



PRIVACY POLICY

Event : Insurance Innovation Hackathon 2022

1. INTRODUCTION

- 1.1. This Privacy Policy is incorporated by reference to FortNynja's Terms and Conditions (the "Terms").
- 1.2. The terms "We" or "Us" or "Our" refers to FortNynja, the owner of the Website, our affiliates and subsidiaries and sponsors.
- 1.3. We will only process your Personal Data in accordance with the laws of Malaysia - the Personal Data Protection Act 2010, the applicable regulations, guidelines, orders made under the Personal Data Protection Act 2010 and any statutory amendments or re-enactments made of the Personal Data Protection Act 2010 from time to time (collectively referred to as the "PDPA") as well as this Policy.
- 1.4. The PDPA requires us to inform you of your rights in respect of your Personal Data that is being processed or that is to be collected and further processed by us and the purposes for the data processing. The PDPA also requires us to obtain your consent to the processing of your Personal Data. In light of the PDPA, we are committed to protecting and safeguarding your Personal Data.
- 1.5. By providing your Personal Data to us and/or continuing access to our Website, you declare that you have read and understood this Policy and agree to us processing your Personal Data in accordance with the manner as set out in this Policy.
- 1.6. We reserve the right to modify, update, and/or amend this Policy from time to time with reasonable prior notice to you. We will notify you of any amendments via announcements on the Website or other appropriate means. Please check the Website from time to time to see if there are amendments to this Policy. Any amendments to this Policy will be effective upon notice to you. By continuing to use the services and/or access to the Website after being notified of any amendments to this Policy, you will be treated as having agreed to and accepted those amendments.
- 1.7. If you do not agree to this Policy or any amendments to this Policy, we may not be able to render all services to you and you may be required to terminate your relevant agreement with us and/or stop accessing or using the Website.

2. PURPOSE

- 2.1. This Privacy Policy explains our online and offline information practices, the kinds of information we may collect, how we intend to use and share that information, and how you can opt-out of a use or correct or change such information. All



PRIVACY POLICY

Event : Insurance Innovation Hackathon 2022

capitalised terms not defined herein will have the meanings set forth in the Terms.

3. COLLECTION OF PERSONAL DATA

- 3.1. The term “Personal Data” carries the same meaning in Section 4 of the PDPA. In essence, it means any information in our possession or control that relates directly or indirectly to an individual to the extent that the individual can be identified or are identifiable from that and other information in our possession, such as name, address, telephone number, Identification/Passport number, date of birth, photograph, email address, household information, etc. as well as Sensitive Personal Data as defined under the PDPA, which includes but is not limited to, information pertaining to the physical or mental health or condition of a data subject and religious beliefs.
- 3.2. FortNynja collects personal information regarding its current, prospective, and former clients, customers, users, visitors, and guests (collectively “Individuals”).
- 3.3. When you use our services or engage in certain activities, such as registering for an account with FortNynja, responding to surveys, requesting services or information, or contacting us directly, we may ask you to provide some or all of the following types of information:
 - 3.3.1. When you create a profile, FortNynja may collect certain personal information including your name, contact details, photographs, and other information, including your username (“Profile”). The information in your Profile may be visible to all FortNynja users and the general public.
 - 3.3.2. We may collect personal information from you such as email address, phone number, or mailing address when you choose to request information about our Services, register for FortNynja’s newsletter, request to receive customer or technical support, or otherwise communicate with us.
 - 3.3.3. From time to time, we may contact you to participate in online surveys. If you do decide to participate, you may be asked to provide certain information which may include personal information. All information collected from your participation in our surveys is provided by you voluntarily. We may use such information to improve our products, websites, and/or services, and in any manner consistent with the policies provided herein.
 - 3.3.4. FortNynja may offer publicly accessible pages, blogs, private messages, or community forums. You should be aware that when you disclose

PRIVACY POLICY

Event : Insurance Innovation Hackathon 2022

information about yourself on FortNynja's pages, blogs, private messages, and community forums, the Services will collect the information you provide in such submissions, including any personal information. If you choose to submit content to any public area of the Services, such content will be considered "public" and will not be subject to the privacy protections set forth herein.

