

PRIVACY POLICY

and Personal Data Protection Notice

Effective / Last modified: 25 September 2026

This Privacy Policy explains how Rinne Technologies Sdn. Bhd. collects, uses, stores, discloses and protects Personal Data in connection with our Website, Services, communications, and Events. It also explains the choices and rights available to individuals under applicable Data Protection Laws.

1. Introduction and Scope

This Privacy Policy applies when you access or use the Website, use or enquire about Rinne Services, communicate with Rinne, register for or participate in an Event, or otherwise provide Personal Data to us.

By providing Personal Data to Rinne, you acknowledge that you have been given access to this Privacy Policy. Where consent is required by applicable law for a particular processing activity, disclosure, marketing communication or international transfer, we will seek that consent separately or through an appropriate affirmative action.

Where Rinne processes Personal Data solely on behalf of a client or other organisation and under that organisation's instructions, that organisation may be the relevant data controller and its privacy notice may also apply.

2. Definitions

You / Your: means an individual whose Personal Data is processed by Rinne, including Website visitors, users of our Services, client representatives, business contacts, Event applicants and attendees.

Rinne / We / Us / Our: means Rinne Technologies Sdn. Bhd., a legal entity registered in Malaysia with registration number 1248860-H, and, where relevant, its affiliated parties.

Affiliated Parties: means Rinne affiliates and subsidiaries and their respective directors, employees and authorised representatives.

Website: means www.rinne.tech and any Rinne-controlled webpages, forms or digital interfaces that link to this Privacy Policy.

Services: means software solutions, technologies, information, consulting, implementation, advisory and other business services provided by Rinne.

Events: means conferences, workshops, networking sessions, community activities, startup programmes, roundtables, webinars and other events or programmes organised, hosted or co-organised by Rinne.

Personal Data: means information relating to an identified or identifiable individual, or any equivalent concept under applicable Data Protection Laws.

Sensitive Personal Data: means Personal Data that receives additional protection under applicable law, including categories such as health information, religious beliefs, biometric data, racial or ethnic origin and other legally protected categories.

Processing: means any operation performed on Personal Data, including collecting, recording, organising, storing, accessing, using, disclosing, transferring, correcting, combining, restricting or deleting it.

Data Protection Laws: means all privacy and personal data protection laws applicable to the relevant Processing, including, where applicable, the Malaysian Personal Data Protection Act 2010 (Act 709), as amended, the EU

General Data Protection Regulation (GDPR), Japan's Act on the Protection of Personal Information (APPI), and other applicable national or regional privacy laws and regulations.

3. Our Role and Responsibilities

When Rinne determines why and how Personal Data is processed - for example, information collected directly through our Website, business communications or Event registrations - Rinne generally acts as a data controller.

Where Rinne processes Personal Data on behalf of a client and only under that client's documented instructions, Rinne may act as a data processor. In those circumstances, the client is responsible for establishing an appropriate legal basis and providing required notices to the individuals concerned, and Rinne will process the data in accordance with the relevant agreement, documented instructions and applicable law.

If you provide Rinne with Personal Data relating to another person, you are responsible for having appropriate authority or another lawful basis to provide that information to us where required by law.

4. Personal Data We May Collect

Depending on your relationship with Rinne, we may collect the following categories of Personal Data:

- identity and contact information, such as your name, email address, telephone number, country or city of residence and business contact details;
- business and professional information, such as employer, organisation, job title, industry, professional background, areas of expertise, work experience and publicly available professional profile information;
- company information connected with your relationship with Rinne, such as company name, address, registration number and other relevant business details;
- account, service and transaction information where relevant to Services you use or request;
- communications and enquiry information, including messages, support requests, feedback and information you voluntarily provide to us;
- Event registration and participation information described in Section 5 below;
- publicly available information from professional or social platforms where relevant to a legitimate business interaction;
- Website and technical information, such as device type, operating system, IP address, browser information, cookie identifiers, approximate location derived from technical information, and information about how you interact with the Website or Services; and
- other Personal Data reasonably necessary for the purpose communicated to you at or before the time of collection.

