

Revision	Prepared by	Date
Version 1	Commercial Team	12/03/2020

PRIVACY POLICY

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JNJ Management Consultant Sdn Bhd. (Company No. 484872-W) and its affiliates ("Company"), may take your personal information when you communicate with us either by log in to our website or contact to our customer service. ~~and~~ The information that we collected from you may be used and will be kept confidential. In order to protect your private information, we have established this Privacy Policy (the "Policy") in accordance with best practices in the industry and applicable laws and regulations. This Policy describes how we handle your personal information for our services on the JNJ Management Consultants Sdn Bhd. website and its related sites, services and tools (the "Website").

By accepting the Policies, Terms ~~of Use~~ & Conditions and the Seller Agreement in registration, you expressly consent to our collection, storage, use and disclosure of your personal information as described in this Policy.

Collection of Personal Information

You can browse our sites without telling us who you are or revealing any personal information about yourself. Once you give us your personal information, you are not anonymous to us.

We may collect and store the following personal information:

- i. Email address, physical contact information, the date of birth and gender information, and (depending on the service used) sometimes financial information, such as credit card or bank account numbers; transactional information based on your activities on the Website;
- ii. Postage, billing and other information you provide to purchase or dispatch an item;
- iii. Community discussions, chats, dispute resolution, correspondence through our Website, and correspondence sent to us;
- iv. other information from your interaction with our Website, services, content and advertising, including computer and connection information, statistics on page views, traffic to and from the Website, ad data, IP address and standard web log information;
- v. Additional information we ask you to submit to authenticate yourself or if we believe you are violating site policies (for example, we may ask you to send us an ID or bill to verify your address, or to answer additional questions online to help verify your identity or ownership of an item you list);
- vi. Information from other companies, such as demographic and navigation data; and
- vii. other supplemental information from third parties (for example, if you incur a debt to the Company, we will generally conduct a credit check by obtaining additional information about you from a credit bureau, as permitted by law).

All personal data shall be provided by you voluntarily unless where it is indicated as mandatory. Where the personal data is mandatory to be provided, failure to provide such information may result in Company not being able to process your request.

Marketing

We don't sell or rent your personal information to third parties for their marketing purposes without your explicit consent. We may combine your information with information we collect from other companies and use it to improve and personalise our services, content and advertising. ~~If you don't wish to receive marketing communications from us or participate in our ad-customisation programmes, simply indicate your preferences in My Page or by following the directions provided with the communication or advertisement.~~

Use

Our primary purpose in collecting personal information is to provide you with a safe, smooth, efficient and customized experience. You agree that we may use your personal information to:

- i. Provide the services and customer support at your request, including but not limited to linking your account with ~~JNJ Management Consultants Sdn Bhd App Account~~related ODELA Digital Application;
- ii. Resolve disputes, collect fees, and troubleshoot problems;
- iii. Prevent potentially prohibited or illegal activities, and enforce our ~~Seller Agreement~~User Agreement;
- iv. Customize, measure and improve our services, content and advertising;
- v. Tell you about our services and those of our corporate family;
- vi. Send you targeted marketing, service updates, and promotional offers; and
- vii. Compare information for accuracy and verify it with third parties.
- viii. Provide aggregate information to our partners about our users (e.g. 500 men under age 30 have viewed this item) without disclosing information about identifiable individuals.

For the purpose of this Policy, the term "~~JNJ Management Consultants Sdn Bhd App Account~~related ODELA Digital Application" shall refer to the related digital mobile application of JNJ Management Consultants Sdn Bhd App operated by JNJ Management Consultant Sdn Bhd. (Company No. 484872-W) that list amongst others, your personal information as may be stored by you, subject always to the prevailing privacy policy of JNJ Management Consultant Sdn Bhd.

