

## **Privacy Notice / Personal Data Protection Notice**

**Effective Date:** 1 April 2026

**Last Updated:** 13 April 2026

### **1. Introduction**

CoachingPen Academy (“CoachingPen”, “we”, “us”, or “our”) respects your privacy and is committed to protecting your personal data.

This Privacy Notice / Personal Data Protection Notice explains how we collect, use, disclose, store, and otherwise process your personal data when you:

- visit our website;
- create an account;
- purchase, access, or use our courses, bundles, programs, or related services;
- receive certificates;
- contact support;
- use chatbot, AI-assisted support, or similar service tools; or
- otherwise interact with us in connection with our business.

This Notice is intended to help you understand how your personal data is handled so that you can make informed choices before providing your personal data to us, consistent with the Personal Data Protection Act 2010 and applicable legal requirements. ([PDP](#))

### **2. Who We Are**

CoachingPen Academy is an online learning and training business operated by **Coachingpen Services (Registration No. 202403325664)**.

#### **Contact Details**

Email: [support@coachingpen.com](mailto:support@coachingpen.com)

Website: [www.coachingpen.com](http://www.coachingpen.com)

LMS: [www.academy.coachingpen.com](http://www.academy.coachingpen.com)

Business Address: Suasana Sentral, Jalan Stesen Sentral 5, Kuala Lumpur, W.P. 50470

Business Registration No.: 202403325664

Country of Operation: Malaysia

### **3. Personal Data We May Collect**

We may collect and process the following categories of personal data, depending on how you use our services:

## **A. Identity and Contact Information**

- full name
- email address
- username or login ID
- phone number, where provided
- organization, profession, or job title, where provided

## **B. Account and Enrollment Information**

- account registration details
- course enrollments and subscriptions
- user preferences
- login history and account records

## **C. Payment and Transaction Information**

- course or bundle purchase records
- transaction reference numbers
- billing details
- payment status information received from payment providers

We do not intentionally store your full payment card details in our LMS unless expressly stated otherwise.

## **D. Learning Activity Information**

- course progress
- lesson completion records
- quiz attempts and scores
- assignment submissions
- learning activity logs

## **E. Certificate Information**

- name printed on certificate
- course or program completed
- completion date

- certificate ID or verification details

#### **F. Support and Communication Information**

- emails or messages sent to us
- support requests
- chatbot or helpdesk submissions
- complaint, refund, or troubleshooting records

#### **G. Technical and Usage Information**

- IP address
- browser and device information
- session information
- website and LMS activity
- cookies or similar technologies, where used

These categories are consistent with the type of information ordinarily described in a PDPA notice, including identity, contact, payment, technical, and business-related data. ([PDP](#))

### **4. How We Collect Personal Data**

We may collect personal data:

- directly from you when you register, enrol, make a purchase, submit information, or contact us;
- when you use our website, LMS, or learning services;
- from payment gateways or service providers involved in your transaction;
- from your employer, sponsoring organization, or institution, where applicable;
- through cookies, analytics tools, and system logs.

### **5. Purposes of Processing**

We may process your personal data for the following purposes:

- to create and manage your account;
- to process your enrolments and purchases;
- to provide access to courses, lessons, quizzes, assignments, certificates, and related learning services;

- to issue and verify certificates;
- to process payments and maintain transaction records;
- to provide support and technical assistance;
- to communicate with you about your account, purchases, course access, updates, and service matters;
- to improve our courses, website, LMS, support systems, and service delivery;
- to maintain security, monitor usage, and prevent misuse, fraud, or unauthorized access;
- to comply with legal, tax, regulatory, accounting, and administrative requirements; and
- where permitted by law or where you have chosen to receive them, to send marketing or promotional communications about our services.

Malaysia's PDPA notice guidance expects the notice to explain the purposes for which personal data is processed so data subjects can make an informed choice. ([PDP](#))

## **6. If You Do Not Provide Personal Data**

If you do not provide the personal data requested, we may not be able to:

- register your account;
- process your purchase;
- enrol you in a course or bundle;
- issue certificates;
- respond effectively to support requests; or
- provide certain features or services.

This is also consistent with official privacy notice guidance, which notes that failure to provide required data may affect service delivery. ([PDP](#))

## **7. Disclosure of Personal Data**

We may disclose your personal data, where reasonably necessary, to:

- our employees, instructors, trainers, and administrators;
- LMS, hosting, IT, and cloud service providers;
- payment gateways and payment processors;
- email, communications, and customer support providers;

- certificate issuance or verification service components;
- analytics, fraud-prevention, and security providers;
- professional advisers, auditors, consultants, or legal advisers;
- government, regulatory, tax, or enforcement authorities where required by law; and
- sponsoring employers, institutions, or organizations, where applicable and appropriate.

We do not sell your personal data.

The official PDPA notice guidance expects the notice to identify likely disclosures and categories of recipients. ([PDP](#))

## **8. Payments**

Payments for courses or bundles may be processed by third-party payment providers. Those providers may process your payment-related data in accordance with their own privacy notices, terms, and security standards.

