

Privacy Policy

Hi, your privacy is important to Doshu, an e-Learning platform by Symphony Digest Sdn Bhd.

Effective Date: 8 April 2020

Symphony Digest Sdn Bhd ("Symphony", "we", "our" or "us") is committed to ensure that your privacy is protected. This Privacy Policy describes how we use the personal information that we collect from you, or that you provide, when you:

- visit our website (the "Website");
- use the services (the "Services") that we provide; or
- communicate with us.

1. Information We Collect

1.1 Information that you provide directly

We collect personal information from you:

- through the use of forms, which may be on paper or on our Website, such as when you register, make a purchase or commence a course of study, sign up to receive our newsletters or register for information;
- when you make a purchase on our Website and provide us with information about your personal details such as full name, MyKad number, passport number, contact number, email address, licensing requirements, your current employment details such as company name and address, and designation; and
- if you choose to provide us with information when you use our Website or access our Services;
- when you communicate with us for any reason, including by email, postal mail or telephone, messaging applications, social media networks and when you use our Services; and
- when you request marketing information about our products and services.

Post training course, we will collect your feedback on your training experience for reporting to relevant regulatory bodies and for record purposes.

1.2 Information that we collect automatically

When you visit our Website, we may collect certain information automatically from your device. Specifically, the information we collect automatically may include information like your IP address, device type, unique device identification numbers, browser-type, broad geographic location (e.g. country or city-level location) and other technical information. We may also collect information about how your device has interacted with our Website, including the pages accessed and links clicked.

Collecting this information enables us to better understand the visitors who come to our Website, where they come from, and what content on our Website is of interest to them. We use this information for our internal analytics purposes and to improve the quality and relevance of our Website to our visitors.

Some of this information may be collected using cookies and similar tracking technology, as explained further under the heading 'Cookies', below.

1.3 Information that we obtain from third party sources

We may receive personal information about you from third party sources (such as your employer if they enroll you in a course), but only where we believe that these third parties either have your consent or are otherwise legally permitted or required to disclose your personal information to us. We collect only the minimum amount of information required from these third parties to enable us to provide the requested service or process any booking you send to us (for example, your full name and email address). We only use the information we receive from these third parties as set out in this Privacy Notice.

2. Use of Your Information

The information that we collect and store relating to you is primarily used to enable us to provide our Services to you. In addition, we may use the information for the following purposes:

- to provide you with information or Services you request from us;
- to meet our contractual commitments to you;
- to personalise your use of the Website, assist your use of the site and improve the Website and services we provide generally;
- to act on your behalf where third party involvement is relevant such as accreditation from Securities Industry Development Corporation, Asian Institute of Chartered Bankers, Federation of Investment Managers Malaysia and any other official / regulatory body as may be applicable;
- to monitor and analyse trends, usage and activities in connection with our Websites/Services; and as necessary to prevent or detect crime.

In general, we will use any of the information we collect from you only for the purposes described in this Privacy Notice or for purposes that we explain to you at the time we collect such information. However, we may also use your personal information for other purposes that are not incompatible with the purposes we have disclosed to you (such as statistical purposes) if and where this is permitted by applicable data protection laws.

3. Storing and Retaining Your Personal Data

We use appropriate measures to protect the personal information that we collect and process about you.

Please note that the transmission of information via the internet (including email) is not completely secure and therefore, though we endeavor to protect the personal information you provide to us, we

cannot guarantee the security of data sent to us electronically and the transmission of such data is therefore entirely at your own risk. We retain personal information we collect from you where we have an ongoing legitimate business need to do so (for example, to provide you with a service you have requested or to comply with applicable legal, tax or accounting requirements).

When we have no ongoing legitimate business or statutory need to process your personal information, we will either delete or anonymise it.

4. Disclosing Your Information

We may disclose your personal information with:

- third party service providers and partners who provide data processing services to us (for example, to support the delivery of Services), or who otherwise process personal information for purposes that are described in this Privacy Notice;
- providers of technical services to us in the provision of our Website and other technical systems internal to Symphony;
- your employer, where required when your employer has undertaken the course purchase on your behalf;
- partners with whom we work to provide Services (such as accreditation bodies);
- any third party in connection with, or during negotiations of, any merger, sales of company assets, financing or acquisition of all or a portion of our business by another company;
- any law enforcement agency, court, regulator, government authority or other third party where we believe this is necessary to comply with a legal or regulatory obligation, or otherwise to protect our rights or the rights of any third party; and to
- any other person with your consent to the disclosure.

If you give your explicit consent (separately obtained), we may pass your contact details to third parties who may then occasionally send communications to you to provide information, offers and services that may be of interest to you.

In certain circumstances we may need to disclose information that is considered as Sensitive Data in order that third party can provide you with the requested product or service.

With your permission, we may publish the testimonial that you provide on the Website in order to help others to evaluate the training on Doshu.

5. Third Party Links

You might find links to third party websites on our Websites or within documentation we provide. If you access other websites using the links provided, the operators of these sites may collect information from you which will be used by them in accordance with their own privacy policies which you should review. We do not accept any responsibility or liability for their policies whatsoever as we have no control over them.

6. Social Networking

The Website may offer you the opportunity to share or follow information about us (or the Website or our Services) using third party social networking functionality (such as through “share this”, “like” or “follow” buttons).

We offer this functionality in order to generate interest in us, the Website and our Services among the members of your social networks, and to permit you to share and follow opinions, news and recommendations about us with your friends. However, you should be aware that sharing personal or non-personal information with a social network may result in that information being collected by the social network provider or result in that information being made publicly-available, including through Internet search engines.

Please note that we do not exercise, endorse or control the policies or practices of any third party social network whose functionality you may access through the Website.

You should always read the Privacy Notice of any social network through which you share information carefully in order to understand their specific privacy and information usage practices.

7. Cookies

We use cookies and similar tracking technology (collectively, “Cookies”) to collect and use personal information about you.

8. Data Protection Rights

If you wish to access, correct, update or request deletion of your personal information, you can do so at any time by contacting us using the contact details provided below.

If we have collected and processed your personal information with your consent, then you can withdraw your consent at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal information conducted in reliance on lawful processing grounds other than consent.

We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws.

9. Marketing Permissions

If you give us explicit permission to do so we may store and use your information for the provision of email marketing, newsletters and other information you have agreed to receive. You may withdraw this permission at any time. Please confirm your withdrawal of consent using the contact details provided below.

You may request to be removed from our database for Marketing purposes at any time. Please confirm your request to be removed by emailing us using the contact details provided below.

We will never sell to or allow any third party to use this data and your Marketing Permissions for marketing purposes without your explicit permission, separately obtained.

All other relevant provisions of this Privacy Policy shall apply to Marketing Permissions.

10. Contacting Us

We welcome any queries, comments or requests you may have regarding this Privacy Notice. Please do not hesitate to contact us at support@doshu.com.my.

11. Changes to the Privacy Notice

We may change this Privacy Notice from time to time by updating this document. You should check this page from time to time to ensure that you are happy with any changes. If material changes are made to this Privacy Notice, we will notify you by placing a prominent notice on the Website or by contacting you to let you know via the contact details you have provided us with.

12. Contact Information

Symphony Digest Sdn Bhd
Tel: +6016-716 7806 (Mon-Fri, 9am-6pm)
Email: support@doshu.com.my