

# PRIVACY POLICY FOR MEMBERSHIP APPLICANTS

## Association of Digital Lenders (AoDL)

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**Approved By:** Committee of Association of Digital Lenders

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## IMPORTANT NOTICE TO MEMBERSHIP APPLICANTS

This Privacy Policy explains how the Association of Digital Lenders ("AoDL," "we," "us," or "our") collects, uses, processes, and protects your personal data when you apply for membership with our Association. By submitting your membership application, you acknowledge that you have read, understood, and agree to the terms of this Privacy Policy.

This Privacy Policy is prepared in compliance with the Personal Data Protection Act 2010 (Act 709), as amended by the Personal Data Protection (Amendment) Act 2024, and forms an integral part of your membership application process.

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## 1. DATA CONTROLLER INFORMATION

### **Association of Digital Lenders (AoDL)**

Registration Number: PPM-011-14-23052025

Registered Address: NO.53 JALAN 34/154, TAMAN DELIMA, 56000 WILAYAH PERSEKUTUAN KUALA LUMPUR

Email: [admin@aodl.com.my](mailto:admin@aodl.com.my)

Phone: 012-3961138

AoDL is a registered society under the Societies Act 1966 (Act 335) and serves as the data controller for all personal data collected through the membership application process. As the data controller, we are responsible for determining the purposes and means of processing your personal data in accordance with the Personal Data Protection Act 2010 and its amendments.

Our Data Protection Officer can be contacted at [DPO Email] for any privacy-related inquiries or concerns regarding the processing of your personal data.

## 2. PERSONAL DATA WE COLLECT

### 2.1 Mandatory Information for Membership Application

#### **Personal Identification Data:**

- Full legal name as per official identification documents
- Identity card number (MyKad/Passport number)
- Date of birth
- Nationality and citizenship status
- Gender
- Residential address and postal code
- Mailing address (if different from residential address)

#### **Contact Information:**

- Primary phone number
- Alternative phone number (if provided)
- Primary email address
- Alternative email address (if provided)

- Preferred method of communication

#### **Professional and Business Information:**

- Current occupation and job title
- Employer name and address
- Business registration details (for corporate applicants)
- Professional qualifications and certifications
- Industry experience and background
- Connection to digital lending industry
- Current business activities related to financial services

#### **Financial and Regulatory Information:**

- Business license numbers and regulatory approvals
- Financial institution relationships
- Credit history information (where relevant)
- Regulatory compliance status
- Any pending legal proceedings or regulatory actions

## 2.2 Supporting Documentation

#### **Identity Verification Documents:**

- Copy of MyKad or passport
- Proof of address (utility bill, bank statement, etc.)
- Professional qualification certificates
- Business registration certificates (for corporate applicants)

#### **Reference and Character Information:**

- Professional references contact details
- Character references and testimonials
- Employment verification letters
- Bank reference letters (where applicable)

#### **Additional Information:**

- Photographs for membership records
- Signature specimens
- Any additional documentation required for specific membership categories

## 2.3 Information Collected During Application Process

#### **Application Processing Data:**

- Date and time of application submission
- Application status and processing history
- Communication records with AoDL staff
- Interview notes and assessment records
- Committee decision records and rationale
- Payment records for application and membership fees

#### **Technical Data:**

- IP address and device information (for online applications)
- Browser type and version
- Operating system information
- Website usage patterns and preferences
- Login credentials and access logs

## **3. PURPOSES OF DATA PROCESSING**

### **3.1 Primary Purposes**

**Membership Application Processing:** We will process your personal data to evaluate and assess your membership application, verify your identity and qualifications, conduct due diligence checks, assess your suitability for membership, and make informed decisions about your application status.

**Membership Administration:** Upon successful application, we will use your personal data to create and maintain your membership records, issue membership certificates and materials, process membership fee payments, and provide ongoing membership services and benefits.

**Communication and Correspondence:** We will use your contact information to communicate with you regarding your application status, send important notices and updates about the Association, provide information about events and activities, and respond to your inquiries and requests.

**Compliance and Legal Obligations:** We will process your personal data to comply with legal and regulatory requirements, including reporting obligations under the Societies Act 1966 (Act 335), anti-money laundering requirements, and other applicable laws and regulations.

