



FVIS

FVIS Privacy Policy

Your privacy is important to First Vibrant Integration Services (“**FVIS**”). This Privacy Policy explains how **FVIS** collects, uses, discloses and retains personal information, including information collected through websites, blogs, apps (including but not limited to messaging services), and our correspondence with you (for example, by e-mail) and when providing you with our products and services.

1. Your Consent

By providing **FVIS** with your personal information, you consent to the collection, use, disclosure and retention of that information by **FVIS** in accordance with this Privacy Policy and as otherwise permitted by applicable law. You may withdraw your consent at any time, subject to legal or contractual restrictions and on reasonable notice to **FVIS**, but then you might not be able to proceed with your intended interactions or transactions with **FVIS** or otherwise receive the full benefit of **FVIS**'s products and services.

2. Data Controller

For purposes of the General Data Protection Regulation (the “**GDPR**”), we are the data controller for the purpose of data protection law, in respect of your personal information collected and used through your use of the website, products and services. This is because we dictate the purpose for which your personal information is used and how we use your personal information.

3. Personal Information Defined

In this Privacy Policy, “**personal information**” means information about you and which identifies you, such as your name and email address, but does not include (to the extent permitted by law) information that is publicly available in a telephone directory or business contact information that enables an individual to be contacted at a place of business.

4. Personal Information FVIS Collects

We collect personal information about you in the course of providing the websites, blogs, apps (including but not limited to messaging services), products and services in correspondence with you. The information may include the following:

CATEGORY	DESCRIPTION
Personal contact information	Name, personal address, personal email address and personal telephone number
Business contact information	Name, business address, business email address and business telephone number
Account information	Username and account preferences
Payment information	Payment card number (credit or debit card), bank account number, billing address or other financial account numbers and account details
Financial aid application information	Contact information, link to social media profile, education and employment information, annual income, country of residence, aid preferences, answers to questions about your financial situation and academic or professional achievements
Course and enrolment information	Online registration information, record of attendance information and assessments
Social Media	Information relating to your social media profiles, including (but not limited to) LinkedIn.
Marketing preferences, marketing activities and customer feedback	Marketing preferences, or response to voluntary customer satisfaction surveys to improve our marketing communications, we may collect information about interaction with, and responses to, our marketing communications reviews and endorsements provided regarding our courses.
Other information you provide to us	For example, if you write a review of our products, submit a “contact us” form or provide other information to us in the course of your use of our websites, products or services.

5. How FVIS Collects Information

a) Information You Provide

You may be asked to voluntarily give your personal information to **FVIS** when you interact with **FVIS**. This information may be provided:

1. in the course of communications between you and us (including by phone, email, chat, in person, via social media, website or otherwise);
2. when you register for an account;
3. when you request information about or use a product or service provided by us;
4. when you subscribe to a newsletter;
5. when you attend tradeshows and other events; and
6. when you report a problem with our websites, products or services.

In certain circumstances, you can choose not to provide certain requested personal information, but then you might not be able to proceed with your intended interaction or transaction with **FVIS** or otherwise receive the full benefit of the desired product or service.

If you give **FVIS** the personal information of another individual, then you are solely responsible for complying with all applicable laws, including obtaining the individual's valid consent, regarding your collection and disclosure of the personal information to **FVIS**'s use, disclosure and retention of the personal information.

b) Automated Collection

FVIS may automatically collect certain information regarding your use of **FVIS**'s websites, such as the date and time that you use the websites, the browsers, operating systems, software and devices that is used to access the website and details of uses on the website.

FVIS's websites, email messages and advertisements may use technologies (e.g. cookies, web beacons, tokens, pixels or tags) to collect information that assists **FVIS** to improve its products, services, customer communications and advertising and to prevent fraud. **FVIS** may use information collected through technological means to recognize you as a user of **FVIS**'s websites, to facilitate and improve your use of **FVIS**'s websites, to confirm that messages have been delivered to and opened by you and to provide you with targeted advertisements. You may choose to decline or disable cookies if your web browser or device permits, but doing so may affect your ability to access or use certain features of the website. More information about cookies used for interest-based advertising is set out in section 5(c) below.

Some of the information automatically collected by technological means is non-personal information (because the information does not identify you), and **FVIS** will deal with that non-personal information as explained below in this Privacy Policy unless applicable law requires otherwise.

c) Cookies

Cookies are small files that a site or its service provider transfers to your computer's hard drive through your Web browser (if you allow) that enables the website's or service provider's systems to recognize your browser and capture and remember certain information. For instance, we may use cookies to help us remember and process the items in your list of requirements and to help us understand your preferences based on previous or current site activity, which enables us to provide you with improved services. We may also use cookies to help us compile aggregate data about site traffic and site interaction so that we can offer better site experiences and tools in the future. You can find out more about how to manage cookies here: www.allaboutcookies.org/manage-cookies.