Denial of Collection

~~You may withdraw your consent to our collection of your personal data and/or information at any time by notifying us or by calling our customer service. In that event, we will not be able to identify you and provide you with a safe, smooth, efficient and customized experience while using our site. Although you can browse~~

~~through most of our sites without giving any information about yourself, in some cases, personal information is required in order to provide the Services you request.~~

Our Disclosure of Your Information

~~We may disclose personal information to respond to legal requirements, enforce our policies, respond to claims that a listing or other content violates the rights of others, or protect anyone's rights, property, or safety. Such information will be disclosed in accordance with applicable laws and regulations.~~

Share of Your Information

We may share your personal information, within or outside Malaysia, with:

- i. Third-party service providers under contract who help with our business operations: We employ other companies and individuals to perform functions on our behalf. Examples include fulfilling orders, delivering packages, sending postal mail and e-mail, removing repetitive information from customer lists, analysing data, providing marketing assistance, providing search results and links (including paid listings and links), processing credit card payments, investigating frauds and providing customer service. They have access to personal information needed to perform their functions but may not use it for other purposes.
- ii. Third parties giving promotional offers: Sometimes we send offers to selected groups our users on behalf of other businesses. When we do this, we do not give that business your name and address. ~~If you do not want to receive such offers, please adjust communication preferences in My Page.~~
- iii. Other third parties to whom you explicitly ask us to send your information (or about whom you are otherwise explicitly notified and consent to when using a specific service) or where you have agreed to link your account with your Odela App Account or utilising a specific service as may be offered by the Company.
- iv. Law enforcement or other governmental officials, in response to a verified request relating to a criminal investigation or alleged illegal activity. In such events, we will disclose information relevant to the investigation, such as name, city, postal code, telephone number, email address, User ID history, IP address, fraud complaints, and purchasing and listing history;
- v. Brand Protection Program participants under confidentiality agreement, as we in our sole discretion believe necessary or appropriate in connection with an investigation of fraud, intellectual property infringement, piracy, or other unlawful activity. In such events, we will disclose name, street address, city, postal code, country, phone number, email address and company name; and
- vi. Other business entities, should we plan to merge with or be acquired by that business entity. (Should such a combination occur, we will require that the new combined entity follow this Policy with respect to your personal information. If your personal information will be used contrary to this policy, you will receive prior notice.)

For the avoidance of doubt, If the Company has reasonable grounds to believe that any User is in breach of any of the terms of this Policy, the Company reserves the right, in its sole and absolute discretion, to cooperate fully with governmental authorities, private investigators, all the rightful owner(s) or interest holder(s) and/or injured third parties in the investigation of any potential or ongoing criminal or civil wrongdoing. Further, the Company may disclose the User's ~~identity identify~~ and contact information, or such other transaction-related data, if requested by a government or law enforcement body, private investigator, rightful owner or interest holder and/or any injured third party or as a result of a subpoena or other legal action, or if the Company is of the view, in its sole and absolute discretion, that it would be in its best interest to do so. The Company shall not be liable for damages or results arising from such disclosure, and the User(s) agrees not to bring action or claim against the Company for such disclosure.

Using Information from this Website

We enable you to share personal information to complete transactions. When users are involved in a transaction, they may have access to each other's name, user ID, email address and other contact and postage information. In all cases, you must comply with data protection laws, and give other users a chance to remove themselves from your database and a chance to review what information you have collected about them.

You agree to use user information only for:

- Fulfilment of the transaction through this website and purposes related to the using transaction; services offered through this website (e.g. escrow, postage and fraud complaints); or
- Other purposes that a user expressly chooses.

Cookies

We use "cookies" (small files placed on your hard drive) on certain of our pages to help analyse our web page flow; customise our services, content and advertising; measure promotional effectiveness, and promote trust and safety.

A few important things you should know about cookies that are:

- i. We offer certain features that are available only through the use of cookies.
- ii. We use cookies to help identify you and maintain your signed-in status.
- iii. Most cookies are "session cookies," meaning that they are automatically deleted from your hard drive at the end of a session.

- iv. You are always free to decline our cookies if your browser permits, although doing so may affect with your use of some of our sites or services.
- v. You may encounter cookies from third parties on certain pages of the Website that we do not control. (For example, if you view a web page created by another user, there may be a cookie placed by that web page.)

