

BUBBLE GUM X-THETIC™

PRIVACY POLICY

BBGA UPTOWN SDN. BHD. (“**Company**”) is a private limited company incorporated under the laws of Malaysia and is primarily in the business of providing beauty treatments at our respective BUBBLE GUM X-THETIC outlet(s) (“**Services**”), under the trade name of “*BUBBLE GUM X-THETIC*” or such other trade names as may be determined by our team from time to time.

Any reference to “**BUBBLE GUM X-THETIC**”, “**we**”, “**us**” or “**our**” shall be a reference to the Company, our shareholders, directors, employees, managers, beauty consultants, representatives, agents, partners and/or our data processor of the Company and other related companies which BUBBLE GUM X-THETIC has direct or indirect interest in it (as applicable). If you are an entity, references to “**you**” and “**your**” shall also include your shareholders, directors, employees, managers, officers, representatives, agents and partners, respectively.

We appreciate the importance of protecting your personal data and our team is at all times committed to ensure compliance with all relevant laws as well as this Privacy Policy.

This Privacy Policy serves as a notice pursuant to the Personal Data Protection Act, 2010 (“**PDPA**”) in respect of and during your use of any of the services made available by the Company. It explains the manner in which the Company records, stores, processes, discloses, transfers and otherwise uses Data collected during the course of us serving you as well as the rights available to you as a data subject, on the handling of Data.

“**Data**” for purposes of this Privacy Policy means any information collected by BUBBLE GUM X-THETIC and it relates directly or indirectly to a data subject that is identified or identifiable from that information. Such Data may include name, electronic mail address, residential address, contact number, identification card number / passport number, date of birth, gender, occupation, bank account details, or such other information as may be provided by you from time to time pursuant to our engagement or correspondences related to the Services. The types of Data collected depends on the purpose for the collection.

By using the Services and providing us your Data, it is deemed that you have read and understood this Privacy Policy and have agreed to our processing of your Data in accordance with this Privacy Policy.

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♥ WHY DOES BUBBLE GUM X-THETIC COLLECT YOUR DATA

The Data collected from you will be used for the creation of your account with BUBBLE GUM X-THETIC for our provision of the Services to you. Please note that, in addition to the Data obtained at the point of your registration with us, we may request additional Data about you during the course of your use of the Services.

We may also collect Data from you in any manner during your course of dealing with us as well as from your engagement with our customer support team or during events organised by us and other publicly available resources.

♥ WHAT DATA DOES BUBBLE GUM X-THETIC COLLECT FROM YOU

Where appropriate, information we collect during our process for the setting up of a customer account includes (but is not limited to) your:

- (a) full name (as per NRIC / Passport);
- (b) NRIC number or passport number;
- (c) date of birth
- (d) correspondence address;
- (e) occupation;
- (f) contact number and email address;
- (g) credit card details or details of other payment method(s);
- (h) bank account details (including name of bank and bank account number);
- (i) password and user name created for your account in respect of the use of the Services;
- (j) health or skin condition;
- (k) previous experiences in similar beauty treatments; and
- (l) any such information as our team may require to serve you better.

You are responsible for the accuracy and completeness of all Data provided by you to us (for which we have assumed), and that none of such Data is misleading or out of date. Should there be any changes/updates to your Data, you will promptly update us in writing in the manner indicated in this Privacy Policy.

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In the case where Data of another data subject is provided by you (e.g. Data related to your family members, child, spouse or other dependent for emergency contact purposes), you confirm that you have explained or will explain to them the processing of their Data in accordance with this Privacy Policy and you represent and warrant the accuracy, truthfulness and completeness of their Data.

♥ HOW DOES BUBBLE GUM X-THETIC COLLECT YOUR DATA

Your Data will be collected via our “**Platforms**”, which refers to (i) our official website and such mobile version of the same operated and maintained by the Company (if any); (ii) any of our smartphone and mobile application(s) developed, owned and made available by the Company; (iii) when you create an account with us or interact with us physically at our respective BUBBLE GUM X-THETIC outlets; (iv) any social media messaging platform(s) or e-commerce platform(s) where you interact with member(s) of our team; and (v) any of our participating or organised events and activities including without limitation to trade fair, shows, exhibitions and expo. By collecting, recording, storing, disclosing, transferring, transmitting or otherwise using the Data constitute an act of us “**processing**” your Data.

Please take note that if you visit our Platforms as a guest without signing up for our Services, we may obtain and retain your Data in a limited manner for promotional and marketing purposes.