We use cookies to:

- help remember and process the items you required;
- understand and save user's preferences for future visits;
- keep track of advertisements; and
- compile aggregate data about site traffic and site interactions in order to offer better site experiences and tools in the future. We may also use trusted third-party services that track this information on our behalf.

You may choose to decline or disable cookies if your web browser permits, but doing so may affect your ability to access or use certain features of **FVIS**'s websites. However, you will still be able to place orders.

d) Internet-Based Advertising

FVIS may use interest-based advertising services (sometimes called "remarketing" or "retargeting") provided by third party vendors (such as Google, Bing, LinkedIn and Facebook) to display advertisements on third party websites and social media sites visited by users of a **FVIS** website. Advertising vendors (such as Google, Bing, LinkedIn and Facebook) use cookies, pixels or tokens – unique identifiers of a web browser on a specific computer that are installed on the computer when it accesses **FVIS** websites – to display ads based on the computer's past access to **FVIS** websites. You can opt out of Google's use of cookies by visiting Google's Ads Settings. You can also opt out of a remarketing vendor's use of cookies by visiting the Network Advertising Initiative's consumer opt-out page. For more information, including details of how to block these cookies specifically, please

see <https://support.google.com/analytics/answer/181881>. We partner with different Advertising companies, who may collect personal information when you interact with our site. The collection and use of this information is subject to this privacy policy.

e) Information from Other Sources

FVIS may collect personal information from various publicly available sources and other third parties that are lawfully entitled to share your personal information with **FVIS**.

If **FVIS** refers you to an independent business (e.g. a sales partner) for a proposed transaction, then **FVIS** may collect from that independent business information regarding the transaction for use by **FVIS** to update your confidential profile for use by **FVIS** as set out in this Privacy Policy.

FVIS may combine your personal information collected by **FVIS** through various sources.

6. How FVIS Uses Personal Information

a) General

Under data protection law, we can only use your personal information if we have a proper reason for doing so, for example:

- To comply with our legal and regulatory obligations;
- For our legitimate interests (see below) or for third parties;
- For the performance of our contract with you or to take steps at your request before entering into a contract; or
- You have given consent.

A legitimate interest is when we have a business or commercial reason to use your personal information, so long as this is not overridden by your own rights and interests. Where we rely on our legitimate business interests or those legitimate interests of a third party to justify the purposes for using your personal information, this will include:

- pursuit of our commercial activities and objectives, or those of a third party;
- compliance with applicable legal and regulatory obligations and any codes of conduct;
- improvement and development of our business operations and service offering, or those of a third party; or
- protection of our business, shareholders, employees and customers, or those of a third party.

(b) Purpose and Legal Basis

FVIS may use your personal information collected by **FVIS** for purposes relating to or arising from your relationship and transactions with **FVIS** and as otherwise set out in this Privacy Policy or permitted by applicable law. The table below explains what we use your personal information for and our reasons for doing so. In general terms we will collect personal information for the following purposes:

PURPOSE	LEGAL BASIS
To administer your relationship with FVIS, including to contact and correspond with you regarding those matters	For our legitimate business interests (i.e the provision of the websites, products and services)
To facilitate your interactions and transactions with FVIS.	For our legitimate business interests (i.e the provision of the websites, products and services)
To provide you with the websites, products and services	For our legitimate business interests (i.e. the provision of the websites, products and services), and depending on the circumstances, to perform a contract between you and us.
To process your application for financial aid	For our legitimate business interests (i.e the provision of the websites, products and services)
To process and respond to your inquiries, requests and other communications	For our legitimate business interests (i.e the provision of the websites, products and services)
To notify you about changes to the website or the products and services.	For our legitimate business interests (i.e the provision of the websites, products and services)
To audit and monitor the use of the websites	For our legitimate business interests (i.e the provision of the websites, products and services, as well as to improve and monitor the security of the websites) or we may request your consent in certain circumstances where we are required to do so by law (e.g in relation to our use of certain cookies)

