

FLOW GEMS JEWELLERY

PRIVACY POLICY

Website: www.flowgems.com/tnc.pdf

Version: 202610

PART A — PRIVACY POLICY

1. Introduction

At Flow Gems Jewellery (“we”, “us” or “our”), we respect your privacy and are committed to protecting your personal data.

This Privacy Policy explains how we collect, use, disclose, store and protect your personal data when you visit our website, contact us, visit our store, purchase our products or otherwise interact with us.

We handle personal data in accordance with the applicable laws of Malaysia, including the Personal Data Protection Act 2010 (Act 709) (“PDPA”), as amended from time to time.

By providing your personal data to us, you acknowledge that you have read this Privacy Policy and understand how your personal data may be processed for the purposes described below, subject to applicable legal requirements.

2. Personal Data Collection

“Personal Data” means information that identifies you or could reasonably be used to identify you.

Depending on your interaction with us, we may collect the following information:

- Personal details: Name, identification details where necessary, and other information you provide to us.
- Contact information: Telephone number, email address, mailing address and delivery address.
- Transaction information: Purchase records, invoices, payment status, order details and warranty or after-sales service records, where applicable.
- Product enquiries: Information about your jewellery preferences, product enquiries, customisation requests and communications with us.
- Website information: Technical information and browsing data collected through cookies or similar technologies, where applicable.

We may collect personal data directly from you through our website, social media channels, messaging platforms, telephone calls, in-store transactions, enquiry forms or other communications with us.

Where personal data is required for us to process a transaction, fulfil an order or provide a requested service, failure to provide such information may prevent us from doing so.

3. Purposes of Collecting and Processing Personal Data

We may collect, use and process your personal data for the following purposes:

- Responding to enquiries and providing customer service.
- Processing purchases, payments, deliveries and order-related requests.
- Issuing invoices, receipts and relevant transaction records.
- Providing product information, jewellery recommendations and customisation services.
- Arranging product verification, certification coordination and after-sales services, where applicable.
- Maintaining transaction records and handling complaints, disputes or legal claims.
- Managing our website, business operations and customer relationships.
- Sending updates about new products, store openings, promotions, events and special offers, where permitted by law and subject to your preferences.
- Complying with applicable legal, regulatory and accounting requirements.

4. Consent and Marketing Communications

Where required by applicable law, we will obtain your consent before collecting, using or processing your personal data for the relevant purposes.

You may opt out of receiving marketing communications from us at any time by contacting us through our official contact channels or following the unsubscribe instructions provided in the communication.

Opting out of marketing communications will not affect communications necessary to complete your purchase, provide requested services or meet our legal obligations.

5. Disclosure of Personal Data

We do not sell your personal data to third parties.

Where necessary and permitted by applicable law, we may disclose your personal data to trusted third parties for legitimate business purposes, including:

- Payment service providers and financial institutions for transaction processing.
- Delivery and logistics providers for order fulfilment.
- Website hosting, information technology and system service providers.
- Professional advisers, auditors and legal representatives.
- Government authorities, regulators, courts or law enforcement agencies where required or authorised by law.

We will take reasonable steps to ensure that third parties receiving your personal data handle it appropriately and use it only for the relevant purposes, subject to applicable legal requirements.

6. Data Security

We take reasonable technical, organisational and administrative measures to protect your personal data against unauthorised access, collection, use, disclosure, alteration, loss or misuse.

Access to personal data is limited to authorised persons who require such information for legitimate business purposes.

However, no method of electronic transmission or data storage can be guaranteed to be completely secure. We will take reasonable steps to protect your information in accordance with applicable legal requirements.

7. Retention of Personal Data

We retain personal data only for as long as reasonably necessary to fulfil the purposes for which it was collected, including transaction processing, customer service, record keeping, dispute resolution and compliance with applicable legal requirements.

When personal data is no longer required, we will take reasonable steps to securely delete, destroy or anonymise it, where appropriate and permitted by law.

