## ASCEND AIRWAYS MALAYSIA SDN BHD

# PRIVACY POLICY WHO ARE WE AND HOW YOU CAN CONTACT US

Contact details of the Data Controller: ASCEND AIRWAYS MALAYSIA SDN BHD (Company No. 202401012971 [1558821-W]) of Unit 2005, 20th Floor, Tower 2, Faber Towers, Jalan Desa Bahagia, Taman Desa, 581 Kuala Lumpur (hereinafter "We", "Ours", "Company") process the personal data of our customers, potential customers, suppliers, vendors, employees, candidates for employment, partners and etc. (hereinafter referred to as the you, your) in accordance with the provisions of the legal acts regulating the legal protection of personal data and applying the highest technical and legal standards of protection and taking all necessary measures to prevent possible breaches of personal data protection. This Privacy Policy (hereinafter referred to as the "Privacy Policy") sets out the basic rules for the collection, processing and storage of your personal data and other information related to you, the scope, purposes, sources, recipients of your personal data and your rights as a personal data subject and other important aspects of your use of the Company's services and/or your interaction with the Company. This information is important, so we hope you will read it carefully.

As used in this Privacy Policy, the term "personal data" (the "**Personal Data**") means any information about you relating to you as a natural person, a data subject whose identity is known or can be directly or indirectly identified through the use of certain data (e.g. name, surname, personal identification number, address, telephone number, etc.).

In processing the Personal Data, we responsibly comply to Regulation No 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC ("GDPR") (when it is to be applied), the Malaysian Personal Data Protection Act 2010 ("PDPA") and all regulations made thereunder and other directly applicable legal acts regulating the protection of personal data, as well as instructions from competent authorities.

In the event that you provide us with personal information other than your own (for example, identifying another person as a beneficiary), please inform them of this Privacy Policy and its contents.

If you have any questions regarding this Privacy Policy or the processing of your personal data, please contact us by email: dataprotection@ascendairwaysmy.aero .

By visiting the Company's websites and / or using the information contained therein and / or our services, you acknowledge and confirm that you have read and understood this Privacy Policy.

#### TO WHOM THE PRIVACY POLICY APPLIES

This Privacy Policy applies to our Website <a href="https://ascendairwaysmy.aero">https://ascendairwaysmy.aero</a> (regardless of which device you are using) and any services provided by the Company or other activities of the Company where Personal Data is being processed.

The terms and conditions of the Privacy Policy apply to you every time you access the content and/or the service we provide, regardless of which device (computer, cell phone, tablet, TV, etc.) you are using.

This Privacy Policy does not apply to links to other entities websites provided on our Websites; therefore, we recommend that you read the Personal Data processing rules applied on such websites.

#### WHAT PRINCIPLES DO WE COMPLY TO?

When processing your Personal Data, we:

- comply with current and applicable legislation, including the GDPR (when it is to be applied) and PDPA and the
  principles espoused thereunder;
- will process your Personal Data in a lawful, fair and transparent manner;
- will collect your Personal Data for specified, clearly defined and legitimate purposes and will not continue to process
  it in a way incompatible with those purposes, except to the extent permitted by law;
- take all reasonable steps to ensure that your Personal Data which are inaccurate or incomplete, having regard to the purposes for which they are processed, are rectified, supplemented, suspended or destroyed without delay;
- will keep them in such a form that your identity can be established for no longer than is necessary for the purposes for which the Personal Data are processed;
- will not disclose or disclose Personal Data to third parties except as provided in the Privacy Policy or applicable law;
- ensure that your Personal Data is processed in such a way as to ensure the appropriate security of Personal Data through appropriate technical or organizational measures, including protection against unauthorized or unlawful processing of personal data and against unintentional loss, destruction or damage.