To maintain, protect and improve FVIS's products and services and to develop new products and services.	For our legitimate business interests (i.e the provision and improvement of the products and our services)
To manage complaints, feedback and queries	For our legitimate business interests (i.e the provision and improvement of the products and our services)
To administer and facilitate your participation in contests and promotions related to FVIS	For our legitimate business interests (i.e. the provision of the websites, products and services), and depending on the circumstances, to perform a contract between you and us
To carry out market research and analysis	For our legitimate business interests (i.e the provision and improvement of the products and our services)
To carry out satisfaction surveys and analysis	For our legitimate business interests (i.e the provision and improvement of the products and our services)
To provide you with information (including by email and other electronic messages) regarding FVIS and its business, products and services offered by other businesses, to the extent permitted by applicable law and in accordance with your preferences as indicated when you entered into any agreement with us, including any marketing consent preferences.	Depending on the method of communication, this processing may be carried out with your consent or in accordance with our legitimate business interests to process your information for direct marketing purposes
To comply with any legal or regulatory obligations (including in connection with a court order) and to protect and enforce FVIS legal rights, interests and remedies to protect the business operation and customers of FVIS or other persons	For our legitimate business interests and for compliance with legal obligations to which we are subject
To enforce or apply the agreements concerning you (including agreements between you and us)	For our legitimate business interests and for compliance with legal obligations to which we are subject

(c) How We Use Automated Decision Making When We Process Your Personal Information.

To help us assess your suitability for financial aid, decisions will be made about you using automated computer software on a system. This is known as automated decision making.

The systems apply pre-defined logic programming and criteria to make a decision and these decisions do not require human input.

You have the right to challenge any automated decision with us directly. You can object to an automated decision, ask that we do not make automated decisions about you and ask that a person reviews it. If you want to know more details about your rights, please see section 7(d) below.

7. How FVIS Discloses and Shares Personal Information

(a) General

FVIS discloses your personal information for purposes relating to or arising from your relationship and transactions with **FVIS** and as otherwise set out in this Privacy Policy or permitted by applicable law.

(b) Specific Consents

FVIS may disclose your personal information in accordance with express or implied consents that you give during your interactions and transactions with **FVIS**.

(c) Affiliates

FVIS Education Inc. and its affiliates may share your personal information with each other and use it in connection with our relationship with you for the provision of our products and services, the whole in accordance with this Privacy Policy. When **FVIS** shares your personal information with its affiliates, **FVIS** may develop, maintain and share a confidential profile for you for use by **FVIS** to provide information, products and services to you, to facilitate your dealings with **FVIS** and as otherwise set out in this Privacy Policy.

(d) Referred Transactions

If **FVIS** refers you to an independent business (e.g. a sales partner) for a proposed transaction, then **FVIS** may disclose your personal information to the independent business to facilitate the proposed transaction, and in those circumstances **FVIS** has no control over, or responsibility or liability for, the use, disclosure or retention of your personal information by the independent business, and the use, disclosure and retention of the disclosed information by the independent business is not subject to this Privacy Policy.

(e) Suppliers and Service Providers

FVIS may disclose your personal information to its suppliers and third party service providers, such as our payments processor or our analytics provider, to assist **FVIS** in the provision of information, products and services to you, to provide services to **FVIS**, to assist **FVIS** to use your personal information as set out in this Privacy Policy and as otherwise permitted by applicable law.

(f) Professional Advisers

FVIS may disclose your personal information to our professional advisers including accountants, lawyers and other professional advisers that assist us in carrying out our business activities.

(g) Law Enforcement/Legal Disclosures

FVIS may disclose your personal information as required or authorized by applicable law, including to comply with a subpoena, warrant or court or arbitral order or litigation disclosure obligation. **FVIS** may disclose your personal information to law enforcement agencies or other independent organizations if **FVIS** reasonably believes the disclosure is necessary or appropriate in connection with national security, law enforcement or other issues of public importance, or if **FVIS** reasonably believes the disclosure is necessary or appropriate to protect and enforce **FVIS**'s legal rights, interests and remedies or to protect the rights, interests, business, operations or customers of **FVIS** or other persons (including to detect and prevent fraud and other illegal activities, to enforce any of the terms of use, terms of service or other agreements that govern access to or use of any of **FVIS**'s products or services). **FVIS** has no control over, or responsibility or liability for, the use, disclosure or retention of your personal information by the agencies, independent organizations or other persons to whom **FVIS** discloses the information in the foregoing circumstances, and the use, disclosure and retention of the disclosed information by those agencies, independent organizations or other persons is not subject to this Privacy Policy.

(h) Business Transactions

FVIS may disclose your personal information in connection with a proposed or actual business transaction in which **FVIS** is involved (e.g. a corporate amalgamation, reorganization, merger or acquisition, or the sale or transfer of

some or all of **FVIS's** business or assets), but **FVIS** will require the information recipient to agree to protect the privacy of your personal information in a manner that is consistent with this Privacy Policy and applicable law.

