

## Privacy Policy

This Privacy Policy describes policies and practices of **China Mobile International Limited** (“**CMI**”) and our subsidiary, **China Mobile International (Malaysia) Sdn. Bhd.** (Company Registration No. 201501017899 (1143231-D)) (“**CMI MY**”), in the collection, use, disclosure and transmission of your personal data in relation to below products and services:

- (i) CMLink Malaysia Mobile Plans;
- (ii) CMLink Malaysia Mobile Add-ons.

(collectively “**CMLink Products**”)

CMI and CMI MY (“**we**”, “**us**” or “**our**”) strive to comply with applicable data protection and privacy legislation and regulations (“**Applicable Laws**”), that may include, without limitation, Malaysia’s Personal Data Protection Act 2010 (Act 709) (“**PDPA**”); Hong Kong Special Administrative Region’s Personal Data (Privacy) Ordinance (Cap. 486) (“**PDPO**”) and the Regulation (EU) 2016/679 (General Data Protection Regulation) (“**GDPR**”). This website is operated and/or managed by CMI and/or CMI MY.

To the maximum extent permitted by Applicable Laws, your continued use of this website and/or CMLink Products, and/or your provision of personal data to us constitutes your acceptance of this Privacy Policy. We may also process your personal data to the extent permitted by Applicable Laws.

We may occasionally update this Privacy Policy to reflect changes in our software and/or products and/or services provided, or changes of Applicable Laws. When we post changes to this Privacy Policy, we will update the "last revised" date at the bottom of the Privacy Policy. Please read through this Privacy Policy and we recommend you to check this Privacy Policy from time to time to be aware of any changes.

This Privacy Policy is available in both Bahasa Malaysia and English and may be translated into other languages for reference purpose. If there is any inconsistency or conflict between the English version and other versions of this Privacy Policy, the English version shall always prevail.

### Source of personal data

1. The sources that we collect personal data may include the following:
  - (a) interactions and communications between you and us such as emails, WhatsApp messages, and interactions on our social media platforms;
  - (b) when you use our services, products, mobile applications, computer programs, software, and websites;
  - (c) information provided by you when you register for an account, subscribe to our services, purchase our products, or complete forms or surveys;
  - (d) information generated or collected automatically when you use our services, including technical data such as device information, IP address, usage data, and log information;

- (e) third parties we deal with or connected with you such as credit reporting agencies, or financial institutions;
- (f) other sources where you have consented to the disclosure of your personal data, and/or where collection or disclosure is otherwise permitted by law.

### **Personal data we collect**

2. In order to provide products or services, we may collect information about you from time to time, including (but not limited to) information in the following categories:
  - (a) Identification data (including but not limited to name, residential address, identification specifications, such as passport, work permit identification card, student identification card and other identification documents, and number such as NRIC, telephone and mobile numbers). Identification data includes sensitive personal information such as biometric data (e.g. facial image, fingerprint and voice);
  - (b) where the subscription is under a business entity, this includes company information as well as the personal data of the business entity's authorised representative;
  - (c) Electronic identification data (e.g. IP addresses, cookies);
  - (d) Information about your usage of and interaction with our mobile applications, computer programs, software, products, and websites (including computer, platform, device and connection information, client performance information, error reports, device capability, bandwidth, statistics on page views, browser type and usage statistics);
  - (e) Traffic data (data processed for the purpose of the conveyance of communications or the billing);
  - (f) Payment details, including the credit card and bank information;
  - (g) Contact details, including contact person name, telephone number, fax number, physical address, or email address etc.
  - (h) CCTV recordings of your image when visiting our offices, or authorised dealers.

You are not obliged to provide us with your personal data. However, we may not be able to or continue to provide you with the required goods and services or to respond to your request if we do not have certain types of personal data from you.

In order to enhance your customer experience, further personal data may also be collected on a voluntary basis such as your age, date of birth, gender, education, profession, salary range, hobbies, interests and leisure activities, other related products and services subscribed, family and household demographics, and etc. We will indicate

in the relevant forms or application whether the provision of the required personal data is on a voluntary basis.