### **3.2 Secondary Purposes**

**Industry Research and Development:** With your consent, we may use aggregated and anonymized data for research purposes to better understand industry trends, improve our services, and contribute to the development of the digital lending sector in Malaysia.

**Marketing and Promotional Activities:** Subject to your consent and preferences, we may use your contact information to send you information about Association events, training programs, industry updates, and other relevant communications that may be of interest to you.

**Network Building and Member Services:** We may use your professional information to facilitate networking opportunities with other members, match you with relevant business opportunities, and provide personalized member services based on your interests and expertise.

**Quality Improvement:** We analyze application and membership data to improve our processes, enhance member experience, and develop better services and programs for our membership community.

## 4. LEGAL BASIS FOR PROCESSING

### 4.1 Consent

For most processing activities, we rely on your explicit consent, which you provide by submitting your membership application and agreeing to this Privacy Policy. Your consent covers the collection, use, and processing of your personal data for the purposes outlined in this policy.

You have the right to withdraw your consent at any time, though this may affect our ability to process your membership application or provide membership services. Withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal.

### 4.2 Legitimate Interests

We may process your personal data based on our legitimate interests in operating the Association, managing membership, and fulfilling our objectives as a professional association. These legitimate interests include:

- Maintaining accurate membership records
- Ensuring the integrity of our membership community
- Protecting the Association's reputation and interests
- Facilitating member networking and professional development
- Conducting research to improve our services

### 4.3 Legal Obligations

We process certain personal data to comply with legal obligations, including:

- Reporting requirements under the Societies Act 1966 (Act 335)
- Anti-money laundering and counter-terrorism financing obligations
- Tax and financial reporting requirements
- Regulatory compliance and cooperation obligations

- Court orders and legal process requirements

## 4.4 Contractual Necessity

Processing of your personal data is necessary for the performance of the membership contract, including:

- Evaluating and processing your membership application
- Providing membership services and benefits
- Managing membership fees and payments
- Communicating important membership information

## 5. DATA SHARING AND DISCLOSURE

### 5.1 Internal Sharing

**Committee Members and Office-Bearers:** Your personal data may be shared with Committee members and office-bearers who are involved in the membership application review process, membership administration, and Association governance. All Committee members are bound by confidentiality obligations and data protection requirements.

**Administrative Staff:** Authorized administrative staff members have access to your personal data as necessary to process your application, maintain membership records, and provide member services. All staff members are trained on data protection requirements and bound by confidentiality agreements.

**Committees and Working Groups:** Relevant personal data may be shared with specialized committees or working groups that require such information to fulfill their functions, such as membership committees, disciplinary committees, or professional development committees.

### 5.2 External Sharing

**Regulatory Authorities:** We may disclose your personal data to regulatory authorities, including the Registrar of Societies, Bank Negara Malaysia, or other relevant authorities as required by law or to comply with regulatory obligations. This includes, but is not limited to, compliance with any lawful subpoena, court order, or formal statutory request.

**Professional References:** We may contact the professional references you provide to verify information in your application and obtain additional insights about your character and qualifications.

**Service Providers:** We may share your personal data with trusted third-party service providers who assist us in operating the Association, such as:

- IT service providers and system administrators

- Payment processing companies
- Professional advisors (lawyers, accountants, auditors)
- Event management companies
- Printing and mailing services

**Legal Requirements:** We may disclose your personal data when required by law, court order, or legal process, or when necessary to protect the rights, property, or safety of the Association, our members, or others.

### 5.3 Member Directory and Networking

**Member Directory:** With your consent, certain information (such as name, company, position, and contact details) may be included in member directories or networking platforms to facilitate professional connections among members.

**Event Participation:** When you participate in Association events, your name and professional information may be shared with other participants for networking purposes, subject to your preferences and consent.

**Business Matching:** We may share relevant professional information with other members for business development and collaboration opportunities, always subject to your explicit consent and preferences.

## 6. DATA RETENTION

### 6.1 Retention Periods

**Successful Applications:** For successful membership applications, we retain your personal data for the duration of your membership plus seven (7) years after termination of membership, or as required by applicable laws and regulations.

**Unsuccessful Applications:** For unsuccessful applications, we retain your personal data for three (3) years from the date of application rejection, unless you request earlier deletion or legal requirements mandate longer retention.

