



JOHOR DARUL TA'ZIM FOOTBALL CLUB

JDT HQ, Stadium Sultan Ibrahim,
Jalan Gelang Patah, 79200, Iskandar Puteri, Johor
Tel: 607-5852442 Email: admin@jdtfc.my

PRIVACY POLICY

Under data protection laws, we are required to provide you with certain information about who we are, how we process your personal data and for what purposes, and your rights in relation to your personal data.

By agreeing the privacy policy, you consent to our processing of your personal data (including your name, contact details, and device information) as described in this policy.

HOW YOU CAN WITHDRAW CONSENT

You may change your mind and withdraw consent at any time by contacting Johor Darul Ta'zim F.C. Data Privacy Manager (details below) but that will not affect the lawfulness of any processing carried out before you withdraw your consent.

Johor Darul Ta'zim F.C. Sdn. Bhd. is committed to protecting your personal data and respecting your privacy.

I. INTRODUCTION

This policy (together with our end-user license agreement as set out at EULA (EULA) and any additional terms of use incorporated by reference into the EULA, together our Terms of Use) applies to your use of:

- JDT FC Official mobile application (App) hosted on Apple's App Store and/or Google's Play Store (App Site), once you have downloaded or streamed a copy of the App onto your mobile telephone or handheld device (Device).
- Any of the services accessible through the App (Services) that are available on the App Site or other sites of ours (Services Sites). This policy sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. This App is not intended for children and we do not knowingly collect data relating to children. Please read the following carefully to understand our practices regarding your personal data and how we will treat it.

II. IMPORTANT INFORMATION AND WHO WE ARE

Johor Darul Ta'zim Football Club Sdn. Bhd. , (the "Company" or "JDTFC"), is a controller and processor of your personal data which will be clear to you when you use our App. We have appointed a data privacy manager. If you have any questions about this privacy policy, please contact them using the details set out below.



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Johor Darul Ta'zim Football Club Sdn. Bhd.

Data Privacy Manager

cs@jdtfc.com.my

JDT Headquarters, Stadium Sultan Ibrahim, 79200 Iskandar Puteri, Johor.

+607-5852084

You have the right to make a complaint at any time to the Department of Personal Data Protection, the Malaysia supervisory authority for data protection issues or other competent supervisory authority of the state if the App is downloaded outside Malaysia.

Changes to the privacy policy and your duty to inform us of changes

We keep our privacy policy under regular review.

This version was last updated on 16th April 2024. It may change and if it does, these changes will be posted on this page and, where appropriate, notified to you by SMS, by email, or when you next start the App or log onto one of the Services Sites. You consent to receiving notice of changes to this privacy policy by any means listed above. The new policy may be displayed on our website www.johorsoutherntigers.com.my and you may be required to read and accept the changes to continue your use of the App or the Services.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during our relationship with you.

III. THE DATA WE COLLECT ABOUT YOU

We may collect, use, store, and transfer different kinds of personal data about you as follows:

- Identity Data
- Event Data
- Contact Data
- Device Data
- Content Data
- Profile Data
- Usage Data

We explain these categories of data in the GLOSSARY below.

We also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but



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is not considered personal data in law as this data will not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific App 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 privacy policy.

We do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

IV. HOW IS YOUR PERSONAL DATA IS COLLECTED?

We will collect and/or process the following data about you:

- **Information you give us.**

This is information (including Identity and Contact Data) you consent to giving us about you by filling in forms on the App Site and the Services Sites (together Our Sites). It includes information you provide when you register to use the App Site, download or register an App, and when you report a problem with an App, our Services. If you contact us, we will keep a record of that correspondence.

- **Information we collect about you and your device.**

Each time you use one of our Apps we will automatically collect personal data including Device and Usage Data.

- **Information we receive from third parties and publicly available sources.**

We will receive personal data about you from various third parties (the controller of your personal data).

- Identity, Event, and Contact data from third parties
- Device Data from your device manufacturer or telecommunications providers
- Usage Data from third party analytics providers

- **Unique application numbers.**

When you want to install or uninstall a Service containing a unique application number or when such a Service searches for automatic updates, that number and information about your installation, for example, the type of operating system, may be sent to us.