# WHAT PERSONAL DATA, FOR WHAT PURPOSE AND BASIS DO WE PROCESS

The purpose of the processing of personal data. Why we process personal data?	The categories of processed personal data. What kind of categories of personal data we process?	On what legal basis do we process personal data?	The period of processing
Administration of our website	When you visit our website, data about your browsing on the website is collected using cookies. We use necessary / technical cookies to ensure the proper functioning of the website and / or other third-party cookies to improve your browsing experience (i.e., to consider your needs, to continuously improve the website and to make offers that suit your interests).	Data using cookies and similar technologies related to Internet browsing, etc. are collected (processed) in accordance with Article 6 Part 1 (a) of the GDPR (where it is to be applied) and/or Section 6 (1) (a) of the PDPA, i.e., with your consent (except for necessary cookies).	You can find more information about cookies and their storage terms on our website: https://ascendairways.aero/cookies-policy/
Management of shareholders' and UBO's rights and the Company's responsibilities to	We may collect your name, surname, home address, email address, telephone number, bank account details,	We process personal data in accordance with:	Personal data is only processed for as long as it is necessary to fulfil the purpose of the processing, or as long

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authorities regarding corporate regulation	date of birth, number shares, structure of shareholding, communication with the Company (including your voice and / or image captured during general meetings, organized online), data used for registration to meetings, drawing up of voting lists and, where applicable, minutes of the general meeting.	- Article 6 Part 1 (c) of the GDPR (where it is applicable) and/or Section 6 (2) (c) of the PDPA, i.e., our legal obligation to communicate and implement the rights of shareholders, to meet responsibilities to tax authorities or other law enforcement.  - Article 6 Part 1 (f) of the GDPR (where it is applicable) and/or Section 6 (2) (e) of the PDPA and/or Section 6 (2) (f) of the PDPA, i.e., our legitimate interest to administer shareholders' and UBO's rights.	as the Company is required to store such data by law.
Providing news, promotions, newsletters, information about products and invitations to events (direct marketing)	When we obtain your explicit consent, we will use your e-mail address and (or) telephone number for direct marketing.  When you are our customer and have not objected to direct marketing of similar services or products, we will process your e-mail address.	Personal Data for direct marketing is processed in accordance with Article 6 Part 1 (a) of the GDPR (where it is applicable) and/or Section 6 (1) (a) of the PDPA, i.e., with your consent or Article 6 Part 1 (f) of the GDPR (where it is applicable) and/or Section 6 (2) (e) of the PDPA and/or Section 6 (2) (f) of the PDPA, i.e., our legitimate interest to offer you a similar goods/services to ones you have purchased from us and to get your feedback about purchased goods/services.	Your data will be used for direct marketing purposes for 3 years after your consent is obtained or until you withdraw your consent.  We consider you to be our customer:  - 3 years after your order or purchase of our product or service.

Selection of candidates for employees (recruiting) Considering the requirements of the position applied we may collect, assess and store the following personal data about you: name, surname, age or date of birth, your e-mail address, phone number, address the place residence, information on language proficiency, computer skills. information about expected salary, educational background, profession, working experience and projects you have been involved with, attended courses, training sessions. seminars, development of qualification, licenses held. accumulated hours on aircraft and other information regarding flights (for pilots and cabin crew), social accounts, media pictures and other information that you may wish to provide in your CV, motivation letter, interviews, also our remarks and assessment of your suitability to perform duties of the particular position.

We will process the your personal data in accordance with:

- Article 6 Part 1 (a) of the GDPR (where it is applicable) and/or Section 6 (1) (a) of the PDPA, i.e., with your which consent, presume and is implied by law when you proactively apply for a job or when we get information about your candidacy data from job portals, recruiting agencies or from publicly accessible sources. business-related social media or platforms where we presume that you are aware and consented or there is an assessed legitimate interest where you had the right to object but did not object.

- Article 6 Part 1 (f) of the GDPR (where it is applicable) and/or Section 6 (2) (e) of the PDPA and/or Section 6 (2) (f) of the PDPA, i.e., our legitimate interest to have a common and coordinated policy on selection personnel and human resources management share and to information about your candidacy within the

We will process the personal information for the recruiting process for 6 (six) months from getting your application unless the selection process continues longer than the indicated period.

When you are unsuccessful in your application for a concrete position and you do not object for further sharing your data within all Avia Solutions Group companies or you provide your candidacy information to dispose to Avia Solutions Group companies by your consent the personal data will be stored for 3 years from the end of selection process for the position you applied or from receiving the data.

