

## **NOVA LIFE PREFERRED CUSTOMER (PC) PRIVACY NOTICE**

This Privacy Notice describes how Nova Life Marketing Sdn. Bhd. (Lot 708, Nova Avenue, 43950 Sungai Pelek, Sepang, Selangor, Malaysia) (“Nova Life” or “we” or “us”) use personal data collected or received from Nova Life Preferred Customers (“PCs” or “you”). It describes how we collect or receive your personal data, the types of personal data we process, how we use, share and protect these data, how long we retain these data, your rights with respect to the processing of your personal data, and how you can contact us about our privacy practices. We act as joint controllers in relation to your personal data.

### **How We Collect and Receive Personal Data from You**

Where we ask you to provide us with your personal data, we will indicate whether providing the personal data is a statutory or contractual requirement, or a requirement necessary to enter into and/or facilitating a contract, as well as whether you are obliged to provide the personal data and of the possible consequences of a failure to provide the personal data.

Nova Life collects and receives personal data from PCs in various ways, such as:

**Registration.** Nova Life collects your personal data through the registration form that you complete and send to us in paper form or electronically through the Nova Life websites (the “Website”) in order to become a PC.

**Logged in as a PC.** If you are logged in on the Website as a PC, we collect personal data that you provide to us while using the Website. For example, when you purchase products or services, we collect personal data.

**Contacting Us.** When you contact us through the various communication channels provided on the “Contact Us” webpage of the Website, we collect personal data and other information that you provide. Examples of such personal data include Nova Life email addresses, telephone numbers or online forms.

## **The Types of Personal Data We Process**

If you are registering as a PC directly with Nova Life, we process the following types of personal data relating to you:

- Contact information (e.g., name, postal or email address, social media handle, fax number and phone number);
- Date of birth;
- Login information incl. username, Preferred Customer ID and password; and
- Payment information (e.g., bank account, debit or credit card numbers);
- Product preferences, purchasing habits, purchasing history, and spending behaviour; and
- Communication preferences.

In addition, when you communicate with us through various communications channels, we collect your contact details, such as your name, email address, address, telephone number, and/or fax number. You may also voluntarily provide other personal data in connection with your enquiries or comments. We encourage you, however, to provide no more personal data relating to you than is necessary in order for us to provide an appropriate response to your enquiries or comments.

We may process other personal data in exceptional circumstances only. If we need to process other types of personal data about you, we will make sure that you are informed about the processing of such personal data and that there is a valid legal basis for doing so (e.g., your consent).

## How We Use the Personal Data We Collect

We only process your personal data to the extent it is necessary:

- (i) **For the performance of your agreement with us or in order to take steps at your request prior to entering into an agreement with us**, including to:

If applicable, Nova Life organisational information (e.g., the name of the company associated with your Nova Life business activities, profession and ownership and management details);

- Manage your relationship with us as a Nova Life PC from initial registration and throughout your time as a Nova Life PC;
- Create and manage your (online) account;
- Address your comments or enquiries;
- Process your orders of products or services;
- Fulfil our obligation to provide business and product support to you;
- Communicate with you;
- Bring you in contact with a Nova Life Distributor if you choose to be connected with a Nova Life Distributor (including providing your name, address, telephone number, or email address, purchases, and purchasing history);
- Perform accounting, auditing, billing, and collection activities; and
- Enforce contractual terms and conditions.

- (ii) **To comply with our legal obligations**, including to:

- Comply with laws which require us to retain records; and
- Comply with any other laws which may be applicable to us.

**(iii) For the purpose of our legitimate interests, including to:**

- Operate, evaluate, and improve our products, business, and services, including by:
  - Tracking and analysing your use of products, materials, and/or services;
  - De-identifying your personal data in order to carry out analysis on information which does not identify you; and
  - Developing new products and services;
- Track, document, and evaluate participation in Nova Life trainings, meetings, and events;
- Prevent and protect you, us, and others against fraud, unauthorised transactions, claims, and other liabilities;
- Ensure compliance with company policies and industry standards; and
- Process personal data for internal administrative purposes.