**Financial Records:** Financial information and payment records are retained for seven (7) years from the date of the last transaction, in compliance with tax and financial reporting requirements.

**Communication Records:** Records of communications with applicants and members are retained for three (3) years from the date of the last communication, unless longer retention is required for legal or regulatory purposes.

### 6.2 Retention Criteria

Our retention periods are based on:

- Legal and regulatory requirements
- Legitimate business needs
- The nature and sensitivity of the personal data
- The purposes for which the data was collected
- The potential risks to data subjects

### 6.3 Secure Disposal

When personal data reaches the end of its retention period, we securely dispose of it using appropriate methods to ensure that the data cannot be recovered or reconstructed. This includes secure deletion of electronic records and secure destruction of physical documents.

## 7. YOUR RIGHTS AS A DATA SUBJECT

### 7.1 Right of Access

You have the right to request access to your personal data that we hold, including:

- Confirmation of whether we are processing your personal data
- Copies of your personal data
- Information about the purposes of processing
- Details of recipients or categories of recipients
- Information about retention periods
- Details of your rights regarding the data

### 7.2 Right of Correction

You have the right to request correction of inaccurate or incomplete personal data. We will respond to correction requests within thirty (30) days and will notify any third parties to whom the data has been disclosed of the corrections made.

### 7.3 Right of Erasure

You have the right to request erasure of your personal data in certain circumstances, including:

- The data is no longer necessary for the original purposes
- You withdraw consent and there is no other legal basis for processing
- The data has been unlawfully processed
- Erasure is required for compliance with legal obligations

### 7.4 Right to Restrict Processing

You have the right to request restriction of processing in certain circumstances, such as when you contest the accuracy of the data or object to processing based on legitimate interests.

## 7.5 Right to Data Portability

Where technically feasible, you have the right to receive your personal data in a structured, commonly used, and machine-readable format, and to transmit that data to another data controller.

## 7.6 Right to Object

You have the right to object to processing of your personal data based on legitimate interests, including processing for direct marketing purposes.

## 7.7 Right to Withdraw Consent

Where processing is based on consent, you have the right to withdraw your consent at any time. Withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal.

## 7.8 Right to Lodge a Complaint

You have the right to lodge a complaint with the Personal Data Protection Department if you believe that our processing of your personal data violates the Personal Data Protection Act 2010.

## 7.9 Exercising Your Rights

To exercise any of these rights, please contact our Data Protection Officer at [privacy@aodl.com.my](mailto:privacy@aodl.com.my) or write to us at our registered address. We will respond to your request within thirty (30) days and may request additional information to verify your identity.

# 8. DATA SECURITY MEASURES

## 8.1 Technical Safeguards

**Encryption:** We use industry-standard encryption to protect personal data both in transit and at rest. All sensitive data transmissions are protected using SSL/TLS encryption, and stored data is encrypted using appropriate encryption algorithms.

**Access Controls:** We implement strict access controls to ensure that only authorized personnel can access personal data. This includes user authentication, role-based access controls, and regular access reviews.

**System Security:** Our systems are protected by firewalls, intrusion detection systems, and regular security updates. We conduct regular security assessments and vulnerability testing to identify and address potential security risks.

**Data Backup and Recovery:** We maintain secure backup systems to protect against data loss and ensure business continuity. Backup data is encrypted and stored in secure locations with appropriate access controls.

## 8.2 Organizational Safeguards

**Staff Training:** All staff members who handle personal data receive regular training on data protection requirements, security procedures, and their obligations under the Personal Data Protection Act 2010.

**Confidentiality Agreements:** All staff members, Committee members, and third-party service providers are required to sign confidentiality agreements that include specific data protection obligations.

**Security Policies:** We maintain comprehensive information security policies and procedures that are regularly reviewed and updated to address emerging threats and regulatory changes.

**Incident Response:** We have established incident response procedures to quickly identify, contain, and respond to security incidents or data breaches.

## 8.3 Physical Security

**Secure Facilities:** Physical documents containing personal data are stored in secure facilities with appropriate access controls, surveillance systems, and environmental protections.

**Document Handling:** We have established procedures for the secure handling, transportation, and disposal of physical documents containing personal data.