- 3.3.5. FortNynja may collect certain information automatically through our Services or other methods of web analysis, such as your Internet protocol (IP) address, cookie identifiers, mobile carrier, mobile advertising identifiers, Media Access Control (MAC) address, International Mobile Equipment Identity (IMEI), Advertiser Identity, and other device identifiers that are automatically assigned to your computer or device when you access the Internet, browser type and language, geo-location information, hardware type, operating system, Internet service provider, pages that you visit before and after using the Services, the date and time of your visit, the amount of time you spend on each page, information about the links you click and pages you view within the Services, and other actions taken through use of the Services such as preferences.
- 3.3.6. For other purposes required to operate, maintain, and better manage our business and your relationship with us, which we notify you of at the time of obtaining your consent; and you agree and consent to us using and processing your information for the Purposes in the manner as identified in this Policy. If you do not consent to us processing your Personal Data for one or more of the Purposes, please notify us at the contact details below.
- 3.4. The collection of your information by us may be mandatory or voluntary in nature depending on the Purposes for which your information is collected. Where it is obligatory for you to provide us with your information, and you fail or choose not to provide us with such data, or do not consent to the above or this Policy, we will not be able to provide products and/or services or otherwise deal with you.

PRIVACY POLICY

Event : Insurance Innovation Hackathon 2022

4. DISCLOSURE AND SHARING OF YOUR PERSONAL DATA

- 4.1. We may share your Personal Data as described in this Privacy Policy (e.g., with our third-party service providers; to comply with legal obligations; to protect and defend our rights and property) or with your permission. We may disclose to the following but not limited to:
- 4.1.1. Vendors and Service Providers - We may share any information we receive with vendors and service providers. The types of service providers (processors) to whom we entrust personal information include service providers for: (i) provision of IT and related services; (ii) provision of information and services you have requested; (iii) payment processing; (iv) customer service activities; and (v) in connection with the provision of the services.
 - 4.1.2. Business Partners - FortNynja may share personal information with our business partners, and affiliates for our and our affiliates' internal business purposes or to provide you with a product or service that you have requested. FortNynja may also provide Personal Data to business partners with whom we may jointly offer products or services, or whose products or services we believe may be of interest to you. In such cases, our business partner's name will appear, along with FortNynja. FortNynja requires our affiliates and business partners to agree in writing to maintain the confidentiality and security of personal information they maintain on our behalf and not to use it for any purpose other than the purpose for which FortNynja provided them.
 - 4.1.3. Content visible to others - When you create a profile or post content to the Website, this information may be displayed to others. We are not responsible for the privacy practices of the other users who will view and use the posted information.
 - 4.1.4. Marketing - Through our services, FortNynja may allow third-party advertising partners to set tracking tools (e.g., cookies) to collect information regarding your activities (e.g., your IP address, page(s) visited, time of day). We may also share such de-identified information as well as selected personal data (such as demographic information) we have collected with third-party advertising partners. These advertising partners may use this information (and similar information collected from other websites) for purposes of delivering targeted advertisements to you when you visit non-FortNynja related websites within their networks. We may allow access to other data collected by the services to facilitate a