In addition, your online session data may also be collected indirectly on an aggregated and anonymous basis.

If you are under the age of 18, please have your parent or legal guardian review this Privacy Policy and provide consent on your behalf before submitting any personal data to us.

### **Use of your personal data**

3. Our primary purpose in collecting information is to provide you with a safe, smooth, efficient, and customized experience. We collect and use, or have third party service providers acting on behalf of us collect and use, personal data relating to you, for the following purposes:

- provide you with phone, internet communication, and/or other products;
- take, process or deliver orders made via our websites, invoice you or notify you of the status of your order;
- provide other services for you (as described when we collect the information);
- administer, operate and manage loyalty programs;
- communicate with you by email, phone, mail or other means;
- process payment instructions, billing and refund;
- provide you with customer support and troubleshoot problems;
- compare information for accuracy;
- inform you about service updates and faults;
- request feedback or participation in on-line surveys;
- handle enquiries, complaints and feedbacks;
- resolve disputes;
- verify your identity;
- conduct internal research;
- design and improve CMLink's products, software and websites;
- plan and carry out CMLink's marketing or promotional operations/offers and similar events;
- offer certain free of charge CMLink software, features and websites, through the support of advertising;
- process debt recovery and credit checking;
- obtain legal advice and establish legal claims or defences and in legal proceedings;
- protect your interests or those of CMI and CMI MY, including, in particular, for enforcement of our Terms and Conditions and policies, for fraud prevention and security purposes, and safeguarding the rights, property or safety or any individual;
- comply with applicable laws and regulations and assist law enforcement, judicial authorities or other government agencies as required;
- other purposes related to or collateral to the above,

(together, the Purposes).

## Disclosure and transfer of your personal data

4. Except as provided herein, we will not sell, rent, trade or otherwise transfer your personal data, traffic data or communications content without your consent, unless it is obliged to do so under applicable laws and regulations, or orders of competent authorities.

In order to facilitate the purposes set out herein, we may disclose or transfer your personal data to third parties, within or outside of Malaysia, including:

- telecommunications network operators, CMI's or CMI MY's third party reward and loyalty program providers, service providers, agents, dealers, contractors, or suppliers;
- CMI's and/or CMI MY's affiliated companies and their service providers, for the provision of products and services by CMI, CMI MY, or their affiliated companies;
- financial institutions, charge or credit card issuing companies, credit providers, credit information or reference bureaus, collection agencies, or security agencies;
- professional advisors including lawyers, accountants, tax advisor, and auditors;
- law enforcement, regulatory, or government bodies, or other authorities,

and you hereby consent to such disclosure or transfer.

## Security and retention of your personal data

5. We will take appropriate organizational and technical measures to protect the personal and traffic data collected in accordance with applicable laws and regulations. Your personal and traffic data will only be accessed by authorized employees or third parties, and retained only as long as necessary to fulfil the Purposes for which it was collected, unless longer retention is required to comply with applicable laws and regulations, or contractual obligations.
6. Our headquarters, which serves as Data Processor for the purpose of GDPR, is located outside the EU. To provide you with our products and services including the CMLink Products, we may disclose or transfer your personal data to our headquarters and you hereby consent to such disclosure or transfer:

Company Name	Company Address	Remark
China Mobile International Limited	Level 30, Tower 1, Kowloon Commerce Centre, No. 51 Kwai Cheong Road, Kwai Chung, New Territories, Hong Kong	Data may be processed in Hong Kong and/or China.

