

# **PRIVACY POLICY**

Effective Date: 1 May 2024

Arrowood International Sdn Bhd ("Arrowood", "we", "us", or "our") operates the AxtionApp website (the "Website") and the AxtionApp software application (the "App", together the "Service"). This Privacy Policy describes how we collect, use, and disclose your information when you use the Service.

## 1. Types of Users

Our Service caters to three main user groups:

**Hotel Users:** These users are employed by hotels that subscribe to AxtionApp.

**Trainers (Optional):** If this functionality is available, trainers can create and publish training modules on the platform.

**General Users:** This category may include individuals who visit the website but do not have an account.

## 2. Information We Collect

We collect several types of information for different purposes to provide and improve our Service to you.

### 2.1 Information you provide directly:

- I. **Hotel Users & Trainers:** This may include your name, email address, phone number, hotel affiliation (for Hotel Users only), and any other information you choose to provide in your profile or while using the Service, such as task details or training content (for Trainers).
- II. **General Users:** We may collect limited information from general users who visit the website, such as browsing activity and IP address.

### 2.2 Information collected automatically:

- I. **Usage Data:** We may collect information about how you use the Service, such as the features you access, the pages you visit, and the time you spend on the platform.
- II. **Device Data:** We may collect information about the device you use to access the Service, such as the device type, operating system, browser type, and IP address.

## 3. How We Use Your Information

We use the information we collect for various purposes, including:

- I. **To provide and improve the Service:** We use your information to operate the Service, deliver content, personalize your experience, and improve the overall functionality.
- II. **To send you marketing communications (with your consent):** We may use your email address to send you marketing communications about our products and services. You can opt-out of receiving these communications at any time.

- III. To comply with the law: We may disclose your information to comply with legal obligations or respond to lawful requests from government authorities.
- IV. To improve our products and services: We may use your information to analyze trends, understand user behavior, and improve our offerings.
- V. For security purposes: We may use your information to detect and prevent fraud or other illegal activities.

#### 4. Data Retention

We will retain your information for as long as necessary to fulfill the purposes outlined in this Privacy Policy. We may also retain certain information as required by law or for legitimate business purposes.

#### 5. Data Sharing

We may share your information with third-party service providers who help us operate the Service. These service providers are obligated to protect your information and use it only for the purposes we specify.

We may also disclose your information to relevant authorities if required by law or to protect the rights, property, or safety of ourselves or others.

#### 6. Your Choices

You have several choices regarding your information:

- I. Accessing and Updating Your Information: You can access and update your information through your account settings.
- II. Marketing Communications: You can opt-out of receiving marketing communications from us by following the unsubscribe instructions in the emails we send.

#### 7. Security

We take reasonable steps to protect your information from unauthorized access, disclosure, alteration, or destruction. However, no internet transmission or electronic storage is completely secure.

#### 8. Children's Privacy

Our Service is not directed to children under the age of 18. We do not knowingly collect personal information from children under 18. If you are a parent or guardian and you are aware that your child has provided us with personal information, please contact us.

#### 9. International Transfers

Your information may be transferred to, stored, and processed in countries other than your own. These countries may have different data protection laws than your own.

#### 10. Changes to this Privacy Policy

We may update this Privacy Policy from time to time. We will notify you of any changes by posting the new Privacy Policy on this page.

#### 11. Contact Us

If you have any questions about this Privacy Policy, please contact us at [hello@axtionapp.com](mailto:hello@axtionapp.com).