(i) Information that You Share

You may use **FVIS's** products and services to share your personal information and other information and content with other users of **FVIS's** products and services, including other Global Corporate Finance Society members (collectively "**FVIS Users**"). When you do so, the information and content that you share can be read, collected, used, retained and disclosed by other **FVIS Users** and may be publicly available on **FVIS's** websites. You are solely responsible for the information and content that you choose to share with other **FVIS Users**. **FVIS** has no control over, or responsibility or liability for, the way in which the information or content that you share is collected, used, retained or disclosed by other **FVIS Users**. **FVIS** encourages you to be careful when you share information or content, including the information.

8. Location and Transfer of Personal Information

FVIS and its service providers may process, store and use your personal information at facilities in various location, including Canada, the United States of America, the European Economic Area, Asia & Australia.

If you are located in European Economic Area and we transfer your personal information outside European Economic Area, we will implement appropriate and suitable safeguards to ensure that such data will be protected as required by applicable data protection law.

If you are located outside the European Economic Area, by providing your personal information to **FVIS**, you consent to the transfer of the personal information to facilities located in other countries and the processing and storage of the personal information at those facilities.

For further information on the steps taken relating to such transfers and the safeguards in place, please contact our Privacy Officer using the details listed at the end of this Privacy Policy.

9. Retention of Personal Information

We will retain your personal information for the period reasonably necessary for the purposes set out or referenced in this Privacy Policy and to comply with **FVIS's** legal obligations or enforce or protect **FVIS's** legal rights, or a longer period required or permitted by applicable law. **FVIS** will delete or dispose of your personal information, or depersonalize the information, when **FVIS** is no longer reasonably required to retain the information for the purposes set out in this Privacy Policy.

Please note that all of the above retention periods may be extended where we need to preserve and use personal information for the purposes of bringing or defending a legal claim. In such cases, we will continue to hold and process your personal information for as long as is necessary to deal with the legal proceedings.

For further information as to our retention periods, please contact our Privacy Officer using the contact details as set out at the end of this Privacy Policy.

10. Protection of Personal Information

FVIS uses reasonable safeguards – including administrative, physical and technical security and safeguarding measures – appropriate to the sensitivity of the personal information in **FVIS's** possession or under **FVIS's** control to help protect the information from unauthorized access, collection, use, disclosure, deletion or similar risks. Nevertheless, security risks cannot be eliminated and **FVIS** cannot guarantee that your personal information will not be accessed, used, disclosed or deleted in ways not otherwise described in this Privacy Policy.

11. Accuracy and Access to Personal Information

FVIS will rely on you to ensure that the personal information that you provide to **FVIS** is as accurate, complete and up to date as necessary for the purposes for which **FVIS** uses the personal information. You will promptly notify **FVIS** of any changes to the personal information that you provide to **FVIS** using the procedures made available for that purpose by **FVIS** or by contacting **FVIS**'s Privacy Officer using the contact information noted below.

You have certain rights with respect to your personal information. The rights may only apply in certain circumstances and are subject to certain exemptions. Please see the table below for a summary of your rights. You can exercise these rights using the contact details at the end of this Privacy Policy.

RIGHT	SUMMARY OF YOUR RIGHTS
Right of access to your personal information	You have the right to receive a copy of your personal information that we hold about you, subject to certain exemptions
Right to rectify your personal information	You have the right to ask us to correct your personal information that we hold where it is incorrect or incomplete
Right to erasure of your personal information	<p>You have the right to ask that your personal information be deleted in certain circumstances. For example</p> <ul style="list-style-type: none"> (i) where your personal information is no longer necessary in relation to the purposes for which they were collected or otherwise used; (ii) if you withdraw your consent and there is no other legal ground for which we rely on for the continued use of your personal information; (iii) if you object to the use of your personal information (as set out below); (iv) if we have used your personal information unlawfully; or (v) if your personal information needs to be erased to comply with a legal obligation
Right to restrict the use of your personal information	<p>You have the right to suspend our use of your personal information in certain circumstances. For example</p> <ul style="list-style-type: none"> (i) Where you think your personal information is inaccurate and only for such period to enable us to verify the accuracy of your personal information; (ii) The use of your personal information is unlawful and you oppose the erasure of your personal information and request that it is suspended instead; (iii) We no longer need your personal

