### **OUR COMMITMENT TO YOUR PRIVACY**

Pentagon Business Centre Sdn. Bhd.. respects your privacy. Because we gather certain types of information about our users, we feel you should fully understand the terms and conditions surrounding the capture and use of that information.

This privacy statement discloses what information we gather and how we use it.

### INFORMATION THAT IS GATHERED AND TRACKED

Pentagon Business Centre Sdn. Bhd.. gathers two types of information about individuals:

<u>Information that individuals provide through optional, voluntary submissions:</u> We receive this information voluntarily from individuals who seek to interact with Pentagon Business Centre in a variety of forms. This includes voluntary form submissions on hymalliance.com to receive our electronic newsletters and other publications; to attend webinars and other events; to inquire about and/or participate in professional development courses or activities; to participate in research surveys or polls; and/or to share information with us through a written inquiry, request, or drawing entry form.

Information Pentagon Business Centre Sdn. Bhd.. gathers through tracking information derived from visitor behaviour and interactions with our website and digital communications: This information allows us to better understand our readers' interests and tailor our content accordingly and also to help our advertisers and sponsors better understand the interests, behaviour and demographics of our audience.

Under no circumstance does Pentagon Business Centre Sdn. Bhd.. divulge any information about an individual user to any third party, except and until compelled by force of law.

## **OPTIONAL VOLUNTARY INFORMATION**

Pentagon Business Centre Sdn. Bhd.. offers a variety of information and resources to our customers and site visitors, many of which require the voluntary submission of personal information:

## 1. Newsletters, Alerts and Publications

We may offer free electronic newsletters and publications to users. Pentagon Business Centre Sdn. Bhd.. gathers the email addresses of all users who voluntarily subscribe and provides options in every message we send to change individual subscription preferences and/or to unsubscribe from any further communications. Subscribers may indicate the topics about which they prefer to receive communications and the types of communications they prefer to receive. Because our objective is to provide each individual with information

that is most relevant to his or her individual interests, topic interests may be adjusted based on content engagement. Users can also select their subscription preferences to influence which newsletters, bulletins and publications they receive as part of their free subscription, and they may change these preferences at any time using the links provided in email communications and on the website. Ultimately, users have full control over whether to subscribe to Pentagon Business Centre email communications and may unsubscribe at any time using the links provided in every Pentagon Business Centre email.

# 2. Surveys

Pentagon Business Centre Sdn. Bhd.. may invite our subscribers to participate in surveys. The aggregated information collected in these research surveys may be published and/or shared with sponsoring companies, but Pentagon Business Centre will never share personally identifiable information or information about specific individuals with any third party.

## 3. Webinars

Pentagon Business Centre Sdn. Bhd.. offers a robust calendar of webinar programs designed to connect attendees with industry thought leaders and best practices. By registering for a Pentagon Business Centre webinar, professionals' consent to receive marketing messages from Pentagon Business Centre Sdn. Bhd.. regarding webinars, publications and other services designed to support training professionals. Information provided by webinar registrants may be shared with webinar sponsors to facilitate educational opportunities and knowledge transfer for training professionals.

## **CHILDREN**

Pentagon Business Centre Sdn. Bhd.. does not authorize the use of our website by minors under the age of 18 years, consistent with the terms of the Malaysian Data Protection Act and will never request the personal information of minors without parental consent.

## **USAGE TRACKING**

Pentagon Business Centre Sdn. Bhd.. tracks user traffic patterns throughout all of our sites, including overall usage statistics and information on a user's originating IP address; browser type; and other information related to the website session, including the URL of Pentagon Business Centre web pages viewed and the length of time spent on individual pages. Additionally, information you enter into our site search may be stored and catalogued; we use this information to help us improve our services.

### **COOKIES**

By using our website, you consent to our use of cookies. We use browser cookies to understand your use of our site(s). While these files do not in themselves contain personal information, they do enable us to understand your use of the site and to associate your site usage with other information you have provided to us.

Pentagon Business Centre Sdn. Bhd.. uses cookies to track user navigation, such as remembering language preferences or the currency used for a purchase, to track advertising impressions and click rates, and to support remarketing (display ads served on third-party websites by vendors such as Google). Pentagon Business Centre Sdn. Bhd.. uses this information to improve the user's next visit and facilitate easier use of the site.

You may refuse cookies by turning them off in your browser. If you've set your browser to warn you before accepting cookies, you will receive the warning message with each cookie. You do not need to have cookies turned on to use this site. However, you do need cookies enabled in order to participate in all features of our site. By using our site(s), you consent to our policy and use of cookies.

### **USE OF INFORMATION**

Pentagon Business Centre Sdn. Bhd.. uses any information voluntarily given by our users to enhance their experience on our sites, whether to provide interactive or personalized elements on the sites or to better prepare future content based on their interests.

As stated above, we use information that users voluntarily provide in order to send electronic newsletters and publications and to enable users to participate in polls, surveys, forums and events. We send newsletters to subscribers on a regular schedule (depending on the newsletter) and occasionally send special editions when we think subscribers might be particularly interested in something.

