

## PRIVACY NOTICE

This Privacy Notice ("Privacy Notice") applies to all persons accessing Urby's mobile application and/or website (collectively, the "Platform") operated by Urban NX Sdn Bhd (Company No. 202401022241 (1568090U)) ("we", "our" or "us" or "Urby") as well as all other persons connected to the use of the services or related services offered by the Platform. This Privacy Notice explains the type of data we collect and how we collect the data, the purposes of processing such data, the parties we disclose the data to and your rights relating to your personal data provided to us.

### 1. Personal Data

1.1 We may from time to time require your personal information to be submitted for you to gain access to information and services offered through the Platform. Your privacy is important to us. Therefore, we are committed to ensure that the confidentiality and security of all personal information provided to us are fully protected at all times in accordance with the Personal Data Protection Act 2010 ("PDPA"), and may only be disclosed or used by us in accordance with this Privacy Notice or where it is permitted under the law.

1.2 We collect, share and process personal information provided by you depending on the service you access through us. The types of information we collect and process, or is processed on our behalf includes those required:

- to establish your identity and background as an individual (e.g. name, age, identity documents, address, contact etc.);
- to establish your financial status and creditworthiness (e.g. employment status, sources of income, financial statements, financing history, credit reports, account information etc.); and
- in relation to you using or applying for the services we offer (e.g. funding, payment details, any form of communication between you and us and any authorised third party etc.).

### 2. Purpose Of Processing Personal Data

2.1 The main purpose we collect and process information related to you is for the operation of the day-to-day business or services offered by the Platform, and includes those relating or incidental to such purpose, such as:

a. Platform Administration

- To administer the Platform and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes.
- To allow you to utilise the functions and features offered on or through our Platform and system.
- To develop, support and maintain IT systems for the services offered.
- To keep the Platform safe and secure.
- To provide you with information relating to services offered through the Platform.

b. Personal Identification and Assessment

- To verify your identity, background and ensure the accuracy of information provided by you.
- To assess your eligibility and suitability to participate in our services.
- To conduct searches, inquiry with Government authorities or credit bureau or any third parties to ensure creditworthiness and for compliance with the law.

c. Provision of Services

- To generate agreements, contracts or other documents and incorporate details into documents.
- To calculate, collect, allocate and disburse funds.
- To keep you and/or related parties personally updated and informed through notices, letters and other documents and forms of communication.
- To perform all other obligations as a service provider whether present or future;
- To customize, market or improve our services or Platform.
- To keep an internal record and database for audit purposes.
- To update, manage and maintain your accounts.

- To carry out internal monitoring and control and enforcement of obligations of participants.
- To maintain a transparent system to enable risk related assessments.
- Other purposes which we deem necessary.

d. Legal Compliance

- To prevent or report on any criminal act such as money laundering and fraud.
- To enforce our rights to recover debts owing to us or any other user of the Platform or any other remedies available to us.
- To comply with any obligation under applicable laws and for any other purposes permitted under PDPA.

Apart from the abovementioned purposes, we will not process or share your personal information without your consent.

### 3. Sources

#### 3.1 We will collect your personal information from a variety of sources including those mentioned below:

- Information collected from you directly
- When you register or apply for our services
- When you browse or visit our Platform and use any of our services
- Via any verbal, written or electronic communications with us or our authorised agents
- When managing or transacting your accounts and when making payments.
- When you take part in surveys, promotions, and advertisements on the Platform etc.
- Other sources
  - a. Credit reporting agencies and publicly available sources such as searches at government authorities or agencies.
  - b. Any other sources which has your consent to disclose your information.
  - c. Other sources where permitted by law or not otherwise restricted.

#### 4. Third Parties' Personal Data

- 4.1 When you provide personal information related to third parties to us, such as your next of kin or nominees, you confirm that you have obtained their consent to do so and we are authorized to use or disclose such information. You will inform such third parties of their right to access their information held by us.

#### 5. Mandatory or Voluntary Information

- 5.1 It may be mandatory or optional for you to supply your personal information to us, depending on situations.

a. Mandatory information

Where such information is compulsory and MUST be provided by you. If you refuse to do so we will NOT be able to offer our services to you.

b. Voluntary Information

Where such information is optional and you may choose whether to provide us with such information or otherwise. If such information is not provided, it shall not affect your use of our services.