If you opt out of marketing communications, we may retain limited information necessary to record your preference and ensure that your request is respected.

8. Access, Correction and Other Rights

Subject to applicable laws and any relevant conditions or exceptions, you may request to:

- Access the personal data we hold about you.
- Correct inaccurate, incomplete or outdated personal data.
- Withdraw consent for processing where consent is the applicable legal basis.
- Stop or object to certain processing activities, including direct marketing, where applicable.
- Exercise any other rights available to you under applicable data protection laws.

We may need to verify your identity before processing a request. Certain requests may be subject to legal requirements, applicable fees or lawful grounds for refusal.

To submit a request, please contact us using the contact details provided in Section 11.

9. Cookies and Website Technologies

Our website may use cookies or similar technologies to support website functionality, improve user experience, understand website traffic and, where applicable, support marketing activities.

You may be able to manage cookies through your browser settings. Disabling certain cookies may affect the functionality of our website.

Where required by applicable law, we will obtain the relevant consent before using cookies or similar technologies.

10. Changes to This Privacy Policy

We may update this Privacy Policy from time to time to reflect changes in our business operations, website features or applicable laws.

Any updated version will be published on our website with a revised effective date, where appropriate.

We encourage you to review this page periodically.

11. Contact Us

If you have any questions about this Privacy Policy, wish to access or correct your personal data, or would like to make a privacy-related request, please contact us:

Flow Gems Jewellery

Website: www.flowgems.com

Email: sales@flowgems.com

Address: *1F-123A, Queensbay Mall P. Pinang*

Contact Number: +6017- 708 6228

FLOW GEMS JEWELLERY

隐私政策

网站：www.flowgems.com/tnc.pdf

Version: 202610

第一部分 — 隐私政策

1. 引言

Flow Gems Jewellery (以下简称“本公司”、“我们”或“我们的”) 尊重您的隐私, 并致力于保护您的个人资料。

本隐私政策说明, 当您浏览我们的网站、与我们联系、到访我们的店铺、购买我们的产品或以其他方式与我们互动时, 我们如何收集、使用、披露、储存及保护您的个人资料。

我们依据马来西亚适用法律处理个人资料, 包括经不时修订的《2010 年个人资料保护法》(第 709 号法令, 简称“PDPA”)。

当您向我们提供个人资料时, 即表示您已阅读本隐私政策, 并了解我们可能会基于下文所述目的处理您的个人资料, 但须遵守适用法律的要求。

2. 个人资料的收集

“个人资料”是指能够识别您身份, 或可合理地用于识别您身份的信息。

根据您与我们的互动情况, 我们可能收集以下资料:

- 个人资料: 姓名、在必要时所需的身份证明资料, 以及您向我们提供的其他信息。
- 联络资料: 电话号码、电邮地址、邮寄地址及收货地址。
- 交易资料: 购买记录、发票、付款状态、订单详情, 以及在适用情况下的保修或售后服务记录。
- 产品查询资料: 您的珠宝偏好、产品查询、定制要求及与我们的沟通记录。
- 网站资料: 在适用情况下, 通过 Cookies (网站识别码) 或类似技术收集的技术信息及浏览数据。

我们可能通过官方网站、社交媒体、即时通讯平台、电话、店内交易、查询表格或其他沟通方式, 直接向您收集个人资料。

如果某些个人资料是处理交易、完成订单或提供您所要求服务所必需的, 若您未能提供相关资料, 我们可能无法完成有关事项。

3. 收集及处理个人资料的目的

我们可能基于以下目的收集、使用及处理您的个人资料:

- 回复查询并提供客户服务。
- 处理购买、付款、配送及订单相关要求。

- 开具发票、收据及相关交易记录。
- 提供产品信息、珠宝建议及定制服务。
- 在适用情况下，安排产品验证、鉴定证书相关事宜及售后服务。
- 保存交易记录，并处理投诉、争议或法律索赔。
- 管理网站、业务运营及客户关系。
- 在法律允许并符合您的偏好时，发送有关新产品、新店开幕、促销、活动及特别优惠的资讯。
- 遵守适用的法律、监管及会计要求。

