

Personal Data Protection Policy (PDPA)

Privacy Policy

I. INTRODUCTION

- The following statements explain the privacy policy of ("Privacy Policy") of
- L3 Education** (which includes all its subsidiaries, related and/or associated companies) ("**L3 Education**", "**we**", "**us**", or "**our**") in which you will find the following:-
 - Description of the personal data that we collect;
 - How the personal data will be used;
 - Who we can disclose the personal data to and why;
 - The procedures in which the personal data can be accessed and corrected;
 - How you can raise enquiries and complaints;
 - Whether it is obligatory or voluntary for the personal data to be provided, and this serves as a notice pursuant to Section 7 of the Personal Data Protection Act 2010.
- This Privacy Policy applies to personal data about you, possessed by us or that we obtain about you, whether now or in the future. We will only process your personal data in accordance with the 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 Privacy Policy.
- The PDPA requires us to inform you of your rights in respect of your personal data that is being obtained, processed or collected and further processed by us for the purposes of the data processing. The PDPA also requires us to obtain your consent to the processing of your personal data.

II. YOUR CONSENT

- By providing your personal data to us, you declare that you have read and understood this Privacy Policy and consent to us processing your personal data in accordance with the manner as set out in this Privacy Policy. If you provide personal data of third parties to us, you warrant and represent to us that you have obtained the required consent of the third parties for the processing of the relevant personal data by us in the manner set out herein.
- This Privacy Policy may be modified/updated/revised from time to time with reasonable prior notice to you. We will notify you of any amendments via announcements on our social media platform or Whatsapp or other appropriate means. We recommend you check from time to time to see if there are amendments to this Privacy Policy.
- Any amendments to this Privacy Policy will be effective upon notice to you. By continuing to communicate with us and/or assessing, using, browsing, downloading, surfing, purchasing or subscribing to our contents, products, services, events, conferences, talks, videos, seminars, road shows, contests, promotions or campaigns after being notified of any amendments to this Privacy Policy, you will be treated as having agreed to and accepted those amendments.

III. COLLECTION OF PERSONAL DATA

- The term "**personal data**" 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, NRIC No, date of birth, email address, etc. The types of personal data collected depend on the purpose of collection. We may "process" your personal data by way of collecting, recording, holding, storing, using and/or disclosing it.
- Your personal data may be collected from you during your course of dealings with us in any way or manner including pursuant to any transactions and/or communications made from/with us. We may also collect your personal data from a variety of sources, including without limitation, at any events, conferences, talks, videos, seminars, road shows, contests, promotions, campaigns or customer satisfaction surveys organised and/or sponsored by us, as well as from publicly available sources.
- In addition, we may also receive, store and process your personal data which are provided or made available by any third parties, credit reference bodies, regulatory and law enforcement authorities, for reasons including delivery of our products and/or services, performance of conditions of agreements and/or to comply with our legal and regulatory obligations.