#### 6. Disclosure to Third Parties

- 6.1 Apart from our staff, employees, affiliates, subsidiaries, holding companies, we may share and disclose your personal information to certain third parties including but not limited to those mentioned below:-

- a. any person or company/ body seeking a funding or providing a funding through the Platform, as the case may be;
- b. any of our agents, representatives, advisers, consultants, operators, programmers, developers, engineers or system providers who are employed or engaged to run, process, or administer the Platform and services offered under the Platform;

- c. other external professionals providing services to us or on your behalf such as auditors, solicitors and advocates, trustees, valuers, tax consultants, banks, financial institutions and accountants;
- d. liquidators/ receivers and managers, auctioneers;
- e. prospective buyer, dealer of any of our business or assets;
- f. credit reporting agencies, debt collection agencies, regulatory authorities, police, officers and/or public authorities;
- g. any person as required by any applicable laws, rules, regulations, court orders or guidelines;
- h. any of our assignees or transferees of our rights, interests or obligations; and
- i. any other person as required and authorised by us to run our day to day operations of the business and services offered vide the Platform.

Save for the relevant parties stated above, we will not otherwise disclose your personal information without your consent.

## 7. Security of Personal Information

7.1 We undertake tight measures and protocols in accordance with industry standards to ensure that your personal information is adequately protected. The following security features are currently implemented by us in relation to our services or Platform:

- Firewalls & Intrusion Prevention Systems
- Anti-Virus Software
- Various authentication processes
- Login ID and Password Verification
- Encryption on transmission of information and passwords
- Automatic Log Out system
- Secure E-signature software/systems
- Regular reviews and checks on systems by security providers
- Limit on sign in attempts and account lock feature
- Storage of information on secure server or drive
- Secure payment/ transfer gateway and/or portal
- Internal Policies & Standard Operating Procedures

Warning: As long as the correct Login ID and Password Verification is entered, we will assume that you are the person giving instructions and making transactions and you and only you will be liable for them. You must therefore keep your Passcodes secret and make sure they are not stored in any way that enables others to impersonate you. In addition, never leave your devices unattended when you are still logged into your account. Always remember to log out once you are done with your transaction.

## 8. Cookies

8.1 You agree and consent that we may from time to time set up cookies on your device, and may access to those cookies. Any information so collected by us will be non-personal and anonymous and such information is obtained solely to understand your use of the Platform.

## 9. Request For Access And Inquiries

9.1 You may e-mail our customer support at [support@urby.ai](mailto:support@urby.ai) if you wish to do any of the following:

- a. request to update/ change/ delete/ amend/ correct your personal information held by us by providing us with the specific details if the same cannot be done via your profile page;
- b. make any complaint or inquiry you have in respect of the use of your personal data;
- c. check or request from us any of your personal information being held or processed by us; and/or
- d. request from us a copy of your personal data being held or processed by us.

Your request above is however subject to:

- a. our right to refuse your request as allowed under the PDPA; and
- b. your payment of charges imposed by us for processing the abovementioned request(s) made by you.

It shall be your responsibility to update and check the accuracy of your personal information supplied to us or held by us and we shall not be responsible for any inaccuracy or error found in your personal information.

## 10. Limiting Information Processing

- 10.1 You have the option of withdrawing your consent or limiting or preventing distribution or processing of your personal information, or personal information relating to other persons or entities who may be identified from your personal data, by e-mailing our customer support at: [support@urby.ai](mailto:support@urby.ai)

## 11. Changes to Privacy Notice

11. Please note that this Privacy Notice may be amended from time to time at our own discretion and it is your responsibility to visit the Platform on a regular basis to keep yourself informed of updates and changes. By continuing to use the Platform and the services provided therein or by omitting to withdraw your consent, you are deemed to have accepted and consented to any such revision and update.

## 12. English version shall prevail

- 12.1 This Privacy Notice is issued in both English and Bahasa Malaysia. In the event of any inconsistencies or discrepancies between the English version and the Bahasa Malaysia version, the English version shall prevail.

## 13. Applicable Law and Jurisdiction

- 13.1 This Privacy Notice shall be governed and construed in accordance with Malaysian law. You hereby consent and submit to the non-exclusive jurisdiction of the courts of Malaysia in connection with any matter or dispute which may arise from this Privacy Notice.