

1. INTRODUCTION

This is the privacy policy (“Privacy Policy”) of Selangor Properties Sdn. Bhd. (SPSB) and its affiliates (including but not limited to its subsidiaries and related companies, whether such companies are resident, situated, carrying on business, incorporated or constituted within or outside Malaysia) (“Selangor Properties Sdn. Bhd.”).

This Privacy Policy applies to personal information about individuals held by the SPSB. The SPSB will only process your Personal Data in accordance with the Personal Data Protection Act 2010, applicable regulations, guidelines, orders made under the Personal Data Protection Act and any statutory amendments or re-enactments of the Personal Data Protection Act from time to time (collectively referred to as the “PDPA”) as well as this Privacy Policy.

The SPSB reserves the right to modify, update and/or amend this Privacy Policy from time to time with reasonable prior notice to you. The SPSB will notify you of any amendments via announcements on the SPSB’s website (“Site”) or other appropriate means as determined by the SPSB. Therefore, please check this Site from time to time if you wish to be informed about amendments to this Privacy Policy. Any amendments to this Privacy Policy will be effective upon notice to you. By continuing to use the services contained within and/or by accessing the Site after being notified of any amendments to this Privacy Policy, you will be treated as having agreed to and accepted the amended Privacy Policy.

If you do not agree to this Privacy Policy or any amendments to this Privacy Policy, SPSB may not be able to provide facilities, services or information to you or perform agreements with you.

2. COLLECTION OF PERSONAL DATA

Under the PDPA, the term “Personal Data” means any information in the possession or control of the SPSB that relates directly or indirectly to an individual to the extent that the individual can be identified or is identifiable from that and other information in the possession of the SPSB such as the individual’s name, address, telephone number, NRIC, email address, etc. The SPSB may “process” your Personal Data by way of collecting, recording, holding, storing, using or disclosing it.

Your Personal Data may be collected from you during your course of dealings with the SPSB in any way or manner including pursuant to any transactions and/or communications made from/with the SPSB. The SPSB may also collect your Personal Data from a variety of sources, including without limitation, at any events, seminars, road shows, customer satisfaction surveys organised or sponsored by the SPSB and/or from the cookies used on the Site.

In addition, the SPSB may also receive, store and process your Personal Data provided or made available by any third parties, credit reference bodies, regulatory and law enforcement authorities, for reasons including delivery of the SPSB’s products and/or services, performance of conditions of agreements and/or to comply with the SPSB’s legal and regulatory obligations.

3. PURPOSE OF ACQUIRING AND PROCESSING YOUR PERSONAL DATA

Your Personal Data may be processed for the following purposes:

- to communicate with you;
- to provide products and/or services and/or facilities to you;

- to respond to your enquiries or complaints;
- to process your purchase;
- to provide you with information and/or updates on the present and future property developments, other products, services and/or promotions offered by the SPSB and selected third parties which may be of interest to you from time to time by SMS, phone call, email, fax, mail, social media and/or any other appropriate communication channels;
- to send you seasonal greetings messages from time to time;
- to send you invitation to join the SPSB's membership, events and promotions and property launch events;
- to monitor, review and improve the SPSB's membership, events and promotions, products and/or services;
- to facilitate execution of necessary agreements and/or contracts for SPSB projects, products and/or services;
- to facilitate vacant possession, handover of keys, property/estate management, customer care and/or defect rectification works;
- to provide you with post vacant possession services, such as club house services, security and customer loyalty programmes;
- to process and analyse your Personal Data either individually or collectively with other individuals;
- to conduct market research or surveys, client profiling activities, planning and statistical analysis within the SPSB in relation to the SPSB's present and future property developments, other products and/or services;
- to share any of your Personal Data with the auditor for the SPSB's internal audit purposes;
- to share any of your Personal Data with a third party for purposes of credit assessment and/or assisting you pursuant to your financial application, where necessary;
- to share any of your Personal Data pursuant to any agreement or document which you have duly entered with the SPSB for purposes of seeking legal and/or financial advice and/or for purposes of commencing legal action;
- to share any of your Personal Data with a third party necessary for the preparation of legal documents or contract to be entered by you with the SPSB;
- to share any of your Personal Data with a third party necessary for the purpose of applying and obtaining insurance policy(ies), where necessary;
- to maintain and improve customer relationship;
- to maintain and update internal record keeping;
- for registration for a user account with the SPSB;
- for internal administrative purposes;
- for audit and risk management purposes;
- for detecting, investigating and preventing fraudulent, prohibited or illegal activities;
- for direct marketing purposes via SMS, phone call, email, fax, mail, social media and/or any other appropriate communication channels;
- for enabling the SPSB to perform its obligations under the agreement or document which you have duly entered into with the SPSB including but not limited to attending to the registration with the relevant authorities on your behalf, delivery of vacant possession, defect rectification works and perfecting the transfer of the separate individual/strata title in your favour;
- for meeting any applicable legal or regulatory requirements and making disclosure under the requirements of any applicable law, regulation, direction, court order, by-law, guideline, circular or code applicable to the SPSB;

- to enforce or defend the SPSB's rights and your rights under, and to comply with, the SPSB obligations under the applicable laws, legislation and regulations; and/or for other purposes required to operate and maintain the SPSB's business, (collectively referred to as the "Purposes"), and you agree and consent to the SPSB using and processing your Personal Data for the Purposes in the manner as identified in this Privacy Policy. If you do not consent to the SPSB processing your Personal Data for one or more of the Purposes, please notify the SPSB at the contact details below.