## Direct marketing

7. CMI (and CMI MY as applicable) intends to use your personal data to deliver to you information about any goods and services, loyalty programs, activities (including joint

collaboration with third parties), newsletters, contests, lucky draws and etc of us and our business partners. The said information may include various classes of marketing subjects including but not limited to mobile devices and accessories, network services such as TV, mobile voice, SMS and data communications, IDD/roaming, Internet connectivity, mobile applications, entertainment and data communications on Internet, other value-added services, as well as computer peripheral, accessories and software (including notebooks, handsets, keyboards, security installations and mobile applications), secretarial services, personal assistance services and information services, gaming, sports, music, beauty products, electronics, technology, ecommerce, mobile payment, travelling, banking, investment, entertainment, transportation, household, fashion, food and beverages, insurance, education, health and wellness, social networking, charity activities, media and high-end consumer products and services. The said information may be delivered to you by mail, phone, email, fax or other means.

If you wish to stop receiving direct marketing materials from us or should you change your mind in relation to your previous decision, you may opt-out of such marketing communications by contacting us through the contact information provided below. In any request to opt out, please state clearly your personal data and contact details for identification purposes. If you opt out, we will stop sending you marketing communications, but we will continue sending you communications that relate to the products and services provided to you.

#### **Use of cookies and location data**

8. If you visit any of our websites, CMI and/or CMI MY may use cookie files to store and track information about you and your preferences. A cookie is a small text file that our website transfers to your device. It allows us to better serve you and/or maintain your information across multiple pages within or across one or more sessions. Most web browsers automatically accept cookies, but if you prefer, you can edit your browser options to block them in future. Cookies contain information about you and your preferences. For example, if you inquire about rates and availability, the site might create a cookie that contains the details you entered or it might only contain a record of which pages within the site you visited to help the site customize the view for you the next time you visit. Only the information that you provide or the choices you make while visiting a website can be stored in a cookie. For example, the site cannot collect or identify your email address unless you voluntarily provide it. Allowing a website to create a cookie does not give that or any other site access to the rest of your device, and only the site that created the cookie can read it.

CMI may use your location data to keep track of your activity patterns and preferences in order to improve the level of service you receive. Your location data may be combined with other information CMI receives from third parties to provide you with better service and, where you have consented to receive direct marketing, CMI may provide you with targeted advertisements, content, features, deals and offers.

#### **Your Rights and Obligations**

9. To help us maintain accurate, complete and up-to-date records, you are responsible for ensuring that the personal data you provide to us including any personal data of other individuals you represent or are responsible for, is accurate, complete and current, and for updating it as soon as it becomes inaccurate or outdated. You have the right to access and, where relevant, to update or correct your personal data held by us.

Where provided by Applicable Laws, you may also (i) request deletion or the portability of your personal data; (ii) limit the use and disclosure of your personal data; and (iii) withdraw consent to any of our data processing activities.

If you wish to exercise any of your rights above, you may do so by contacting us through the contact information provided below. Subject to CMI's and CMI MY's rights under the Applicable Laws, CMI and/or CMI MY will endeavour to respond to your request within a reasonable period of time (or such other period of time as may be required under the Applicable Laws) and may take steps to verify your identity, before we are able to respond to your request.

We will endeavour to accommodate your request to delete your personal data held by us unless it is required to be retained by laws and regulations, to fulfil legal or contractual obligations, or for legitimate business purposes.

In accordance with the Applicable Laws, we reserve the right to charge a reasonable fee for the processing of your request.

#### **Access by mobile device**

10. When you use CMLink on your mobile device, CMI and/or CMI MY may use the notification services available for that device to let you know of any information when you are not actively running or using the CMLink application. These notification services may be provided by a third party (for example, Apple's Push Notification Services for Apple devices).

In providing the notification services, the third party may receive information about the caller, sender of the message and the content of the message. Such information will be processed in accordance with the third party's terms and conditions and privacy policy. CMI and CMI MY do not control and are not responsible for the personal data collected, or used by the third party.

*(Apple is a trademark of Apple Inc., registered in U.S. and other countries.)*

#### **Contact us**

11. Should you have any queries or concerns in relation to this Privacy Policy, please contact our customer service via [csmmy@cmlink.com](mailto:csmmy@cmlink.com)