

# PRIVACY POLICY

**Last Updated:** 01 January 2026

## 1. Introduction

This Privacy Policy explains how **Kunkwan** and its affiliated entities (“**Kunkwan**”, “**we**”, “**us**”, or “**our**”) collect, use, disclose, store, and protect your personal data when you access our website, use our services, enroll in our programmes, or purchase our products.

We are committed to protecting your privacy and handling your personal data responsibly and in accordance with applicable data protection laws.

## 2. Our Legal Entities

This Privacy Policy applies to Kunkwan and its affiliated entities, including but not limited to:

- **Kunkwan Sdn. Bhd.** (Malaysia)
- **PT Kunkwan Mandarin Indonesia** (Indonesia)
- Any other present or future subsidiaries, holding companies, or related entities within the Kunkwan Group, whether incorporated in Malaysia or any other jurisdiction.

(each referred to as a “**Relevant Kunkwan Entity**”).

The Relevant Kunkwan Entity responsible for your personal data will generally be determined based on:

- your country of residence; and/or
- the entity through which you engage with our services or make a purchase.

## 3. Scope of This Policy

This Privacy Policy applies to personal data collected through:

- our websites and online platforms
- enrollment into programmes or courses
- purchase of live programmes, recorded courses, or digital learning materials
- participation in online or offline classes
- customer support, inquiries, or communications
- marketing, events, and promotional activities

## **4. Types of Personal Data We Collect**

Depending on how you interact with us, we may collect the following categories of personal data:

### **4.1. Identity & Contact Information**

- Full name
- Identification number (where required by law)
- Email address
- Phone number
- Billing and correspondence address

### **4.2. Account & Enrollment Information**

- Account login credentials
- Enrollment and programme details
- Course schedules and participation records
- Academic or learning-related records (where applicable)

### **4.3. Payment & Transaction Information**

- Payment method details (processed via third-party payment gateways)
- Transaction records, invoices, and receipts

*We do not store full credit or debit card numbers.*

### **4.4. Digital Learning Data**

- Login history
- Course access records
- Learning progress, completion records, and engagement data
- Interaction with recorded or digital learning materials

### **4.5. Communication Data**

- Emails, messages, and customer support communications
- Feedback, surveys, and reviews

### **4.6. Technical & Usage Data**

- IP address
- Browser type and device information
- Cookies and similar technologies
- Website usage and analytics data

## **5. How We Use Your Personal Data**

We collect and use personal data for the following purposes:

- to provide, manage, and deliver our programmes, courses, and services
- to process enrollments, purchases, and payments
- to manage user accounts and learning access
- to communicate with you regarding courses, updates, or support
- to improve our services, platforms, and user experience
- to conduct marketing, promotions, and events (where consent is given)
- to comply with legal, regulatory, and contractual obligations

## **6. Legal Basis for Processing**

We process personal data based on one or more of the following legal grounds:

- your consent
- performance of a contract (e.g. enrollment or purchase)
- compliance with legal obligations
- legitimate business interests, provided such interests do not override your rights

## **7. Disclosure of Personal Data**

We may disclose your personal data to:

- Relevant Kunkwan Entities within the Group
- service providers and vendors (e.g. payment gateways, IT platforms, learning systems)
- professional advisers (legal, accounting, audit)
- regulatory or governmental authorities where required by law

All third parties are required to protect your personal data and use it only for authorised purposes.

## **8. Cross-Border Data Transfers**

Your personal data may be transferred to and processed in countries outside your country of residence, including where our servers, partners, or group entities are located.

Where required, we take reasonable steps to ensure such transfers comply with applicable data protection laws and provide an adequate level of protection.

## **9. Data Retention**

We retain personal data only for as long as necessary to fulfil the purposes for which it was collected, including:

- providing services and programmes
- complying with legal and regulatory requirements
- resolving disputes and enforcing agreements

## **10. Data Security**

We implement reasonable administrative, technical, and organisational measures to protect personal data against unauthorised access, loss, misuse, or disclosure.

However, no system can be guaranteed to be completely secure.

## **11. Cookies and Tracking Technologies**

Our website uses cookies and similar technologies to:

- improve website functionality
- analyse usage and performance
- personalise user experience

You may control cookies through your browser settings.

## **12. Your Rights**

Subject to applicable laws, you may have the right to:

- access your personal data
- request correction or updates
- withdraw consent
- request deletion (where legally permissible)
- object to certain processing activities

Requests may be subject to verification and legal limitations.

## **13. Children's Data**

Our services are not intended for individuals under the age required by applicable laws without parental or legal guardian consent.

#### **14. Changes to This Privacy Policy**

We may update this Privacy Policy from time to time.

Any changes will be posted on our website and will take effect upon publication.

#### **15. Contact Us**

If you have any questions, requests, or concerns regarding this Privacy Policy or your personal data, please contact:

**Email:** support@kunkwan.com