Account Protection

Your password is the key to your account. Use unique numbers and letters and do not disclose your password to anyone. If you do share your password or your personal information with others, remember that you are responsible for all actions taken in the name of your account. If you lose control of your password, you may lose substantial control over your personal information and may be subject to legally binding actions taken on your behalf. Therefore, if your password has been compromised for any reason, you should immediately notify us and change your password.

We will never ask for your password by phone or e-mail, so if you receive such an inquiry, please report the incident to the Security & Resolution Center or the [Personal Information Manager Security Personnel](#).

If you access our Website from a shared computer or a computer in an internet cafe, a PC room or a library, certain information about you, such as your user ID, activity or reminders from the Website, may also be visible to other individuals who use the computer after you. To protect your personal information or communication from being disclosed to others, you should log out and close the web browser after using our Website.

Payment

- i. If you enter into any transactions on our website or app, your payment shall be made using the applied denomination of Ringgit Malaysia (RM), and in the form of immediate available funds; unless specified otherwise in the agreement between seller and buyer, and upon consent from the Company.
- ii. Once your transaction is successful, the payment is payable in full to the Company in cash or its equivalent. Subject to agreed terms and conditions set forth for the purchase, all payments for the amount due shall be using the following methods:
 - a) cash transfer
 - b) credit card
 - c) debit card
 - d) e-wallet
 - e) Cheque
 - f) financing disbursement

- g) any other method of payments agreed upon. The Company reserves the right to apply the mechanism of payments through payment gateway, or direct transfer, based on the nature of purchase and/or transaction.
- iii. As a buyer with financing facility, you hereby give your consent for the Bank to disburse your financing facility through ODELA for the procurement activities of your business.
- iv. This consent is granted without prejudice to any rights that the Bank may have on the disclosure of your information pursuant to any financing agreement executed between you and the Bank, whichever information or details necessary to execute the procurement transactions and the financing disbursement on ODELA.
- v. This consent supersedes and cancels any objections you may had previously indicated or informed to the Bank.
- vi. ODELA Letter of Consent will need to be signed off at on-boarding on ODELA for members with financing facility, to allow for financing amount to be disbursed via ODELA.
- vii. ODELA does not interfere with the Bank's policy on disbursement approval, and any issues or questions on the financing facility should be directly to the respective Bank.

Accessing, Reviewing, Changing and Retaining Your Personal Information

You can see, review and change most of your personal information by signing on to the Website. Generally, we will not manually modify your personal information because it is very difficult to verify your identity remotely. You must promptly update your personal information if it changes or becomes inaccurate. Once you make a public posting, you may not be able to change or remove it. Upon your request to the customer service, we will close your account and remove your personal information from view as soon as reasonably possible, based on your account activity and in accordance with applicable law. We do retain personal information from closed accounts to comply with law, prevent fraud, collect any fees owed, resolve disputes, troubleshoot problems, assist with any investigations, enforce our [Seller Agreement](#)~~User Agreement~~, and take other actions otherwise permitted by law. Otherwise, your personal information will be destroyed by us once we confirm there is no use for it. If you would like to obtain further information on limiting the processing of your personal information, kindly email us at support@odela.com.my~~myedelamy@gmail.com~~

Security

Your information is stored on our servers located in the Malaysia. We treat data as an asset that must be protected and use lots of tools (encryption, passwords, physical security, etc.) to protect your personal information against unauthorised access and disclosure. However, as you probably know, third parties may unlawfully intercept or access transmissions or private communications, and other users may abuse or misuse your personal information that they collect from the site. Therefore, although we work very hard to protect your privacy, we do not promise, and you should not expect, that your personal information or private communications will always remain private.

Third Parties

Except as otherwise expressly included in this Policy, this document addresses only the use and disclosure of information we collect from you. If you disclose your information to others, whether they are buyers or sellers on our Website or other sites throughout the Internet, different rules may apply to their use or disclosure of the information you disclose to them. We do not control the privacy policies of third parties, and you are subject to the privacy policies of those third parties where applicable. We encourage you to ask questions and to review their privacy policies before you disclose your personal information to others.

Consent

By continuing to use [the](#) Website, you consent to the processing of your personal data in accordance with the Privacy Policy [Policy](#), Terms [of Use & Conditions](#) and Seller Agreement by Company.