♥ HOW DOES BUBBLE GUM X-THETIC PROCESS YOUR DATA

The purpose for which BUBBLE GUM X-THETIC may use your Data include amongst others the following and such purposes may be carried out by any means or methods as BUBBLE GUM X-THETIC deems fit, subject to the laws of the relevant jurisdictions:

- (a) for the registration and opening of a customer account with BUBBLE GUM X-THETIC for our Services (including any redemption requests);
- (b) for the use and access to BUBBLE GUM X-THETIC's Platforms and internal operation and administration including data analysis, market research and consumer analysis and assessment;
- (c) facilitating, dealing with, arranging, administering, managing our Services to you (such the setting of appointment for Services);
- (d) to facilitate the change or transfer of outlets servicing you, sharing and processing your Data amongst the BUBBLE GUM X-THETIC outlets;
- (e) processing your payment or where appropriate at the discretion of our management, any refund process;
- (f) responding, addressing or attending to your queries and/or requests and to take actions related to such queries and/or requests;
- (g) verifying the authenticity of your identity with a third party data holder or authorised verification body;
- (h) as applicable, meeting any billing requirements and service charges;
- (i) as applicable, for marketing and advertising purposes and to send to you all the marketing and promotional materials in relation to the Services (subject to your consent);
- (j) complying to any requirements or obligations of the laws of the relevant jurisdictions;
- (k) adhering to any rulings, guidelines and orders imposed by any regulatory body;
- (l) subject to your consent given at the time of registration or at any time thereafter, provide any updates, promotions, or any activities or information in relation to the Services and/or BUBBLE GUM X-THETIC, or through any of our appointed third party agencies, by way of text messages, phone calls, electronic mails, social media announcement and/or any other appropriate channels of communication;
- (m) analysing customers' profiling to improve and enhance our level and standard of services to you;
- (n) sharing of your Data for purposes of seeking legal and/or financial advice (including for purposes of preparing such legal documentation);
- (o) sharing of any of your Data with a third party business partner or service provider for purposes of a potential joint collaboration of services;

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- (p) sharing of any of your Data with third party such as event company or outsourcing company for administration, marketing or promotional purposes;
- (q) to process orders of any products (either sold by BUBBLE GUM X-THETIC or a third party seller) and sharing of any of your Data to third party for the delivery of such products;
- (r) to share any of your Data with the auditor for our internal audit and reporting purposes;
- (s) to detect, investigate and prevent any fraudulent or illegal activity, omission or conduct;
- (t) to upgrade, improve or revamp our Platforms;
- (u) for our storage, hosting back-up (whether for disaster recovery or otherwise) of your Data, whether within or outside of Malaysia; and/or
- (v) any other purposes as we may deem fit for purposes of enhancing your experience with BUBBLE GUM X-THETIC.

We will only process your Data in accordance with the PDPA and the applicable regulations, guidelines, orders and any statutory amendments or re-enactments made pursuant thereto as well as this Privacy Policy.

♥ DISCLOSURE AND TRANSFER OF DATA

Subject to the laws of the relevant jurisdictions, the Company may disclose your Data to the following persons under any of the circumstances set out below:

- (a) our employees, consultants, staff, subsidiary companies (local or foreign), related entities (local or foreign), independent contractors, service providers, business associates, agents and any other agent who assists the Company in processing the Data and manages the operation and maintenance and in support of the Services;
- (b) our subsidiaries, affiliates, associates and other related companies which BUBBLE GUM X-THETIC has direct or indirect interest in it as deemed necessary by BUBBLE GUM X-THETIC for the purposes of the Services;
- (c) if required to do by operation of law or by regulatory or compliance bodies in order to identify risks or threats relating to fraud, money laundering, terrorism financing and/or any other illegal or criminal activities;
- (d) auditors, accountants and/or solicitors in the preparation of documents of the Company for statutory filing purposes or any other document required to be submitted to adhere to the statutory or regulatory compliance owed by the Company to governmental authorities or compliance bodies;
- (e) to the extent permitted by any relevant laws, any third parties (including financial advisers / legal advisers / professional advisers) carrying out due diligence review in connection with any proposed merger, acquisition, sale, reorganisation, joint venture or any other corporate activity related to the Company or any of its subsidiaries, related or associated companies;
- (f) any third party data processor or authorised verification body;
- (g) data centres and/or servers, storage facilities and/or records managements companies located within or outside of Malaysia for purpose of storing your Data;
- (h) government agencies, law enforcement agents, courts, tribunals, regulatory / professional bodies, if required to do so in satisfaction of any applicable law, regulation, order or judgement; and/or
- (i) any other person which requires your Data in order to operate and maintain the Services.