PRIVACY POLICY

Event : Insurance Innovation Hackathon 2022

- transmission of information that may be useful, relevant, valuable or otherwise of interest to you.
- 4.1.5. Disclosures as required by Law or similar disclosures - We may access, preserve, and disclose your personal data, other account information, and content if we believe doing so is required or appropriate to: (i) comply with law enforcement or national security requests and legal process, such as a court orders; (ii) respond to your requests; (iii) protect yours', ours' or others' rights, property, or safety; (iv) to enforce FortNynja policies or contracts; (v) to collect amounts owed to FortNynja; (vi) when we believe disclosure is necessary or appropriate to prevent physical harm or financial loss or in connection with an investigation or prosecution of suspected or actual illegal activity; or (vii) if we, in good faith, believe that disclosure is otherwise necessary or advisable.
- 4.1.6. Server - From time to time, server logs may be reviewed for security purposes – e.g., to detect unauthorised activity on the Website. In such cases, server log data containing IP addresses may be shared with law enforcement bodies in order that they may identify users in connection with their investigation of the unauthorised activities.
- 4.1.7. Merger, Sale, or Other Asset Transfers - If we are involved in a merger, acquisition, financing due diligence, reorganisation, bankruptcy, receivership, sale of company assets, or transition of service to another provider, then your information may be sold or transferred as part of such a transaction as permitted by law and/or contract. In such an event, FortNynja will endeavor to direct the transferee to use personal information in a manner that is consistent with the Privacy Policy in effect at the time such personal information was collected.
- 4.2. You hereby acknowledge that such disclosure and transfer may occur and permit us to disclose and transfer your Personal Data to such third-party service provider and its advisors/representatives and/or any other person reasonably requiring the same in order for us to operate and maintain our business or carry out the activities set out in the Purposes.

5. ACCURACY OF YOUR PERSONAL DATA

- 5.1. We aim to keep all Personal Data as accurate, complete, not misleading, up-to-date and reliable as possible. Therefore, the accuracy of your Personal Data depends to a large extent on the information you provide. As such, it is a condition of us providing the products and/or services to you that you:

PRIVACY POLICY

Event : Insurance Innovation Hackathon 2022

- 5.1.1. Warrant and declare that all your information submitted or to be submitted to us are accurate, not misleading, updated and complete in all respects for purposes of acquiring or using the relevant products, services and/or facilities, and you have not withheld any information which may be material in any respect and that we are authorised to assume the accuracy and up-to-dateness of the Personal Data given by you when processing such information); and
- 5.1.2. Promptly update us as and when such information provided earlier to us becomes inaccurate, incomplete, misleading, outdated or changes in any way whatsoever by contacting us at the contact details below.

6. YOUR RIGHTS

- 6.1. Subject to the exceptions provided under the PDPA, you have the right to request for access to, request for a copy of, a request to update or correct, your Personal Data held by us. We may charge a small fee (such amount as permitted by the PDPA) to cover the administration costs involved in processing your request to access your Personal Data.
- 6.2. In respect of your right to access and/or correct your Personal Data, we have the right to refuse your request to access and/or correct your Personal Data for the reasons permitted under the law, such as where the expense of providing access to you is disproportionate to the risks to your privacy, or where the rights of others may also be violated, amongst other reasons.
- 6.3. You have the right at any time to request us to limit the processing and use of your Personal Data (for example, requesting us to stop sending you any marketing and promotional materials or contacting you for marketing purposes).
- 6.4. In addition, you also have the right, by notice in writing, to inform us on your withdrawal (in full or in part) of your consent given previously to us subject to any applicable legal restrictions, contractual conditions and a reasonable duration of time for the withdrawal of consent to be affected. However, your withdrawal of consent could result in certain legal consequences arising from such withdrawal. In this regard, depending on the extent of your withdrawal of consent for us to process your Personal Data, it may mean that we will not be able to continue with your existing relationship with us and/or the contract that you have with us will have to be terminated.

PRIVACY POLICY

Event : Insurance Innovation Hackathon 2022

7. DATA RETENTION

- 7.1. Any of your Personal Data provided to us is retained for as long as the purposes for which the Personal Data was collected continues; your Personal Data is then destroyed from our records and system in the event your Personal Data is no longer required for the said purposes unless its further retention is required to satisfy a longer retention period to meet our operational, legal, regulatory, tax or accounting requirements.