4. 同意及营销通讯

在适用法律要求的情况下，我们会在收集、使用或处理您的个人资料前，就相关目的取得您的同意。

您可以随时通过我们的官方联络渠道，或按照相关通讯中提供的取消订阅指示，选择不接收营销信息。

选择停止接收营销信息，不会影响我们为完成您的购买、提供您所要求的服务或履行法律义务而必须发送的通讯。

5. 个人资料的披露

我们不会向第三方出售您的个人资料。

在业务所需且适用法律允许的情况下，我们可能为了正当业务目的向可信赖的第三方披露您的个人资料，包括：

- 用于处理交易的支付服务提供商及金融机构。
- 用于完成订单的配送及物流服务商。
- 网站托管、信息技术及系统服务提供商。
- 专业顾问、审计师及法律代表。
- 法律要求或授权披露资料的政府部门、监管机构、法院或执法机关。

我们会采取合理措施，确保接收您个人资料的第三方妥善处理相关资料，并仅将其用于相关目的，同时遵守适用法律要求。

6. 资料安全

我们会采取合理的技术、组织及行政措施，保护您的个人资料免遭未经授权的访问、收集、使用、披露、修改、遗失或滥用。

只有因正当业务需要而获授权的人员，才可访问相关个人资料。

然而，任何电子传输或资料储存方式都无法保证绝对安全。我们会依据适用法律要求，采取合理措施保护您的信息。

7. 个人资料的保存期限

我们只会在合理必要的期限内保存个人资料，以实现收集资料的目的，包括处理交易、提供客户服务、保存记录、解决争议及遵守适用法律要求。

当个人资料不再需要时，我们会在适当且法律允许的情况下，采取合理措施安全地删除、销毁或匿名化相关资料。

如果您选择停止接收营销信息，我们仍可能保留少量必要资料，以记录并遵守您的选择。

8. 查阅、更正及其他权利

在适用法律及相关条件或例外的规限下，您可以提出以下要求：

- 查阅我们所持有的您的个人资料。
- 更正不准确、不完整或过时的个人资料。
- 在同意是相关处理的适用法律依据时，撤回您的同意。
- 在适用情况下，停止或反对某些资料处理活动，包括直接营销。
- 行使适用资料保护法律赋予您的其他权利。

在处理您的要求前，我们可能需要核实您的身份。部分要求可能受法律规定、适用费用或合法拒绝理由的限制。

如需提出申请，请使用第 11 节所列的联络资料与我们联系。

9. Cookies 及网站技术

我们的网站可能使用 Cookies（网站识别码）或类似技术，以支持网站功能、改善用户体验、了解网站流量，并在适用情况下支持营销活动。

您可以通过浏览器设置管理 Cookies。停用某些 Cookies 可能影响网站的部分功能。

在适用法律要求的情况下，我们会在使用 Cookies 或类似技术前取得相关同意。

10. 隐私政策的修改

我们可能不时更新本隐私政策，以反映业务运营、网站功能或适用法律的变化。

在适当情况下，更新后的版本将连同修订后的生效日期发布于我们的网站。

我们建议您定期查阅本页面。

11. 联络我们

如果您对本隐私政策有任何疑问、希望查阅或更正您的个人资料，或提出与隐私相关的申请，请通过以下方式联系我们：

Flow Gems Jewellery(003684551-W)

网站: www.flowgems.com

电邮: sales@flowgems.com

地址: 1F-123A, Queensbay Mall P. Pinang

联系号码: +601- 708 6228

FLOW GEMS JEWELLERY

REFUND & EXCHANGE POLICY

PART B — REFUND & EXCHANGE POLICY

No Refunds, Exchange Only

All sales are final. Refunds are not permitted. Eligible items may be exchanged within three (3) calendar days from the date of receipt, subject to our Exchange Policy. Nothing in this policy excludes any rights or remedies available to customers under applicable law.

