

# **PRIVACY POLICY**

**LIVEIN SDN BHD (previously known as HOSTEL HUNTING SDN BHD) (Company No.: 1071007-U)** is committed to protecting personal data and strives to provide a safe and secure user experience.

This Privacy Policy is formulated in accordance with the Malaysia Personal Data Protection Act 2010 (Act 709) ("Act") and describes how the User's and the Owner's personal data are collected and used.

Capitalised terms used in this Privacy Policy have the meanings given to them in the Terms and Conditions of Use.

Each User and the Owner unconditionally, irrevocably and unequivocally acknowledges, covenants, consents and agrees that we may access, preserve and disclose any of the personal data that each User or Owner makes available to us when accessing or using or registering as a User or Owner on the Website, if required to do so by law or in a good faith belief that such access, preservation or disclosure is reasonably necessary to (a) respond to claims asserted against us; (b) to comply with legal process; (c) for fraud prevention, risk assessment, investigation, customer support, product development, maintenance and de-bugging purposes, (d) to protect the rights, property or personal safety of us, our users, or members of the public and for all other general purposes stipulated under paragraph 2(a) below. Each User and Owner undertakes, agrees, warrants and covenants that the User and the Owner will not hold us liable or seek any legal or equitable remedy from us for any damages, expenses, costs or losses of whatsoever nature suffered or incurred by the User, Owner or any third-party as a direct or indirect result of any of access, preservation or disclosure of the User's or the Owner's personal data.

## 1. Types of Personal Data We Collect

Here are the types of personal data we gather:

(a) Personal Data from Users and Owners

We receive and collect the personal data directly from the User who is interested in searching or booking or reserving a room or accommodation and from the Owner who is interested in listing or publishing a room or accommodation on or through this Website. Typically, this data includes the User's or the Owner's name, postal address, email address and mobile number. We may also collect other types of data such as gender, age and date of birth, which we may associate with personal data. If the User makes bookings through this Website or the Owner creates listing or accepts booking through this Website, we will collect credit card information, the tenure of tenancy, the check-in time and date and the details of room listed, booked or reserved and other personal information related to the stay. We collect personal data when the User or the Owner registers, logs-on or visits this Website, including communications between the User, the Owner and us.

## (b) Personal Data From Others

We are constantly improving the contents of this Website. To aid in serving the User and the Owner better we may supplement personal data that we have collected directly from the User and the Owner with other personal data that we obtain offline from third parties or from our affiliates or other services with the user's or owner's consent. In addition, we may obtain personal data about individuals (through sources with the individuals' consents) who may be interested in the services provided by this Website. When we associate personal data that we obtained from third parties with personal data that we have collected under this Privacy Policy, we will treat the acquired personal data like the personal data that we collected ourselves.

## (c) Personal Data Collected Through Technology.

We collect personal data through technology to make this Website more responsive, relevant and useful. For example, we collect the User's or the Owner's IP address. An IP address is often associated with the portal through which the User or the Owner enters the Internet, like the User's or the Owner's ISP (Internet service provider), company, school, learning institution or university. Standing alone, an IP address is not personally identifiable. At times, we also use IP addresses to collect personal data regarding the frequency with which our users visit various parts of this Website. We may combine this personal data with the personal data described above. We also may collect personal data through "cookies" or "web beacons". Cookies are small bits of information that are automatically stored on a person's web browser in their computer, mobile phone or any other access device that can be retrieved by this Website. Cookies may be disabled by changing the settings on the applicable browser. This Website uses a variety of technical methods for tracking purposes, including web beacons. Web beacons are small graphic images on a website or in an email that allow us and third parties to monitor the activity on this Website or to make cookies more effective. We may use these technical methods to analyse the traffic patterns on this Website, such as the frequency with which the User or the Owner visit various parts of this Website. These technical methods may involve the transmission of personal data either directly to us or to another party authorized by us to collect personal data on our behalf. We also use these technical methods in HTML emails that we send the User or the Owner to determine whether the User or the Owner has opened those emails or clicked on links in those emails. The personal data from use of these technical methods may be collected in a form that is personally identifiable.