	<p>information, but your personal information is required by you for the establishment, exercise or defence of legal claims;</p> <p>(iv) You have objected to the use of your personal information and we are verifying whether our grounds for the use of your personal information override your objection.</p>
Right to data portability	<p>You have the right to obtain personal information that you have provided to us in a structured, commonly used and machine-readable format and for it to be transferred to you or another organization, where it is technically feasible. The right only applies where the use of the personal information you provided was with your consent or for the performance of a contract with you, and when the use of your personal information is carried out by automated (i.e. electronic) means.</p>
Right to object to the use of your personal information	<p>You have the right to object to the use of your personal information in certain circumstances. For example</p> <p>(i) where you have grounds relating to your particular situation and we use your personal information for our legitimate interests (or those of a third party);</p> <p>(ii) if you object to the use of your personal information for direct marketing purposes.</p>
Right to withdraw consent	<p>You have the right to withdraw your consent at any time where we rely on consent to use your personal information.</p>
Right to complain to the relevant data protection authority	<p>You have the right to complain to the relevant data protection authority where you think we have not used your personal information in accordance with data protection law.</p>

12. Non-Personal Information

FVIS may use personal information to create and collect non-personal information (information that is not about an identifiable individual), including personal information that has been aggregated or otherwise depersonalized so that the information no longer relates to an identifiable individual. **FVIS** may use, disclose, transfer and retain nonpersonal information for any purpose and in any manner whatsoever. If non-personal information is combined with personal information, then **FVIS** will treat the combined non-personal information as personal information for the purposes of this Privacy Policy for as long as the non-personal information is combined with your personal information.

13. Other Websites and Businesses

FVIS's websites and correspondence (including emails and messages) may include advertisements for products and services offered by independent businesses or links to websites operated by independent businesses. **FVIS** has no responsibility or liability for, or control over, those other websites, online services or businesses, their products or services, or their collection, use, disclosure or retention of your personal information. This Privacy Policy does not apply to the collection, use, disclosure and retention of your personal information by those websites, online services and independent businesses. If you have questions about how those websites, online services or independent businesses collect, use, disclose or retain personal information, please contact the owner or operator of the website, service or business.

14. Social Networking and Similar Situations

When you use certain aspects of **FVIS**'s websites or other services, or post information to other social networking sites (e.g. there may be links to **FVIS**'s Facebook, Twitter, Instagram, YouTube, LinkedIn or Google+ pages or you may be able to "like" a product on your Facebook account or "pin" a product on your Pinterest account), the personal information that you post or share in connection with these third party sites is visible to other persons and can be read, collected, used and disclosed by other persons, including to send unsolicited messages. As will be evident, in such a case, you will be leaving a **FVIS** website and going to the third party's website. Any information provided to such third party social networking sites and other sites is governed by their own privacy policies, which you may read on the applicable site. You are solely responsible for the personal information that you choose to post or share in those situations. **FVIS** has no control over, or responsibility or liability for, the use, disclosure and retention of the personal information that you disclose in those situations, and the use, disclosure and retention of the disclosed information is not subject to this Privacy Policy.

15. Other Matters

- a) **Disclaimers, Liability Exclusions/Limitations and Disputes:** The agreements (including any website terms of use) that you accept when you apply, register for, order or use **FVIS**'s products and services contain important provisions, including provisions disclaiming, limiting or excluding the liability of **FVIS** and other persons (including service providers) and provisions determining the applicable law and jurisdiction for the resolution of disputes. To the extent permitted by applicable law, each of those provisions applies to any dispute that may arise in relation to this Privacy Policy or **FVIS**'s collection, use, disclosure and retention of your personal information, and are of the same force and effect as if they were reproduced directly in this Privacy Policy. Nothing in this Privacy Policy amends any of those other agreements.
- b) **Changes to this Policy:** **FVIS** may change this Privacy Policy as it applies to **FVIS** from time to time by posting a new version of this Privacy Policy on **FVIS**'s websites. **FVIS**'s collection, use, disclosure and retention of your personal information will be governed by the version of this Privacy Policy in effect at that time. Your continued dealings with **FVIS** after any change to this Privacy Policy will signify your consent to the collection, use, disclosure and retention of your personal information by **FVIS** as set out in the changed

Privacy Policy. Accordingly, you should check the “Last Updated” date of this Privacy Policy (at the top of this Privacy Policy) and review any changes since the last version.

- c) **English Language:** You and **FVIS** have each expressly requested and required that this Privacy Policy and all other related documents be drawn up in the English language.
- d) **Contacting FVIS’s Privacy Officer:** If you have any comments or questions about this Privacy Policy or how
- e) **FVIS** deals with your personal information, please contact **FVIS’s** Privacy Officer by mail or email at:
Unit 3-3, MH Avenue- Jalan Bunga Kantan off Jalan Genting Kelang – Setapak, 53300 Kuala Lumpur -
Malaysia; email: privacy@fvis.com.my



FVIS