

X-MILES PRIVACY POLICY

This privacy policy describes the personal data collected when you interact with X Miles Sdn Bhd (“X-Miles”, “we”, “us”, or “our”) through our xmiles.com.my websites (“Sites”), digital experiences, mobile applications, stores events, or one of our other products or services, all of which are part of X-Miles’s Platform (“Platform”). It also explains how your personal data is used, shared and protected, and how you can contact us.

PRIVACY POLICY CHANGES

We reserve the right to make changes to this Privacy Policy. Our current Privacy Policy will always be on our Platform and any updates will be effective upon posting. You are responsible for periodically checking our Platform for updates. Certain areas of our Platform may require you to acknowledge your consent via a pop-up message and/or click-through box requiring your agreement to the amended Privacy Policy before you can proceed to that Platform area. For any significant change affecting your Personal Information (defined below), we may notify you of such change. If you disagree with any change, you must stop using our Platform; otherwise, we will consider your continued use to be acceptance of any change.

WHAT PERSONAL DATA X-MILES COLLECTS

X-Miles collects and retains personal data necessary for the products or services you request. When you create a new account, purchase a product or service, participate in an online survey, contact us, or interact through our Platform, we may collect personal information including:

- Contact details including name, email, telephone number and shipping and billing address.
- Login and account information, including username and password.
- Device details including device ID, network access, browser identification, cookies, and IP addresses.
- Personal details including gender, hometown, property records, date of birth and purchase history.
- Payment details including bank details, credit, debit, or any payment information.
- Transaction details including purchases of X-Miles products and/or services.
- Browser activity including browsing, session, interaction, and search history related to our Platform, IP address, cookies, data and time of access, clicks per visit, device identifiers, MAC address, device ID/UDID.
- Images, photos and videos.
- Location or movement details to facilitate the selection of a nearby EV charging stations.

HOW X-MILES COLLECT YOUR PERSONAL DATA

The personal data we collect through our Platform may include:

- Information that you provide by filling in forms on our Platform. This includes information provided when registering to use our websites or mobile apps. We may ask you for information when you report a problem with our Platform.
- Records and copies of your correspondence (including email addresses), if you contact us.

- Your responses to surveys that we might ask you to complete.

Automatic Data Collection Technologies

We may use automatic data collection technologies to collect certain aggregated or anonymized information about your browsing behaviors and patterns. The information we collect automatically is statistical data and may include Personal Information, but we may maintain it or associate it with Personal Information we collect in other ways or receive from third parties. It helps us to improve our Platform and to deliver a better and more personalized service, including, but not limited to, by enabling us to: (a) estimate our audience/visitor size and usage patterns; (b) store information about your preferences, allowing us to customize and improve our Platform; (c) speed up your searches; and/or, (d) recognize you when you return to our Sites.

The technologies we use for this automatic data collection may include cookies, local storage cookies, web beacons, pixel tracking, GIF, and/or IP address. Each of these is discussed below.

Cookies (or browser cookies)

A cookie is a small file placed on the hard drive of your computer or mobile device. It may contain certain data, including, but not limited to: the name of the server that has placed it there, an identifier in the form of a unique number, and, an expiration date (some cookies only). Cookies are managed by the web browser on your computer (Internet Explorer, Firefox, Safari or Google Chrome).

Different types of cookies which have different purposes are used on our Sites.

Essential Cookies

These cookies are essential to allow you to browse our Sites and use its functions. Without them, services such as shopping baskets and electronic invoicing would not be able to work.

Performance Cookies

These cookies collect information on the use of our Sites, such as which pages are consulted most often. This information enables us to optimize our Sites and simplify browsing. Performance cookies also enable our affiliates and partners to find out whether you have accessed one of our Sites from their site and whether your visit has led to the use or purchase of a product or service from our Sites, including the references for the product or service purchased. These cookies do not collect any information which could be used to identify you. All the information collected is aggregated, and therefore anonymous.

Functionality Cookies

These cookies enable our Sites to remember the choices you have made when browsing. For example, we can store your geographical location in a cookie so that the Sites corresponding to your

area is shown. We can also remember your preferences, such as the text size, font and other customizable aspects of the Sites. Functionality cookies may also be able to keep track of the products or videos consulted to avoid repetition. The information collected by these cookies cannot be used to identify you and cannot monitor your browsing activity on sites which do not belong to us.

It is possible that you will come across third-party cookies on some pages of sites that are not under our control.

You may refuse to accept browser cookies by activating the appropriate setting in your browser. However, if you select this setting, you may be unable to access certain parts of our Sites. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you direct your browser to our Sites.

