

Privacy Policy

Your personal data is of paramount importance to us and we take your right to privacy seriously. We are committed to safeguarding and protecting your Personal Data (as defined below) provided to us, in accordance with the Personal Data Protection Act 2010 (“**PDPA 2010**”).

To this end, we have developed this privacy policy (“**Privacy Policy**”) which shall be applicable whenever we process your Personal Data for the purposes of providing our services to you. For purposes of this Privacy Policy, services shall mean PMSB auction (which include on-site and/or online auction) and storage services (“**Services**”).

Please read this Privacy Policy carefully and diligently in understanding our practises when processing your Personal Data.

1. Collection of Personal Data

For purposes of this Privacy Policy, “personal data” means information identifiable about you, including but not limited to your name, IC number, softcopy/hardcopy of your IC, contact details, company information, telephone number, email address, nature of your business and/or employment, bank account information, device model, IP address, cookie information, GPS information, and SST registration number (where applicable), information in connection with the Services and any information about you which you have provided to us/PMSB in any correspondence, interactions with our physical auction house and any of our employee(s), any information about you that has been or may be directly or indirectly collected, stored, used and processed by us/PMSB from time to time, to the greatest extent where it is permissible by applicable laws and regulations (“**Personal Data**”).

2. When do we process your Personal Data?

We/PMSB will receive and store your Personal Data from your browser or mobile platform or the Personal Data as provided by you in your member registration form and/or bidder form when you:-

- (a) register as a member of our website (<https://praisemillion.com>) (“**Website**”);
- (b) register either as a floor bidder or an online bidder of any of our auction event;
- (c) access or use the Services or log in to our Website;
- (d) respond to our survey or marketing communication; and
- (e) contact us for purposes relating to our Services and/or auction event.

3. Purposes of which we process your Personal Data

Your Personal Data that is collected pursuant to the above may be processed, used and/or stored, without limitation, for the following purposes:-

- (a) to handle your membership registration on our Website and any other matter relating to your membership, including verifying whether the information as provided by you is valid, communicating and whether any prior membership registration has been made with the same Personal Data provided by you to us;
- (b) to monitor, review and improve our Website and/or Services in order to serve you better (such Personal Data will only be used to analyse or understand how you interact with our Services, to further improve and innovate our Services);
- (c) to personalise your experience when using our Website and to allow us to deliver the type of content and product offering that appeal to you the most;
- (d) to facilitate our auction event operation (whether onsite or offsite/online bidding), including depositing and withdrawing funds from bidder accounts, registration of bids and completing the transactions relating to a sale and all its associated fees;
- (e) to process your transaction(s) more efficiently;
- (f) to send email to you periodically in order to keep you updated with the Services and/or auction events organised by PMSB;
- (g) to communicate and/or liaising with you in respect of any query/complaint you may have and to follow up with you after correspondences (including but not limited to live chat, emails or phone enquiries);
- (h) to enforce and/or defend any legal and/or equitable rights that we may have and for the purposes of obtaining legal advice;
- (i) for purposes of detection, prevention, investigation and/or prosecution of crime and illegal/fraudulent activities, whether within or outside of Malaysia;
- (j) to maintain and update internal records;
- (k) for internal audit and recording purposes;
- (l) to legally disclose your Personal Data to any individual or company involved in negotiation or assignment should we engage in any merger, acquisition, financing, consolidation or sale of assets, or in any other case whereby we may transfer our operating assets in part or in total;
- (m) to enable us to perform our obligations and/or enforce our rights under any agreement/document of which we are a party to;
- (n) to provide your Personal Data to any third-party partners, such as banks, so as to perform any agreed services; and
- (o) to enable us to comply with our obligations as required by any applicable laws and/or regulations.

4. Usage of cookies and other equivalent/similar technologies

4.1 We strive to provide the best user experience for you. In order to do so, we may collect your Personal Data through cookies.

4.2 A cookie is information which is sent and stored on your computer/device when you first access to/use our Website that enable us to identify your computer/device the subsequent times you access to/use our Website. A cookie allows us to collect information about you that are not personally identifiable, which includes, without limitation to, the general information about your computer/device settings, your connection to internet, your browsing patterns and your geographical location. Such information is to be used only for purposes of managing and creating a better user experience and identifying areas of improvement for the Website.

- 4.3 When you access/use our Website, we will seek your consent to place cookie to your computer/device by displaying a cookie banner.
- 4.4 Most internet browsers are initially set up to accept cookies. Most internet browsers also provide you the option to accept or reject all cookies, erase/delete all cookies stored on your computer/device or be notified before a cookie is stored on your computer/device. If you choose not to accept cookies, please bear in mind that this may impair the usability of the Website and you may not be able to utilise some of the features of the Website and Services offered.