**Equipment Security:** Computing equipment and storage devices are secured against unauthorized access, theft, and environmental hazards.

# 9. CROSS-BORDER DATA TRANSFER

## 9.1 Transfer Restrictions

We generally process and store your personal data within Malaysia. However, in certain circumstances, we may need to transfer your personal data outside Malaysia for legitimate business purposes.

## 9.2 Safeguards for International Transfers

When we transfer personal data outside Malaysia, we ensure appropriate safeguards are in place, including:

**Adequacy Decisions:** We may transfer data to countries that have been deemed to provide adequate protection for personal data by the Malaysian authorities.

**Standard Contractual Clauses:** We may use standard contractual clauses approved by the Personal Data Protection Department to ensure appropriate protection for transferred data.

**Binding Corporate Rules:** Where applicable, we may rely on binding corporate rules that provide appropriate safeguards for international data transfers.

**Explicit Consent:** In some cases, we may seek your explicit consent for specific international data transfers after informing you of the potential risks.

### 9.3 Third-Country Processing

If we use third-party service providers located outside Malaysia, we ensure that they provide appropriate safeguards for your personal data and comply with data protection requirements equivalent to those under Malaysian law.

## 10. COOKIES AND WEBSITE DATA

### 10.1 Use of Cookies

If you submit your membership application through our website, we may use cookies and similar technologies to:

- Remember your preferences and settings
- Improve website functionality and user experience
- Analyze website usage and performance
- Provide personalized content and services

### 10.2 Types of Cookies

**Essential Cookies:** These cookies are necessary for the website to function properly and cannot be disabled. They include cookies that enable you to log into secure areas of the website and submit your application.

**Analytics Cookies:** These cookies help us understand how visitors use our website by collecting anonymous information about page visits, time spent on the site, and user interactions.

**Functional Cookies:** These cookies enable enhanced functionality and personalization, such as remembering your preferences and providing customized content.

## 10.3 Cookie Management

You can control and manage cookies through your browser settings. However, disabling certain cookies may affect the functionality of our website and your ability to submit your membership application online.

# 11. THIRD-PARTY SERVICES

## 11.1 Service Providers

We may use third-party service providers to assist with various aspects of our operations, including:

**Payment Processing:** We use secure payment processors to handle membership fee payments. These processors have their own privacy policies and security measures.

**Email Services:** We may use third-party email service providers to send communications to applicants and members. These providers are bound by data processing agreements that ensure appropriate protection of your personal data.

**Cloud Services:** We may use cloud storage and computing services to store and process personal data. All cloud service providers are required to provide appropriate security measures and comply with data protection requirements.

## 11.2 Due Diligence

We conduct due diligence on all third-party service providers to ensure they:

- Provide appropriate security measures
- Comply with data protection requirements
- Have appropriate data processing agreements in place
- Maintain professional standards and reputation

## 11.3 Data Processing Agreements

All third-party service providers who process personal data on our behalf are required to sign data processing agreements that specify:

- The scope and purpose of data processing
- Security measures and safeguards
- Confidentiality obligations
- Data retention and disposal requirements
- Incident reporting procedures

## 12. DATA BREACH NOTIFICATION

### 12.1 Breach Response

In the event of a personal data breach that is likely to result in a risk to your rights and freedoms, we will:

- Contain and assess the breach within 24 hours
- Notify the Personal Data Protection Department within 72 hours
- Notify affected individuals without undue delay
- Take appropriate measures to mitigate the impact of the breach

### 12.2 Notification Content

Our breach notifications will include:

- Description of the nature of the breach
- Categories and approximate number of data subjects affected
- Likely consequences of the breach
- Measures taken or proposed to address the breach
- Contact information for further inquiries

### 12.3 Prevention Measures

We continuously review and improve our security measures to prevent data breaches, including:

- Regular security assessments and testing
- Staff training and awareness programs
- System monitoring and intrusion detection
- Incident response planning and testing

## 13. CHILDREN'S PRIVACY

### 13.1 Age Restrictions

Membership in AoDL is generally restricted to individuals who are at least 18 years of age. We do not knowingly collect personal data from children under 18 years of age without appropriate parental consent.