We may obtain Personal Data directly from you, from your employer or organisation, from Event co-organisers or referral partners, from publicly available sources, and from service providers that support our Website, Services or Events. Where applicable law requires us to notify you when information has been obtained from another source, we will do so.

5. Events, Workshops and Community Activities

When you register for, apply to attend, participate in or otherwise interact with an Event, we may collect information required to manage that Event. This may include:

- your name and contact details;
- your organisation, job title, professional background, industry, technical area, experience level or other professional information relevant to the Event;
- your city or country of residence and other logistical information;
- your responses to registration forms, questionnaires, surveys or feedback forms;
- your registration, approval, waitlist, rejection or attendance status;

- information about your interests, preferred sessions or participation objectives;
- dietary or accessibility information that you voluntarily provide where needed to accommodate your participation; and
- photographs, audio or video recordings where an Event is photographed or recorded and appropriate notice is provided.

We may use Event Personal Data to review and approve registrations for limited-capacity or approval-based Events; administer attendance; communicate confirmations, reminders, venue information and changes; manage speakers, participants and partners; conduct feedback and post-Event follow-up; maintain appropriate administrative records; and, where permitted, communicate future Rinne Events or programmes.

If an Event is co-organised with another organisation, we may share relevant registration or attendance information with that co-organiser or Event partner where reasonably necessary for the organisation and administration of the Event. Where required by applicable law, we will disclose the relevant recipient or category of recipient and obtain consent before such sharing.

6. How We Use Personal Data

We may process Personal Data for the following purposes, depending on the context:

- providing, operating, administering and improving our Website and Services;
- creating and managing accounts and business relationships;
- responding to enquiries, requests and support matters;
- communicating service, administrative, contractual, security and policy information;
- organising and administering Events, including approval-based registration and participant communications;
- understanding how our Website, Services and Events are used and improving user experience and functionality;
- maintaining security, detecting misuse, managing operational risk and protecting our systems and legitimate business interests;
- complying with legal, regulatory, tax, audit, governance and record-keeping requirements;
- establishing, exercising or defending legal claims and resolving disputes;
- conducting internal business administration, reporting and planning; and
- sending marketing or promotional communications about Rinne products, Services, Events or programmes where you have consented or where another lawful basis permits such communications.

We will not materially change the purpose for which Personal Data is used in a way that is incompatible with the purpose originally communicated to you unless permitted by applicable law or unless additional notice or consent is provided where required.

7. Required and Optional Information

Some Personal Data is necessary for us to provide a requested Service, respond to an enquiry, manage a contractual relationship or administer an Event. If you do not provide information identified as required, we may be unable to provide the relevant Service, process your request, or complete or approve your Event registration.

Where information is optional - for example, certain Event questionnaire responses, feedback or marketing preferences - you may choose whether to provide it. We aim to identify optional fields where reasonably practicable.

8. Sensitive Personal Data

Rinne does not generally seek to collect Sensitive Personal Data unless it is relevant and reasonably necessary for a stated purpose. For example, an Event attendee may voluntarily provide dietary or accessibility information that could reveal health or religious information.

Where Sensitive Personal Data is collected or processed, we will do so only as permitted under applicable Data Protection Laws and will obtain explicit or other required consent where the law requires it. If Sensitive Personal Data is provided to us unnecessarily, we may delete or restrict the use of that information.

9. Automated Decision-Making and Profiling

Rinne does not currently use Personal Data to make solely automated decisions that produce legal effects or similarly significant effects on individuals. If we introduce such processing, we will provide any notice, safeguards and rights required under applicable Data Protection Laws.

Event registration or approval may involve review of information you submit against the stated audience, capacity or participation criteria. Unless specifically disclosed otherwise, such Event approval decisions are not intended to be solely automated decisions with legal or similarly significant effects.