We also use cookies to implement tracking technology on our Platform. This allows us to display advertising that is tailored to you on our Sites which parts of our content interest you the most and which service categories you request. This tracking uses De-Identified Personal Information data. We will not combine this data with your other Personal Information without your express permission. Some of our contracted vendors and affinity partners are allowed to place cookies on our Sites. Those companies may also provide you with the option of preventing the use of cookies in the future. For more information, contact the relevant third-party provider.

At any time, you can prevent the use of cookies in the future. You may activate the appropriate setting in your browser to refuse to accept browser cookies. However, if you do, your experience on our Sites may be affected.

Local Storage Cookies

Certain features of our Sites may use local stored objects (or Adobe Flash cookies) to collect and store information about your preferences and navigation to, from and on our Sites. Local storage cookies are not managed by the same browser settings as are used for browser cookies.

Web Beacons

Pages of our Sites and our emails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags and single-pixel gifs) that permit us, for example, to count users who have visited those pages or opened an email and for other related website statistics (for example, recording the popularity of certain website content and verifying system and server integrity).

Pixel Tracking

In addition to using Cookies, the Sites may employ “pixel tracking”, a common process which may be used in connection with advertisements on other sites. Pixel tracking involves the use of pixel tags that are not visible to the user and consist of a few lines of computer code. Pixel tracking measures the effectiveness of advertisements and compiles aggregate and specific usage statistics. A “pixel tag” is an invisible tag placed on certain pages of websites that is used to track an individual user’s activity. We may access these pixel tags to identify activity and interests that may allow us to better

match our goods, services, and other offers with your interests and needs. For example, if you visit our Sites from an advertisement on another website, the pixel tag will allow the advertiser to track that its advertisement brought you to the Sites. If you visit our Sites, and we link you to another website, we may also be able to determine that you were sent to and/or transacted with a third-party website. This data is collected for use in our marketing and research.

GIF

We may use tiny images known as clear GIFs to track behavior of users, including statistics on who opens our emails.

IP Address

Our servers automatically record certain log file information reported from your browser when you access the Platform. These server logs may include information such as which pages of the Platform you visited, your internet protocol ("IP") address, browser type, and other information on how you interact with the Platform. These log files are generally deleted periodically. All of this information is stored only in aggregated form and is not personally identifiable.

INFORMATION X-MILES COLLECT FROM THIRD PARTIES

We may collect information that others provide about you when you use our Platform, or obtain information from other sources and combine that with information we collect through our Platform, including:

Other Sources. To the extent permitted by applicable law, we may receive additional information about you, such as demographic data or fraud detection information, from third party service providers and/or partners, and combine it with information we have about you. For example, we may receive background check results or fraud warnings from service providers like identity verification services for our fraud prevention and risk assessment efforts. We may receive information about you and your activities on and off our Platform through partnerships, or about your experiences and interactions from our partner ad networks.

Third-Party Use of Cookies and Other Tracking Technologies

Some content or applications, including advertisements, on our Platform are served by third parties, including advertisers, ad networks and servers, content providers and application providers. First-party or third-party cookies may be used alone or in conjunction with web beacons or other tracking technologies to collect information about you when you use our Platform. A first-party cookie is a cookie set by the domain name that appears in the browser address bar. A third-party cookie is a cookie set by (and on) a domain name that is not the domain name that appears in the browser address bar. It might be set as part of a side resource load (image, JS, iframe, etc., from a different hostname) or an AJAX HTTP request to a third-party server. The information that first-party and third-party cookies collect may be associated with your Personal Information or they may collect information, including Personal Information, about your online activities over time and across

different websites and other online services (i.e., tracking such activities). They may use this information to provide you with interest-based (behavioral) advertising or other targeted content.

We do not control these third parties' tracking technologies or how they may be used. If you have any questions about an advertisement or other targeted content, you should contact the responsible provider directly.

Google Tools

We use tools provided by Google as described below.

Google Analytics. We use, and some of our third-party service providers may use, Google Analytics (click for link to Google's website) or other analytics service to help us understand use of our Services. Such service providers may place their own cookies in your browser. This Privacy Policy covers use of cookies by us only and not the use of cookies by third parties.

Google AdSense Advertising. We use Google AdSense Advertising (or other search engine or display network advertising) on our website. Google's advertising requirements can be summed up by Google's Advertising Principles (click for link to Google's website). They are put in place to provide a positive experience for users. We have implemented the following: (a) Remarketing with Google AdSense and (b) Google Display Network Impression Reporting.

