

# Privacy policy

Effective date: 12th January 2023

This Privacy Notice ("Privacy Notice") describes how PLOWMANGROCER SDN. BHD. (1517692D), its respective holding company, subsidiaries, affiliates, associated companies, and jointly controlled entities (collectively "Plowman Grocer," "we," "us," or "our") collect, use, process, and disclose your Personal Data through the use of mobile applications, websites, products, features, and other services globally, operated by Plowman Grocer (collectively, "Services").

This Privacy Notice applies to our consumers, agents, vendors, suppliers, partners, contractors, and service providers (collectively "you," "your," or "yours").

"Personal Data" is any information that 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.

Why do we collect your Personal Data? Plowman Grocer may use your Personal Data for the following purposes set out in the list below ("Purposes").

## **Providing services and features**

Your Personal Data will be used to provide, personalize, maintain, and improve our Services. This includes, but is not limited to:

- Manage your requests for products and services, including deliveries, processing payments and refunds, reward points, and discounts.
- Respond to feedback, complaints, or concerns you have regarding our products and services.
- Registering and servicing your account, including keeping your information up-to-date and verifying your identity.
- Request feedback through surveys and research to improve our products and services.
- Improve our operational processes to enhance your customer experience.
- Work with our service providers.

- Conduct safety, security, investigative, fraud, and loss prevention activities.
- Facilitate corporate transactions like mergers and acquisitions, e.g., to assess those transactions and manage the transition of the business.
- As otherwise required or permitted by law.

## **Marketing and promotions**

We may use your Personal Data to send you marketing communications relating to customised products or services (that may be of interest or relevance based on your profile), or Plowman Grocer's partners', sponsors', and advertisers' products, services, events, or promotions. For example, we may:

- Send you special offers that may be of interest or relevance to you across all of Plowman Grocer's product and service offerings.
- Send you alerts, newsletters, updates, mailers, promotional materials, special privileges, festive greetings.
- Notify, invite, and manage your participation in our events or activities.

We may communicate such marketing to you by various means, where applicable (including by SMS, chat applications (e.g., WhatsApp, Telegram), call, and by email).

## **Legal purposes**

We may use the Personal Data we collect for legal purposes, such as to investigate and resolve claims or disputes, detect/prevent/prosecute crime, or as allowed or required by applicable law.

We may also use your Personal Data when we are required, advised, recommended, expected, or requested to do so by our legal advisors or any local or foreign legal, regulatory, governmental, or other authority.

For example, we may use your Personal Data to:

- Comply with court orders or other legal, governmental, or regulatory requirements.
- Enforce our Terms of Service or other agreements.
- Protect our rights or property in the event of a claim or dispute.

## **Research and development and security**

We may use the Personal Data we collect for testing, research, analysis, and product development. This helps us to improve and enhance the safety and security of our Services, develop new features and products, and facilitate insurance and finance

solutions in connection with our Services.

What Personal Data do we collect? The types of Personal Data that we collect depend on the nature of the transaction and the circumstances of collection, but may include:

- Identity and contact details (e.g., name, address, phone number, email address).
- Financial and transactional information (e.g., credit card or bank account numbers).
- Health information (e.g., allergies or medical conditions) for certain products or services.
- Loyalty program information (e.g., membership details, purchase history).
- Location information (e.g., GPS or IP address).
- User data and preferences (e.g., username, password, and other identifiers used to authenticate or access your account or our Services).
- Usage and interaction data (e.g., information about how you use our Services, including log files, user preferences, and browsing history).
- Contact history (e.g., records of our interactions with you).
- Marketing and communications data (e.g., your preferences for receiving marketing communications).

How do we collect your Personal Data? We may collect your Personal Data in the following ways:

- When you provide it voluntarily.
- When you use our Services.
- When we obtain your Personal Data from other sources.

If you provide us with any Personal Data relating to a third party (e.g., information of your spouse, children, parents, and/or employees), you represent that you have obtained the necessary consent from the relevant third party to share and transfer their Personal Data to us.

How do we disclose your Personal Data? We may disclose your Personal Data to the following parties or for the following purposes:

- Within the PlowmanGrocer Sdn Bhd Group, including its respective holding company, subsidiaries, affiliates, and associated companies.
- Our service providers, suppliers, vendors, agents, contractors, and strategic partners that provide services to us, such as delivery services, payment processing, data analytics, customer service, marketing, and advertising.
- Our business partners who may offer products or services jointly with us or on behalf of PlowmanGrocer Sdn Bhd.
- Regulatory authorities, statutory bodies, governmental or public agencies, and industry regulators.

- Law enforcement agencies, courts, tribunals, and dispute resolution forums.
- Any third party to whom we assign or novate any of our rights or obligations.
- Any actual or proposed purchaser of all or part of our business or assets.
- To protect or enforce our rights or the rights of any third party.

When disclosing your Personal Data to third parties, we will take reasonable measures to ensure that those third parties protect your Personal Data and comply with applicable laws and regulations.

How do we protect your Personal Data? We have implemented reasonable technical, administrative, and physical measures to protect your Personal Data against unauthorised access, disclosure, alteration, and destruction. However, please note that no data transmission or storage can be guaranteed to be 100% secure. If you have reason to believe that your interaction with us is no longer secure, please notify us immediately.

Use of cookies and similar technologies We use cookies and similar technologies on our Services. By using our Services, you consent to our use of cookies and similar technologies in accordance with our Cookies Policy.

Cross-border transfer of Personal Data Your Personal Data may be stored and processed in any country where we have operations or where we engage service providers, and by using our Services, you consent to the transfer of information to countries outside your country of residence, including those outside the European Economic Area (EEA), which may have different data protection rules than your country.

We will take all steps reasonably necessary to ensure that your Personal Data is treated securely and in accordance with this Privacy Notice.

Your rights and choices You may have certain rights and choices regarding your Personal Data under applicable laws. These rights may include the right to access, rectify, and erase your Personal Data, as well as the right to restrict or object to certain processing activities.

To exercise your rights or make any requests regarding your Personal Data, please contact us using the contact details provided below. We will respond to your request within the timeframes required by law.

Updates to this Privacy Notice We may update this Privacy Notice from time to time to reflect changes in our practices or legal obligations. We will notify you of any material updates by posting the updated version on our website or through other reasonable means.

Contact us If you have any questions, comments, or requests regarding this

Privacy Notice or our privacy practices, please contact us at:

PLOWMANGROCER SDN. BHD. (1517692D)

Attn: Privacy Officer

Address: 195f, Jalan Tudm, Kampung Subang Baru, 40150 Shah Alam, Selangor

Email: [privacy@plowmangrocer.com](mailto:privacy@plowmangrocer.com)

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