Privacy Policy

In view of the importance of protection of personal data and to ensure compliance with the requirements of the applicable laws including the Personal Data Protection Act 2010 (the "**PDPA**") and the data protection principles as contained therein, **RIZAP MALAYSIA SDN. BHD.** (hereinafter referred to as the "**Company**") has adopted this Privacy Policy Statement and Personal Information Collection Statement (collectively, the "**Privacy Policy**") to safeguard users' personal data. References in this Privacy Policy to the "**Company**," "**we**," "**us**" or "**our**" refer to RIZAP MALAYSIA SDN. BHD. and may include its related corporations where personal data is shared in accordance with applicable data protection laws.

This document comprises two parts, Part A being the Privacy Policy Statement, as a general statement on our privacy policies and practices in relation to the personal data we handle, and Part B being the Personal Information Collection Statement, which is provided to you in accordance with the PDPA when or before we collect personal data from you as a Data Subject.

The provisions of this Privacy Policy form part of the terms and conditions and /or the agreement or arrangements that an individual has entered or may enter into with the Company. If any inconsistency is found, the provisions of this Privacy Policy shall prevail to the extent of the subject matter relating to personal data protection.

By visiting the Company's website or applications (collectively, the "**Website**") and/or using the products and services made available to you through the Website, you acknowledge that you have read and understood this Privacy Policy which shall apply to all information that we have about you, and that, to the maximum extent permitted by law, any dispute over personal information collection shall be subject to this Privacy Policy.

A. Privacy Policy Statement

1. Proper Collection and Use of Personal Data The Company will collect, use and disclose personal data in accordance with the PDPA. Personal data collected from users will be used only for the purposes notified to the individual at or before the time of collection, and we will obtain the individual's consent where required under the PDPA. Reasonable measures will be taken to prevent use beyond the specified purpose, except as permitted under applicable laws.

At or before the time of collection of data from an individual, we will inform the individual:
(a) the purposes for which the data is to be collected and the groups of persons to whom the data may be transferred;
(b) whether it is obligatory or voluntary to supply the data, and the consequences of not supplying obligatory data;
(c) the individual's right to request access to and correction of data held by us; and
(d) the person responsible for handling data access and correction requests.

2. Disclosure and Provision of Personal Data to Third Parties and/or for Other Purpose The Company will appropriately use and disclose personal data obtained from users only with the individual's consent or as otherwise permitted or required under the PDPA or other applicable laws and regulations. Unless the individual has provided consent or where such use is permitted under applicable laws, we will not use personal data for any purpose other than the purpose for which the data was originally collected. We will only use personal data for marketing purposes if the individual has provided clear and express consent in accordance with the PDPA. Any consent for use of personal data in direct marketing may be withdrawn by notifying us at any time.

3. Cross-Border Transfer The Company may transfer personal data to its related corporations including, for greater transparency, the following group companies located in Japan:
(i) RIZAP, Inc.;
(ii) RIZAP Technologies Inc.; and
(iii) Health Communications Inc.,
and/or engage service providers, data processors or other third parties (whether within or outside **Malaysia**) to process personal data on its behalf for purposes including IT system management, data hosting, administrative support and other operational needs.
Where personal data is transferred outside Malaysia, the Company will ensure that the recipient is bound

by legally enforceable obligations to provide a standard of protection that is at least comparable to that required under the PDPA, whether by contractual arrangements or other legally enforceable means. For transparency, your personal data may be stored and processed on cloud servers located in Japan by third-party cloud service providers.

4. Accuracy and Duration of Retention of Personal Data The Company takes all reasonable steps to ensure that the user's personal data collected and retained is accurate and up to date to the extent necessary to achieve the purpose of use. Personal data will be retained only for as long as it is necessary for the fulfilment of the purposes for which it is collected or to which consent has been given, or as otherwise required or permitted by applicable laws. We will cease to retain personal data, or remove the means by which the data can be associated with particular individuals, as soon as it is reasonable to assume that the purpose for which the data was collected is no longer being served and retention is no longer necessary for legal or business purposes. In general, retention periods are determined based on the nature of the data, the purposes for which it was collected, and any legal, regulatory, accounting or reporting requirements applicable to the Company.

5. Security Measures The Company will take reasonable security measures to protect personal data from unauthorised access, collection, use, disclosure, copying, modification or disposal. In the unlikely event of a data security incident, we will promptly implement corrective measures in accordance with the PDPA and applicable laws. Where required under the PDPA, we will notify the relevant authorities and the affected individuals , particularly where such breach is likely to result in significant harm. In addition, the Company will provide the necessary and appropriate education and internal guidance to employees and supervision in order to ensure safe management of personal data.

While we take reasonable steps to safeguard personal data, transmission of information over the internet is not completely secure and may involve risks beyond our control. Information passing over the internet may be transmitted outside Malaysia (even when the sender and recipient are located in the same country).