We generally receive only the information reasonably necessary to confirm payment, activate enrolment, provide support, and maintain records.

## **9. Certificates and Verification**

Where applicable, we may issue certificates upon successful completion of a course or program. For this purpose, we may process data such as:

- your name;
- course or program title;
- certificate ID;
- completion date; and
- verification status.

If certificate verification is available, limited certificate-related information may be visible to persons who use the verification feature.

## **10. Support, Chatbot, and AI-Assisted Services**

We may provide FAQs, chatbot support, AI-assisted support, or AI course support features. When you use these services, we may process the information you submit in order to:

- answer your questions;

- provide technical or course-related support;
- improve service quality;
- maintain security and system administration.

Please do not submit unnecessary sensitive personal information through support or chatbot tools.

## **11. Marketing Communications**

We may send you service-related communications where necessary for your account, purchases, access, or support.

We may also send promotional or marketing communications where permitted by applicable law or where you have requested, subscribed to, or consented to receive them. You may opt out of non-essential marketing communications at any time by using the unsubscribe option, where available, or by contacting us.

## **12. Cookies and Similar Technologies**

Our website or LMS may use cookies or similar technologies for:

- login and session management;
- remembering preferences;
- security;
- performance monitoring;
- analytics and improvement.

You may adjust your browser settings to manage cookies. However, disabling cookies may affect the functioning of some features.

Official Malaysian privacy guidance also recognizes the use of cookies and technical information such as IP addresses in digital interactions. ([PDP](#))

## **13. Security**

We take reasonably practical, technical, and organizational steps to protect personal data from loss, misuse, unauthorized access, disclosure, alteration, or destruction. These measures may include password protection, role-based access controls, secure hosting, monitoring, and administrative safeguards.

However, no method of transmission over the internet or electronic storage is completely secure, and we cannot guarantee absolute security.

The PDPA framework includes a security principle requiring reasonable safeguards for personal data. ([PDP](#))

## **14. Retention of Personal Data**

We retain personal data only for as long as reasonably necessary for the purposes described in this Notice, including to:

- maintain learner records;
- provide course access;
- issue and verify certificates;
- respond to support requests;
- comply with legal, tax, accounting, and regulatory obligations; and
- manage disputes and protect our legitimate business interests.

When personal data is no longer required, we will take reasonable steps to delete, destroy, anonymize, or securely dispose of it, subject to applicable legal and operational requirements.

The PDPA framework also includes a retention principle requiring that personal data not be kept longer than necessary. ([PDP](#))

## **15. Your Rights**

Subject to applicable law, you may:

- request access to your personal data;
- request correction of personal data that is inaccurate, incomplete, misleading, or out of date;
- request withdrawal of consent where processing is based on consent, subject to legal or contractual restrictions; and
- opt out of non-essential marketing communications.

We may take reasonable steps to verify your identity before responding to a request.

Malaysia's official privacy notice materials list rights including access, correction, and withdrawal of consent. ([PDP](#))

To make a personal data request, please contact us at [support@coachingpen.com](mailto:support@coachingpen.com) and provide sufficient information for us to verify your identity and respond to your request.

## **16. Your Choices**

You may choose:

- whether to provide optional profile information;

- whether to receive non-essential marketing communications;
- whether to use optional support tools or features; and
- how certain cookies are managed in your browser.

Please note that some personal data is necessary for account creation, course delivery, payment processing, certification, and support.

### **17. Cross-Border Processing**

Your personal data may be stored in, transferred to, or accessed from systems or service providers located outside Malaysia.

Where this occurs, we will take reasonable steps to ensure that your personal data is handled with appropriate protection consistent with applicable legal requirements and our service obligations.

### **18. Third-Party Links and Services**

Our website or LMS may contain links to third-party websites, payment pages, video platforms, or external resources. We are not responsible for the privacy practices of third parties outside our control. You should review their privacy notices and terms separately.

### **19. Children**

Our services are generally intended for adult learners, professionals, managers, executives, and organizations. We do not knowingly collect personal data from children in a manner inconsistent with applicable law.

### **20. Changes to This Notice**

We may update this Privacy Notice / Personal Data Protection Notice from time to time. Any updated version will be posted on our website or LMS together with the revised effective date. You should review this Notice periodically to stay informed of any changes.

### **21. Complaints, Questions, and Requests**

If you have any questions, complaints, or requests relating to this Notice or your personal data, including requests for access, correction, withdrawal of consent where applicable, or opt-out from non-essential marketing communications, please contact us:

#### **Coachingpen Services**

Email: [support@coachingpen.com](mailto:support@coachingpen.com)

Website: [www.coachingpen.com](http://www.coachingpen.com)

LMS: [www.academy.coachingpen.com](http://www.academy.coachingpen.com)

Business Address: Suasana Sentral, Jalan Stesen Sentral 5, Kuala Lumpur, W.P. 50470