IV. PURPOSE OF COLLECTING AND PROCESSING YOUR PERSONAL DATA

- The personal data as provided/furnished by you to us or collected by us from you or through such other sources as may be necessary for the fulfilment of the purposes at the time it was sought or collected, may be processed for the following purposes (collectively referred to as the "**Purposes**"):
 - to consider and/or process your registration/application/transaction with us;
 - to respond to your enquiries or complaints or resolve any issues and disputes which may arise in connection with any dealings with us;
 - to facilitate, process, deal with, administer, manage and/or maintain your relationship with us;
 - to administer and process any payments related to our products, services, events, conferences, talks, videos, seminars, road shows, contests, promotions or campaigns and/or facilities requested by you;
 - to administer and give effect to your commercial transactions with us;
 - to process any payments related to your commercial transactions with us;
 - to facilitate your participation in, and our administration of, any events, conferences, talks, videos, seminars, road shows, contests, promotions or campaigns organized, managed, facilitated, provided, sponsored and/or participated by us and/or selected third parties which may be of interest to you from;
 - to provide you with information and/or updates on our products, services, events, conferences, talks, videos, seminars, road shows, contests, promotions or campaigns organized, managed, facilitated, provided, sponsored and/or participated by us and/or selected third parties which may be of interest to you from time to time by Whatsapp, phone call, email, fax, mail, social media and/or any other appropriate communication channels, unless you have otherwise notified us that you do not wish for us to process your personal data for such purpose at the address stated below in this Privacy Policy;
 - to send you seasonal greetings/messages, gifts, newsletters from time to time;
 - to send you invitation to join our events, conferences, talks, videos, seminars, road shows, contests, promotions or campaigns, unless you have otherwise notified us that you do not wish for us to process your personal data for such purpose at the address stated below in this Privacy Policy;
 - for direct marketing purposes via Whatsapp, phone call, email, fax, mail, social media and/or any other appropriate communication channels, unless you have otherwise notified us that you do not wish for us to process your personal data for such purpose at the address stated below in this Privacy Policy;
 - to share any of your personal data with our business partners to jointly develop products and/or services or launch marketing campaigns or to provide information on further education, counselling and all education activities;
 - to monitor, review and improve our contents, products, services, events, conferences, talks, videos, seminars, road shows, contests, promotions or campaigns;
 - to process and analyse your personal data either individually or collectively with other individuals;
 - to conduct market research or surveys, internal marketing analysis, customer profiling activities, analysis of customer patterns and choices, planning and statistical and trend analysis in relation to our products and/or services;
 - to share any of your personal data with the auditor for our internal audit and reporting purposes;
 - to carry out due diligence or other monitoring or screening activities (including background checks) in accordance with legal or regulatory obligations or risk management procedures that may be required by law or that may have been put in place by us;
 - to share any of your personal data pursuant to any agreement or document which you have duly entered with us for purposes of seeking legal and/or financial advice and/or for purposes of commencing legal action;
 - to share any of your personal data with a third party necessary for the preparation of legal documents or contract to be entered by you;
 - to share any of your personal data with insurance companies necessary for the purpose of applying and obtaining insurance policy(ies), if necessary;
 - to share any of your personal data with financial institutions necessary for the purpose of applying and obtaining credit facility(ies), if necessary;
 - to communicate with you and to maintain and improve customer relationship;
 - to maintain and update internal record keeping, files and contact lists;
 - to detect, investigate and prevent any fraudulent, prohibited or illegal activity or omission or misconduct;
 - to enable us to perform our obligations and enforce our rights under any agreements or documents that we are a party to;
 - to transfer or assign our rights, interests and obligations under any agreements entered into with us;
 - to meet any applicable legal or regulatory requirements and making disclosure under the requirements of any applicable law, regulation, direction, court order, by-law, guideline, circular or code applicable to us;
 - to comply with or as required by any request or direction of any governmental authority; or responding to requests for information from public agencies, ministries, statutory bodies or other similar authorities;
 - to enforce or defend our rights and your rights under, and to comply with, our obligations under the applicable laws, legislation and regulations;
 - for internal administrative purposes;
 - to communicate with parents, guardians and authorized representatives in the event of emergency or accident;
 - for audit, risk management and security purposes;
 - for our storage, hosting back-up (whether for disaster recovery or otherwise) of your personal data, whether within or outside Malaysia; and/or
 - for other purposes required to operate, maintain and better manage our business and your relationship with us,
- and you agree and consent to us using and processing your personal data for the Purposes in the manner as identified in this Privacy 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.
- We will seek your separate consent for any other purposes which do not fall within the categories stated above.
- We may also be collecting from sources other than yourself, personal data about you, for one or more of the above Purposes, and thereafter using, disclosing and/or processing such personal data for one or more of the above Purposes.
- Unless otherwise specified by us, the supply of your personal data is voluntary, and you may withdraw your consent to this Privacy Policy.
- However, please note that your personal data is necessary for us to carry out the aforesaid Purposes and the failure to supply such personal data will or may:-
 - result in us being unable to administer the business or our contractual relationship;
 - result in us being unable to provide you with information about the products, services, events, conferences, talks, videos, seminars, road shows, contests, promotions or campaigns organized, managed, facilitated, provided, sponsored and/or participated by us; and/or
 - result in us being unable to provide you with information about the products, services, events, conferences, talks, videos, seminars, road shows, contests, promotions or campaigns offered by selected third parties which may interest you.

