PRIVACY STATEMENT

MYStartup, an initiative by Cradle Fund Sdn. Bhd. and its group of companies ("**we**", "**us**", "**our**" or "**ours**"), value your privacy and endeavours to protect your personal data in compliance with the Personal Data Protection Act 2010 ("**Act**"). Our compliance ensures that your data is processed with due care and attention.

BACKGROUND

This privacy statement ("**Privacy Statement**") describes how we collect, use, process and disclose your Personal Data through the use of our Website.

"**Personal Data**" is any information which can be used to identify you or from which you are identifiable. This includes but is not limited to your name, nationality, telephone number, personal interests, email address, your image, government-issued identification numbers, race, date of birth, marital status, educational history, employment history and financial information.

All acts of processing the above Personal Data will be carried out in compliance with the Act. As defined in the Act, "processing" in relation to Personal Data, means collecting, recording, holding or storing the Personal Data or carrying out any operation or set of operations on the personal data.

ACKNOWLEDGEMENT & CONSENT

By using www.mystartup.gov.my ("**Website**"), continuing your communications with us, you acknowledge that you have read this Privacy Statement and expressly agree and consent to the use and processing of your Personal Data by us as described in this Privacy Statement.

INFORMATION COLLECTED BY US

(a) **Identity and Professional Information**
Name, designation, organisation, education history, work experience, profile photographs, publicly available professional profiles, and other similar information relevant to the Website, programme participation, or ecosystem profiling;

(b) **Contact Information**
Email address, telephone number and other contact details provided to us;

(c) **Organisation or Business-Related Information**
Where you represent an organisation, company, or startup, we may collect business-related information, which may include Personal Data where individuals are identifiable, such as company name, logo, incorporation or founding date, website, publicly available social media profiles, product, service or application descriptions, business and/or registered address, general contact details, and business information voluntarily submitted (e.g. high-level business information submitted voluntarily, such as business model summaries or ecosystem participation details);

(d) **Biometric data (where applicable)**
Facial images, facial recognition data, or fingerprint information, where collected for identification, security, or access control purposes;

(e) **Information Voluntarily Provided**
Any other information voluntarily provided by you with your participation in our programmes, Website, initiatives, platforms, or services.

Where the information includes or is linked to Personal Data of third parties or identifiable individuals (such as founders, key contacts, or authorised representatives), by submitting such information to us, you represent to us that you have obtained the consent of the third party to provide us with their Personal Data for the respective purposes. Such data is collected and processed as Personal Data under this Privacy Statement.

WHERE DO WE COLLECT YOUR PERSONAL DATA FROM?

We collect your Personal Data both directly and indirectly from you through the following sources, including but not limited to:

(a) Information provided directly by you through official requests, enquiries, registrations, or submissions made to us;
(b) Communications with you, including by phone, emails, correspondence, messages, and other interactions made through our official channels, written form or electronic means;
(c) Forms submitted through the Website, including “Contact Us” and registration forms;
(d) Digital interactions through our websites, mobile applications, social media platforms, or other official online channels;
(e) Through cookies and similar technologies on our Website, which we use for functionality, analytics, and personalisation where you have provided consent;
(f) Your participation in our programmes, initiatives, events, or activities organised by us or our affiliated partners;
(g) Information obtained from regulatory bodies, government agencies, statutory authorities, or public registries;
(h) Information provided by third parties connected to you, such as employers, colleagues, partners, or representatives, where permitted by law;
(i) Publicly available sources or third-party sources where such disclosure is lawful and permitted.

WHY DO WE NEED YOUR PERSONAL DATA?

Your Personal Data may be collected, stored, and processed (directly or indirectly) for the following purposes (“Purposes”), where relevant and necessary, including but not limited to:

(a) **Platform operation and administration**
To operate, maintain, and improve our Website and related information technology systems, including user access management, system security, analytics, and technical support.

(b) **Programme delivery and ecosystem services**
To administer and manage programmes, initiatives, events, research activities, surveys, and ecosystem-related services, including stakeholder engagement and reporting.

(c) **Regulatory and legal compliance**
To comply with applicable laws, regulations, directives, guidelines, and requirements imposed by regulatory authorities, government agencies, or courts of competent jurisdiction.

(d) **Communications and publications**
To publish your name, role, organisation, profile information, and/or any information submitted by you or through your participation, on the Website, reports, publications, newsletters, alerts, programmes/courses/events, or official materials related to the startup ecosystem, where relevant.

Such information may be visible to other users, participants, partners, or the public. We will process and disclose your Personal Data only as necessary for these purposes and in accordance with applicable data protection laws.

(e) **Service support and enquiries**
To respond to enquiries, requests, feedback, and provide user support related to the Website or our services.

(f) **Transactions and engagements**
To manage engagements or transactions relating to programmes, services, or initiatives you participate in.

(g) **Analytics, improvement, and personalisation**
To analyse usage patterns, including through aggregated or anonymised data, improve platform performance, functionality and user experience and tailor content or communications relevant to your interests.

(h) **Communications on related initiatives**
To send you information, updates, or notifications relating to our programmes, initiatives, or ecosystem activities via email, messaging, or other communication channels. We will not disclose your Personal Data to third parties for marketing purposes without your prior consent.

(i) **Ancillary purposes**
For purposes incidental or reasonably necessary to support the above Purposes.

Your Personal Data will not be processed for purposes that are incompatible with the above without your consent, unless permitted or required by law.