**How We Share Personal Data**

Nova Life does not sell, rent, or trade your personal data. We do share your personal data among us as joint controllers and with:

- Related entities operating direct selling businesses around the world under the company name Nova Life, to whom it is reasonably necessary or desirable for Nova Life to disclose personal data;
- Your Nova Life Distributor (if you choose to be connected with a Nova Life Distributor), to allow communication regarding products, services and orders relating to the Nova Life business;
- Providers of infrastructure- or platform- or software-as-a-service solutions, software development services, information system maintenance services, record management services or marketing services;
- Logistics providers;
- Financial transactions service providers; and

- Government authorities or other third parties, if required or allowed otherwise by law or reasonably necessary to protect the rights, legal interests, property, or safety of you, others, or ourselves.

## **International Data Transfers**

We transfer the personal data we collect about you to entities within the Nova Life organisation, as well as to third-party service providers that process personal data on our behalf. Some of these companies and service providers are located in countries other than the country in which the personal data was originally collected. The laws of those countries may not have the same level of data protection as the country in which you initially provided the personal data. When we transfer your personal data to other countries, we will protect that personal data as described in this Privacy Notice and in accordance with applicable law.

For personal data originating from the EEA that are transferred to countries that have not been recognised by the European Commission as providing an adequate level of data protection, we have put in place contractual safeguards (based on the European Commission's Standard Contractual Clauses for data transfers outside the EEA) or rely on an equivalent legal mechanism to ensure that your personal data remain protected. For more information on the safeguards we have put in place to protect your personal data when transferred outside the EEA (including how to obtain a copy or consult these safeguards), please contact us [compliance@eterner.my](mailto:compliance@eterner.my)

## **How We Protect Personal Data**

We maintain appropriate technical and organisational security safeguards designed to protect the personal data we process against accidental, unlawful or unauthorised destruction, loss, alteration, access, disclosure, or use.

## **How Long We Retain Personal Data**

We store personal data as long as necessary to fulfil the purposes for which we collect the data (see above under “How We Use the Personal Data We Collect”), except if required or allowed otherwise by law. Please contact us using our contact details provided below if you have any questions with respect to our data retention practices.

## **Updates to this Privacy Notice**

Nova Life may update this Privacy Notice from time to time. We will notify you of any significant changes to this Privacy Notice on the relevant Nova Life websites, in official Nova Life publications, or through other appropriate communication channels. All changes shall be effective from the date of publication, unless otherwise provided in the notification.

## **Your Rights**

Subject to the relevant legislative provisions, you have the following data protection rights:

- **The right to access**

You have the right to obtain confirmation as to whether or not your personal data are being processed and, where this is the case, access to the personal data. You also have the right to ask us for a copy of your personal data.

- **The right to rectification**

You have the right to ask us to rectify personal data about you that you think are inaccurate. You also have the right to ask us to complete data you think are incomplete. This right always applies.

- **The right to erasure**

This is also known as 'the right to be forgotten' and, in simple terms, enables you to request the deletion or removal of your data where there's no compelling reason for us to keep using the data. This is not a general right to erasure; there are exceptions, e.g. if we have a legal obligation to keep your data.

- **The right to restriction of processing**

You have the right to ask us to restrict the processing of your personal data under certain circumstances.

- **The right to data portability**

This right only applies to personal data you have given us. You have the right to ask that we transfer the data you gave us to another organisation or give the data to you.

- **The right to withdraw consent**

Where you have provided us with consent to process your personal data, you have the right to withdraw your consent at any time. This will not affect the lawfulness of the processing that has been carried out based on your consent prior to the withdrawal.

- **The right to object**

When we process your personal data for purposes of pursuing our legitimate interests, you have the right to object to such processing at any time. If you object, we will stop the processing unless we have strong and legitimate reasons to continue using your data.

If you would like to learn more about any of these rights, please contact us at [compliance@eterner.my](mailto:compliance@eterner.my)

- **The right to lodge a complaint**

If you have concerns about the way we handle or process your personal data, please contact our Privacy Office (contact details below) who will investigate the matter and report back to you. If you are still not satisfied after our response, depending on the law of the country where you live or work, you may have the right to complain to a data-protection regulator.

## How to Contact Us

If you have any enquiries about this Privacy Notice, if you would like to update information we have about you, or if you wish to exercise your data protection rights, you may contact Ms. Sangeetha at [compliance@eterner.my](mailto:compliance@eterner.my) or by letter to:

Nova Life Marketing Sdn Bhd

Attn: Regulatory Compliance & Quality Assurance Department

Lot 708, Nova Avenue,

43950 Sungai Pelek,

Sepang, Selangor, Malaysia.