

Privacy Policy

Last Updated: 1 October 2024

At Acodent Malaysia Sdn. Bhd. ("**Acodent**", "**we**", "**us**", "**our**"), your privacy is important to us. The following statement describes the privacy practices we use on our Website. Customers using Acodent's PunchOut web site, please refer to the P3P policy found within your web browser. Note, our P3P policy is applicable only to Acodent's cXML PunchOut Website and cXML OrderRequests sent to Acodent.

By communicating with us, using our Website or purchasing products from us, you signify that you have read and understood this Privacy Policy, and provide your consent to Acodent to collect, use and disclose your personal data in accordance with this statement.

I. Collection of Information

The types of personal data that we collect depend on the circumstances of collection and on the nature of the service requested or transaction undertaken.

There are 6 broad categories of personal data collected by us:

- a. **Identity Data**, which includes your name, job title and practice name.
- b. **Contact Data**, which includes your email address, phone number and fax number.
- c. **Profile Data**, which includes your username, password, interests, preferences, feedback and survey responses.
- d. **Transaction Data**, which includes your credit card details, your billing address, your mailing address or the mailing address of the intended recipient of your order, payments and orders to and from you, and other details of products and services that you have supplied to or purchased from us.
- e. **Technical Data**, which includes the domain name of the site providing you with Internet access, the Internet protocol (IP) address used to connect your computer to the Internet, your browser type and version, operating system and platform, the average time spent on our site, pages viewed, information searched for, access times and other relevant statistics.
- f. **Marketing and Communications Data**, which includes your interests, feedback, survey responses, preferences in receiving marketing materials from us and your communication preferences, as well as your preferences for particular products or services.

We also collect, use and share **Aggregated Data** such as statistical or demographic data. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Technical Data to calculate the percentage of users accessing a specific service feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this statement.

How we collect your personal data

We collect your personal data as follows:

- a. **Directly from you.** You may give us your Identity, Contact, Profile and Transaction Data when you do any of the following (whether on your own behalf or on behalf of your organisation):

- use our Website;
 - create an account on our Website;
 - enter into a contract with us or purchase our products;
 - apply for or enquire about our Website or products;
 - participate in a promotion, survey, event or other marketing campaign organised by us;
 - subscribe to our newsletters or alerts;
 - request marketing materials to be sent to you; or
 - contact us – for example, if you get in touch to give us some feedback.
- b. **From your authorised representatives.** We may also collect your Identity, Contact, Profile and Transaction Data from your authorised representatives. These include persons whom you have authorised and persons who have been validly identified as acting on your behalf pursuant to our security procedures.
- c. **When you interact with our Website.** As you interact with our Websites, we may automatically collect your Technical Data. We may collect such personal data by using website cookies.
- d. **Third parties or publicly available sources.** We may receive your personal data from third parties which are located in various countries. These include:
- Technical Data from analytics providers [such as Google], advertising networks and social media platforms such as [LinkedIn, Instagram, Twitter and Facebook]; and
 - Contact and Transaction Data from providers of technical, payment and delivery services.

II. Use of Information

We may use your personal data for the following purposes:

- a. To register you as a new customer.
- b. To process and deliver your order(s).
- c. To manage your account, including managing payments, fees and charges and collecting and recovering money owed to us.
- d. To manage our relationship with you.
- e. To administer, operate, provide, maintain and protect our business and our Website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data, as well as ensuring that unauthorised users do not access the information on our Website).
- f. To deliver relevant content and advertisements to you and measure or understand the effectiveness of the advertising we serve you.
- g. To make suggestions and recommendations to you about products or services that may be of interest to you.
- h. To send you relevant information about our events, news announcements or promotions.
- i. To enable you to complete a survey or participate in a promotion, survey, event or other marketing campaign organised by us.
- j. To contact you in relation to all of the above.
- k. Where we have to use your personal data for another purpose as required by law or regulation – for example, to respond to administrative, judicial or law enforcement requests or to comply with applicable laws and regulations.