We use tracking information to determine which areas of our sites users like and don't like, based on traffic to those areas. This helps us continue to build a better service for our audience. We track search terms entered in the search function as one of many measures of what interests our users.

We use third-party advertising companies to serve ads when users visit our website. These companies may use information (not including individuals' name, address, email address or telephone number) about their visits to this and other websites in order to provide advertisements about goods and services of interest to them. More information about this practice and users' choices about not having this information used by these companies.

Pentagon Business Centre Sdn. Bhd.. creates aggregate reports on user demographics and traffic patterns for advertisers, sponsors and partners. These reports allow our advertisers to advertise more effectively and allow our users to receive advertisements that are pertinent to their needs. Because we don't track the usage patterns of individual users for advertisers, an advertiser or sponsor will never know that a specific user clicked its ad, unless that user specifically shares his or her contact information with that advertiser. We will not disclose any information about any individual user except to comply with applicable law or valid legal process or to protect the personal safety of our users or the public.

## **SHARING OF THE INFORMATION**

Pentagon Business Centre Sdn. Bhd.. uses the above-described information to tailor our content to suit users' needs and help our advertisers better understand our audience's demographics. This process is essential to keeping our service free.

When you share your contact details with Pentagon Business Centre to access sponsored content, you authorize us to share your information with the respective third-party or sponsor company. We request your consent in advance of sharing with said third party or sponsor company. If you do not consent to your information being used as specified on a Pentagon Business Centre form, do not complete or submit the form.

We will not share information about individual users with any unrelated third party, except to comply with applicable law or valid legal process or to protect the personal safety of our users or the public.

# **SECURITY**

Pentagon Business Centre Sdn. Bhd.. operates secure data networks protected by industry-standard firewall and password protection systems. Our security and privacy policies are periodically reviewed and enhanced as necessary, and only authorized individuals have access to the information provided by our customers.

# **OPT-OUT POLICY**

Your use of the Pentagon Business Centre site(s) is entirely voluntary, as is your decision about information you elect to share with Pentagon Business Centre Sdn. Bhd. If you choose to opt-out of our email newsletters, you may do so at any time. We include unsubscribe information in every email we send.

### YOUR CONSENT

By using this site, you consent to the collection and use of this information by Pentagon Business Centre Sdn. Bhd.. This Privacy Policy is updated periodically. The current policy will always be posted on our site, so you always are aware of what information we collect, how we use it and under what circumstances we disclose it.

### **LEGAL BASIS FOR PROCESSING**

Pentagon Business Centre Sdn. Bhd.. processes personal data, as provided, with the clear and affirmative consent of the individual. We prompt for such consent at all data-gathering points, but in order to avoid ambiguity, no user is authorized to use Pentagon Business Centre Sdn. Bhd.. website(s) or resources without providing affirmative consent of their understanding of an agreement to our published Privacy Policy. Persons who do not understand and consent to these terms must not use our site(s).

### **DATA BREACH REPORTING**

Pentagon Business Centre Sdn. Bhd.. will promptly notify any affected users and appropriate supervisory authorities of a data breach within data structures directly controlled by us or, as appropriate, as any such material data breach is reported to us by any of our third-party data processors.

## **DATA PROTECTION OFFICER**

Pentagon Business Centre's Data Protection Officer may be contacted by emailing <a href="mailto:admin@pentagonbc.com">admin@pentagonbc.com</a>.

## **DATA ACCESS AND ERASURE**

Data subjects have the right to request a report of how their personal data exist in our database(s) and to request that such data be erased in certain circumstances. All such requests must be verifiably submitted by the individual seeking access to or erasure of their own data. Erasure is subject to certain limitations, including whether Pentagon Business Centre Sdn. Bhd.. and/or our data processors asserts a legal requirement or right to preserve the data.

After a request is received, Pentagon Business Centre Sdn. Bhd.. will comply as fully as possible. If full compliance is not possible, we will specify the degree to which we are unable to comply and for what reason.

In the event of personal data erasure, Pentagon Business Centre Sdn. Bhd.. may anonymize the related and non-personal data associated with the individual, including but not limited to web tracking, email tracking, transactions and survey responses.

### **DATA RECTIFICATION**

Pentagon Business Centre Sdn. Bhd.. will, to the best of our ability, promptly rectify inaccuracies in personal data that are verifiably brought to the attention of our Data Protection Officer by the subject individual.

## **AUTOMATED DECISION-MAKING**

Pentagon Business Centre Sdn. Bhd.. employs automated processes to align the content our users experience with our profile of their interests. This automated decision-making is not legally or otherwise significant for the purpose, and Pentagon Business Centre does not engage in fully automated decision-making that has a legal or otherwise significant effect on an individual data subject.

## **DATA PROTECTION AND SECURITY**

Pentagon Business Centre Sdn. Bhd.. operates secure data networks protected by industry-standard firewall and password protection systems. Our security and privacy policies are periodically reviewed and enhanced as necessary, and only authorized individuals have access to the information provided by our customers. Our website(s) employ HTTPS data encryption.