Where necessary for service delivery, platform administration, analytics, improvement, security, compliance, or other reasonably related purposes, we may process your Personal Data. For optional features such as personalised content or communications, processing will be subject to

your consent where required by law. You may withdraw your consent for these optional features at any time.

RETENTION PERIOD

We retain Personal Data including any information generated through your use of the Website for as long as necessary to fulfil the purposes for which the data was collected, in accordance with the Act and other applicable laws and regulations.

Personal Data and/or any information generated through your use of the Website will be securely deleted or anonymised when we reasonably determine that:

(a) the purposes for which the data was collected have been fulfilled or are no longer applicable;
(b) the retention of such data is no longer required for legal, regulatory, audit, operational, or business purposes; and
(c) there are no other lawful or legitimate grounds requiring continued retention.

Where required by law or regulatory obligations, certain data may be retained for a longer period, after which it will be securely disposed of or anonymised.

WITH WHOM DO WE DISCLOSE YOUR PERSONAL DATA?

We do not disclose your Personal Data to third parties except in the following circumstances:

(a) Government agencies, statutory authorities, regulators, or law enforcement bodies, where disclosure is required or permitted under applicable laws or regulations;
(b) Service providers, contractors, or professional advisers appointed by us, including technology service providers, auditors, consultants, lawyers, and advisors, where such disclosure is necessary for the operation, maintenance, or improvement of the Website or our services;
(c) Programme partners, event organisers, marketing agencies, or communications partners, solely where relevant to your participation in our programmes, initiatives, or events;
(d) Credit reference agencies or financial institutions, where applicable and permitted by law;
(e) Any other third party where you have expressly provided your consent for such disclosure.

All disclosures are made on a need-to-know basis and subject to appropriate contractual, confidentiality, and data protection obligations to safeguard your Personal Data.

HOW DO WE PROTECT YOUR PERSONAL DATA?

We implement appropriate technical and organisational security measures to protect your Personal Data against unauthorised or unlawful processing, accidental loss, misuse, disclosure, alteration, or destruction. These measures are designed in accordance with the Act and recognised industry standards.

Our security measures include, but are not limited to:

(a) **Access control**
Access to systems and data is restricted to authorised personnel on a role-based and need-to-know basis. Privileged access is limited, regularly reviewed, and revoked when no longer required.

(b) **Encryption**
Personal Data is encrypted at rest and protected during transmission using industry-standard encryption protocols.

(c) **Secure communications**
All data transmitted through the Website is protected using HTTPS with secure transport layer protocols.

(d) **Transport Layer Security**
We use Transport Layer Security ("**TLS**") version 1.2 or higher to safeguard data in transit.

(e) **Monitoring and safeguards**
System activity is logged and monitored to detect unauthorised access, security incidents, and potential vulnerabilities.

WHAT ARE YOUR RIGHTS, IN RESPECT OF YOUR PERSONAL DATA?

Subject to applicable laws, you have the right to:

(a) Request access to your Personal Data held by us;
(b) Request a copy of your Personal Data, subject to applicable fees and verification requirements;
(c) Request correction or updating of inaccurate, incomplete, or outdated Personal Data;
(d) Right to data portability: Under certain circumstances, you may request us to transmit Personal Data that you have provided to us, to a third party without hindrance, or to give you a copy of it so that you can transmit it to a third party, where technically feasible;
(e) Request to withdraw from promotional materials;
(f) Right to Be Notified of a Data Breach;
(g) Withdraw your consent to the processing of your Personal Data at any time by providing written notice to us.

COOKIES AND RELATED TECHNOLOGIES

Our Website may automatically collect certain information in connection with your use of the Website. This may include your device information, log information, browsing history, IP address, cookie data and location information. Such information may be collected through cookies or similar technologies and may be stored either persistently or for the duration of your browsing session.

We use cookies and similar technologies to analyse your activity on our Website, improve your experience, enhance functionality and performance and where applicable, for marketing purposes. We will not use cookies for purposes other than those described in this Privacy Statement without your consent where required by applicable law.

By continuing to use this Website, you consent to our use of cookies as described in this Privacy Statement, unless you have disabled them. You may choose to disable, block or deactivate cookies through your browser settings. Please note that disabling certain cookies may affect the availability, functionality, or performance of the Website or Services.

Certain cookies may be managed by third parties, such as analytics or advertising providers (e.g., Google or Meta). These third parties may collect and process data for purposes including analytics, functionality enhancement, or personalised marketing. For more information, kindly refer to the relevant third parties' own cookie and privacy policies to understand the types of cookies they use and how they process your data.

CONTACT US

If you have any questions, comments, or requests relating to this Privacy Statement or your Personal Data, or if you wish to exercise your rights of access, correction, withdrawal of consent, or limitation of processing, please email us at mystartup@cradle.com.my

We may require reasonable verification of your identity before processing any request. All request will be handled within a reasonable timeframe in accordance with applicable laws and regulations. Where consent is withdrawn, we will cease processing your Personal Data unless such processing is required or permitted by law.

Language

In accordance with Section 7(3) of the Act, we provide the Privacy Statement in both English and Bahasa Malaysia.

Updates to this Privacy Statement

We may revise and/or update this Privacy Statement periodically. Kindly review it from time to time to stay informed. We may also notify you of these changes through email, post, short message service, or other communication methods.

Conflict

In case of any conflict or inconsistency between the English version of this Privacy Statement and the translated version in Malay, the English version shall prevail.

Last update: February 2026