V. DISCLOSURE OF YOUR PERSONAL DATA

- We may disclose your personal data to the following third parties, for one or more of the above Purposes:-
 - your immediate family members and/or emergency contact person as may be notified to us from time to time;
 - successors in title to us;
 - any person under a duty of confidentiality to which has undertaken to keep your personal data confidential which we have engaged to discharge our obligations to you;
 - any party in relation to legal proceedings or prospective legal proceedings;
 - our auditors, consultants, lawyers, accountants or other financial or professional advisers appointed in connection with our business on a strictly confidential basis, appointed by us to provide services to us;
 - any party nominated or appointed by us either solely or jointly with other service providers, for purpose of establishing and maintaining a common database where we have a legitimate common interest;
 - data centres and/or servers located within or outside Malaysia for data storage purposes;
 - storage facility and records management service providers;
 - payment channels including but not limited to banks and financial institutions for purpose of assessing, verifying, effectuating and facilitating payment of any amount due to us in connection with your purchase of our products and/or services;
 - government agencies, law enforcement agencies, courts, tribunals, regulatory/professional bodies, industry regulators, ministries, and/or statutory agencies or bodies, offices or municipality in any jurisdiction, if required or authorised to do so, to satisfy any applicable law, regulation, order or judgment of a court or tribunal or queries from the relevant authorities;
 - our business partners, third party product and/or service providers, suppliers, vendors, distributors, contractors or agents that provide related products and/or services in connection with our business, or discharge or perform one or more of the above Purposes and other purposes required to operate and maintain our business;
 - our customers, on a need to know basis;
 - insurance companies for the purpose of applying and obtaining insurance policy(ies), if necessary;
 - financial institutions for the purpose of applying and obtaining credit facility(ies), if necessary;
 - financial institutions, merchants and credit card organizations in connection with your commercial transactions with us;
 - the general public when you become a winner in a contest, participate in our events, conferences, talks, videos, seminars, road shows, contests, promotions or campaigns by publishing your name, photographs and other personal data without compensation for advertising and publicity purposes;
 - any third party (and its advisers/representatives) in connection with any proposed or actual reorganization, merger, sale, consolidation, acquisition, joint venture, assignment, transfer, funding exercise or asset sale relating to any portion of the Company; 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 or as instructed by you.
- Notwithstanding the foregoing, we reserve our rights to rely on any statutory exemptions and/or exceptions to collect, use and disclose your personal data.
- 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 effected. 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 or the contract that you have with us will have to be terminated.

VIII. RETENTION OF YOUR PERSONAL DATA

- 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 accordance with our retention policy 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.

IX. SECURITY OF YOUR PERSONAL DATA

- We endeavour, where practicable, to implement appropriate security measures 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. 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 Privacy Policy.
- We will also put in place various security procedures to your electronic communications with us. All our employees and data processors, who have access to, and are associated with the processing of your personal data, are obliged to respect the confidentiality of your personal data.
- We do not accept responsibility for any unauthorised or unlawful processing, the destruction of, the loss of, the damage to, the alteration of or unauthorised access to your personal data, that is beyond our reasonable control.
- If you assess, use, browse, download, surf, purchase or subscribe to the contents, products, services, events, conferences, talks, videos, seminars, road shows, contests, promotions or campaigns from our strategic partner and you subsequently provide your personal data directly to that third party, that personal data will be subject to that third party's privacy/personal data protection policy (if they have such a policy) and not to this Privacy Policy. We recommend you to read and understand the privacy/personal data protection statement/policy by that third party in order to understand their procedures for collecting, processing, using and disclosing personal data and before submitting your personal data to them.

X. PERSONAL DATA FROM MINORS AND OTHER INDIVIDUALS

- You hereby confirm and warrant that you are above the age of minority and you are capable of understanding and accepting the terms of this Privacy Policy.
- If you are a minor (i.e. individuals under 18 years of age) or individuals not legally competent to give consent, you shall only assess, use, browse, download, surf, purchase or subscribe to the contents, products, services, events, conferences, talks, videos, seminars, road shows, contests, promotions or campaigns only with the involvement of a parent or legal guardian.
- As the parent or guardian or person who has parental responsibility over them or the person appointed by court to manage their affairs or that they have appointed you to act for them, in the event that such personal data of a minor is disclosed to us, you hereby consent on the minor's behalf to the processing of the minor's personal data and accept and agree to be bound by this Privacy Policy and take responsibility for his/her actions.
- To the extent that you have provided (or will provide) personal data about your family members, spouse, other dependants and/or other individuals, you confirm that you have explained (or will explain) to them that their personal data will be provided to, and processed by, us and you represent and warrant that you have obtained their consent to the processing (including disclosure and transfer) of their personal data in accordance with this Privacy Policy.

XI. TRANSFER OF YOUR PERSONAL DATA OUTSIDE OF MALAYSIA

- Our information technology storage facilities and servers may be located in other jurisdictions outside of Malaysia. This may include, but not limited to, instances where your personal data may be stored on servers located outside Malaysia. In addition, your personal data may be disclosed or transferred to entities located outside Malaysia. Please note that these foreign entities may be established in countries that might not offer a level of data protection that is equivalent to that offered in Malaysia under the laws of Malaysia. You hereby expressly consent to us transferring your personal data outside of Malaysia for such purposes. We shall endeavour to ensure that reasonable steps are taken to procure that all such third parties outside of Malaysia shall not use your personal data other than for that part of the Purposes and to adequately protect the confidentiality and privacy of your personal data.

XII. CONTACT DETAILS

- If you have any inquiries or complaints or would like to make a data access or correction request in respect of your personal data, kindly communicate to us in writing at the postal/email address specified below:

Personal Data Protection Officer

Contract : 011-10080862

Email: lifelongeducation333@gmail.com