

# PRIVACY POLICY

Nucleus Advisory Sdn Bhd

**Effective Date:** February 24, 2026

## 1. Introduction

Nucleus Advisory Sdn Bhd ("Company," "we," "us," or "our") is committed to protecting your privacy and personal data. This Privacy Policy explains how we collect, use, disclose, and safeguard your information when you use our website and digital self-assessment services.

This Privacy Policy is designed to comply with:

- Personal Data Protection Act 2010 (PDPA) of Malaysia
- General Data Protection Regulation (GDPR) for EU data subjects
- Applicable international data protection standards

By accessing our website and using our services, you consent to the practices described in this Privacy Policy.

## 2. Information We Collect

### 2.1 Personal Information

We may collect the following personal information:

- Full name
- Email address
- Phone number
- Billing address
- Payment information (processed securely by third-party payment processors)
- Employment history and professional background (for assessment purposes)
- Educational background

## 2.2 Assessment Data

During the assessment process, we collect:

- Psychometric assessment responses
- Cognitive test results
- Personality profile data
- Work style preferences
- Career interest indicators

## 2.3 Automatically Collected Information

When you visit our website, we automatically collect:

- IP address
- Browser type and version
- Device information
- Operating system
- Pages visited and time spent
- Referring website
- Cookies and similar tracking technologies

## 3. How We Use Your Information

We use your personal information for the following purposes:

1. Service Delivery: To provide, maintain, and improve our assessment services
1. Assessment Processing: To analyze assessment responses and generate professional reports
1. Consultation: To schedule and conduct personalized consultation sessions
1. Communication: To send order confirmations, assessment instructions, and service updates
1. Customer Support: To respond to inquiries and resolve technical issues
1. Payment Processing: To process transactions and send receipts
1. Legal Compliance: To comply with applicable laws and regulations
1. Service Improvement: To analyze usage patterns and enhance our offerings

1. Security: To detect and prevent fraud and unauthorized access

## 4. Legal Basis for Processing

Under the Personal Data Protection Act 2010 (Malaysia) and GDPR, we process your personal data based on:

- Contractual Necessity: Processing is necessary to fulfill our contract with you
- Consent: You have provided explicit consent for specific processing activities
- Legitimate Interests: Processing is necessary for our legitimate business interests
- Legal Obligation: Processing is required to comply with legal requirements

## 5. Data Sharing and Disclosure

We do not sell your personal information. We may share your data with:

### 5.1 Service Providers

- Payment processors (for secure transaction handling)
- Cloud hosting providers (for data storage)
- Email service providers (for communication delivery)
- Video conferencing platforms (for consultation sessions)

### 5.2 Legal Requirements

We may disclose your information if required by:

- Court order or legal process
- Government authorities with proper jurisdiction
- Applicable laws and regulations

### 5.3 Business Transfers

In the event of a merger, acquisition, or sale of assets, your information may be transferred to the acquiring entity.

## 6. Data Security

We implement appropriate technical and organizational measures to protect your personal data:

- Encryption of data in transit (SSL/TLS) and at rest
- Secure server infrastructure with firewalls
- Regular security assessments and penetration testing
- Access controls and authentication mechanisms
- Employee training on data protection practices
- Incident response procedures

Despite our efforts, no security system is impenetrable. We cannot guarantee absolute security of your data.

## 7. Data Retention

We retain your personal information for:

- Active Accounts: As long as necessary to provide our services
- Assessment Data: 7 years from the date of assessment (for professional reference)
- Financial Records: 7 years as required by Malaysian tax laws
- Marketing Communications: Until you opt out or withdraw consent

After the retention period, your data will be securely deleted or anonymized.

## 8. Your Data Protection Rights

Under Malaysian PDPA and GDPR, you have the following rights:

- Right to Access: Request a copy of your personal data
- Right to Rectification: Correct inaccurate or incomplete data
- Right to Erasure: Request deletion of your personal data (subject to legal obligations)
- Right to Restrict Processing: Limit how we use your data
- Right to Data Portability: Receive your data in a structured format
- Right to Object: Object to certain processing activities
- Right to Withdraw Consent: Withdraw consent at any time

To exercise these rights, contact us at [enquiries@nucleusadvisory.co](mailto:enquiries@nucleusadvisory.co). We will respond within 30 days.

## 9. Cookies and Tracking Technologies

Our website uses cookies and similar technologies to:

- Maintain user sessions and authentication
- Remember user preferences
- Analyze website traffic and usage patterns
- Improve website functionality

You can control cookies through your browser settings. Disabling cookies may affect website functionality.

## 10. International Data Transfers

Your personal data may be transferred to and processed in countries outside Malaysia. When we transfer data internationally, we ensure appropriate safeguards are in place:

- Standard contractual clauses approved by relevant authorities
- Adequacy decisions for countries with equivalent data protection
- Binding corporate rules for intra-group transfers

## 11. Children's Privacy

Our services are not intended for individuals under 18 years of age. We do not knowingly collect personal information from children. If you believe we have collected information from a minor, please contact us immediately.

## 12. Data Protection Officer

We have appointed a Data Protection Officer (DPO) to oversee our data protection practices. Contact our DPO for privacy-related inquiries:

Email: [enquiries@nucleusadvisory.co](mailto:enquiries@nucleusadvisory.co)

Address: Nucleus Advisory Sdn Bhd, Lot No. 4, Jalan P/13, Kawasan Perindustrian Miel, Bangi Phase 5, Section 10, Bandar Baru Bangi, Selangor, Malaysia

## 13. Changes to This Privacy Policy

We may update this Privacy Policy periodically. Changes will be posted on this page with an updated effective date. We encourage you to review this policy regularly.

## 14. Contact Information

For any questions or concerns about this Privacy Policy, please contact us:

Nucleus Advisory Sdn Bhd

Lot No. 4, Jalan P/13,

Kawasan Perindustrian Miel,

Bangi Phase 5, Section 10,

Bandar Baru Bangi, Selangor, Malaysia

Email: [enquiries@nucleusadvisory.co](mailto:enquiries@nucleusadvisory.co)

Phone: (+60)11 3908 1838

Website: <https://nucleusadvisory.co>

## 15. Complaints

If you believe your data protection rights have been violated, you have the right to lodge a complaint with:

- The Personal Data Protection Commissioner of Malaysia
- The relevant supervisory authority in your jurisdiction (for EU residents)