		Avia Solutions Group companies.	
Video surveillance (for the safety of individuals and property)	Image and other objects relating to personal data (e.g. vehicle registration plates).	Video recording and storing is processed in accordance with Article 6 Part 1 (f) of the GDPR (where it is applicable) and/or Section 6 (2) (e) of the PDPA and/or Section 6 (2) (f) of the PDPA, i.e., our legitimate interest to protect the safety of property and individuals and to have evidential material for incident or fraud investigation.	Video records stored for up to 60 days.
Responding to your general enquiries or requests of information	Our website or other public business channels provide contacts where you can contact us to consult us on issues that concern you. We will accept, review and respond to all your messages. If you contact us by email, regular mail or phone, we may process the following personal data of yours: name, surname, e-mail, postal address and the text of the correspondence and / or attached documents. This data will be processed for the administration of your enquiry. Please note that we may need to contact you to provide a reply to your enquiry so be sure to share accurate contact data of yours.	All personal data you provide when communicating with us is used only for the purposes of reviewing and responding to messages, administering (managing) communication flows and providing you with a response. We will process the said personal data in accordance with Article 6 Part 1 (a) of the GDPR (where it is to be applied) and/or Section 6 (1) (a) of the PDPA i.e., with your consent, which you express by contacting us by e-mail, mail or phone.	Communication with you will be handled until the enquiry is fully processed and stored for one year from the date of the last communication with you unless there is another legitimate purpose for storing it longer (e. g. business contract with you has been concluded and communication material can be considered as the proof of negotiation).

Drawing up and executing contracts for the purchase and sale of services	We may process name, surname, contact information, position in the company you represent, signature, other information required for negotiations, concluding and performing of contracts.	We will process your personal data in accordance with Article 6 Part 1 (b) of the GDPR (where it is to be applied) and/or Section 6 (2) (b) of the PDPA, i. e. to conclude a contract with you and perform it, as well as Article 6 Part 1 (c) of the GDPR (where it is to be applied) and/or Section 6 (2) (c) of the PDPA., i.e., we are subject to a legal obligation to keep contracts and accounting documents and Article 6 Part 1 (f) of the GDPR (where it is to be applied) and/or Section 6 (2) (e) of the PDPA and/or Section 6 (2) (e) of the PDPA and/or Section 6 (2) (f) of the PDPA, i.e., inter alia our legitimate interest in asserting and / or defending our legal claims (where applicable).	Contracts and accounting documents (in physical and electronic form) are kept for 10 years from the date of full performance of the contract.
Onboarding and due diligence procedure for counterparties	Depending on whether a counterparty is a natural person or legal entity and if the latter depending on your status in the company, we may process the following personal data:  Name, surname, date of birth, nationality, occupation, valid ID/passport number, data on whether the client is a politically exposed person,	Personal data for onboarding and due diligence is processed in accordance with:  - Article 6 Part 1 (c) of the GDPR (where it is to be applied) and/or Section 6 (2) (c) of the PDPA, i.e., our legal obligation to monitor and implement the international and/or national sanctions.	l process your personal data collected during the Onboarding and Due Diligence Procedure for 5 years after the last Onboarding/Due Diligence procedure, unless longer storage of personal data and related documents will be required by applicable laws, legal regulations, or institutional/state authorities, or will be necessary for the defense in the judicial process.  For more details of personal data processing for onboarding and due diligence please check the Privacy

residential and registered address details, phone number, e-mail address, bank information (account number), relationship with any third party (if payment will be made by any third party), source of funds/wealth, signature, role/position in the company, occupation, information about reputation from public sources.

We also process personal data collected within provided copies of documents: Identity Card or Passport; Official documents of authorities verifying the identity and the place of residence; Documentation proving the source of funds/wealth; Articles of Association authorizing the representative of a legal entity; Certificate of Incorporation or its equivalent; Certificate of Directors or copy of CEO (or other principal management body) appointment document.

- Article 6 Part 1 (f) of the GDPR (where it is to be applied) and/or Section 6 (2) (e) of the PDPA and/or Section 6 (2) (f) of the PDPA, i.e., our legitimate interest to fulfil the requirements for money laundering financing terrorism prevention, prevention of corruption, bribery, and fraud to legitimate, reliable, and reputable business to our counterparties and authorities.