10. How We Share Personal Data

We may disclose Personal Data only where reasonably necessary for the purposes described in this Privacy Policy, where you have consented, or where disclosure is otherwise permitted or required by law. Recipients may include:

- Rinne Affiliated Parties for legitimate internal business and operational purposes;
- service providers and data processors that support hosting, cloud infrastructure, IT, cybersecurity, communications, email delivery, analytics, customer support, payment processing, professional services or Event administration;
- Event co-organisers, venues and Event partners where relevant to the organisation or delivery of an Event;
- professional advisers such as lawyers, accountants, auditors, tax advisers and consultants who are subject to professional or contractual confidentiality obligations;
- public authorities, regulators, courts, law enforcement bodies or other persons where disclosure is required or permitted by applicable law; and
- a purchaser, investor, successor or other relevant party in connection with a proposed or completed merger, acquisition, restructuring, financing, sale of assets or similar corporate transaction, subject to appropriate confidentiality and legal requirements.

We do not sell Personal Data as a business practice. We do not provide Personal Data to unrelated third parties for their own direct marketing purposes without consent where consent is required by applicable law.

11. Event Co-Organisers and Partners

For a co-organised Event, the registration page, invitation or other Event notice may identify a co-organiser or partner that will receive attendee information. Where required, we will explain the purpose of the sharing and provide access to the relevant recipient's privacy policy before or at the time consent is requested.

A co-organiser or partner may process Personal Data under its own privacy policy and may act as an independent data controller for its own permitted purposes. Rinne is not responsible for processing independently undertaken by another organisation outside Rinne's control, but we will take steps required by applicable law in relation to disclosures made by Rinne.

12. Cross-Border Processing and Transfers

Rinne is based in Malaysia and operates internationally. Personal Data may therefore be accessed, processed or stored in Malaysia and in other countries where Rinne, its Affiliated Parties, service providers or Event partners operate.

Where Personal Data is transferred across borders, we will use measures required under applicable Data Protection Laws. Depending on the circumstances, these measures may include contractual protections, due

diligence regarding the recipient and destination, transfer assessments, consent, or reliance on another legally recognised transfer condition.

For transfers subject to Malaysia's Personal Data Protection Act, Rinne will apply the conditions and reasonable precautions required for cross-border transfers under applicable Malaysian law and guidance.

For Personal Data subject to Japan's APPI, where consent is required for a transfer or disclosure to a third party located outside Japan, Rinne or the relevant transferring party will provide the information required by APPI before obtaining that consent, including, where applicable, information concerning the destination country and the measures used by the recipient to protect Personal Data.

For transfers subject to the GDPR or equivalent regimes, Rinne will use an applicable transfer mechanism or safeguard where required.

13. Protection and Security of Personal Data

Rinne uses reasonable and appropriate technical, organisational and administrative measures designed to protect Personal Data against accidental or unlawful loss, misuse, unauthorised access, disclosure, alteration or destruction. Measures may include access controls, authentication, encryption, system and network protections, confidentiality requirements and internal procedures appropriate to the nature of the data and the risks involved.

No electronic transmission or storage system is completely secure. Accordingly, we cannot guarantee absolute security, but we review and adapt security measures as appropriate to our operations and legal obligations.

14. How Long We Retain Personal Data

We retain Personal Data only for as long as reasonably necessary for the purposes for which it was collected, including to provide Services, administer Events, maintain business and contractual records, comply with legal and regulatory requirements, resolve disputes, enforce agreements and protect legitimate interests.

Retention periods vary according to the type of data, the purpose of processing, contractual requirements, legal limitation periods and applicable record-keeping obligations. When Personal Data is no longer required, we will delete, anonymise or otherwise dispose of it in accordance with applicable requirements and our internal procedures.

A deletion request does not necessarily require immediate deletion where continued retention is permitted or required by law, needed for security or fraud prevention, or necessary for the establishment, exercise or defence of legal claims.

15. Password and Account Security

If you use a Rinne Service that requires an account, you are responsible for keeping your credentials confidential and for taking reasonable steps to prevent unauthorised access to your account. Please notify us promptly if you believe your account or credentials have been compromised.

16. Cookies and Similar Technologies

When you visit the Website, Rinne and authorised service providers may use cookies and similar technologies to operate the Website, remember preferences, understand usage, maintain security, measure performance and, where applicable and permitted, support analytics or marketing.

Cookies may include:

- essential or session cookies required for core Website functions and security;
- preference cookies that remember settings or choices;
- analytics cookies that help us understand Website usage and performance; and

- marketing or advertising cookies, where used, subject to the consent or choice requirements applicable in your jurisdiction.