Exchange Policy

- 1. Exchange Period.** Exchange requests must be made within three (3) calendar days from the date the parcel is received. The item must be returned in its original, unused and undamaged condition, together with the original receipt, certificate of identification (if applicable), packaging and any accessories provided at the time of purchase. Requests submitted after the exchange period will not be accepted, except where required by applicable law.
- 2. Exchange Value and Price Difference.** Any approved exchange is subject to the Company's confirmation. If the replacement item is of a higher price, the customer must pay the price difference. If the replacement item is of a lower price, the price difference will not be refunded. The replacement item must be agreed upon by both parties before the exchange is completed.
- 3. Eligible and Excluded Items.** Exchange eligibility depends on the type and condition of the item. Unless otherwise agreed in writing by the Company, items that are custom-made, personalised, altered, resized, damaged, or no longer in their original condition are not eligible for exchange. Any item sold with a certificate must be returned with the original certificate.
- 4. Previously Exchanged Items.** Any replacement item provided through an approved exchange is final and is not eligible for a further exchange, except where required by applicable law or where the Company agrees otherwise in writing.
- 5. Online Purchases.** This Exchange Policy applies to purchases made directly through the official Flow Gems Jewellery shop, official store or website at www.flowgems.com, unless otherwise stated by the Company.
- 6. Natural Jadeite and Product Characteristics.** Natural jadeite is a natural gemstone, and variations in colour, texture, translucency, internal inclusions and other natural characteristics may occur. Such natural variations do not automatically constitute a defect. However, this provision does not exclude any rights or remedies available to customers under applicable law.
- 7. How to Request an Exchange.** Customers must contact Flow Gems Jewellery through our official contact channels within the exchange period and obtain confirmation before returning any item. Return shipping arrangements and costs will be communicated to the customer when the exchange request is approved.

FLOW GEMS JEWELLERY

退款及换货政策

第二部分 — 退款及换货政策

不退款，仅限符合条件的商品换货

所有交易一经完成，原则上不予退款。符合换货条件的商品，可根据本公司的换货政策，在收到商品之日起三（3）个日历日内申请换货。本政策不排除消费者根据适用法律享有的任何权利或补救措施。

换货政策

- 1. 换货期限。** 换货申请必须在收到包裹之日起三（3）个日历日内提出。商品必须保持原始、未使用及未损坏的状态，并连同原始收据、鉴定证书（如适用）、包装及购买时附带的所有配件一并退回。超过换货期限的申请将不予受理，但适用法律另有要求的情况除外。
- 2. 换货价值及差额。** 任何换货均须经本公司确认批准。如替换商品的价格较高，顾客须补足差价。如替换商品的价格较低，差额将不予退还。换货完成前，双方必须就替换商品达成一致。
- 3. 符合及不符合换货条件的商品。** 商品是否符合换货条件，取决于商品类别及状态。除非本公司另以书面同意，定制商品、个性化商品、已修改或调整尺寸的商品、已损坏商品，或不再保持原始状态的商品，均不符合换货条件。附有鉴定证书出售的商品，换货时必须一并退回原始证书。
- 4. 已换货的商品。** 经批准换货后提供的替换商品，原则上不得再次换货，但适用法律另有要求或本公司另以书面同意的情况除外。
- 5. 网上购买。** 除非本公司另有说明，本换货政策适用于通过 Flow Gems Jewellery 门店，官方旗舰店，官方网店 (www.flowgems.com) 直接购买的商品。
- 6. 天然翡翠及产品特性。** 天然翡翠属于天然宝石，其颜色、质地、透明度、内部内含物及其他天然特征可能存在差异。这些天然差异并不必然构成商品瑕疵。但本条款不排除消费者根据适用法律享有的任何权利或补救措施。
- 7. 如何申请换货。** 顾客必须在换货期限内通过 Flow Gems Jewellery 的官方联络渠道提出申请，并在获得确认后寄回商品。换货获批后，我们会告知顾客退货运输的安排及相关费用。