PAY.
- 4 Fasspay may use and process your Personal Data for business and activities of Fasspay which shall include, without limitation, the following ("**Purposes**"):
  - (a) to perform the Parties' obligations in respect of any contract entered with you;
  - (b) to provide you with any services pursuant to the Terms of Use;
  - (c) to process, manage or verify your application for ATLAS PAY pursuant to the Terms of Use;
  - (d) to validate and/or process payments pursuant to the Terms of Use;
  - (e) to process any refunds, rebates and or charges pursuant to the Terms of Use;
  - (f) to facilitate or enable any audit, investigation or checks as may be required pursuant to the Terms of Use;
  - (g) to develop, enhance and provide ATLAS PAY pursuant to the Terms of Use;
  - (h) for internal administrative purposes, such as auditing, data analysis, database records or operational, planning, product or service development, troubleshooting and research requirements;
  - (i) for purposes of detection, prevention and prosecution of crime including in relation to their obligations under Anti-Money Laundering, Anti-Terrorism Financing and Proceeds of Unlawful Activities Act 2001 or any applicable law;

- (j) for Faspay to comply with their obligations under applicable laws or regulations (whether in Malaysia or overseas, including disclosing your Personal Data to Malaysian and overseas regulators, law enforcement agencies or courts);
- (k) for any communications with you to ensure customer satisfaction, including without limitation to conduct surveys or to notify you of any changes to the Terms of Use; and
- (l) to respond to questions, comments and feedback from you.

- 5 You are responsible for ensuring that your Personal Data is accurate, true, complete and kept current. If any of the Personal Data that you have provided to us changes, for example, if you change your email address, telephone number or payment details, please update your details by sending your request to ACO TECH through [talkto@myatlas.com.my](mailto:talkto@myatlas.com.my) or through ACO TECH's Customer Service telephone number, 012-229 3588. Faspay and/or ACO TECH shall, to the best of its/their abilities, effect such changes as requested within fourteen (14) working days of receipt of your request.
- 6 Faspay may transfer your Personal Data to its affiliates, service providers, consultants, advisers (whether in Malaysia or overseas) for the purpose of using such data in the operations of the Designated Payment Instrument that are provided to Faspay by such affiliates, service provider, consultants, or advisers. Faspay will ensure such affiliates, service providers, consultants and advisers process and protect your Personal Data in accordance with applicable law.
- 7 Faspay is committed to full compliance with the provisions of the Personal Data Protection Act 2010. Faspay will retain your Personal Data for as long as legally required or for as long as necessary to provide ATLAS PAY to you or for any other purposes set out in this Wallet Privacy Policy. Faspay will take reasonable steps to destroy or permanently delete your Personal Data in the Faspay's custody if your Personal Data is no longer need for the purposes set out above.
- 8 Should you wish to request access to your personal data, or if you have any inquiries or complaints in respect of our processing of your personal data, a data protection officer may be communicated with in writing through [talkto@myatlas.com.my](mailto:talkto@myatlas.com.my) or through ACO TECH's Customer Service telephone number, 012-229 3588.