

Privacy Notice for Customers

Ncell Axiata Limited is a part of Axiata Group Berhad (together referred to as “Ncell Axiata” or “Ncell” or “us” or “we” or “our”). Respecting and protecting your Privacy is an integral part of our business and we do not view this as an obligation, but rather as a commitment to maintain your confidence and trust on us.

In Ncell, we take Privacy seriously and all our activities are underpinned by our **T.R.U.S.T** principles of being Transparent, respecting your Rights, in our Use of your personal data, through robust cyber Security practices and we take due care when Transfer of data is required.

This notice applies to personal data which we collect, generate or use when you subscribe to any of our products and services, use our applications or visit any of our websites. We advise you to read this notice alongside Terms and Conditions of our products/services as they may contain product/service specific information on how we process your personal data.

1. Collection and use of your data

Ncell may collect and use your personal data when:

- you use our network, products or services (including call centers)
- you contact us with a question about our products and services
- you use our applications or visit any of websites
- you contact us for any other purpose(s).

The types of personal data that Ncell may collect include, but are not limited to:

- contact information (such as name, address, email address and telephone number)
- identification information (such as passport identification number, driver’s license, date of birth, and government issued national identification cards etc)
- demographic information (such as age range, marital status, gender etc.)
- photographs, such as those that you may submit for contests or prize-winning competitions
- product specific information (such as preference, closed user groups (CUGs), friends and family who you chose to include in your service plan, credit limit etc.)
- banking information (such as direct debit and related bill payment banking transactions)

- service account information (such as call usage, account balances, transaction history, credit information, billing and loyalty points).

Ncell collects and uses your personal data with your knowledge and consent and typically when you:

- use Ncell's wide range of products and services that are offered or for which you may choose to opt-in
- make customer enquiries, register for information or other services
- respond to communications from us (such as SMS, emails, questionnaires or surveys)
- interact with Ncell's websites, such as submitting an application form, completing survey form, use online services. (If your browser has Internet cookies enabled, it can facilitate Ncell's tracking of personal preferences, pages visited etc.)
- participate on Ncell's social media pages such as Facebook etc.
- participate in Ncell's promotional events, incentive or loyalty programs
- provide information through Ncell Axiata's customer call centers, dealers and sales channels or any other affiliates or business dealings with Ncell by which you have consented to provide your personal data.

Your personal data may be collected, used or otherwise processed by us for the following purposes:

- to provide you with our products, services and offers which may be of interest to you
- to notify you about benefits and changes to the features of our products and services
- to provide you with our latest offers, campaigns and promotions (where you subscribe to such updates)
- to send you service messages about our subscription or account registration
- to use your data for participation in our customer surveys or meetings
- enable us to send you information by e-mail, telecommunication means (telephone calls or text messages) or social media about products and services offered by selected third parties that we think may interest you

2. Information about Children

If you are under the age of 18, you are required to obtain the consent of your parents or legal guardian before using our network, products and/or services.

3. Disclosure

We keep your personal data confidential and do not share it with non-affiliated companies, except: (a) to provide products or services you have requested, (b) when we have your consent or (c) under the following circumstances:

- We may share your personal data to meet our legal and regulatory obligations.
- We may share your personal data to prevent and detect crime as per the law.
- When we believe it is necessary to share the information or enforce Ncell's rights, usage terms, intellectual or physical property and for safety of Ncell or associated parties.
- We may share your personal data if Ncell is acquired by or merged with another company or for any legal claim, where Ncell is required to do so.

We may disclose your personal data to the below classes of parties:

- with Axiata group companies, where necessary and within the limits of applicable law
- with other carriers and operators when routing international calls
- when we believe in good faith that disclosure is necessary to protect our rights, protect your security, investigate fraud or respond to a law enforcement request
- with Ncell's service providers, field engineers, contractors who work on our behalf and who do not have an independent right to use the information to which they have access or that we disclose to them
- with our business partners for Ncell's marketing activities, in such case no specific personally identifiable information is provided, as such information is generally aggregated
- with third parties for credit checks and fraud management
- with third parties for carrying out analytics to understand how you use our services
- with third parties for research and development purposes
- with our subsidiaries and affiliates such as Ncell dealers.

We make sure that the above-mentioned parties maintain the confidentiality of your personal data and are restricted from using such information for any unauthorized purpose. Ncell will ensure through formally executed contracts that these parties will provide an adequate level data protection as per the applicable data privacy laws and industry best practices.

4. Cross Border Data Transfer

With your consent or in accordance with the applicable laws, we may transfer your personal data across geographical borders to other entities. The transfer of personal data is carried out under our standard contracts with appropriate data protection clauses or data transfer agreements with similar obligations for the parties receiving this information to protect the security and confidentiality of your personal data.

5. Data Retention

We shall retain your personal data for as long as it is required for business, tax or legal purposes. Post that, we shall take measures to securely dispose your data.

6. Security

We endeavor, where practicable, to process your personal data in a safe environment by preventing any unauthorized or unlawful processing of personal data or accidental loss or destruction of, or damage to such information. We have implemented various physical, technical and administrative security measures to protect your personal data and our network from unauthorized access. Some of these measures include:

- encryption of data in transit or at rest
- strict adherence to privacy and security practices
- periodic security assessment and reviews to upgrade our practices
- restriction of access to such data to personnel who have a need to know such data.

7. Exercise your Rights

We respect your rights and privacy by taking steps to ensure that your personal data is accurate and up-to-date. In compliance with the Privacy Act, 2075 (2018), we assure you that:

- you have the right to know what personal data we have about you

- you have the right to request a copy of your personal data
- you have the right to correct your personal data to ensure it is accurate, complete and up-to-date

For exercising your rights, you can reach out to us through the details under '**Contact Us**' section given below.

8. Consequences of not providing Personal Data

For you to use our products and services, we may require collection of certain personal data about you and failure to provide such information may:

- result in us being unable to process your application and/or provide you with our services
- result in us being unable to respond to your requests on our products/services
- limit or prevent access to certain features on our website/weblinks
- result in us being unable to update you on latest updates regarding any promotions, our services/products or launches
- result in your inability to receive invitation to promotional activities organized by us.

9. By submitting your personal data to us, you acknowledge that:

- i. You have read and understood this Privacy Notice and agree to the use of your personal data as set out herein.
- ii. All your representations are true and correct to the best of your knowledge, and you have not knowingly omitted any relevant information which may have an adverse effect.

10. Contact Us

If you have any questions or complaints about this notice, our privacy and information handling practices, or would like to exercise your rights as data subjects, kindly reach out to our Data Privacy Officer via:



9809005000

or



data.privacy@ncell.axiata.com

11. Updates to the Privacy Notice

Ncell reserves the right to amend, modify, vary or update this Privacy Notice, at its sole discretion from time to time, as and when the need arises. The most recently published Privacy Notice shall prevail over any of its previous versions. Ncell has no obligation to inform you of any variations and you are encouraged to check this Privacy Notice from time to time to stay informed of any changes. You agree to adhere to the terms of the Privacy Notice including any variations.

12. Version Info

This notice was published on 10/30/2020 and last updated on 09/30/2020.