

PRIVACY POLICY

This Privacy Policy (“**Policy**”) describe how Zeal Systems (M) Sdn Bhd, its respective subsidiaries, affiliates, associated companies and jointly controlled entities (collectively “**ZEAL**”, “**we**”, “**us**” or “**our**”) collect, use, process and disclose your Personal Data through the use of FOODIO applications and websites (respectively “**Apps**” and “**Websites**”), as well as products, features and other services globally, operated by ZEAL (collectively, “**Services**”).

This Policy applies to our customers, merchants, vendors, suppliers, partners, contractors and service providers (collectively “**you**”, “**your**” or “**yours**”).

“**Personal Data**” is any information which can be used to identify you or from which you are identifiable. This includes but is not limited to your name, nationality, telephone number, bank and credit card details, personal interests, email address, your image, government-issued identification numbers, biometric data, race, date of birth, marital status, religion, health information, vehicle and insurance information, employment information and financial information.

1. COLLECTION OF PERSONAL DATA

We collect Personal Data about you in the ways listed below. We may also combine the collected Personal Data with other Personal Data in our possession.

You provide your Personal Data to us

We collect your Personal Data when you voluntarily provide it to us. For example, you may provide your Personal Data to us when you:

- complete a user profile or registration forms or ordering form (such as your name, contact information and other identification information where needed);
- interact with our social media pages (such as your social media account ID, profile photo and any other publicly available data);
- participate in contests or events organized by us (such as the pictures, audio files, or videos you may submit, which may include images of yourself);
- verify your identity through various means (such as social media logins, submission of selfie images or independently verified payment card information);
- fill up demographic information in surveys (such as your age, gender, and other information you may volunteer such as your marital status, occupation and income information); and

We will Process the Personal Data that you have provided to us for the following purposes, including but not limited to (“**Purpose**”):

- To manage and verify your account and identity; and complete transactions with you;
- To enable us to provide our services and perform our services to you;
- To notify you about benefits and changes to the services offered;
- To protect the safety and well-being of yourself and/ or other customers;
- To enable you to participate in promotions, offers and contests;
- To improve our service;

- To send you updates on products, news and event updates, rewards and promotions, special privileges and initiatives offered by the Company, where applicable;
- To maintain records required for security, claims or other legal purposes;
- To respond to any enquiries, complaints, comments or feedback that you submit to us;
- To comply with any regulatory, statutory or legal obligation imposed on us by any relevant authority;
- To develop, market and communicate to you in relation to products and services offered by the Company;
- To contact you for product or customer satisfaction surveys and market research;
- To conduct statistical analysis and run machine learning algorithms, and create a data pool so that we can better understand our customer profile and improve our services to you;
- To produce data, reports and statistics which have been anonymized or aggregated in a manner that does not identify you as an individual;
- To third parties with whom we have contracted to provide services to us (such as analysis on our behalf) for any of the purposes described above. Where we disclose your personal data to third parties we shall ensure that such data is used only to provide services to us;
- For any other purposes that is required or permitted by any law, regulations, guidelines and/or relevant regulatory authorities.
- For the prevention of crime including but not limited to fraud, money-laundering, and bribery;
- For meeting any legal or regulatory requirements relating to our provision of services and products and to make disclosure under the requirements of any applicable law, regulation, direction, court order, by-law, guideline, circular, code applicable to us or any of our member companies; and / or
- In order to fulfil any purpose directly related to the above purposes.

2. DISCLOSURE OF PERSONAL DATA

We need to share Personal Data with various parties for the Purposes. These parties include:

With Merchant/Food Operator

For them to contact you for food collection or delivery in the event they can't locate you.

With ZEAL partners at your request

For example, if you requested a service through ZEAL's partner or used a promotion provided by a ZEAL's partner, ZEAL may share your Personal Data with that ZEAL's partners. Our partners include partners that integrate with our App or our App integrates with the partners which ZEAL collaborates with to deliver a promotion, competition or other specialised service.

With subsidiaries and affiliates

We share Personal Data with our subsidiaries, associated companies, jointly controlled entities and affiliates.

