



1 January 2023

## Flagstick Ventures Sdn Bhd (“FV”)

### Website Privacy Policy

This is the privacy notice of Wedge. In this document, “we”, “our”, or “us” refer to Flagstick Ventures Sdn Bhd.

This privacy notice pertains to our portfolio of websites, products, and services located at [www.wearewedge.com](http://www.wearewedge.com) and related sub-domains.

#### Introduction

1. This is a notice to inform you of our policy about all information that we record about you. It sets out the conditions under which we may process any information that we collect from you, or that you provide to us. It covers information that could identify you (“personal information”) and information that could not. In the context of the law and this notice, “process” means collect, store, transfer, use or otherwise act on information.
2. We regret that if there are one or more points below with which you are not happy, your only recourse is to leave our website immediately.
3. We take seriously the protection of your privacy and confidentiality. We understand that all visitors to our website are entitled to know that their personal data will not be used for any purpose unintended by them, and will not accidentally fall into the hands of a third party.
4. We undertake to preserve the confidentiality of all information you provide to us, and hope that you reciprocate.
5. Except as set out below, we do not share, or sell, or disclose to a third party, any information collected through our website.

#### The bases on which we process information about you

##### 1. Information we process because we have a contractual obligation with you

When you create an account on our website, buy a product or service from us, or otherwise agree to our terms and conditions, a contract is formed between you and us. In order to carry out our obligations under that contract, we must process the information you give us. Some of this information may be personal information.

We may use it in order to:

- verify your identity for security purposes
- sell products to you
- provide you with our services
- provide you with suggestions and advice on products, services and how to obtain the most from using our website

We process this information on the basis there is a contract between us, or that you have requested we use the information before we enter into a legal contract.

Additionally, we may aggregate this information in a general way and use it to provide class information, for example, to monitor our performance with respect to a particular service we provide. If we use it for this purpose, you as an individual will not be personally identifiable.

**Flagstick Ventures Sdn Bhd (1459317-X)**

68-3 Jalan 27/70A, Desa Sri Hartamas  
50480 Kuala Lumpur



We shall continue to process this information until the contract between us ends or is terminated by either party under the terms of the contract.

## **2. Information we process with your consent**

Through certain actions when otherwise there is no contractual relationship between us, such as when you browse our website or ask us to provide you more information about our business, including our products and services, you provide your consent to us to process information that may be personal information. Wherever possible, we aim to obtain your explicit consent to process this information, for example, by asking you to agree to our use of cookies.

Sometimes you might give your consent implicitly, such as when you send us a message by e-mail to which you would reasonably expect us to reply.

Except where you have consented to our use of your information for a specific purpose, we do not use your information in any way that would identify you personally. We may aggregate it in a general way and use it to provide class information, for example, to monitor the performance of a page on our website.

If you have given us explicit permission to do so, we may from time to time pass your name and contact information to selected associates whom we consider may provide services or products you would find beneficial.

We continue to process your information on this basis until you withdraw your consent or it can be reasonably assumed that your consent no longer exists.

## **3. Information we process for the purposes of legitimate interests**

We may process information on the basis there is a legitimate interest, either to you or to us, of doing so.

Where we process your information on this basis, we do after having considered:

- whether the same objective could be achieved through other means
- whether processing (or not processing) might cause you harm
- whether you would expect us to process your data, and whether you would, in the round, consider it reasonable to do so

For example, we may process your data on this basis for the purposes of:

- record-keeping for the proper and necessary administration of our official documents and customer records
- responding to unsolicited communication from you to which we believe you would expect a response protecting and asserting the legal rights of any party
- insuring against or obtaining professional advice that is required to manage risk related to our business
- protecting your interests where we believe we have a duty to do so

## **4. Information provided on the understanding that it will be shared with a third party**

Our website allows you to post information with a view to that information being read, copied, downloaded, or used by other people.

Examples include:

- posting a message our forum or comment form
- tagging an image

**Flagstick Ventures Sdn Bhd (1459317-X)**

68-3 Jalan 27/70A, Desa Sri Hartamas  
50480 Kuala Lumpur



- clicking on an icon next to another visitor's message to convey your agreement, disagreement or thanks

In posting personal information, it is up to you to satisfy yourself about the privacy level of every person who might use it.

We do not specifically use this information except to allow it to be displayed or shared.

We do store it, and we reserve a right to use it in the future in any way we decide.

Once your information enters the public domain, we have no control over what any individual third party may do with it. We accept no responsibility for their actions at any time.

Provided your request is reasonable and there is no legal basis for us to retain it, then at our discretion, we may agree to your request to delete personal information that you have posted.

## **5. Complaints regarding content on our website**

We attempt to moderate user-generated content, but we are not always able to do so as soon as that content is published.

If you complain about any of the content on our website, we shall investigate your complaint.

If we feel it is justified or if we believe the law requires us to do so, we shall remove the content while we investigate.

Free speech is a fundamental right, so we must make a judgment as to whose right will be obstructed: yours, or that of the person who posted the content that offends you.

If we think your complaint is vexatious or without any basis, we shall not correspond with you about it.

## **6. Information relating to your method of payment**

Payment information is never taken by us or transferred to us either through our website or otherwise. Our employees and contractors never have access to it.

At the point of payment, you are transferred to a secure page hosted by a reputable payment service provider. The payment form may be branded to look like a page on our website, but it is not controlled or hosted by us.