Google DART Cookie. Google, as a third-party vendor, uses cookies to serve ads on our Platform. Google's use of the DART cookie enables it to serve ads to our users based on previous visits to our Website and other sites on the Internet. Users may opt-out of the use of the DART cookie by visiting the Google Ad and Content Network privacy policy.

We, along with third-party vendors such as Google, use first-party cookies (such as the Google Analytics cookies) and third-party cookies (such as the DoubleClick cookie) or other third-party identifiers together to compile data regarding user interactions with ad impressions and other ad service functions as they relate to our Platform.

Google DoubleClick Cookie. We work with DoubleClick Cookie Google, as a third-party vendor, uses cookies to serve ads on our Platform. Google's use of the DoubleClick cookie enables it and its partners to serve ads to our users based on their visit to our Platform or other websites on the Internet.

Google Maps/Google Earth. We also use Google Maps (including the Google Maps API(s)) and/or Google Earth, which may, among other things, request access to your geolocation, and both of which are subject to their own terms of use and privacy policy.

Users can set preferences for how Google advertises to you using the Google Ad Settings page. Alternatively, you can opt out by visiting the Network Advertising Initiative Opt Out page or by using the Google Analytics Opt Out Browser add-on.

Vehicle, Session, and Charging Services Information.

We automatically receive certain types of information whenever you use our Platform, including information about your electric vehicle, computer, and online activities. For example, when you access our Platform, we may automatically collect your devices' and computer's IP address, the date

and time of your access, the type of browser you use, information about your computer's or mobile device's operating system, your location and the specific services accessed. Information we may collect when we provide you charging services includes the time and date of your access of our charging network, the duration of your charging session, how much power you consume during a charging session, the location of the network charging station you utilize, information on your vehicle that enables us to identify it, and the state of charge of your battery at the beginning and end of your charging session. We may also analyze and compile information on patterns of usage of the charging services. We may use this information to improve our services and provide this information in aggregated, de-identified, and/or anonymized form to third parties for marketing purposes. Some of this information is automatically collected through systems or tracking tools such as cookies, tracking pixels, and web beacons, as described above.

When you register for services, contact us, or participate in an online survey or poll, we will collect information from you (like name, title, e-mail address, telephone number, credit card or other means of payment, etc.). When using our services, you may also be asked for additional information to help identify you.

HOW X-MILES USE YOUR PERSONAL DATA

X-Miles uses personal data to provide products and services that you have requested, including:

- Present our Sites and its contents to you.
- Present our mobile app and its contents to you.
- Provide our products and services you have requested.
- Provide notices about your account.
- Send you emails, text, and newsletters with information on products, services, discounts, special promotions or upcoming events, and features or offers that we believe will be of interest to you our company, and other information.
- Respond to your questions or other requests.
- Contact you with regard to our Platform and to send important notices, such as communications about our services, your account or changes to our terms, conditions, and policies.
- Process any applications, changes to your account information.
- Process other information or personal data that you submit through our Platform.
- Notify you about changes to our Platform, our policies, terms, or any products or services we offer or provide through it.
- Allow you to participate in interactive features on our Platform.
- Ask for ratings and reviews of our Platform, and/or products and services.
- Contact you regarding a sweepstakes, contest, or promotion in which you have participated.
- Provide access to restricted parts of our Platform.
- Request your participation in surveys, or other initiatives which help us to gather information used to develop and enhance our products and services.
- Examination or event registration, scheduling, attendance verification, administration, and related purposes.
- Serve relevant information to you when you visit our Platform, or other third-party sites (including social media platforms).

- Enhance and improve our products and Services, for example, by performing internal research, analyzing user trends, and measuring demographics and interests.
- Improve our content and deliver information to you that is targeted to your interests.
- For internal purposes, such as website, mobile app, and system administration or internal audits and reviews.
- For analyzing how any of our Platform are used, diagnosing services or technical problems, maintaining security, and personalizing content.
- Operate, maintain, and provide to you the features and functionality of our Platform.
- To provide statistics about the usage of Platform and other related information to reputable third parties, but these statistics will not include information which will allow you to be identified.
- Notify you of data privacy incidents or provide you with legally required information.
- Provide marketing material or advertisements from X-Miles, but you will be able to opt-out of these communications.
- Fulfill any other purpose for which you provide it.
- In any other way we may describe when you provide the information.

We use historical charging session data to (1) forecast network utilization; (2) evaluate and understand trends across the charging network; (3) establish charger capacity needs by geography; (4) conduct financial analyses; (5) determine pricing and reimbursements; (6) create and assign customer profiles; and/or, (7) build promotion and advertising campaigns internally and jointly with promotional program service providers.