4. CONSEQUENCES OF NOT CONSENTING TO THIS PRIVACY POLICY

It is obligatory for the SPSB to collect and to retain your Personal Data unless stated otherwise. If you do not provide the SPSB with your Personal Data, or do not consent to the above or this Privacy Policy, the SPSB will not be able to:

- process your purchase of any of the SPSB's products and/or services;
- communicate with you;
- provide you with the SPSB's products and/or services requested;
- update you on the SPSB's latest products, services and/or promotions; and/or allow you to access certain sections of the Site where log in is required, and you may be required to terminate your agreement or discontinue your business relationship with the SPSB.

5. DISCLOSURE OF YOUR PERSONAL DATA

The SPSB will not disclose any of your Personal Data to any third party without your consent except to the following third parties, for one or more of the above Purposes:

- companies within the SPSB and their respective employees;
- your immediate family members and/or emergency contact person as may be notified to the SPSB from time to time; successors in title to the companies within the SPSB;
- any party who is involved in connection with corporate exercises, such as a potential or actual sale/disposal of any business or interest of any companies within the SPSB, merger, consolidation, re-organisation or funding exercise relating to any companies within the SPSB, or asset sale, or in the event of winding-up of any companies within the SPSB;
- the SPSB's business partners and affiliates that provide related products and/or services in connection with the SPSB's business for joint promotions;
- any person under a duty of confidentiality, who has undertaken to keep your Personal Data confidential, to which the SPSB has engaged to discharge the SPSB's obligations to you;
- any party in relation to legal proceedings or prospective legal proceedings;
- the SPSB auditors, consultants, lawyers or other financial or professional advisers on a need to know basis for the purpose of those advisers providing advice to the SPSB;
- any party nominated or appointed by the SPSB either solely or jointly with other service providers, for purpose of establishing and maintaining a common database where the SPSB has a legitimate common interest;
- data centres and/or servers located within or outside Malaysia for data storage purposes;
- payment channels including but not limited to financial institutions for purpose of assessing, verifying, effectuating and facilitating payment of any amount due to the SPSB in connection with your purchase of the SPSB's products and/or services;

- government agencies, law enforcement agencies, courts, tribunals, regulatory bodies, ministries, and/or statutory agencies or bodies, offices or municipality in any jurisdiction, if required or authorised to do so, to satisfy any applicable law, regulation, order or judgment of a court or tribunal or queries from the relevant authorities;
- any provider of public utility or related services, whether or not governmental owned and/or any corporations approved and established for the provision of utility services and facilities, includes without limitation to Tenaga Nasional Berhad, Syarikat Bekalan Air Selangor Berhad, Syarikat Telekom Malaysia Berhad and Indah Water Konsortium Sdn. Bhd.;
- the SPSB's contractors or sub-contractors as may be necessary for discharging the SPSB's duties and obligations under any document or agreement duly entered by you with SPSB;
- the SPSB's appointed product and/or service providers, suppliers or agents, to discharge or perform one or more of the above Purposes; and/or any persons, authorities or regulators to whom the SPSB is permitted or required to disclose to under the applicable laws.

6. ACCURACY OF YOUR PERSONAL DATA

The SPSB aims to keep all Personal Data as accurate, complete, not misleading, up-to-date and reliable as possible. The accuracy of your Personal Data depends to a large extent on the information you provide. As such, it is a condition of the SPSB providing the products and/or services and/or facilities to you that you:

- warrant and declare that all your Personal Data submitted or to be submitted to SPSB is accurate, not misleading, updated and complete in all respects for purposes of acquiring or using the relevant products and/or services and/or facilities and you have not withheld any Personal Data which may be material in any respect and that the SPSB is entitled to assume the authenticity and accuracy of the Personal Data given by you when processing the Personal Data submitted by you to the SPSB (and the SPSB is not obliged to independently verify any of such Personal Data); and update the SPSB as and when such Personal Data provided to the SPSB becomes inaccurate, incomplete, misleading, outdated or changes in any way whatsoever by contacting the SPSB at the contact details below.

7. YOUR RIGHTS

Subject to the exceptions provided under the PDPA, you have the right to request for access to, request for a copy of, request to update or correct, your Personal Data held by the SPSB. The SPSB may charge a small fee (such amount as permitted by the PDPA) to cover the administration costs involved in processing your request to access your Personal Data.

In respect of your right to access and/or correct your Personal Data, the SPSB has the right to refuse your request to access and/or correct your Personal Data for the reasons permitted under the law, such as where the expense of providing access to you is disproportionate to the risks to your privacy, or where the rights of others may also be violated.