6. Compliance with Laws and Regulations The Company will comply with the PDPA and other applicable data protection laws and regulations in Malaysia. We will take into account the best practices as stipulated in guidelines issued by the relevant local authorities from time to time. In addition, we will establish and comply with the relevant policies for the protection of personal data.

7. Continuous Improvement The Company may review and update the implementation of personal data protection measures to ensure compliance with applicable laws and regulations.

8. Information to be Generally Available We will provide upon request the following information in relation to personal data collected and processed by us:
(1) the kinds of personal data held by us;
(2) the purposes for which personal data is collected, used and disclosed; and
(3) our policies and practices in relation to the handling of such personal data.

9. Access to Personal Data and Data Correction Requests You may request access to your personal data held by us by writing to our Data Protection Officer. You may also request the portability of your personal data, where applicable under law. We will charge a reasonable administrative fee for processing each data access request. We will generally be able to inform you of the outcome within 21days of your submission of the access request and will give a reason if the request is refused, except where we are not required to do so under the PDPA. If we are unable to respond within 21 days, we will inform you in writing of the time by which we will respond.

You also have the right to request correction of your personal data that is inaccurate at no charge by notifying our Data Protection Officer.

10. Withdrawal of Consent You may withdraw your consent to the collection, use or disclose your personal data at any time by providing reasonable notice to our Data Protection Officer. Upon receipt of your request, we will process the withdrawal within a reasonable period and inform you of the likely consequences of such withdrawal, including any legal or contractual implications.

Please note that depending on the nature and scope of your request, we may not be able to continue providing certain products or services to you. Withdrawal of consent shall not affect our right to continue

to collect, use or disclose personal data where such collection, use or disclosure without consent is permitted or required under applicable laws.

11. Amendment We may update this Privacy Policy from time to time to ensure compliance with applicable laws and to reflect changes in our business practices. The latest versions will be posted on the Website and will take effect upon publication.

This Privacy Policy shall be read in conjunction with any other notices, consent clauses or contractual terms that apply in relation to the collection, use and disclosure of personal data by the Company.

12. Data Protection Officer We have appointed a Data Protection Officer ("DPO") to oversee our compliance with the PDPA, including the security of our AI-based surveillance and cross-border data transfers. If there is any query, feedback or request relating to this Privacy Policy or any issues relating to the handling of personal data by the Company, please reach out to our Data Protection Officer ("**DPO**") via the contact details below:
Address: 64, Jalan SS 21/58, Damansara Utama, 47400 Petaling Jaya, Selangor, Malaysia
Email address: **chocozapmy@chocozap24.com**

B. Personal Information Collection Statement

1. Introduction This Personal Information Collection Statement ("**PICS**") mainly sets out:
(a) the kind of personal data collected from you or held by the Company;
(b) the purposes for which personal data is collected, used or disclosed; and
(c) the classes of persons to whom such personal data may be transferred or disclosed.

Through this PICS, you will be informed whether it is obligatory or voluntary for you to provide the personal data when we seek to collect the data from you. If provision is obligatory, you will be informed of the consequences for you if you do not supply such data.

If you provide us with personal data about another person, you represent and warrant to us that you have obtained all necessary consents from that other person to permit us to collect, use and disclose that personal data as set forth herein.

2. Type of Personal Data Collected Depending on the nature of the services you use, we may collect the following types of personal data:
(1) Your name, date of birth, occupation, residential and/or correspondence address, email, mobile phone number, home phone number, office phone number, preferred contact method and time, name of emergency contact, contact details of such emergency contact, gender, and profile photo;
(2) Identification document number (where required for verification or legal purposes);
(3) Your credit/debit card details and/or other payment method details;
(4) Your attendance or visit records and usage records of the Company's equipment, facilities and devices;
(5) Your purchase history, previous and future transaction records;
(6) Your subscription records to e-newsletters and marketing communications,
(7) Your workout information, preferences, plans and goals (where voluntarily provided) including biometric data (where applicable), such as body measurement data;
(8) Year of commencement of customer relationship with the Company;
(9) The method of how you first learn of the Company's offerings;
(10) Correspondence with us (including but not limited to those via our website, application or emails, and content and records of comments and inquiries about the Company);
(11) Other information from your usage of our websites, applications and services, including computer and connection information, statistics on page views, traffic to and from our website and applications, advertisement data, IP address and standard web log information; and
(12) Images or footages of you captured via our closed-circuit television ("CCTV") surveillance system located across or within the vicinity of the premises of the Company for security and safety purposes.

We may collect the above personal data when you use the Website or applications, including when you voluntarily register or update your existing profile with us, subscribe to catalogues or newsletters, email us, use our customer services, answer surveys, enter promotional opportunities, post on our social networks' message boards, or make any other submissions to our Website.