Promotional offers and marketing

If you supply us with your Contact Data, you may receive periodic mailings, calls or faxes from us with information about new products and services or upcoming events. If you do not wish to receive such mailings or calls, you may “opt out” by logging into our Website and updating your preferences under “My Account”, or by writing, calling, or e-mailing us at the address/numbers listed below:

Acodent Malaysia Sdn. Bhd.
D-01-01, Sekitar26 Enterprise,
Persiaran Hulu Selangor, Seksyen 26,
40400 Shah Alam, Selangor, Malaysia
Attn: Kateryna Iakovenko
Phone: +60 10 374 3772
E-mail: sales.my@acodentsupplies.com

If you do not wish to receive such faxes from us, you may “opt-out” by writing, faxing or calling us at the address/numbers listed below:

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Cookies

We use cookies to provide visitors with a personalised experience on our Website. Cookies are pieces of information that a website transfers to the memory or hard drive of a visitor’s computer for record-keeping purposes. We use cookies to allow access without re-entering the visitor’s User ID, to make improvements, and to better tailor our Website to our visitors’ needs. We also use this information to verify that visitors meet the criteria required to process their requests.

Most browsers used by visitors have options that allow the visitor to control whether the browser will accept cookies, reject cookies, or notify the visitor each time a cookie is sent. However, if you disable or refuse cookies, please note that some parts of our Website may become inaccessible or not function properly. In addition, you can delete your Acodent cookies from your browser program at any time.

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us at sales.my@acodentsupplies.com. If we need to use your personal data for an unrelated purpose, we will notify you and will explain the legal basis which allows us to do so.

III. Disclosure of Information

We do not disclose your information with third parties except in limited circumstances, as set out below:

- a. We may share your personal data with our suppliers, agents or contractors in connection with services they perform for us or pursuant to agreements with our suppliers.
- b. We may share your personal data with third parties to comply with a legal obligation, when we believe in good faith that an applicable law requires it, at the request of government authorities conducting an investigation, to verify or enforce our contractual rights or other applicable policies, to detect and protect against fraud or any technical or security vulnerabilities, to respond to an emergency, or otherwise to protect the rights, property, safety or security of third parties and visitors to our website or the public.
- c. As we continue to develop our business, we may sell or purchase assets. If another entity acquires or merges with us, your personal data will be disclosed to such entity. Also, if any bankruptcy or reorganisation proceeding is brought by or against us, all such information will be considered an asset of ours and as such it is possible they will be sold or transferred to third parties.

We do not disclose your personal data to unaffiliated third parties for their independent use unless pursuant to confidentiality agreements. We also require all third parties to respect the security of your personal data and to treat it in accordance with the law.

IV. Retention of Information

We only retain your personal data for as long as is necessary for us to use your information as described above. However, please be advised that we may retain some of your personal data after you cease to use our services, for instance if the data is necessary to meet our legal obligations, such as retaining the information for tax and accounting purposes.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

V. International Transfers of Information

Where our partners who help us in the administration or operation of our organisation are based in other locations, your information may be transferred outside of Malaysia. When we send your personal data outside Malaysia, we will make sure that your personal data is protected to at least the same standard as that in Malaysia. For example, we will always ensure that there is a proper legal agreement that covers the data transfer.

VI. Security

Our management and their teams take commercially reasonable precautions to keep all information obtained from our online visitors secure against unauthorised access (e.g. data breach) and use and we periodically review our security measures. Although there is no way that any Website can absolutely

guarantee the security of your information, Acodent is committed to employing reasonable security measures, regularly reviewing our security practices (security risk assessments / audits), and providing regular awareness training. You are responsible for keeping your login information and passwords confidential.

VII. Collection of Information from Children

Acodent does not knowingly collect personal data from children under the age of 13. If you are under the age of 13, please do not provide personal data of any kind whatsoever.

If a child under the age of 13 provides us with personal data, a parent or guardian of that child may have this information deleted from our records by contacting us through e-mail at sales.my@acodentsupplies.com, by calling us at +60 10 374 3772 or by writing to us at:

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D-01-01, Sekitar26 Enterprise,
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40400 Shah Alam, Selangor, Malaysia
Attn: Kateryna Iakovenko

VIII. Making Changes to Your Personal Data

You can access and edit any of the personal data that you have provided by logging into our Website and updating your preferences under "My Account", by contacting us through e-mail at sales.my@acodentsupplies.com, by calling us at +60 10 374 3772 or by writing to us at:

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Attn: Kateryna Iakovenko

IX. Links to Other Sites

Our Website contains links to other sites. These sites are not covered by this privacy policy, and we are not responsible for the privacy practices or the content of those other sites.

X. Changes to the Privacy Policy

We reserve the right to modify this privacy policy and related business practices at any time by posting updated text on this page. Please check this page periodically for updates.

XI. Contact us

If you have any comments, questions or complaints about our privacy policy, please contact us through e-mail at marketing@acodentsupplies.com by calling us at +60 10 374 3772 or by writing to us at:

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