8. SECURITY OF YOUR PERSONAL DATA

- 8.1. We take steps to ensure that your Personal Data is treated securely and in accordance with this Privacy Policy. In order to prevent unauthorised access, disclosure or other similar risks, we endeavour, where practicable, to implement appropriate technical, physical, electronic, and procedural security measures in accordance with the applicable laws and regulations and industry standard to safeguard against and prevent the unauthorised or unlawful processing of your Personal Data, and the destruction of, or accidental loss, damage to, alteration of, unauthorised disclosure of or access to your Personal Data.
- 8.2. By using our services or providing personal data to us, you agree that we may communicate with you electronically regarding security, privacy, and administrative issues relating to your use of the services. Please be aware that communications over the Internet, such as emails/webmails are not secure unless they have been encrypted. Your communications may be routed through a number of countries before being delivered.
- 8.3. Unfortunately, the Internet cannot be guaranteed to be 100% secure, and we cannot ensure or warrant the security of any Personal Data you provide to us. We cannot and do not accept responsibility for any unauthorised access or interception or loss of Personal Data that is beyond our reasonable control.
- 8.4. We will make reasonable updates to its security measures from time to time and ensure the authorised third parties only use your Personal Data for the Purposes set out in this Policy. If we learn of a security system's breach, we may attempt to notify you electronically by posting a notice on the services or sending an e-mail to you. You may have a legal right to receive this notice in writing.

PRIVACY POLICY

Event : Insurance Innovation Hackathon 2022

9. USE OF COOKIES AND RELATED ANALYTICAL TOOLS

- 9.1. Our Website uses cookies and other analytical tools to facilitate your Internet sessions and offer you products and/or services according to your preferred settings, track use of our Websites and apps and to compile statistics about activities carried out on our Website.
- 9.2. Cookies:
 - 9.2.1. Cookies are small files, which are automatically created by your browser and stored on your terminal device (laptop, tablet, smartphone, or similar) when you visit our Website.
 - 9.2.2. Cookies collect information about users and their visit to the Website or use of the app, such as their Internet protocol (IP) address, how they arrived at the Website (for example, through a search engine or a link from another Website), and how they navigate within the Website.
 - 9.2.3. We also use temporary cookies, which are stored on your terminal device for a specific determined period of time to optimise user-friendliness. If you revisit our Website to use our services, it will automatically be recognised that you have already visited us, which entries you have made and which settings you have selected, so you are not required to enter these again.
- 9.3. Analytics Tools:
 - 9.3.1. Google Analytics
 - 9.3.1.1. We use Google Analytics for web analytics purposes to manage and improve our website - the Platform and/or our Services. Features of Google Analytics that we may use include Remarketing with Google Analytics, Google Display Network Impression Reporting, and Google Analytics Demographics and Interest Reporting.
 - 9.3.1.2. Accordingly, your information may be collected for reports such as impression reporting, demographic reporting, interest reporting and to assist with tailoring our online advertising to provide you with a better experience. You may refer to <https://www.google.com/policies/privacy/partners> for more information about how your data is collected through Google Analytics.
 - 9.3.2. BugSnag

PRIVACY POLICY

Event : Insurance Innovation Hackathon 2022

- 9.3.2.1. We use BugSnag online service to collect data and process data for website, mobile device and server applications and programs to help identify and address errors in our Website. Bugsnag collects personal data such as name, email address, telephone number and payment and billing information through its online services and processes personal data for its business purposes.
- 9.3.2.2. Bugsnag may disclose personal data to its affiliates and service providers where required, to government agencies. For further information about how BugSnag processes data and how you can object, please consult their privacy policy at <https://docs.bugsnag.com/legal/privacy-policy/>.

10. SUBSEQUENT CHANGES TO OUR PRIVACY POLICY & PRACTICES

- 10.1. This Privacy Policy may change from time to time. You understand and agree that you will be deemed to have accepted the updated Privacy Policy if you use our services after the updated Privacy Policy is posted. If at any point you do not agree to any portion of the Privacy Policy then in effect, you must immediately stop using the services we provide.
- 10.2. We may revise this Privacy Policy in our sole discretion, so review it periodically. If you continue to visit this Website and use the services made available to you after such changes have been made, you hereby provide your consent to the changes.
- 10.3. We will post any adjustments to the Privacy Policy on this webpage, and the revised version will be effective immediately when it is posted (or upon notice as applicable). If you are concerned about how your information is used, bookmark this page and read this Privacy Policy periodically.

11. CONTACT DETAILS

- 11.1. If you have any questions about our privacy practices or this Privacy Policy, please contact FortNynja by email at info@fortnynja.com.