We will take reasonable measures to procure compliance to this Privacy Policy by any foreign entities handling your Data to adequately protect the confidentiality and privacy of your Data. Except as indicated in this Privacy Policy, it is our strict policy that we must not sell, rent, transfer or disclose any of your Data to any third party without your consent.

♥ RETENTION AND DESTRUCTION OF YOUR DATA

We will retain your Data for as long as any of the purpose indicated in this Privacy Policy subsists notwithstanding the cessation of your use of our Services or the termination of your account with us. Thereafter, we will delete from

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or keep anonymous your Data in our records and system unless otherwise required to be retained for legal, regulatory, tax or accounting requirements.

Notwithstanding the representations made in this Privacy Policy, you acknowledge that transmissions over the internet (e.g., emails/webmails/data transmission) are not secured unless they have been encrypted. As internet communications may be routed through different countries before being delivered, we cannot guarantee a risk-free transmission and do not accept responsibility for any unauthorised access or interception or loss of Data that is beyond our reasonable control.

♥ SECURITY OF DATA

In order to ensure adequate protection and measures are in place to protect your Data, we will use our reasonable endeavour to utilise appropriate software, hardware, programming systems and/or servers and other information technology equipment which we deem suitable and fit for the purpose of storing and securing your Data.

Against compliance with the PDPA, we endeavour to take reasonable and practical measures to mitigate and reduce the risks of unauthorised exposure, destruction, accidental loss, damage and alteration, to your Data by restricting the access of any unidentified or unauthorised third parties to your Data. We may from time to time implement and improve our technical, electronic and procedural security measures to safeguard your Data.

Our Platforms may contain links to external websites. The Company is not responsible for the veracity of such websites and does not substantiate or endorse the content, information, services or any other details contained or featured on such external websites. You are advised to read the terms of use and/or privacy policy of such third party website(s) before accessing or using these websites.

♥ YOUR RIGHTS TO ACCESS YOUR DATA

To the extent permitted under the PDPA and applicable laws, you have the right to request for access to or request for a copy of, your Data for purposes of checking, correcting or updating such Data.

Access to your data or correction of such data can be effected and processed (i) vide interactive communication channel available on our Platforms; (ii) electronic mail to info@bubblegumx.com; (iii) by contacting our customer support team at +603-5102 9957; or (iv) by visiting our office at 5, Jalan Serendah 26/41, Hicom Industrial Estate, 40400 Shah Alam, Selangor during office hours.

Upon receipt of a request for correction of Data from you, we reserve the right to reject and demand that you resubmit your request if such correction cannot be effected due to insufficient information or such correction cannot be verified against the documents requested (as the case may be).

Please be informed that, subject to any legal restrictions and/or contractual conditions, you have the right to withdraw your consent to our processing of your Data with reasonable notice by sending an email to us at our contact details below, indicating your intention to withdraw your consent. Please however note that, upon such withdrawal of your consent, we might not be able to continue to serve you and we will construe the withdrawal of consent as your intention to discontinue our Services. We will thereafter close your account with BUBBLE GUM X-THETIC accordingly.

♥ IF YOU REFUSE TO PROVIDE US WITH YOUR DATA

During the course of us servicing you, it may be obligatory or voluntary for you to provide and for us to collect and process your Data. If mandatory and if you fail or refuse to provide and/or do not provide on the basis of not willing to consent to this Privacy Policy, we may not or will not (as the case may be) be able to serve you.

♥ UPDATES TO OUR PRIVACY POLICY

We have the absolute right to modify, vary, update and/or amend all or any part of this Privacy Policy at any time from time to time with reasonable notice to you by publishing an updated version of this Privacy Policy on our website.

Any such modification, variation, update and/or amendments shall be effective at the end of the twenty one (21) days' notice provided by the Company to you and by continuing use of the Services and/or communication with us, you shall be deemed to have agreed and accepted our modified, varied, updated and/or amended Privacy Policy.

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This Privacy Policy is prepared and issued in accordance with Section 7(3) of the PDPA in both the English and Malay language. In the event of any inconsistency or discrepancy between the versions, the English version shall prevail.



FOR ANY ENQUIRIES ON THIS PRIVACY POLICY, PLEASE CONTACT US

If you have any queries or concerns relating to this Privacy Policy or if you wish to have access to or correct your Data or make a complain, you may contact us at:

Address : 5, Jalan Serendah 26/41, Hicom Industrial Estate, 40400 Shah Alam, Selangor.
Attention : Personal Data Protection Officer
Contact No : +603-5102 9957
Email Address : info@bubblegumx.com

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(Version 1.0)***