With ZEAL's service providers and business partners

We may provide Personal Data to our vendors, consultants, marketing partners, research firms, and other service providers or business partners. This includes:

- payment processors and facilitators;
- debt collectors;
- credit bureaus and other credit reporting agencies;
- background check and anti-money laundering service providers;
- cloud storage providers;
- marketing partners and marketing platform providers;
- data analytics providers;
- research partners, including those performing surveys or research projects in partnership with ZEAL or on ZEAL's behalf;
- insurance and financing partners;
- third party intermediaries involved in the managed investment of funds, such as brokers, asset managers, and custodians;
- service providers who perform identity verification services;

3. RETENTION OF PERSONAL DATA

We retain your Personal Data for the period necessary to fulfill the Purposes outlined in this Policy unless a longer retention period is required or allowed by law. Once your Personal Data is no longer necessary for the Services or Purposes, or we no longer have a legal or business purpose for retaining your Personal Data, we take steps to erase, destroy, anonymize or prevent access or use of such Personal Data for any purpose other than compliance with this Policy, or for purposes of safety, security, fraud prevention and detection, in accordance with the requirements of applicable laws.

4. INTERNATIONAL TRANSFERS OF PERSONAL DATA

Your Personal Data may be transferred from country, state and city ("**Home Country**") in which you are present while using our Services to another country, state and city ("**Alternate Country**").

When we transfer your Personal Data from your Home Country to the Alternate Country, we will comply with our legal and regulatory obligations in relation to your Personal Data, including having a lawful basis for transferring Personal Data and putting appropriate safeguards in place to ensure an adequate level of protection for the Personal Data. We will also ensure that the recipient in Alternate Country is obliged to protect your Personal Data at a standard of protection comparable to the protection under applicable laws.

Our lawful basis will be either consent (i.e. we may ask for your consent to transfer your Personal Data from your Home Country to the Alternate Country at the time you provide your Personal Data) or one of the safeguards permissible by laws.

5. PROTECTION OF PERSONAL DATA

We will take reasonable legal, organizational and technical measures to ensure that your Personal Data is protected. This includes measures to prevent Personal Data from getting lost or used or accessed in an unauthorized way. We limit access to your Personal Data to our employees on a need to know basis. Those processing your Personal Data will only do so in an authorized manner and are required to treat your information with confidentiality.

Nevertheless, please understand that the transmission of information via the internet is not completely secure. Although we will do our best to protect your Personal Data, we cannot guarantee the security of your Personal Data transmitted through any online means, therefore, any transmission remains at your own risk.

6. YOUR RIGHTS WITH RESPECT TO YOUR PERSONAL DATA

In accordance with applicable laws and regulations, you may be entitled to:

- ask us about the processing of your Personal Data, including to be provided with a copy of your Personal Data;
- request the correction and/or (in some cases) deletion of your Personal Data;
- in some cases, request the restriction of the processing of your Personal Data, or object to that processing;
- withdraw your consent to the processing of your Personal Data (where we are processing your Personal Data based on your consent);
- request receipt or transmission to another organization, in a machine-readable form, of the Personal Data that you have provided to us where we are using your Personal Data based on consent or performance of a contract; and
- complain to the relevant data privacy authority if your data privacy rights are violated, or if you have suffered as a result of unlawful processing of your Personal Data.

Where you are given the option to share your Personal Data with us, you can always choose not to do so. If we have requested your consent to processing and you later choose to withdraw it, we will respect that choice in accordance with our legal obligations.

However, choosing not to share your Personal Data with us or withdrawing your consent to our use of it could mean that we are unable to perform the actions necessary to achieve the purposes of processing described in Section II (Use of Personal Data) or that you are unable to make use of the Services. After you have chosen to withdraw your consent, we may be able to continue to process your Personal Data to the extent required or otherwise permitted by applicable laws and regulations.

If you wish to make a request to exercise your rights, you can contact us through our contact details in the web-site or Apps.

We will screen and verify all requests beforehand. In order to verify your authority to make the request, we may require you to provide supporting information or documentation to corroborate the request.

Once verified, we will give effect to your request within the timelines prescribed by applicable laws.

7. AMENDMENTS AND UPDATES

ZEAL shall have the right to modify, update or amend the terms of this Policy at any time by placing the updated Policy on the Websites. By continuing to use the Apps, Websites or Services, purchase products from ZEAL or continuing to communicate or engage with ZEAL following the modifications, updates or amendments to this Policy, you signify your acceptance of such modifications, updates or amendments.