We may use third-party analytics services, including Google Analytics where enabled. Third-party providers process information according to their own privacy terms and our applicable arrangements with them.

You can manage or disable cookies through your browser or any cookie preference tools made available on the Website. Disabling some cookies may affect Website functionality. Where applicable law requires consent for non-essential cookies, we will request that consent before placing or using them.

17. Marketing Communications

Where required by law, Rinne will obtain consent before sending direct marketing communications. You may unsubscribe or withdraw marketing consent at any time by using the unsubscribe mechanism in the communication or by contacting us. Withdrawal from marketing does not prevent us from sending non-marketing communications that are necessary for a Service, Event, contractual relationship, security matter or legal obligation.

18. Your Rights and Choices

Depending on the Data Protection Laws that apply to you and the circumstances of the Processing, you may have rights that include:

- requesting information about how your Personal Data is processed;
- requesting access to or a copy of Personal Data held about you;
- requesting correction of inaccurate, incomplete or outdated Personal Data;
- withdrawing consent where Processing is based on consent, subject to applicable legal limitations;
- objecting to or requesting restriction, cessation, deletion or erasure of Processing where applicable;
- objecting to direct marketing and withdrawing from marketing communications;
- requesting data portability where this right applies;
- requesting review or safeguards in relation to certain automated decisions where applicable; and
- lodging a complaint with an applicable data protection or privacy authority.

These rights are not absolute and may be subject to legal exceptions, verification requirements and procedural rules. We may ask for information necessary to verify your identity and protect Personal Data before acting on a request.

To exercise a privacy right or raise a privacy concern, contact: support@rinne.tech

19. Legal Grounds for Processing

The legal grounds available for Processing differ between jurisdictions. Where a legal basis is required, Rinne will rely on one or more grounds permitted by applicable law. Depending on the context, these may include:

- performance of a contract or steps requested before entering into a contract;
- compliance with a legal or regulatory obligation;
- your consent, where consent is required or appropriate;
- Rinne's legitimate interests or those of another party, where that basis is recognised by applicable law and is not overridden by your rights and interests; and
- other grounds specifically permitted by applicable Data Protection Laws.

Where the applicable law uses a different framework from the GDPR concept of legal bases, Rinne will apply the requirements of that law rather than treating the GDPR framework as universally applicable.

20. Age Restrictions

Our Website, Services and business Events are generally intended for adults and professional users. We do not knowingly seek to collect Personal Data from children where parental or guardian consent would be required. If an Event or programme is specifically designed for minors, we will provide an appropriate notice and obtain any consent required by applicable law.

If you believe a child has provided Personal Data to Rinne in circumstances where required consent was not obtained, please contact us so that we can review the matter and take appropriate action.

21. Third-Party Websites and Platforms

Our Website, Services, communications or Event pages may contain links to or use third-party websites, registration platforms, social media services or other external services. Those third parties have their own privacy practices and policies. This Privacy Policy does not govern Processing independently carried out by those third parties, and you should review their privacy information before providing Personal Data to them.

22. Personal Data Breaches

Rinne maintains procedures for assessing and responding to suspected Personal Data breaches. If a breach occurs, we will investigate and take appropriate containment, remediation, documentation and notification steps in accordance with the Data Protection Laws applicable to the incident.

Where notification to a regulator, commissioner or affected individual is legally required, Rinne will make the relevant notification within the timeframe and in the manner required by the applicable law, including the Malaysian Personal Data Protection Act and its data breach notification requirements where applicable.

23. Changes to This Privacy Policy

We may update this Privacy Policy from time to time to reflect changes in our activities, technology, Events, Services or legal requirements. The current version will be published on the Website and the "Last modified" date will be updated.

Where a change materially affects how we process Personal Data, we will provide any additional notice or obtain consent required by applicable law before applying the change to Personal Data already collected.

24. Contact Us

If you have questions about this Privacy Policy, wish to exercise a privacy right, or want to report a privacy or security concern, please contact Rinne Technologies Sdn. Bhd.:

support@rinne.tech

info@rinne.tech

inquiries@rinne.tech

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