3. Purpose for Which Your Personal Data is Collected The Company collects, uses and discloses your personal data for the following purposes:
(1) To accept and process your requests or orders for the Company's goods and services;
(2) Administration of the provision of the Company's goods and services to individual users and corporate users;
(3) To handle, receive, investigate and respond to users' comments, complaints and enquiries;
(4) To manage services necessary for application, creation, operation and administration of accounts and records for customers and registering personal data and logging in with ID and password in systems and applications operated by the Company;
(5) To identify and verify the identity of Company's customers;
(6) To notify you of changes to our terms, policies or services;
(7) To compile users' statistics in relation to the use of the Company's products and services with a view to promote and improve the quality of the same;
(8) To administer and maintain the Company's Website and applications and diagnosing problems where necessary;
(9) To assess creditworthiness, manage outstanding payments related to transactions with the Company and process billing and payment;

(10) So far as personal data captured via the CCTV surveillance system is concerned, to facilitate and monitor daily operation of the premises of the Company, and safeguard security, ensuring specifically the safety and security of all users on such premises, prevention, detection and/or reduction of crime, and for analysis and investigation purposes including investigation of legal claims and allegations, and health and safety related matters; and
(11) To comply with applicable legal requirements; and

Note: This PICS does not apply to job applicants or employees of the Company, who are subject to separate data protection notices.

Consent for Marketing Subject to your consent, the Company may use your personal data to send you marketing/promotional material relating to our product and service, including information about new offerings, e-newsletters, limited time deals, and other services, updates or promotions.

If you do not wish the Company to send the marketing/promotional material as described above, you may withdraw your consent by notifying our Data Protection Officer. Upon withdrawal, we will cease sending you such marketing communications within a reasonable period.

4. Disclosure, Transfer and Provision of personal Data to Third Parties The Company, subject to the provisions of any applicable law and regulation, may disclose or provide to the following categories of recipients for the purposes described above:
(1) any employee, agent, independent contractor, joint venture partners, service providers or any other third party as necessary for the purposes stated above and any such purpose including provision of administrative, audit, data-processing, document management, technology, telecommunication, storage, payment, security, emergency, reward, loyalty, co-branding and privilege programmes or other services to the Company in **Malaysia** or elsewhere under a duty of confidentiality to the same. Your personal data may be transferred to, stored or processed in countries outside Malaysia. We will ensure that such transfers are carried out in accordance with applicable data protection laws and that appropriate safeguards are in place to protect your personal data.;
(2) organizations and/or institutions with which we jointly offer services or collaborate;
(3) the holding company of the Company, related corporations or affiliates including, without limitation, the following group companies:
(i) RIZAP, Inc. (Japan);
(ii) RIZAP Technologies Inc. (Japan); and
(iii) Health Communications Inc. (Japan),
as necessary for the purposes stated above;
(4) our professional advisers such as lawyers, tax adviser, accountants and auditors;
(5) regulatory authorities, government bodies or law enforcement agencies where required by law;
(6) any person in connection with any claims made by or against or otherwise involving you;
(7) any actual or potential assignee, transferee, participant or sub-participant of our rights or business; and
(8) where it is necessary to protect your vital interests or safety .
In the event of any suspected fraud or breaches concerning disclosure, transfer and provision of personal data to third parties, we shall take appropriate measures to investigate and address such risks. By providing personal data through the Website or otherwise to us, you acknowledge that you have read and understood this Privacy Policy.

5. Access and Correction of Personal Data When you request access to or correction of your personal data held by the Company, subject to charging a reasonable handling fee, we will comply with such request within a reasonable time limit upon ascertaining the identity of the requestor and assessment. However, we may refuse to comply with such data access requests where permitted or required under applicable laws, including the PDPA.

For matters and questions regarding the access, handling, correction and disclosure of personal data, withdrawal of consent, as well as complaints and inquiries, etc., you may contact our Data Protection Officer.

6. Links to External Websites The Company's Website may contain links to external websites. The handling of personal data by external websites is not within the scope of responsibility of the Company. If you have any comments or inquiries about an external website, please contact the company that operates

the external website.

7. Security Measures We take reasonable steps to make sure that the personal data we collect is protected from unauthorized access, disclosure, misuse or loss. We have implemented security safeguards appropriate to the sensitivity of the information, including the use of physical and electronic security measures. Such security measures include implementation of restricted access facilities and appropriate disposal of personal data. The Website uses industry-standard security technologies to protect users' personal data through our online service. If the Company engages another third-party organization to provide a service on its behalf, the Company will ensure they have appropriate security measures and only process your information as the Company has authorized. Those organizations will not be entitled to use your personal information for their own purposes. The Company will take reasonable steps to check these organizations to make sure that they are meeting the security requirements in accordance with our instructions and applicable data protection laws.

8. Cookies and Website Analytics The Company may use cookies and other similar technologies such as web beacons on our Website to enhance user experience, analyze website traffic and improve our services. Cookies are small text files containing small amounts of information which are downloaded and may be stored on any of your internet enabled devices. You may turn off or delete cookies by changing your browser's settings. Since these settings vary in different browsers and browser extensions, we cannot guarantee that the site would function properly in all circumstances. The Company may use third-party analytics services to help us understand how users interact with our Website. Such service providers process data on our behalf in accordance with applicable data protection laws.

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