BORENOS PRIVACY STATEMENT

Effective Date: 1 January 2025

At Borenos ("Borenos", "we", "us", "our"), we are committed to protecting your privacy and the personal data we collect from you. This Privacy Statement ("Statement") explains how we collect, use, disclose, store, and safeguard your personal data in accordance with the **Personal Data Protection Act 2010 (Malaysia)** ("PDPA").

By interacting with us through our restaurants, websites, mobile applications, loyalty programs, and other online services ("Online Services"), you agree to the practices described in this Statement.

1. PERSONAL DATA WE COLLECT

"Personal Data" refers to information that identifies you directly or indirectly, including but not limited to:

- name;
- postal address;
- email address;
- mobile or telephone number;
- delivery details and recipient information;
- transaction history and payment information;
- device information, IP address, and browsing activity (when using our Online Services).

We do **not** intentionally collect Sensitive Personal Data as defined under PDPA (e.g., health information, religion, political beliefs) unless required by law or voluntarily provided.

We may collect Personal Data when you:

- visit our websites or mobile apps;
- interact with our social media pages;
- subscribe to newsletters or marketing communications;
- submit forms or provide feedback;
- contact us by phone, email, or other channels;
- make or attempt to make a purchase or order.

Providing Personal Data is voluntary. However, without certain information, we may be unable to process your transactions or provide some services.

2. HOW WE USE YOUR PERSONAL DATA

We may use your Personal Data for the following purposes:

- processing and fulfilling orders, transactions, and payments;
- managing your account or loyalty participation;
- sending order confirmations, receipts, alerts, and service updates;
- responding to your enquiries or requests;
- planning and executing marketing campaigns;
- sending promotions, offers, newsletters, and event updates (with your consent);
- conducting analytics, trend research, and service improvements;
- detecting and preventing fraud or security risks;
- complying with legal and regulatory obligations.

We will only process your Personal Data for lawful purposes permitted under the PDPA, including:

- your consent;
- performance of a contract with you;
- compliance with legal obligations;
- legitimate business interests (e.g., improving our services, preventing fraud).

3. DISCLOSURE OF PERSONAL DATA

We may disclose your Personal Data to the following parties when necessary:

- franchisees operating Borenos-branded restaurants;
- payment processors, IT service providers, and data hosting partners;
- marketing and advertising partners;
- delivery and logistics providers;
- professional advisors (legal, accounting, audit);
- regulatory bodies, law enforcement, or government authorities as required by law.

Where service providers act on our behalf, they are required to protect your Personal Data and use it only for the purposes we specify.

Cross-Border Transfers

Your Personal Data may be transferred to or stored in servers located outside Malaysia. When such transfers occur, we take reasonable steps to ensure the receiving parties provide a level of protection comparable to PDPA requirements.

4. COOKIES AND TRACKING TECHNOLOGIES

We use cookies, pixels, tags, and similar technologies to enhance your browsing experience and understand how you use our Online Services. These technologies may collect information such as:

- device and browser type;
- IP address and time zone;
- pages viewed and time spent;
- referring websites or ads.

We may use:

- **Essential Cookies** (required for site operation)
- **Analytics Cookies** (to improve performance and user experience)
- **Marketing Cookies** (to deliver personalised ads and measure campaign effectiveness)

You may disable cookies through your browser settings. However, some features of our Online Services may not function properly.

5. DATA SECURITY

We implement administrative, technical, and physical safeguards to protect your Personal Data against loss, misuse, unauthorised access, disclosure, alteration, or destruction. While we strive to protect your Personal Data, no method of transmission or storage is completely secure.

6. RETENTION OF PERSONAL DATA

We retain your Personal Data for as long as necessary to fulfil the purposes for which it was collected, or as required by law. When data is no longer needed, we take steps to securely delete or anonymise it.

7. YOUR RIGHTS UNDER PDPA

Subject to applicable laws, you have the right to:

- access your Personal Data;
- request correction of inaccurate or incomplete Personal Data;
- withdraw your consent at any time;
- request that we stop processing your data for direct marketing;
- request limitations on the processing of your Personal Data (where applicable).

A reasonable fee may apply for access requests as allowed under PDPA.

8. MINORS

Our Online Services are not intended for individuals below the age of majority. If you are under 18 years old, you may only use our Online Services with the supervision and consent of a parent or legal guardian.

9. CHANGES TO THIS STATEMENT

We may update this Privacy Statement from time to time to reflect changes in our practices or legal requirements. Updates will be posted on our Online Services with a revised Effective Date.

10. CONTACT US

If you have questions about this Privacy Statement or wish to exercise your rights under PDPA, please contact us at:

Email: info@borenos.com