#### 2. How We Use, Process and Share the Personal Data We Collect

#### (a) Our Use

We use and process personal data to enable the User to access or continue to access or use or continue to use this Website; to operate, protect, improve and optimize this Website and our user's experience; to help create and maintain a trusted and safer environment on this Website, such as fraud detection and prevention, conducting investigations, risk assessments, verifying the address of the User's listing, verifying any identifications provided by the User, and conducting checks against databases such as public government databases; to send the User's service, support and administrative messages, confirmations, reminders, technical notices, updates, security alerts, and information requested by the User; to send the User marketing and promotional messages and other information that may be of interest to the User, to administer rewards, surveys or other promotional activities or events sponsored or managed by us; and to comply with our legal obligations and resolve disputes relating to our services.

#### (b) Email Address

We may use the User's email address for processing, servicing or enforcing transactions and sending related service communications; providing Users or Owners with service or listing updates, promotional notices and offers; or responding to questions, inquiries or comments.

(c) Communications.

We may scan, review and analyze User's or Owners communications with each other, with us or other parties through this Website for fraud prevention, risk assessment, regulatory compliance, investigation, product development, research and customer support purposes. For example, we may scan, review and analyze the communications between the User and the Owner exchanged through this Website in the event if there is any dispute, disagreement, misunderstanding or miscommunication between the User and the Owner. We may also scan, review or analyze messages for research and product development purposes to help make search, booking, listing and communications more efficient and effective. The User's and/or the Owner's use of this Website constitute(s) the User's and/or the Owner's irrevocably, unconditionally and unequivocally consent(s), acceptance(s) and acknowledge(s) that we may, at any time or from time to time, at our discretion, scan, review, analyze and store your communications, whether done manually or through automated means.

(d) Affiliate, Booking Partner or Referring Partner.

In order to provide the best service, we may share personal data with our Affiliate, Booking Partner or Referring Partner.

(e) Companies that Facilitate Communications and Transactions.

We may hire service providers to help deliver, improve, support or manage our services, including those for data analysis, development of new services, sending email, credit card processing, sending promotional mailings, providing customer service or marketing assistance. We also work with legal and reputable service providers who help obtain with consent further User's or Owner's personal data or communicate with the User or the Owner. These service providers are required to hold personal data disclosed to them in strict confidence and upon data privacy terms that are no less stringent that those stated here. These service providers are permitted to collect and use personal data disclosed to them only for the purposes described in this policy.

(f) Disclosures Required By Law, Security and Safety.

We will disclose personal data when we believe in good faith that such disclosures are required by law or will help enforce our Terms and Conditions, protect any person's safety or security, or the safety and security of this Website and our services.

(g) Third-Party Marketers.

We will not rent or sell personal data to third-party, marketers or other parties.

## 3. Security

We use best efforts to implement technical, administrative and physical security measures to protect personal data from unauthorized access and improper use. No method of transmission over the Internet or method of electronic storage is 100% secure or error free, nor is stored data free from vulnerabilities. We cannot guarantee or warrant that personal data will not be intercepted while being transmitted to us over the Internet. We are not responsible for the actions of any third party who hack, intercept, carry out fraudulent or mischievous acts relating to or otherwise obtain unauthorised use of personal data.

#### 4. Update Personal Data

Users and Owners may access their Accounts to update personal data.

## 5. Other Personal Data

(a) Child Use.

We do not knowingly collect personal data from, provide this Website for use or otherwise deal with persons under the age of 18.

(b) This Website may contain links to other web sites. We are not responsible for the privacy practices of any other web sites. This privacy policy applies solely to personal data collected by this Website.

### 6. Notification of Changes

(b) We reserve the right to modify, alter, vary, amend or otherwise update this Privacy Policy at any time or from time to time and the User and the Owner irrevocably, unconditionally and unequivocally agree, covenant and consent to be bound by such modifications, alterations, variations, amendments or updates. We will notify the User and the Owner of material changes to this Privacy Policy by posting the revised policy with the date it was revised on this page. The User's or Owner's continued use (including access, searching, browsing, booking, listing or use of any interactive feature) of this Website constitutes the User's or the Owner's agreement to this Privacy Policy and any amendments.