

PRIVACY POLICY

Thank you for visiting this website, a comprehensive educational ecosystem consisting of the BeED Learning Management System, Mobile Learning Platform, Educational Marketplace and Edutravel Services, presented to you by Beeducation Adventures Sdn. Bhd. (Company No: 1160905-A) (hereinafter referred to as “BeED”, “we” or “us”). We have updated the privacy policy applicable to our online and mobile website, applications, and services and clarified data collection, usage and sharing practices among BeED, its affiliated and unaffiliated third parties. Please take the time to read the full privacy policy. **If there are any terms in this Privacy Policy that you do not agree with, please discontinue the use of our Sites and our Services.** You hereby consent to the data collection, use, disclosure and storage practices described in this privacy policy when you provide the information to us by whatever means and/or cause or authorize the information to be provided to us and/or use any of our Services, including when you access, use, contribute or upload any content, pictures or videos to our website <https://www.beed.world/> or our mobile application and other online products, including BeED Learning Management Systems, BeED Journeys and BeED Nexus and / or any other services by BeED (“Site”), or when you otherwise interact with us by any means, including during offline transactions at BeED’s offices, over the telephone or via a third party e.g. our Users, vendors or service providers. This privacy policy (“Privacy Policy”) explains our practices in respect of such information and the choices you can make about the way your information is collected and used by us. This Privacy Policy is applicable to all visitors, suppliers and users of our Website, mobile applications and all our services, including and without limitation to Account Users, members, purchasers of Learning content and Experiences, BeED Learning Management System, BeED Journeys, BeED Nexus, Users, Subscribers, Free-User Accounts, Content Contributors, suppliers of services, including without limitation for Travel bookings, Travel Concierge Services, Accommodation and hotel bookings, excursions, activities, transportation services, car rental, Visa applications and other related, or ancillary acts and services. You will be asked to consent to the terms of this Privacy Policy when accessing BeED’s website, registering as a member or user on the Site, registering for any services or programmes or otherwise corresponding with us via the Site or otherwise where required under applicable laws. Your continued use of the Site will constitute your deemed consent to the terms of this Privacy Policy. In respect of personal data of third parties that you provide to us, you warrant that you have obtained their and where applicable their parents'/guardians' consent in accordance with all applicable laws, rules and regulations thereof, allowing us to process their personal data in accordance with this Policy and you have extended a copy of this Notice to them.

TYPES OF PERSONAL DATA WE COLLECT

Information you provide to us: we collect personal data (including where applicable sensitive personal data) you provide directly to us and/or via our suppliers or business associates and affiliates. This includes:

- Your and/or family's full name, National Registration Identity Card (NRIC) number (or the equivalent in any other country outside Malaysia), passport and visa information, nationality, gender;
- Your date of birth;

- Your and/or family's contact information, including address, email address and telephone number;
- Your membership information, account details, profile or password details and profile photo;
- Any information necessary to fulfill special requests based on the use of our services (for example, for travel and accommodation arrangements, and related particular preferences);
- Your reviews, feedback and opinions about our programs and services;
- Videos, audio files or pictures of your trip you upload to the Site; and
- Any other personal data you choose to provide to us.

Information We Collect Automatically When You Use the Site and/or our Services: when you access or use the Site or our Services, we automatically collect personal data about you, including:

- Information collected through our services, including photos and videos of you from excursions and travels;
- Information collected when you voluntarily complete a customer survey or provide feedback, or when you email us;
- Information collected when you view or use our website via your browser's cookies;
- Information obtained from third parties through lawful sources including but not limited to the National Registration Department of Malaysia;
- Log Information: we may collect system log information about your use of the Site, including the type of browser you use, access times, pages viewed, your IP address;
- Device Information: we may collect information about the computer or mobile device you use to access our Site, including the hardware model, operating system and version, unique device identifiers (such as, IP address, IMEI number, the address of the device's wireless network interface, or mobile phone number used by the device) and mobile network information;
- Location Information: we may collect information about the location of your device each time you access or use one of our mobile applications or otherwise consent to the collection of this information. You can turn off location services for a device at any time, but this may turn off some useful features. Failure to turn off location services will be rendered as consent for us to collect your location information during your visit to our mobile applications and/or other devices with similar features;
- Information Collected by Cookies and Other Tracking Technologies: we and our service providers use various technologies to collect information, including cookies and web beacons. Cookies are small data files stored on your hard drive or in device memory that help us improve our Site and your experience, see which areas and features of our Site are popular and count visits. Web beacons are electronic images that may be used in our services or emails and help deliver cookies, count visits and understand usage and campaign effectiveness. For more information about cookies, and how to disable them, please see our [Cookies Policy](#).
- Facebook Page Information. For example, the list of pages you manage on Facebook and information from those pages granted when you authorize our Facebook application.
- If you or any Connected Persons would like to request for your Facebook Login to be removed from our database, please contact us at support@beed.world.