5. Security of Your Personal Data

- 5.1 The security of your Personal Data is our highest priority. We have appropriate and reasonable security measures in place to protect against misuse and loss and from unauthorised access, modification or disclosure of your Personal Data within our reasonable control.
- 5.2 In the event where we engage a third party for any service relating to our Services or Website of which the disclosure of your Personal Data is necessary, we compel such third party to protect and have appropriate measures in place to safeguard all Personal Data that is transmitted.
- 5.3 The internet is not a secure medium. Please bear in mind that while we strive to protect your Personal Data, no data transmitted over the internet can be guaranteed as completely secured. As such, we cannot warrant or guarantee the security of any Personal Data transmitted to us and you shall do so at your own risk.
- 5.4 We shall not bear any responsibility nor in any way be held liable for any misuse, unauthorised access, modification, disclosure or loss or interception of your Personal Data beyond our reasonable control.

6. Disclosure of your Personal Data

The confidentiality of your Personal Data is imperative to us. We hereby undertake not to release or disclose your Personal Data to any third party without your prior consent.

However, we may release or disclosure your Personal Data without your prior consent under the following circumstances:-

- (a) to our subsidiary, affiliated or related companies;
- (b) to our Website hosting partner(s), third party service provider(s), data processor(s), agent(s), business/joint venture partner(s) whose assistance are necessary in the operation and maintenance of our Website, our business and the Services (so long as these parties agree to keep your Personal Data strictly confidential);
- (c) where such release or disclosure of your Personal Data is compelled by laws and/or regulations or that it is for the purposes of complying with court

decisions, judgments or legal requirements or the order of relevant government authorities;

- (d) issues relating to national security and/or public interest;
- (e) Personal Data of yours collected from legally and publicly disclosed information and sources;
- (f) to our accountant(s), auditor(s), consultant(s), lawyer(s) or any other financial and/or professional advisor(s) appointed in connection with our business on a strictly confidential basis to provide services to us;
- (g) to your immediate family members and/or emergency contact list, if any, that has been provided to us;
- (h) data centres and/or servers located within or outside Malaysia for data storage purposes or otherwise; and
- (i) where release or disclosure of your Personal Data may be required in the event of a potential, proposed or actual sale/disposal of any of our business or interest, merger, acquisition, consolidation, re-organisation, funding exercise or asset sale relating to us, or in the event of winding-up.

7. Personal Data from other Individuals

In the event that you provide Personal Data relating to other individual(s) to us, you represent and warrant that you have obtained the full authority from such individual(s) to provide their Personal Data to be processed and used in the manner as set out in this Privacy Policy and that they are fully aware and agree to all the contents of this Privacy Policy.

8. Protection of Minors

All form of access and/or usage of our Website by a minor is strictly prohibited. Registration as a member of our Website and either as a floor bidder or online bidder of any of our auction events by minors shall not be allow. For purposes of this Privacy Policy, a minor means any person who is below the age of eighteen (18).

9. Amendments/Revisions to this Privacy Policy

Please bear in mind that the terms of this Privacy Policy may be amended/revised by us from time to time, subject to the changes to the applicable laws and regulations and/or the development in our nature of business.

We may inform you of such amendments/revisions by way of posting an announcement on the Website and/or by way of email to the email address you have provided to us. As such, kindly check our Website and/or your email inbox from time to time for such amendments and/or revisions.

10. Your rights and consent

You are entitled to the following rights:-

- (a) Right to access to the Personal Data we hold about you;
- (b) Right to rectify/amend/revise your Personal Data we hold about you;
- (c) Right to erase/remove/delete your Personal Data we hold about you;
- (d) Right to withdraw consent to receiving direct marketing communications from us;
and
- (e) Right to restrict/limit data processing.

Whenever reasonably possible and required, we will strive to grant these rights within such period as required under the applicable laws.

However, kindly note that we may not be able to continue providing Services to you if you partially or entirely withdraw or consent or request that we remove/delete your Personal Data entirely.

If you would like to exercise any one or more of the abovementioned rights, please contact us at [082-349069] or email to us at [member@praisemillion.com.my].

Enquiries

Should you have any enquiry in respect of our Privacy Policy, please do not hesitate to contact us at [082-349069] or email us at [member@praisemillion.com.my].

This Privacy Policy is written in English language and may be translated into other languages. In the event of any inconsistency between the English version and the translated version of this Privacy Policy, the English version shall prevail.