You have the right at any time to request the SPSB to limit the processing and use of your Personal Data (for example, requesting the SPSB to stop sending you any marketing and promotional materials or contacting you for marketing purposes).

In addition, you also have the right, by notice [in writing] to withdraw (in full or in part) your consent given previously to the SPSB subject to any applicable legal restrictions, contractual conditions and a reasonable duration of time for the withdrawal of consent to be affected.

8. RETENTION OF YOUR PERSONAL DATA

Any of your Personal Data provided to the SPSB is retained for as long as the purposes for which the Personal Data was collected continues; your Personal Data is then destroyed unless its further retention is required to satisfy a longer retention period to meet the operational, legal, regulatory, tax or accounting requirements of the SPSB.

9. SECURITY OF YOUR PERSONAL DATA

The SPSB is committed to ensuring that your Personal Data is stored securely. With the intention of preventing unauthorised access, disclosure or other similar risks, the SPSB will take practical steps to implement appropriate technical and procedural measures in accordance with the applicable laws and regulations to protect against the unauthorised or unlawful processing of your Personal Data, and the destruction of, or accidental loss, damage to, alteration of, unauthorised disclosure of or access to your Personal Data.

The SPSB will ensure the authorised third parties only use your Personal Data for the Purposes set out in this Privacy Policy.

The Internet is not a secure medium and communications over the Internet, such as emails/webmails are not secure. However, the SPSB will take practical steps in accordance with the law to put in place security measures with regard to the Site and your electronic communications with the SPSB.

For the reasons set out above, the SPSB cannot and does not guarantee that they will be able to prevent unauthorised access or interception or loss of Personal Data.

10. PERSONAL DATA FROM MINORS AND OTHER INDIVIDUALS

To the extent that you have provided (or will provide) Personal Data about your family, spouse and/or other dependents, you represent and warrant that you have obtained their consent to provide their Personal Data to the SPSB and they consent to their Personal Data being processed in accordance with this Privacy Policy and, with respect to minors (i.e. individuals under 18 years of age) or any individuals not legally competent to give consent, you consent on their behalf (and you confirm that you have the authority to do so).

11. TRANSFER OF YOUR PERSONAL DATA OUTSIDE OF MALAYSIA

The SPSB's information technology storage facilities and servers may be located in jurisdictions outside of Malaysia. Your Personal Data may be transferred to entities outside of Malaysia. Please note that these foreign entities may be established in countries that might not offer a level of data protection that is equivalent to that offered in Malaysia under the laws of Malaysia. You hereby

expressly consent to the SPSB transferring your Personal Data outside of Malaysia for such purposes. The SPSB shall endeavour to take reasonable steps to procure that all such third parties outside of Malaysia shall not use your Personal Data other than for that part of the Purposes and to adequately protect the confidentiality and privacy of your Personal Data.

12. WEBSITE

External links

If any part of the Site links you to other websites, those websites do not operate under this Privacy Policy and the SPSB does not accept any responsibility or liability arising from those websites.

Likewise, if you subscribe to an application, content or a product from a strategic partner of the SPSB and you subsequently provide your Personal Data directly to that third party, that Personal Data will be subject to that third party's privacy policy (if they have such a policy) and not to this Privacy Policy.

The SPSB recommends you to read and understand the privacy statement/policy posted on those other websites in order to understand their procedures for collecting, processing, using and disclosing personal data and before submitting your Personal Data to those websites.

Cookies

The SPSB employs an industry standard technology called "cookies". The cookie is a small piece of information stored on the hard drive of your computer or device for record-keeping purposes, and is used by the SPSB to track your visits to the Site. Cookies may be used to save your preferences for your ease and convenience when using the Site. Third party advertising networks may issue their separate cookies to your hard drive when serving advertisements.

The type of anonymous click stream data collected by the SPSB through the cookies may include your Internet Protocol address, web browser software, date and time of visit of the Site, and whether your requests (including search requests and clicking on links to parts of the Site) were met with successfully. All such information collected through cookies are not Personal Data and you cannot be identified from this information. Such information is only used for the purpose of managing and creating a better user experience and to identify areas for improvement on the Site.

The use of cookies is now an industry standard, and you will find them used on most major websites. Most browsers are initially set up to accept cookies. If you prefer, you can reset your browser either to notify you when you have received a cookie, or to refuse to accept cookies. You should understand that areas of certain sites will not function properly if you set your browser to not accept cookies.

13. CONTACT DETAILS

If you have any questions about this Privacy Policy or would like to make a complaint or data access or correction request, you may contact the SPSB at the contact details below:

Personal Data Protection Officer/Legal Officer

Address: Level 2, Block D

Kompleks Pejabat Damansara

Jalan Dungun, Damansara Heights
50490 Kuala Lumpur, Malaysia
Contact No.:603 2094 1122
Facsimile No.:603 2095 0150
Email Address:pdpo@selangorproperties.com.my