Information We Collect From Other Sources: we may also obtain personal data from our Clients and from our third party service providers.

Where you provide personal data of third parties (for example, names and contact details of your family members in connection with bookings or family memberships), you confirm that you have their consent to provide their personal data to us. We strongly recommend you show them this Privacy Policy.

Data Pseudonymization

We will process your personal data in such a manner that the personal data can no longer be attributed to a specific data subject or to an identified or identifiable natural person by encrypting the data into an ID number, which is only known to the data controller in our system.

HOW WE USE COOKIES

A cookie is a small file, which asks permission to be placed on your computer's hard drive. Once you agree, the file is added and the cookie helps analyse web traffic or lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences. We use traffic log cookies to identify which pages are being used. This helps us analyse data about web page traffic and improve our website in order to tailor it to customer needs. We only use this information for statistical analysis purposes and then the data is removed from the system. Overall, cookies help us provide you with a better website, by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us. We treat information collected by cookies and other technologies as non-personal information. You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of the website and certain features of our website will not be available once cookies are disabled. Failure to decline cookies will be rendered as consent for us to use such Cookies.

We use different types of cookies. In particular, we use the following first party cookies:

- Necessary cookies which allow certain fundamental features of the Site to work. These cookies are essential to enable you to browse our services and use certain features. Disabling them may prevent you from using certain parts of the services. Without these cookies, services like login, booking and paying activity cannot be provided. These cookies also help keep our services safe and secure;
- Functional cookies, which allow us to remember choices you make (e.g. your cookie preference), we use these cookies so that we recognize you on our website and remember your previously selected preferences. These could include what language you prefer and location you are in;
- Performance cookies, which monitor usage of the Site; and

- Advertising cookies which record the fact that you have visited the Site and then which links you have accessed whilst you use the Site.
- Facebook Analytics, Advertising, & Social Features. We use Facebook technologies to customize content and advertising, to provide social media features, and to analyze traffic to our website.
- You can choose to remove or disable cookies in your browser settings and you may use browser extensions with our site that limit the ability to set third certain types of cookies including those from Google and Facebook.

We also use third party cookies – these are cookies that are set by a third party website or applications rather than by us. In particular, the Site allows cookies of third party social networks (e.g. Facebook and LinkedIn), and this enables a user to share content of the Site on social networks. These third parties may use cookies, but their use of cookies will not be governed by this Cookies Policy.

HOW WE USE YOUR PERSONAL DATA

We may use your personal data for the purposes set out below:

- We use your Personal Information for administrative purposes e.g. processing, confirming, organizing, fulfilling and completing your transactions and requests for our services, and ancillary works in providing the products and/or services (whether by BeED, its related or affiliated entities, merchants, partners or third parties and responding to enquiries by you or made on its behalf);
- Fulfill contractual obligations to you, anyone involved in the process of organizing your travel arrangements (e.g. travel agents, group travel organisers, airline operators, hotels, transportation providers, schools and your employer) and vendors (e.g. credit card companies,etc);
- Provide you with access to the content on our Site, and respond to your enquiries and requests for information and services;
- Verifying and assisting with identification of users and to determine appropriate services;
- Sending important notices such as communications about changes to our policies, terms and conditions, and your purchases;
- Monitor your use of our Site and your bookings, and conduct analysis of the use of our Site in order to operate, evaluate and improve our Site and our services, understand your preferences, display customised content to you on our Site which may be of interest to you and troubleshoot any problems;
- Forwarding publicity materials or other information to you from BeED or sending promotional emails about new products, special offers or other information which we think you may find interesting using the email address which you have provided;
- Meeting any legal, governmental or regulatory requirements in Malaysia or any other applicable jurisdiction including disclosure or notification requirements;
- Liaising with any person who is acquiring or participating in any contractual arrangements between BeED and you, to enable the transaction;
- And any other incidental and associated purposes in order for BeED to carry out its business and/or relating to any of the above.