## **7. Sending a message to our support team**

When you contact us, whether through our website or by e-mail, we collect the data you have given to us in order to reply with the information you need.

We record your request and our reply in order to increase the efficiency of our customer service program. We keep personally identifiable information associated with your messages, such as your name, email address, and phone number so as to be able to track our communications with you to provide a high-quality service.

## **Use of information we collect through automated systems when you visit our website**

## **8. Cookies**

Cookies are small text files that are placed on your computer's hard drive by your web browser when you visit any website. They allow information gathered on one web page to be stored until it is needed for use on another,

**Flagstick Ventures Sdn Bhd (1459317-X)**

68-3 Jalan 27/70A, Desa Sri Hartamas

50480 Kuala Lumpur



allowing a website to provide you with a personalized experience and the website owner with statistics about how you use the website so that it can be improved.

Some cookies may last for a defined period of time, such as one day or until you close your browser. Others last indefinitely.

Your web browser should allow you to delete any you choose. It also should allow you to prevent or limit their use.

Our website uses cookies. They are placed by software that operates on our servers, and by software operated by third parties whose services we use.

When you first visit our website, we ask you whether you wish us to use cookies. If you choose not to accept them, we shall not use them for your visit except to record that you have not consented to their use for any other purpose.

If you choose not to use cookies or you prevent their use through your browser settings, you will not be able to use all the functionality of our website.

We use cookies in the following ways:

- to track how you use our website
- to record whether you have seen specific messages we display on our website
- to keep you signed in our site
- to record your answers to surveys and questionnaires on our site while you complete them

We provide more information about the cookies we use in our cookie policy.

## **9. Personal identifiers from your browsing activity**

Requests by your web browser to our servers for web pages and other content on our website are recorded.

We record information such as your geographical location, your Internet service provider and your IP address. We also record information about the software you are using to browse our website, such as the type of computer or device and the screen resolution.

We use this information in aggregate to assess the popularity of the webpages on our website and how we perform in providing content to you.

If combined with other information we know about you from previous visits, the data possibly could be used to identify you personally, even if you are not signed in to our website.

## **10. Our use of re-marketing**

Re-marketing involves placing a cookie on your computer when you browse our website in order to be able to serve to you an advert for our products or services when you visit some other website.

We may use a third party to provide us with re-marketing services from time to time. If so, then if you have consented to our use of cookies, you may see advertisements for our products and services on other websites.

## **Disclosure and sharing of your information**

### **11. Information we obtain from third parties**

**Flagstick Ventures Sdn Bhd (1459317-X)**

68-3 Jalan 27/70A, Desa Sri Hartamas  
50480 Kuala Lumpur



Although we do not disclose your personal information to any third party (except as set out in this notice), we sometimes receive data that is indirectly made up from your personal information from third parties whose services we use.

No such information is personally identifiable to you.

## **12. Third party advertising on our website**

Third parties may advertise on our website. In doing so, those parties, their agents or other companies working for them may use technology that automatically collects information about you when their advertisement is displayed on our website.

They may also use other technology such as cookies or JavaScript to personalize the content of, and to measure the performance of their adverts.

We do not have control over these technologies or the data that these parties obtain. Accordingly, this privacy notice does not cover the information practices of these third parties.

## **Access to your own information**

### **13. Access to your personal information**

- At any time you may review or update personally identifiable information that we hold about you, by signing in to your account on our website.
- To obtain a copy of any information that is not provided on our website you may send us a request.
- After receiving the request, we will tell you when we expect to provide you with the information, and whether we require any fee for providing it to you.

### **14. Removal of your information**

If you wish us to remove personally identifiable information from our website, you may contact us.

This may limit the service we can provide to you.

### **15. Verification of your information**

When we receive any request to access, edit or delete personally identifiable information we shall first take reasonable steps to verify your identity before granting you access or otherwise taking any action. This is important to safeguard your information.

## **Other matters**

### **16. Use of site by children**

We do not sell products or provide services for purchase by children, nor do we market to children.

If you are under 18, you may use our website only with consent from a parent or guardian.

### **17. Encryption of data sent between us**

We use Secure Sockets Layer (SSL) certificates to verify our identity to your browser and to encrypt any data you give us.

**Flagstick Ventures Sdn Bhd (1459317-X)**

68-3 Jalan 27/70A, Desa Sri Hartamas  
50480 Kuala Lumpur



Whenever information is transferred between us, you can check that it is done so using SSL by looking for a closed padlock symbol or other trust mark in your browser's URL bar or toolbar.

#### **18. Retention period for personal data**

Except as otherwise mentioned in this privacy notice, we keep your personal information only for as long as required by us:

- to provide you with the services you have requested;
- to comply with other law
- to support a claim or defense in court

#### **19. Compliance with the law**

Our privacy notice has been compiled so as to comply with the law of every country or legal jurisdiction in which we aim to do business. If you think it fails to satisfy the law of your jurisdiction, we should like to hear from you.

However, ultimately it is your choice as to whether you wish to use our website, products, and services.

#### **20. Review of this privacy policy**

We may update this privacy notice from time to time as necessary. The terms that apply to you are those posted here on our website on the day you use our website.

If you have any question regarding our privacy notice, please contact us.

**Flagstick Ventures Sdn Bhd (1459317-X)**

68-3 Jalan 27/70A, Desa Sri Hartamas  
50480 Kuala Lumpur