We may use your personal data you provide us and which we obtain from other sources to better understand your interests so we can try to predict what other products, services, and information you might be most interested in. This practice involves making automated decisions about you based on this information in order to better enable us to tailor our interactions with you to make them more relevant and interesting.

HOW X-MILES SHARE PERSONAL DATA

We do not sell your personal data.

We may disclose your personal data, in whole or in part, with third parties for the purpose of providing or improving our services to you, who perform services on our behalf, or for marketing purposes. We may or do disclose personal data to the following types of third parties, and for one or more of the following purposes:

- Hosting providers for the secure storage and transmission of your data.
- Learning technology and online event providers for the delivery and improvement of web events and learning programs and the tracking of your progress.
- Identity management providers for authentication purposes.
- Database software providers for the management and tracking of your data.
- Promotional program service providers for fulfillment of promotion program and delivery of promotional services.
- Legal and compliance consultants, such as external counsel, external auditors, or tax consultants.

- Third party service providers who send communications on our behalf regarding our products and services.
- Payment solution providers for the secure processing of payments you provide to us.
- Technology providers who assist in the development and management of Platform.
- Outbound call center providers, who may perform outreach on our behalf regarding our products and services.
- Fulfillment and shipping vendors for the fulfillment of our products and services.
- Survey and research providers who perform studies on our behalf.
- Advertising partners, including social media providers, for the delivery of targeted advertisements.

Disclosures to Service Providers

We may share your personal data with third parties for the purpose of providing or improving the services to you. We may share your personal data with third party service providers which perform services on our behalf ("Service Providers"). This includes, without limitation, Service Providers which provide outbound and/or inbound communications, process payments, analyze data, credit checks, screening, marketing assistance, managing customer information, promotion fulfillment, or create, host, and/or provide customer or support services on our behalf. These Service Providers may have access to your personal data in order to provide these services to us or on our behalf. If we engage Service Providers for any of the foregoing, use of your personal data will be bound by obligations of confidentiality and their use will be restricted to providing their services to us. We may store personal data in locations outside our direct control (for instance, on servers or databases located or co-located with hosting Service Providers).

Disclosure of De-Identified Personal Information

We may share De-Identified Personal Information or anonymous information (including, but not limited to, anonymous usage data, referring/exit pages and URLs, IP address, platform types, number of clicks, etc.) with interested third parties to help them understand the usage patterns for certain services, working with those third parties to do research, including for marketing purposes, and to improve our services and provide new services, and for any other purpose we deem appropriate.

Required Disclosures

Except as otherwise described in this Privacy Policy, we will not disclose your personal data to any third party unless required to do so by law, court order, legal process, or subpoena, including to respond to any government or regulatory request, or if we believe that such action is necessary to: (a) comply with the law, comply with legal process served on us or our affiliates, subsidiaries, contracted vendors, or affinity partners, or investigate, prevent, or take action regarding suspected or actual illegal activities; (b) enforce our Terms (including for billing and collection purposes); (c) take precautions against liability; (d) investigate and defend ourselves against any third-party claims or allegations; (e) assist government enforcement agencies or to meet national security requirements; (f) to protect the security or integrity of our Platform; or, (g) exercise or protect the rights, property, or personal safety of us, our users or others.

We will attempt to notify you about these requests unless: (i) providing notice is prohibited by the legal process itself, by court order we receive, or by applicable law, or (ii) we believe that providing notice would be futile, ineffective, create a risk of injury or bodily harm to an individual or group, or create or increase a risk of fraud upon us, our users, our Sites, or our services. In instances where we comply with legal requests without notice for these reasons, we will attempt to notify that user about the request after the fact if we determine in good faith that we are no longer legally prohibited from doing so and that no risk scenarios described in this paragraph apply.

It is likely that the identity and categories of such third parties will change during the life of your account. We require that our third-party service providers only use your personal data as necessary to provide the requested services to us and each service provider is subject to a set of terms consistent with the applicable portions of this Privacy Policy.

Your Consent to Disclosure/Transfer/Sale of Your Personal Information

You consent to our disclosure of your personal data and other information to a potential or actual buyer of our company or other successor for the purpose of considering a merger, divestiture, restructuring, reorganization, dissolution, change in control, or sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation or other court proceeding, in which personal data held by us is among the assets transferred. You agree to and do hereby consent to (and shall not object to) our assignment, conveyance, transfer, and/or license (whether by contract, merger or operation of law) of any or all of our rights to your personal data and your consents, in whole or in part, and other information, with or without notice to you and without your further consent.