### 13.2 Youth Membership

For Youth Membership categories that may include individuals under 18, we require:

- Parental or guardian consent for data processing
- Additional safeguards for the protection of children's data

- Limited data collection and processing
- Enhanced security measures

### 13.3 Parental Rights

Parents or guardians of children whose data we process have the right to:

- Access their child's personal data
- Request correction or erasure of the data
- Withdraw consent for data processing
- Object to certain types of processing

## 14. UPDATES TO THIS PRIVACY POLICY

### 14.1 Policy Updates

We may update this Privacy Policy from time to time to reflect changes in:

- Legal and regulatory requirements
- Our data processing practices
- Technology and security measures
- Association policies and procedures

### 14.2 Notification of Changes

We will notify you of material changes to this Privacy Policy by:

- Posting the updated policy on our website
- Sending email notifications to applicants and members
- Providing notice during the application process
- Including information in Association communications

### 14.3 Continued Use

Your continued use of our services and participation in the membership application process after we post changes to this Privacy Policy constitutes your acceptance of the updated policy.

## 15. CONTACT INFORMATION

### 15.1 Data Protection Officer

**Data Protection Officer**

Association of Digital Lenders (AoDL)

Email: [privacy@aodl.com.my](mailto:privacy@aodl.com.my)

Address: NO.53 JALAN 34/154, TAMAN DELIMA, 56000 WILAYAH PERSEKUTUAN KUALA LUMPUR.

## 15.2 General Inquiries

For general privacy-related inquiries or concerns, please contact:

### **Secretary**

Association of Digital Lenders (AoDL)

Email: [admin@aodl.com.my](mailto:admin@aodl.com.my)

## 15.3 Regulatory Authority

If you have concerns about our data processing practices that cannot be resolved through our internal procedures, you may contact:

### **Personal Data Protection Department**

Ministry of Communications and Digital

Email: [aduan@pdp.gov.my](mailto:aduan@pdp.gov.my)

Website: [www.pdp.gov.my](http://www.pdp.gov.my)

# 16. CONSENT AND ACKNOWLEDGMENT

## 16.1 Consent Declaration

By submitting your membership application to the Association of Digital Lenders (AoDL), you hereby acknowledge that you have:

- Read and understood this Privacy Policy in its entirety
- Been informed of the purposes for which your personal data will be processed
- Been made aware of your rights as a data subject under the Personal Data Protection Act 2010
- Been provided with information about how to exercise your rights
- Been informed about data sharing arrangements and security measures

## 16.2 Explicit Consent

You hereby provide your explicit and informed consent for AoDL to:

- Collect, use, and process your personal data for the purposes outlined in this Privacy Policy
- Share your personal data with third parties as described in this Privacy Policy
- Retain your personal data for the periods specified in this Privacy Policy
- Transfer your personal data outside Malaysia where necessary and with appropriate safeguards

### 16.3 Optional Consents

Please indicate your preferences for the following optional data processing activities:

**Marketing Communications:**  I consent to receiving marketing communications about AoDL events, programs, and services  I do not wish to receive marketing communications

**Member Directory:**  I consent to my contact information being included in member directories for networking purposes  I do not wish to be included in member directories

**Research and Analytics:**  I consent to my data being used for research and analytics purposes (in anonymized form)  I do not consent to research and analytics use

### 16.4 Withdrawal of Consent

You understand that you may withdraw your consent at any time by contacting our Data Protection Officer. However, withdrawal of consent may affect our ability to process your membership application or provide membership services.

### 16.5 Acknowledgment of Understanding

By signing below or submitting your electronic application, you acknowledge that:

- You have the legal capacity to provide this consent
- You understand the implications of providing your personal data
- You have been given the opportunity to ask questions about this Privacy Policy
- You consent to the processing of your personal data as described in this Privacy Policy

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**Applicant Signature:** \_\_\_\_\_ **Date:** \_\_\_\_\_

**Printed Name:** \_\_\_\_\_

**For Electronic Applications:** By clicking "I Agree" or "Submit Application," you provide your electronic consent to this Privacy Policy.

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#### Document Control:

- **Version:** 1.0
- **Effective Date:** 5<sup>th</sup> November 2025
- **Next Review Date:** [Annual review required]

- **Approved By:** Committee of Association of Digital Lenders
- **Document Owner:** Secretary, Association of Digital Lenders

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