

# **PRIVACY POLICY**

**Effective Date: 1 September 2025**

AxtionApp Sdn Bhd ("AxtionApp", "we", "us", or "our") operates the AxtionApp website (the "Website") and the AxtionApp software application (the "App", together the "Service").

We are committed to safeguarding your personal data in accordance with the Personal Data Protection Act 2010 of Malaysia (PDPA 2010), and, where applicable, other international data protection regulations such as the General Data Protection Regulation (GDPR).

This Privacy Policy explains how we collect, use, disclose, and safeguard your information when you use our Service.

## **1. Types of Users**

Our Service caters to three main user groups:

Hotel Users : Employees of hotels that subscribe to AxtionApp.

Trainers : Trainers who create and publish training modules on the platform.

General Users: Individuals who visit the Website without creating an account.

## **2. Information We Collect**

We collect several types of information for different purposes to provide and improve our Service to you.

### **2.1 Information you provide directly:**

- I. Hotel Users & Trainers: This may include your name, email address, phone number, hotel affiliation (for Hotel Users only) and any other information you choose to provide in your profile or while using the Service, such as task details or training content (for Trainers).
- II. General Users: We may collect limited information from general users who visit the website, such as browsing activity and IP address.

### **2.2 Information collected automatically:**

- I. Usage Data: We may collect information about how you use the Service, such as the features you access, the pages you visit, and the time you spend on the platform.
- II. Device Data: We may collect information about the device you use to access the Service, such as the device type, operating system, browser type, and IP address.

## **3. How We Use Your Information**

We use the information we collect for various purposes, including:

- I. To provide and improve the Service: We use your information to operate the Service, deliver content, personalize your experience, and improve the overall functionality.
- II. To send you marketing communications (with your consent): We may use your email address to send you marketing communications about our products and services. You can opt-out of receiving these communications at any time.

- III. To comply with the law: We may disclose your information to comply with legal obligations or respond to lawful requests from government authorities.
- IV. To improve our products and services: We may use your information to analyse trends, understand user behaviour, and improve our offerings.
- V. For security purposes: We may use your information to detect and prevent fraud or other illegal activities.

#### 4. Data Retention

We will retain your information for as long as necessary to fulfill the purposes outlined in this Privacy Policy. We may also retain certain information as required by law or for legitimate business purposes.

#### 5. Data Sharing

We may share your information with third-party service providers who help us operate the Service. These service providers are obligated to protect your information and use it only for the purposes we specify.

We may also disclose your information to relevant authorities if required by law or to protect the rights, property, or safety of ourselves or others.

#### 6. Your Choices

In accordance with the Personal Data Protection Act 2010 (PDPA 2010), you have the right to:

- I. Access and obtain a copy of the personal data we hold about you.
- II. Correct any personal data that is inaccurate, incomplete, or outdated.
- III. Withdraw consent for the processing of your personal data (which may affect your ability to use some features of the Service).
- IV. Restrict or object to certain forms of data processing, subject to legal and contractual restrictions.

To exercise these rights, contact us at [hello@axtionapp.com](mailto:hello@axtionapp.com).

#### 7. Security

We take reasonable steps to protect your information from unauthorized access, disclosure, alteration or destruction. However, no internet transmission or electronic storage is completely secure.

#### 8. Children's Privacy

Our Service is not directed to children under the age of 18. We do not knowingly collect personal information from children under 18. If you are a parent or guardian and you are aware that your child has provided us with personal information, please contact us.

#### 9. International Data Transfers

Your personal data may be transferred and processed outside Malaysia. Where this occurs, we will take reasonable steps to ensure compliance with PDPA 2010 and where applicable, GDPR, including the use of Standard Contractual Clauses (SCCs) or equivalent safeguards.

#### 10. Cookies and Tracking Technologies

We use cookies and similar technologies to improve your browsing experience, analyze usage patterns, and deliver personalized content. You can manage your cookie preferences through your browser settings.

#### 11. Changes to this Privacy Policy

We may update this Privacy Policy from time to time. We will notify you of any changes by posting the new Privacy Policy on this page.

#### 12. Consent

By providing your personal data to us and/or by continuing to use the Service, you acknowledge and consent to the collection, use, processing and disclosure of your personal data as described in this Privacy Policy and in accordance with the Personal Data Protection Act 2010 (PDPA 2010).

#### 13. Contact Us

If you have any questions about this Privacy Policy, or if you wish to exercise your rights under PDPA 2010, please contact us at: [hello@axtionapp.com](mailto:hello@axtionapp.com)