Article 6 Part 1. (f) of the GDPR), i.e. our legitimate interest to protect our business interests and defend or enforce legal claims (If you get involved in a dispute with us or we need to otherwise defend, enforce, exercise, and uphold our rights or legitimate interests, we collect, use and store the data that is necessary for the specific case)

Notice on our website: https://ascendairways.aero/onboarding-and-due-diligence-privacy-notice/.

Whistleblowing Policy

– prevention of adverse
effects to whistleblower, investigation of
disclosure and
perpetrated or suspected
infringement.

We may process name, surname, contact information, position in the company, other information provided voluntarily by a whistle-blower or processed for the

Your personal data shall be processed in accordance with:

- Article 6 Part 1 (c) of the GDPR (where it is applicable) and/or We will process your personal data collected during the whistleblowing procedure no longer than 5 years unless longer storage of personal data and related documents will be required by applicable laws, legal regulations, or

Section 6 (2) (c) of the authorities or is necessary for the purpose investigation of the PDPA, i.e., legal judicial process. perpetrated obligation to establish or For more details of personal data an internal reporting suspected processing for whistleblowing infringement. channel to which we are procedure please check subject. Whistleblowing Policy on our website In principle, we do not request or process any - Article 6 Part 1 (f) of special categories of the GDPR (where it is applicable) and/or personal data or sensitive personal data Section 6 (2) (e) of the (e.g., information about PDPA and/or Section 6 health, racial and/or (2) (f) of the PDPA, i.e., ethnic origin, religious our legitimate interest and/or ideological handle fraud. convictions, corruption or other trade union membership or wrongdoings in the Company and to defend sexual orientation), unless such special against requirements categories of personal and/or claims and data are voluntarily investigations of the disclosed by competent authorities, the whistle-blower or other litigation (if any) or, if necessary, to keep such concerned persons. data regarding possible investigations on allegedly illegal or criminal acts.

If you do not provide any required Personal Data, the provision of which to the Company is necessary to ensure compliance with the requirements of legal acts and / or the conclusion and / or performance of the contract, we will not be able to provide you with services or conclude another transaction.

## **DIRECT MARKETING**

For direct marketing purpose, we process your Personal Data in the following cases:

- when we obtain your explicit consent to such processing;
- when you are a customer of ours who has not objected to the processing of Personal Data for the purpose of direct marketing, marketing of similar services or products.

For direct marketing purpose, we process the following of your Personal Data: name, email address, phone number and any stated preferences.

With your expressed consent to receive direct marketing messages or newsletters when you subscribe, you agree to receive our news about new services, products, invitations to events and etc.

We inform you that Visitors may at any time refuse our newsletters or other promotional messages by clicking on a link to this in our outgoing newsletters and/or messages.

#### HOW WE PROCESS YOUR PERSONAL DATA

Our use and/or processing of your Personal Data will always have a lawful basis. Most commonly, we use your Personal Data:

- Where we need to conclude any contract and/or perform any contract we have entered into with you;
- Where we need to comply with a legal obligation;
- Where we have your consent;
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights
  do not override those interest.

"Legitimate interest" means our interest to enhance our services, products, to manage the processes of businesses and activities. We consider and balance any potential impact on you (both positive and negative) and your rights before we process your Personal Data for our legitimate interests.

#### HOW LONG WE WILL RETAIN YOUR PERSONAL DATA

We will retain your Personal Data for as long as necessary to achieve and fulfil the purposes set out in this Privacy Policy, taking into account the nature of the services provided to you and/or the contracts you enter into, unless longer storage of Personal Data and related documents is required by applicable laws and regulations or is required for the defence of our legitimate interests in judicial, other public institutions etc.

We ensure and take all necessary measures to avoid storing outdated or unnecessary Personal Data about you and to keep your Personal Data up-to-date and accurate.

We will use your Personal Data for direct marketing purposes for 3 (three) years after you're giving consent or after the end of the contractual relationship (direct marketing of similar services or products).