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Tracking/Usage Technologies

We use tracking technologies to distinguish you from other users of the App, App Site, the distribution platform or Services Sites and to remember your preferences. This helps us to provide you with a good experience when you use the App or browse any of Our Sites and also allows us to improve the App and Our Sites.

V. HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when the law allows us to do so. Most commonly we will use your personal data in the following circumstances:

- Where you have consented before the processing.
- Where we need to perform a contract we are about to enter or have entered with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

VI. PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA

PURPOSE	TYPE OF DATA	LAWFUL BASIS FOR PROCESSING
To install the App, register you as a new App user, and provision virtual credentials.	Identity Event Contact Device	Your consent
To manage our relationships with you including notifying you of changes of the App or any Services, and updating/issuing credentials.	Identity Event Contact Profile Usage	Your consent -Necessary for our legitimate interests (to keep records updated and to analyse how customers use our products/ Services) -Necessary to comply with legal obligations (to inform you of any changes to our terms and conditions).
To administer and protect our business and this App, including troubleshooting, data analysis, system testing, and App improvements.	Identity Event Contact Usage	Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security)



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VII. DISCLOSURES OF YOUR PERSONAL DATA

When you consent to providing us with your personal data, we will also ask you for your consent to share your personal data with the third parties set out below for the purposes set out in the table:

- Internal Third Parties as set out in the GLOSSARY.
- External Third Parties as set out in the GLOSSARY.
- Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

VIII. DATA SECURITY

All information you provide to us is stored on secure servers.

Once we have received your information, we will use strict procedures and security features to try to prevent your personal data from being accidentally lost, used or accessed in an unauthorized way.

We may collect and store personal data on your Device using a secure wallet technology.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator when we are legally required to do so.

IX. DATA RETENTION

Details of retention periods for different aspects of your personal data are available in our retention policy which you can request by contacting us.

In some circumstances you can ask us to delete your data. Please refer to your legal rights below for further information.

In some circumstances we will 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.

In the event that you do not use the App for a period of 3 months then we may treat the account as expired and your personal data may be deleted.



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X. YOUR LEGAL RIGHTS

Under certain circumstances you have rights under data protection laws in relation to your personal data. To find out more about these rights, see YOUR LEGAL RIGHTS in the GLOSSARY section below:

- Request access to your personal data.
- Request correction of your personal data.
- Request erasure of your personal data.
- Object to processing of your personal data.
- Request restriction of processing your personal data.
- Request transfer of your personal data.
- Right to withdraw consent.

You can exercise any of these rights at any time by contacting us at cs@jdtfc.com.my.

GLOSSARY

XI. LAWFUL BASIS

Consent means processing your personal data where you have signified your agreement by a statement or clear opt-in to processing for a specific purpose. Consent will only be valid if it is a freely given, specific, informed and unambiguous indication of what you want. You can withdraw your consent at any time by contacting us.

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure 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. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a legal obligation means processing your personal data where it is necessary for compliance with a legal obligation that we are subject to.



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XII. YOUR LEGAL RIGHTS

You have the right to:

- Request access to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:
 - a) if you want us to establish the data's accuracy;
 - b) where our use of the data is unlawful but you do not want us to erase it;
 - c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or
 - d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.



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- Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

XIII. DESCRIPTION OF CATEGORIES OF PERSONAL DATA

- Identity Data: first name, last name, maiden name, username or similar identifier, company, title, date of birth, gender, nationality, country of residence and photo.
- Event Data: venue, seating, vending and discount codes.
- Contact Data: billing address, delivery address, email address and telephone numbers.
- Device Data: includes the type of mobile device you use, a unique device identifier (for example, your Device's IMEI number, the MAC address of the Device's wireless network interface, or the mobile phone number used by the Device), mobile network information, your mobile operating system, the type of mobile browser you use, and time zone setting.
- Content Data: includes information stored on your Device, including friends' lists, contacts, photos, videos or other digital content.
- Profile Data: includes your username and password, in-App purchase history, your interests, preferences, feedback and survey responses.
- Usage Data: includes details of your use of any of our Apps including, but not limited to, traffic data and other communication data, whether this is required for our own billing purposes or otherwise and the resources that you access.

XIV. ALL RIGHTS RESERVED

JDT FC reserves all rights to change any terms and conditions as needed.