Data held relating to you will be kept confidential but it may be shared with:

- Any person under a duty of confidentiality to BeED or to entities related to or affiliated to BeED;
- Any relevant agent, contractor, business associate or affiliate, agent, joint venture partner or associate or third party service provider, including who provides administrative, telecommunications, computer, payment, securities clearing, management, audit, insurance, professional or other services to BeED;
- With third-party payment processors, payment service providers, IT and marketing support service providers and other consultants, vendors and service providers who need access to such information to carry out work or provide services on our behalf or who help us to provide the Site to you;
- Anyone involved in the process of the organizing of your travel arrangements (for example, for travel and accommodation arrangements, and related services (e.g. travel agents, group travel organisers, airline operators, hotels, transportation providers, schools and your employer) and vendors (e.g. credit card companies, etc);
- Any person or corporation to whom BeED transfers or proposes to transfer its interests and/or obligations in respect of you or any product or service provided to you;
- Any nominee, trustee, co-trustee, centralised securities depository or registrar, custodian, insurance company, estate agent, lawyer, tax advisor, auditor, other professional advisor or other person who is involved with the provision of services or products by BeED to you;
- Any person by whom BeED is required by applicable legal, governmental or regulatory requirements to make disclosure;
- Or any other person reasonably requiring the same in order for BeED to carry out its business.

We will jointly use Personal Information as well as cookies for the purposes as described above:

- With any law enforcement, courts, Government or regulatory bodies (in whatever jurisdiction), or otherwise in response to a request for information if we believe disclosure is in accordance with, or required by, any applicable law, regulation, court order or legal process;
- In connection with, or during negotiations of, any merger, sale of company assets, financing or acquisition of all or a portion of our business by another company, or any change of management;
- With our advisors, which includes our accountants, auditors, lawyers, other professional advisors and business contacts for the purpose of assisting us to better manage, support or develop our business and comply with our legal and regulatory obligations;
- With any other party at your consent or at your direction; and
- Otherwise as permitted or required by applicable laws and regulations.

We may also disclose aggregate or de-identified data that is not personally identifiable with third parties, including our commercial and strategic partners.

Besides the parties and entities listed above, we may also share your data with the following entities related to or affiliated with BeED, for operational and administrative purposes;

- SchoolOS.eu OÜ (Company Reg No: 14295950)
- ACD Development Sdn. Bhd. (Company Reg No: 1160879-K)
- eGHL (GHL ePayments Sdn. Bhd.) (Company Reg. No. 1040427-M)
- Paypal Malaysia Services Sdn. Bhd. (Company Reg. No. 0901292-X)
- Shopify Inc. (Company Reg. No. 5337842)
- Tripsmart Consultants Private Limited (Company Reg. No. 003722)

We do not sell or rent any of your Personal Information on our Website to any other parties. We may share anonymous and/or aggregated information about all our users with third parties.

DATA STORAGE

BeED is located in Malaysia. However, we may transfer your Personal Information to service providers and or business associates and affiliates outside Malaysia and/or store the information on our servers located overseas. Such transfers may be necessary to provide the Services or to fulfil contractual obligations Note: i) Data derived from China will be stored in China Data Storage; ii) Data derived from EU will be stored in the EU Data Storage; and iii) Data derived from any other countries will be stored in Singapore Data Storage. It will also be accessed and processed by our personnel and the personnel of our partners, affiliates and third party service providers, who operate outside Malaysia. It is voluntary for you to supply your Personal Data to BeED. However, if you do not agree or consent to BeED processing your Personal Data for the purposes set out herein, please notify BeED by contacting the Data Protection Officer at contact@beed.world. Note: Any enquiries pertaining to our products and services are to be forwarded in writing to the Data Protection Officer at contact@beed.world and we will entertain such enquiries within Fourteen (14) days from the date of the enquiry.

Marketing

Our Company would like to send you information about products and services of ours that we think you might like, via the entities listed above in Clause 3.3 which are related to or affiliated to BeED. If you have agreed to receive marketing, you may always opt out at a later date. You have the right at any time to stop Our Company from contacting you for marketing purposes or giving your data to other members of the Our Company Group. If you no longer wish to be contacted for marketing purposes, please contact our Data Protection Officer at contact@beed.world to inform us of the same.

Retention of Personal Data

To the extent required by law, we take reasonable steps to destroy, or de-identify or redact personal data in a secure manner when we no longer need it for the purposes for which it was

collected (as set out in this Privacy Policy) and retention is no longer necessary for legal or business purposes. In any event, we do not retain your personal data for longer than six (6) years, subject to local laws and regulations.