#### HOW DO WE PROTECT YOUR PERSONAL DATA?

We responsibly implement appropriate organisational and technical Personal Data security measures intended for the protection of Personal Data against accidental or unlawful destruction, alteration and disclosure as well as against any other unlawful processing. The security measures we implement include the protection of personnel, information, IT infrastructure, internal and public networks as well as office buildings and technical equipment.

In the event of Personal Data breach of security that could seriously jeopardise your rights or freedoms and determine the circumstances with which unauthorised access to Personal Data has been obtained, we will immediately inform you about it.

#### TO WHOM IS YOUR PERSONAL DATA DISCLOSED

We may share some of your Personal Data with the following categories of third parties:

- any Avia Solutions Group<sup>1</sup> company (listed at <a href="https://aviasg.com/en/the-group/general-contacts">https://aviasg.com/en/the-group/general-contacts</a>) for the purposes set out in this Privacy Policy.
- representatives acting on our behalf with respect to the promotion of our services in particular territories;
- companies providing data centers, hosting, cloud, site administration and related services, software developers, providing, maintaining and developing companies, companies providing information technology infrastructure services, companies providing communication services;
- credit and debit card companies used to facilitate payment transactions related to the provision of our services, banks and other credit and/or payment companies;
- our professional advisors, auditors, lawyers and/or financial advisers;
- our other service providers (data processors) or our subcontractors;
- notaries, if the contract concluded with you requires a notarial form;
- judicial officers, entities providing legal s and/or debt recoveries services, subrogator of claim right;
- companies providing advertising and marketing services;
- companies providing archiving, physical and / or electronic security, asset management and/or other business services;
- in accordance with the laws to state institutions, establishments, etc.;
- law enforcement authorities at their request or on our own initiative if there is a suspicion that a criminal offense has been committed, as well as courts and other dispute resolution bodies; tax administrators
- in the event of a company restructuring, transfer / acquisition and / or business transfer / acquisition, to a third party acquiring the business and processing personal data for the same purposes as specified in this Privacy Policy and/or doing the Due Diligence by our and/or their legal and/or financial advisors, etc.

# CROSS-BORDER TRANSFERS OF PERSONAL DATA As a general rule, your Personal Data will be processed in Malaysia and the countries of the European Economic Area (hereinafter - EEA). However, in certain cases, your Personal Data may be transferred to countries outside of Malaysia and to non-EEA countries.

Please note that in countries outside of Malaysia and in non-EEA countries, Personal Data may be subject to less protection than within Malaysia and/or the EEA, but we carefully evaluate the conditions under which such Personal Data will be processed and stored after being transferred to the above-mentioned entities.

Please note that if the European Commission has determined that the third country, territory or one or more specified sectors in that third country or international organization concerned provides an adequate level of personal data protection, the transfer must take place in the same manner as in the EEA. Please be informed that you can have access to the information as to the states in respect of which the decision of the European Commission has been taken, here: <a href="https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/adequacy-protection-personal-data-non-eu-countries\_enIn">https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/adequacy-protection-personal-data-non-eu-countries\_enIn</a> other cases, we take all necessary measures to ensure that your Personal Data is transferred to the recipient safely processing the data. The tools we use: appropriate contracts for international transfers, on the basis of the standard contractual clauses approved by the European Commission and other international models as required by local law.

#### RIGHTS GUARANTEED TO YOU

We guarantee the implementation of these rights and the provision of any related information at your request or in case of your query:

know (be informed) about the processing of your Personal Data;

<sup>&</sup>lt;sup>1</sup> **AVIA SOLUTIONS GROUP (ASG) PLC,** a private limited liability company, established and acting under the laws of the Republic of Irland, legal entity code: 727348, address: Building 9, Vantage West, Central Park, Dublin, D18 FT0C, Ireland

- to get access to your Personal Data which are processed by us;
- request correction or addition, adjustment of your inaccurate, incomplete Personal Data;
- require the destruction of Personal Data when they are no longer necessary for the purposes for which they were collected;
- request the destruction of Personal Data if they are processed illegally or when you withdraw your consent to the processing of Personal Data or do not give such consent, when is necessary;
- disagree with the processing of Personal Data or withdraw the previously agreed consent;
- request to provide, if technically possible, the provision of your Personal Data in an easily readable format according
  to your consent or for the purpose of performing the contract, or request the transfer of your Personal Data to another
  data controller.

