

Privacy Statement

The ASEAN Startup Portal (“**ASP**”), an initiative by Cradle Fund Sdn Bhd and its partner organizations across ASEAN (“**we**”, “**us**”, “**our**” or “**ours**”), values your privacy and strives to protect your personal data in compliance with the Personal Data Protection Act 2010 (“**Act**”). Our commitment ensures that your data is processed with due care and attention.

This privacy statement (“**Privacy Statement**”) explains the types of personal data we collect from you, how your personal data will be used and protected, the parties with whom we share the personal data with, and the choices you are entitled to including your rights to control our disclosure of such data and your right to have access to, correct and update your personal data.

By using www.startup-asean.org (“**Website**”), you accept our practices set out in this Privacy Statement.

What Types of Personal Data Do We Collect About You?

Personal Data means information that identifies you and shall include but not be limited to the following information:

- (a) Individuals
 - (i) name, job title and company name;
 - (ii) age, gender, date of birth, identity card number, passport number, photograph and social media profile;
 - (iii) race, ethnic origin and nationality;
 - (iv) contact information including address, email address and phone number;
 - (v) education history, occupation, work history, income and employer; and
 - (vi) such other relevant information and data.
- (b) Companies
 - (i) name, logo and founded date;
 - (ii) company website, social media profiles;
 - (iii) services, products, mobile applications developed and uniform resource locator (URL) of the mobile applications developed on different mobile app distribution platforms;
 - (iv) contact information including address, email address and phone number;
 - (v) employee count, income streams, pitch deck, business model and ownership details; and
 - (vi) such other relevant information and data.

The above mentioned types of personal data shall hereinafter collectively be referred to as “**Personal Data**”.

We recognise that you may provide us with your Personal Data by completing our forms or by communicating with us in person or by phone, e-mail, short message service, instant messages, written form or otherwise.

Cookies/ similar technologies, log files and web beacons

(a) What is a cookie?

A cookie is a piece of information placed on your internet enabled devices such as computer, mobile and tablet when you visit a website. The cookie allows web servers to collect information from the web browser and recognise your device on future visits.

By continuing to use this Website, you are agreeing to us placing cookies on your device.

(b) Purpose of the cookies

The cookies allow us to analyse your activity at our Website so that we can improve your experience and develop better functionalities for our Website. We will not use cookies for any purposes not stated in this Privacy Statement.

Please be informed that the cookies are managed by third parties. Kindly refer to the third parties' own cookie and privacy policies for information on the types of cookies they use and how they may use your data.

Why Do We Need Your Personal Data?

Your Personal Data may be collected, stored and/or used (whether directly or indirectly) and in whatever form including audio visual recordings and photographs, amongst others, for the following purposes:

- (a) to populate and operate our Website and information technology software (including the collection of internet protocol (IP) address and cookies including all internet related activities;
- (b) maintenance and upkeep of records, administration, management, business development, advertising, continuous professional development, education, research, internal operations, troubleshooting, data analysis, testing, statistical and survey purposes, professional network, employment and social activities;
- (c) meeting any legal or regulatory requirement relating to our services and to make disclosure under the requirements of any applicable law, regulation, directive, guideline, by-law, code, circular, government authorities and/or court of competent jurisdiction;
- (d) your name and picture may be displayed on our Website, publications, newsletters, documents, alerts, notifications, and any other material of similar nature;
- (e) any subsequent commercial transactions in relation to any projects and/or services;
- (f) for consumer service purpose including responding to your enquiries;
- (g) with your consent (where required), (i) to analyse your preferences, behaviours and habit based on your activities on our Website; (ii) to anticipate your needs and preferences based on your profile; (iii) to improve and tailor your user experience on our Website; (iv) to optimise our content

on the Website for you and your device; (v) to serve you with targeted advertising based on your preferences and behaviours on our Website;

- (h) enable us to send you information by email, regular postal mail, telecommunication means (including but not limited to telephone calls, text messages, social chat applications) about services offered by selected third parties that we think may interest you but in doing so we maintain control over your Personal Data and we will not disclose your Personal Data to such third parties without your prior consent;
- (i) for any other purpose that is incidental or ancillary or in furtherance to the above purposes.