Children and Minors

Minors* under 18 years of age for other countries (except European Union where Minor age is below 16 years of age): [Note: * Age of minors for residents in Japan is under 20 years old]. **Except where required by local laws, we do not knowingly collect personal data from minors. If you are a minor, you may only use our Site and services with the permission of your parent or guardian.** If you are a parent or guardian of someone under 16 years old who has provided us his/her Personal Information without your knowledge and consent, you may request that we remove such information by contacting us at contact@beed.world. If you are in the EU, our online services are not directed towards children under the age of 13. If you believe we have collected information about a child under the age of 13, please contact us so that we may take appropriate steps to delete such information. If you are at least 13 but under the age of 16, please get the consent of your parent or legal guardian before giving us any personal data about yourself.

SECURITY

We and our partners will strive to secure the storage of your personal Data in compliance with the minimum security measures prescribed the Personal Data Protection Act 2010 of Malaysia, the General Data Protection Regulation (EU) 2016/679, Children's Online Privacy Protection Act 1998 and all corresponding standards and regulations related thereof.

BeED is committed to ensuring that your data is secure. BeED maintains appropriate administrative, physical and technical safeguards to help protect the security, confidentiality and integrity of data our customers submit to us to prevent loss, unauthorised access, modification or disclosure. We use a multi-layered approach to protect that key information, constantly monitoring and improving our application, systems and processes to meet the growing demands and challenges of security.

BeED's IT vendors generally do not have a direct relationship with individuals whose personal data is collected and our IT vendors do not collect personal information on our behalf. Our IT vendors do not determine how we use such data. Additionally, BeED's contracts with our IT vendors generally prohibit our vendors from accessing customer data except under limited circumstances.

LINKS TO OTHER WEBSITES

Our website may contain links to other websites of interest. However, once you have used these links to leave our site, you should note that we do not have any control over that other

website. Therefore, we cannot be responsible for the protection and privacy of any data which you provide whilst visiting such sites and such sites are not governed by this Privacy Policy. You should exercise caution and look at the privacy statement applicable to the website in question.

EMAIL AND WEBSITE

Any Personal Data contained in the emails and “Contact Us” messages sent via BeED's Website to BeED shall be used and processed in the manner set out in this Notice.

If you do not wish your Personal Data to be collected via cookies on the Website, please configure your internet browser to delete or deactivate cookies.

BeED's Website may contain links to other sites and pages. BeED shall not be responsible for any Personal Data or information that you may provide to any other entity via the links.

REQUEST FOR ACCESS AND INQUIRIES

You are entitled to the following rights: The right to access – You have the right to request our Company for copies of your personal data. We may charge you a small fee for this service. The right to rectification – You have the right to request that our Company correct any information you believe is inaccurate. You also have the right to request our Company to complete information you believe is incomplete. The right to erasure – You have the right to request that our Company erase your personal data, under certain conditions. The right to restrict processing – You have the right to request that our Company restrict the processing of your personal data, under certain conditions. The right to object to processing – You have the right to object to our Company's processing of your personal data, under certain conditions. The right to data portability – You have the right to request that our Company transfer your data that we have collected to another organization, or directly to you, under certain conditions. If you make a request, we may take up to one month to respond to you. You may also withdraw your consent to receiving direct marketing communications, or more generally to our processing of your personal data, at any time, and you may in certain circumstances ask us to delete your personal data. However, where such data is needed for the services requested, our ability to provide the Services may be compromised if you entirely withdraw your consent or ask us to delete your personal data entirely.

You may at any time exercise any of these rights, or if you have any questions or complaints about how we handle your personal data, forward the complaints, request for access to, or request for rectification or correction of your Personal Data or limit the processing of your Personal Data by BeED, as the case may be, however subject to the exceptions and restrictions as may be contained under the applicable laws, rules and regulations as follows: i) [Personal Data Protection Act 2010 \(Act 709\)](#); ii) [The General Data Protection Regulation 2016/679](#); iii) [Children's Online Privacy Protection Act 1998](#);

If you wish to do so, please contact: The Data Protection Officer at contact@beed.world, or by writing to: “The Data Protection Officer at Beeducation Adventures Sdn. Bhd., D-06-03 & D-06-3A, Sky Park @ One City, Jalan USJ 25/1, 47650 Subang Jaya, Selangor, Malaysia”.

Please note that BeED has the right to refuse your request to access and/or make any correction to your Personal Data, but only to the extent permitted under the applicable laws, rules and regulations. To help BeED to better serve you, please ensure that your personal data such as contact details including your home and office addresses, your telephone numbers (including your mobile telephone number), email address and other details registered with us are correct and up to date.

CHANGES TO PRIVACY POLICY

BeED reserves the right to amend or modify this Notice from time to time.

Changes may be made from time to time to this Privacy Policy. BeED will post notice of material changes on our website. Please revisit this Privacy Policy from time to time to learn of any such changes.