In order to exercise your rights, please send us the request by e-mail to dataprotection@ascendairwaysmy.aero or directly coming to the Company at the following address:- Unit 8B, Level 8, Menara Shell, No. 211, Jalan Tun Sambanthan, 50470 Kuala Lumpur.

Upon receipt of your request, we may ask you to provide proof of your identity or other identifying information to ensure that we are exercising your rights as a data subject and to prevent unauthorized disclosure of Personal Data or information to others who are not entitled to it. If we are unable to identify you, we will not be able to exercise your rights as a data subject.

We provide information about the processing of your Personal Data free of charge. If your request is unfounded, repetitive or disproportionate, we may charge a fee commensurate with our administrative costs.

Upon receipt of your request, we will respond to you within 30 calendar days of receipt of your request and the due date for submission of all documents necessary to prepare the answer.

In exceptional circumstances, which may require us to have additional time, the deadline for replying may be extended for a further two months, depending on the complexity of the situation. In this case, we will inform you in writing about such extension within 1 (one) month from the receipt of the request and indicate the reasons for the delay. If we think we need to, we will stop the processing your Personal Data, except for storage, until your application is resolved. If you have legally withdrawn your consent, we will immediately terminate the processing of your Personal Data and within no more than 30 calendar days, except in the cases provided for in this Privacy Policy and in the cases provided for by law when further processing of your Personal Data is binding on us by the legislation in force, the legal obligations we are facing, court judgements or binding instructions from the authorities. The response will be provided in the same way as your request was received.

If we refuse to comply with your request, we will clearly indicate the grounds for such refusal.

If you disagree with our actions or the response to your request, you can complain to the competent state authority in Malaysia i.e., the Personal Data Protection Commissioner appointed under Section 47 of the PDPA

For users in in European Economic Area (EEA) — you have the right at any time to lodge a complaint with the data protection supervisory authority, in particular in the EU Member State where you are resident or where the alleged breach of the GDPR occurred, and to seek judicial remedies (the list of supervisory authorities by each EU countries: https://edpb.europa.eu/about-edpb/board/members\_en).

In all cases, we recommend that you contact us before making a formal complaint so that we can find the right solution.

#### WHAT HAPPENS IF OUR BUSINESS CHANGES HANDS?

We may, from time to time, expand or reduce the scope of our business operations and this may involve the sale and/or the transfer of control of all or part of our business. Any Personal Data that you have provided will, where it is relevant to any

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part of our business that is being transferred, be transferred along with that part and the new owner or newly controlling party will, under the terms of this notice, be permitted to use that Personal Data only for the same purposes for which it was originally collected by us.

#### LINKS TO OTHER WEBSITES

Our Websites may contain links to other websites, which are not operated by us. We have no control over how your Personal Data is collected, stored, or used by such other websites and we advise you to check the privacy policies of any such websites before providing any Personal Data to them.

#### SOCIAL NETWORKS

When you visit social networks, your Personal Data is processed by a specific social network, and we start processing your Personal Data when you visit ASCEND AIRWAYS MALAYSIA on social networks. Through various social media channels, we want to introduce you to our wide range of services / products and exchange ideas and opinions with you on important topics.

Your Personal Data provided on the social network is processed for the following purposes:

- communicate with our social network visitors;
- respond to visitor inquiries;
- obtaining statistical information;
- conducting customer surveys, marketing campaigns, market analysis, lotteries, competitions or similar actions or events;
- if necessary, defending the legitimate interests of the Company in institutions and in other cases.

Unless explicitly stated otherwise, the legal basis for Personal Data processing is Article 6 part 1 point (f) of the GDPR and/or Section 6 of the PDPA. Our legitimate interests are to be able to answer your messages or questions and analyze our availability on social networks, to present our products and services. To the extent that you wish to enter into a contractual relationship with us with your request, the legal basis for such processing of Personal Data is Article 6 part 1 point (b) of the GDPR and/or Section 6 (2) (b) of the PDPA.