The above mentioned purposes shall hereinafter collectively be referred to as “**Purposes**”. Your Personal Data shall not be further processed in any manner incompatible with the Purposes.

Retention Period

We will retain Personal Data and/or user search data in compliance with the Act and/or other applicable regulations. Specifically, your Personal Data and/or user search data will either be deleted or anonymized once we have reasonably determined that: (i) the purpose for which the said data was collected no longer justifies its retention; (ii) retention is no longer required for legal or business reasons; and (iii) there are no other legitimate interests that justify keeping the said data.

Where Do We Collect Your Personal Data From?

We collect your Personal Data both directly and indirectly from you through:

- (a) official request for information by our employees;
- (b) any queries, emails or any correspondences that we have received from you requesting for information or making enquiries;
- (c) any ‘contact us’ forms that you have submitted through this Website;
- (d) via e-mails, short messaging service (or any other analogous form of messaging), mobile applications, social media channels, blogs, and various Websites;
- (e) through the use of cookies;
- (f) when you participate in our programmes and events and/or the programmes and events of our affiliates;
- (g) from a regulatory body, government agency or registry;
- (h) individuals connected to you such as your family members, friends, colleagues, and employers past and present; and
- (i) from such sources that have your consent to share your personal data with us.

What Are Your Rights, In Respect of Your Personal Data?

Please note that you have the right to the following:-

- (a) rights to request access to your Personal Data provided to us;
- (b) rights to request for a copy of your Personal Data provided to us;
- (c) rights to request to update or correct your Personal Data in our records.

- (d) rights to request for withdrawal of consent at any time. We will stop processing your Personal Data when your withdrawal of consent is communicated to us in writing. (processing means collecting, recording, holding or storing the Personal Data)

However, kindly be informed that, the withdrawal of your consent may affect the features that we can extend to you via the Website.

Your request should be addressed to contact@startup-asean.org

If we do not receive any notification in writing, we will assume that we are authorized to continue processing your Personal Data for the Purposes.

With Whom Do We Disclose Your Personal Data?

We may share your Personal Data with any company within Cradle Fund Sdn Bhd group of companies for the Purposes set out above. We will not disclose your Personal Data to any third party except for the following:

- (a) any ASEAN government agencies, statutory authorities and/or industry regulators where we are required by law or regulations to disclose Personal Data;
- (b) the ASEAN government or private bodies, agencies, corporations, organizations or entities involved in developing this Website, our affiliates, sponsors, auditors, consultants, lawyers, and advisors;
- (c) prospective investors, event organisers, marketing agencies and consultants, social media channels and websites;
- (d) credit reference agencies; or
- (e) any parties which you have given us your consent to disclose your personal data to.

How Do We Protect Your Personal Data?

We have appropriate security measures in place to protect against unauthorized and/or unlawful processing, as well as any accidental loss or damage to your Personal Data. We endeavor to implement the necessary security safeguards and procedures in accordance with the Act to protect and safeguard the integrity of your Personal Data. Some of the security measures in place includes:

- (a) Role-based Access Control (RBAC): The solution architect has root access to the Microsoft Azure subscription. The Lead developer has read and write access to the necessary resources. The quality assurance lead had read-only access to the logs/monitoring tools. Access will be reviewed and revoked when unneeded.
- (b) Encryption: Data is encrypted at rest. Data is encrypted in transit via secure layer (SSL).
- (c) HTTPS everywhere: Automatically redirects HTTP traffic to HTTPS.
- (d) TLS version: Uses the latest TLS version 1.2 or higher for secure data transmission

Language

This Privacy Statement is available in English only to avoid any confusion and in case of any conflict, the English version will prevail.

Updates to this Privacy Statement

We may revise and/or update this Privacy Statement periodically. Kindly review it from time to time to stay informed. We may also notify you of these changes through email, post, short message service, or other communication methods.

Last update: November 2024.