

PRIVACY NOTICE

(1) Introduction

This Privacy Notice applies to all persons whose personal data is processed by Community P2P Sdn. Bhd. (collectively referred to as “CP2P”, “we”, “our” or “us”), all other people access our website www.cp2p.com (hereinafter referred to as “the website”, or “the Platform”) and/or use of the services provided by the Platform. This privacy notice outlines how we collect, use, disclose, and protect your information when you use our Platform.

(2) Our Commitment

Your privacy is important to us, and we are committed to protect your personal information at all times in accordance with the Personal Data Protection Act 2010 (“PDPA”). Such information will only be disclosed or utilized by us as outlined in this Privacy Notice or as permitted by law.

(3) The Information We Collect

We may collect the following information, including:

(i) Personal Data

To address your inquiries, manage your user, and provide our products and services, we may need to process personal data about you, which can include various types of information. We collect, share, and process this personal data based on the services you access.

- (a) Personal information includes any data that relates directly or indirectly to you. This includes your name, address, account details, as well as other necessary information to establish your identity and background, such as gender, age, date of birth, and marital status. We may collect a variety of personal information from you over time, including contact details, email address, bank account information, username, password, photographs, video footage, and any past legal breaches or convictions. Additionally, we gather information from you through your use of our website and app, as well as any other data you provide directly, to help us understand and verify your identity.
- (b) We may gather information about any businesses or companies you are associated with or interested in to understand your background as a company or partnership. This includes details such as the company name, directors, shareholders, shareholding percentages, company number, relevant transactions, and the names and information of all partners involved.
- (c) To evaluate your financial status and creditworthiness, we may gather information including your sources of income, expenses, assets, liabilities, investment portfolios, financial statements, financing history, credit reports, and account details. This financial information helps us to assess your financial standing and suitability for the services you apply for, including relevant aspects of your accounts and overall financial situation.

(ii) Usage Data

We may collect information on how you use and interact with our platform, including your transactions, subscribed products and services, and technical details such as your Internet Protocol (IP) address, browser type, pages visited, and time spent on the platform. When using our mobile application, we also gather information like your contact list, device details, and connection information, which facilitate services such as fund transfers, bill payments, and mobile reloads. This data enables us to offer features like automatic product updates, personalized content, and customized search results. Additionally, we may collect information related to your use of our services, including funding, payment, and repayment details, as well as communications between you,

us, and any authorized third parties. With your consent, we may also obtain information from third-party service providers, which may include your profile content or other personally identifiable information.

(4) Your Data Protection Rights

Unless stated otherwise at the time of collection, you are required to provide the personal data we request. Providing your personal data is essential for us to process your application for our products or services; without this necessary information, we may be unable to proceed with your application or fulfill your request.

You are responsible to ensure the accuracy, completeness, not misleading, and keep up update of the personal information you provide, we will not be liable for any inaccuracies or errors in the information we maintain. To correct any factual errors in your personal information, please submit a request that clearly specifies the error. To ensure your privacy and security, we will take reasonable measures to verify your identity and require additional documentation to prevent fraud or inaccuracies before granting access or making any corrections. If you need to update, change, delete, amend, or correct your personal information and are unable to do so through your profile page, please include specific details in your request. However, we retain the right to refuse such requests as allowed under the PDPA and may impose fees for processing these requests.

(5) How We Use Your Information

We may use and process your information for the following purposes:

- (i) to ensure the functionality of our platform, offer our products and services, grant you access to our platform, identify you as a user in our platform, and enhance and update our services;
- (ii) to meet our responsibilities under relevant laws, regulations, and cooperation agreements with authorities. This involves adhering to legal requirements established by regulatory bodies, following directives, and protecting our rights. We aim to prevent and report criminal activities such as money laundering and fraud, enforcing or defending our legal rights, obtaining legal advice, and ensuring compliance with obligations under the PDPA;
- (iii) to perform due diligence in line with our internal governance, risk, and compliance policies, as well as to fulfil legal obligations related to potential corporate transactions. This information is essential for audit, compliance, and risk management purposes, and enables us to conduct internal monitoring, control, and enforcement of participants' obligations;
- (iv) to address inquiries, resolve concerns or complaints, and communicate effectively with you, including responding to your feedback; helps us to resolve disputes and respond to your questions regarding our products/services as stated on our platform, application, or other requests;
- (v) to keep you updated on our products, services, and events, as well as those of our business partners. This includes sending newsletters, marketing materials, and other relevant updates, conducting market research, and informing you of any changes to our website and application. We aim to promote our website, application, and products, along with special offers from third parties that may be of interest to you. Additionally, we provide promotional materials for marketing purposes and strive to enhance, personalize, and expand our services while tailoring our marketing efforts to improve your experience;
- (vi) to understand and analyse user interactions with our platform, enabling us to enhance and tailor your experience on our website and app. This includes conducting research for analytical purposes, such as data mining and reviewing your transactions with us, to improve the overall quality of your interactions;
- (vii) to process transactions and manage your account, as well as for internal management and administrative tasks, including data storage and management. This includes maintaining your account(s), facilities, and registration with us, keeping internal records for auditing purposes, and ensuring the security of our systems through internal audits; and

- (viii) for any additional purposes you specify or consent to, as well as for purposes related to or incidental to those mentioned above. This includes any uses mandated or allowed by law, guidelines, or relevant regulatory authorities, along with any other purposes we deem necessary.

(6) Disclosure of Your Information

We utilize the information you provide internally and do not share it with third parties unless required. Your personal data may be shared with specific external parties when necessary for the provision, management, and operation of our products and services, but only with your consent. We may disclose your information to:

- (i) our listed issuers, their directors, person provide guarantee or security, and advisers, participants, and any other individuals required to adhere to our rules. This includes individuals or companies seeking or providing funding through the platform, as well as organizations that act as our agents, affiliates, or professional advisors. In all cases, we will ensure that we comply with applicable laws and regulations when sharing your information with our affiliates, subsidiaries, associate companies, and service providers;
- (ii) various authorities, including the Securities Commission Malaysia, Bank Negara Malaysia, Royal Malaysian Police, Malaysian Anti-Corruption Commission, Companies Commission of Malaysia, Registrar of Societies, and any other relevant supervisory or governmental bodies, as well as regulatory and public authorities;
- (iii) credit reporting agencies, debt collection agencies, or anyone looking to settle any outstanding debts granted to you by us;
- (iv) your advisors, including but not limited to accountants, auditors, financial advisors, and other professional consultants; external professionals providing services to us or on your behalf, such as solicitors, trustees, valuers, tax consultants, banks, financial institutions, liquidators, receivers and managers, and auctioneers;
- (v) any person as mandated by applicable laws, rules, regulations, guidelines, or court orders;
- (vi) our assignees or transferees of our rights, interests, or obligations, as well as with individuals involved in enforcing or preserving our rights under your agreements with us; and
- (vii) any person authorized by us to assist in our daily operations and the services provided through the platform, along with any other relevant parties necessary for carrying out our business purposes or functions.

We will not use or share your personally identifiable information in any manner not described above without your consent. Furthermore, unless allowed by law, we will not disclose any information categorized as "sensitive personal data" without your explicit consent.

(7) Amendment to Privacy Notice

We reserve the right to amend and update this Privacy Notice at any time, we may make modification prior notice or will be posted on our platform or communicated through other methods we deem appropriate. It is your responsibility to regularly check the platform for any updates and changes, as this notice may be revised at our discretion. By continuing to use the platform and its services, or by not withdrawing your consent, you are deemed to have accepted any revisions and the updated policy.

(8) Applicable Law and Jurisdiction

This Privacy Notice is governed by and interpreted in accordance with Malaysian law. You consent to the non-exclusive jurisdiction of the courts of Malaysia for any matters or disputes arising from this Privacy Notice.