If we intend to process your Personal Data for any other purpose not mentioned above, we will notify you prior to such processing.

Our pages on social networks are managed by specific social networks, so when you visit them, the processing of Personal Data is based on the social network privacy policies. With some social networks, depending on the social network policy, the purposes and scope of the processing, we are considered as joint data controllers.

Currently we use these social networks:

FB: https://www.facebook.com/p/Ascend-Airways-Malaysia-61557768377001/

Linkedin: https://www.linkedin.com/company/ascend-airways-malaysia

Instagram: https://www.instagram.com/ascendairwaysmalaysia

Youtube: https://www.youtube.com/@AscendAirwaysMalaysia

Name of the social network and its Privacy Policy	Personal Data we process	Personal Data we process as joint data controllers
Facebook  You can read their privacy policy by clicking here: https://www.facebook.com/policy.php	Facebook username, when you comment, react to the publication, share posts, write us messages, Your activities on our site, e.g. Your page views, duration statistics, query, comment information, and more.	We use statistical information (visits to our website, range of contributions, visits and average video transmission times, information about the countries and cities from which our visitors come, age range, gender). We receive anonymous statistics from Facebook through their service. The data controllers' agreement can be found here: https://www.facebook.com/legal/terms/page_controller_addendum]
LinkedIn  You can read their privacy policy by clicking here: https://www.linkedin.c om/legal/privacy-policy	Your LinkedIn username, when you comment, react to the publication, share posts, write us messages, Your location indicated on the personal account, Your activities on our site, e.g. Your page views, duration statistics, query, comment information, and more.	We use statistical information (visits to our website, range of contributions, visits and average video transmission times, information about the countries and cities from which our visitors come, age range, gender). We receive anonymous statistics from LinkedIn through their service. The data controllers' agreement can be found here: https://www.linkedin.com/legal/l/dpa
Instagram  You can read their privacy policy by clicking here: https://help.instagram. com/51952212510787 5/?helpref=uf_share	Your Instagram username, when you comment, react to the publication, share posts, share content in stories section, write us messages, Your activities on our site, e.g. Your page views, duration statistics, query, comment information, and more.	We use statistical information (visits to our website, range of contributions, visits and average video transmission times, information about the countries and cities from which our visitors come, age range, gender). We receive anonymous statistics from Instagram through their service. The data controllers' agreement can be found here: https://help.instagram.com/494561080557017/?helpref=hc_fnav
YouTube  You can read their privacy policy by clicking here: https://www.youtube.c om/howyoutubeworks/our-commitments/protecting-user-data/	Your YouTube username, when you comment, interact with content.	If you are logged in with YouTube, you agree to YouTubes terms of use, privacy and cookie policies and to YouTubes processing of your personal data, at which we have no control over. If you are not registered with YouTube, YouTube may still perform statistical analysis of your personal data when you access our YouTube channel and provide us with anonymized statistics on this.

We use statistical information. Processed data types:
- Inventory data (e.g. names, addresses), contact data (e.g. e-mail, telephone numbers);
- Content data (videos etc.);
- Usage data (e.g. websites visited, interest in content, access times, video views, video likes, comments, purchases etc.), meta/communication data (e.g. device information, IP addresses).
Video Statistics:
- Number of subscribers and changes
- Watch time data (duration, stoppage time, retention rate)
- Demographics (gender distribution, age, places of origin, use of devices etc.)
We receive anonymous statistics from Youtube through their service. The data controllers' agreement can be found here: https://business.safety.google/controllerterm

## **CHANGES TO OUR PRIVACY POLICY**

We reserve the right to change this Privacy Policy unilaterally from time to time (for example, if the law changes). Any changes will be immediately posted on our Websites. We recommend that you check this page regularly to keep up-to-date with the current version of this Privacy Policy.

This Privacy Policy applies from the date it is posted on the Websites. Last review of the Privacy Policy: 30 December 2024. If you continue to use our services (such as the Website) after the terms of this Privacy Policy have been changed, you will be deemed to have read and understood the changed terms of this Privacy Policy.