

## PERSONAL DATA AND PRIVACY POLICY

Glomac Berhad respects the privacy of individuals with regard to Personal Data and is committed to the protection of your personal information and your privacy. This Personal Data and Privacy Policy are formulated in accordance with the Personal Data Protection Act 2010 ("Act").

For the purpose of this Personal Data and Privacy Policy, "Personal Data" shall have the meaning as ascribed to it in the Act. We may change this Personal Data and Privacy Policy ("this Policy") from time to time without prior notice and you are advised to check the said policy on a regular basis.

This Policy explains our policy on collecting, using and disclosing your Personal Information. The processing of your Personal Information is also subject to applicable laws. The Personal Information which you provide to us now or from time to time or have provided to us previously will be used and processed, and continued to be used and processed by us, in accordance with this Policy (as amended, varied or revised from time to time).

For the purpose of this Policy, below words shall have the mean meaning as stated in the followings:

"GLOMAC" means Glomac Berhad and includes its subsidiaries, related and associate companies.

"Personal Information" means any information in our possession or control that relates directly or indirectly to you (or any other individual) to the extent that you (or such other individual) are identified or identifiable from that information or from other information in our possession.

"Products" include but is not limited, to the properties or residential, commercial, industrial or mixed development projects developed or to be developed by GLOMAC.

"Sensitive Personal Data" means any personal data consisting of information as to physical or mental health or condition, political opinions, religious beliefs or other beliefs of a similar nature, the commission or alleged commission of an offence or any personal data prescribed under law as sensitive personal data.

"We", "us" or "our" means GLOMAC.

### **1. Personal Information**

1.1 Personal Information we collect about you, include but is not limited, to the following: -

- a. personal details such as name, identity card number, age, gender, nationality, date of birth, address, telephone number, email address and other details;
- b. information in connection with Products you may have purchased from us or have registered your interest with us for purchase, information, updates, inquiries, billing and payment status and records other information that are, have been or may be collected by us, or which you provide to us, from time to time, in connection with any service, transaction, contest, survey, promotion, questionnaire or communication with us;
- c. personal interests or preferences such as language, product or content interests, communicating and marketing preferences;
- d. your image, by way of video surveillance installed in some parts of our premises as part of our security infrastructure; and
- e. the username, password and other identifiers when you register at our website.

**Certain information requested by us are mandatory which you must provide and agree to the processing of such mandatory information by us, failing which, we will not be able to provide you the relevant Products or information and updates pertaining to the Products.**

1.2 How your Personal Information is collected:

- a. when you sign up to purchase the Products or register your interest with us to purchase the Products or to obtain information and updates on the Products;
- b. when you visit our websites or social networking sites;
- c. when you enter contests or respond to surveys, promotions or questionnaires;
- d. from third party sources such as credit reference agencies, fraud prevention agencies and publicly available sources of information from any company within GLOMAC; and
- e. pursuant to any transaction or inquiry or communication made with or to us.

1.3 Purpose of collecting and processing your Personal Information:

- a. to verify and authenticate your identity;
- b. to communicate with you;
- c. to process your application, inquiry or request;
- d. to provide the Products and services relating to the Products or such other goods and services you requested;
- e. for booking fees collection purposes;
- f. user or customer relationship management procedures;
- g. to update your records on the sales details;
- h. for general sales operation and maintenance of the services or goods provided in relation to GLOMAC;
- i. to provide you with regular communications (other than direct marketing materials) from GLOMAC relating to the services or goods provided in relation to GLOMAC;
- j. to market and promote other products and services that are or may be offered by us or our partners from time to time;
- k. for direct marketing purposes;
- l. conducting marketing and client profiling activities in connection with our services and related products; to help us monitor and improve our services;
- m. to provide you with information and updates on the Products;
- n. for administrative purposes, including billing, payment and debt collection;
- o. to match any data held by GLOMAC relating to you from time to time;
- p. to respond to your queries enquiries including processing instructions and generating confirmations, advices and statements;
- q. to comply with applicable laws, proceedings or inquiries from regulatory authorities, and enforcement agencies;
- r. any other purposes permitted by applicable laws;
- s. to investigate complaints and suspicious transactions;
- t. prevention of crime (including but not limited to fraud, money-laundering, bribery);
- u. meeting any legal or regulatory requirements relating to our provision of services and products and to make disclosure under the requirements of any applicable law, regulation, direction, court order, by-law, guideline, circular, code applicable to us or any member companies of our Group;

- a. upon your consent, for cross selling purposes for other products and services of GLOMAC,

and for all other purposes incidental or associated with the above.

#### 1.4 Sensitive Personal Data

We do not collect Sensitive Personal Data from you unless required by applicable laws. If you do not want your Sensitive Personal Data collected by us, please do not submit it.

If you do choose to submit your Sensitive Personal Data to us, such data shall then be deemed to be and will be treated by us as Personal Information which will be subject to the terms and scope of this Policy including as to processing, usage and disclosure thereof.

### 2. **Limit the process of your Personal Information**

If you do not wish to receive offers, promotions and marketing materials and information on other products and services from us or our partners or would like us to cease processing your Personal Information (withdraw consent) for a specified purpose or in a specified manner please notify us in writing to the address set out in Section 6 below.

In the absence of such written notification from you, we will deem it that you consent to the processing, usage and dissemination of your Personal Information in the manner, to the extent and within the scope of this Privacy Policy. If you do not consent to the processing of your Personal Information, we may not be able to provide you the Products or other goods and services you requested and your approved application or request to GLOMAC for any of the above purposes may be cancelled.

Where you elect to limit our right to process your personal data, you may also contact the Customer Relation Management at 03-77239000.

### 3. **Disclosure**

We may disclose your Personal Data to selected third parties and shall endeavour to ensure that reasonable steps are taken to procure that such third parties shall not use the Personal Data other than for that part of the purpose as set out below and to adequately ensure the confidentiality of the Personal Data. These third parties, and the purpose for their processing of your Personal Data, are as follows:

- a. any related companies and subsidiaries of Glomac Berhad, including those established in the future;
- b. third party service providers, including but not limited to, service providers for electricity, water, sewerage, cable and broadcast TV, telecommunications and other utilities, and their respective contractors/ agents;
- c. our business partners and online affiliates that provide related services or products in connection with our business
- d. debt collection agencies;
- e. credit reporting agencies or credit providers;

- f. payment channels, including without limitation, financial institutions for purposes of maintaining financial records, assessing or verifying credit and facilitating payments due to us, regulatory authorities and enforcement agencies;
- g. our contractors, service providers, consultants, auditors and advisors on a need to know basis;
- h. any actual or potential assignee, transferee or acquirer of any of GLOMAC's company or business, or in connection with any corporate exercise.
- i. Our appointed service providers in relation to our loyalty programs, for the purpose of delivery of gift redemption or services.

We may also disclose your personal data if required to do so by law or in good faith, if such action is necessary:

- (i) to comply with requirements of any law enforcement agency, court orders or legal process; or
- (ii) to protect and defend rights or property of GLOMAC and its group of companies.

#### **4. Transfer of Personal Information outside Malaysia**

The Personal Data you have provided to us may be transferred outside of Malaysia to be processed for any of the purposes set out above. You hereby expressly consent to us transferring your Personal Data outside Malaysia for such purposes. We shall endeavour to ensure that reasonable steps are taken to procure that such third parties outside of Malaysia including the class of third parties set out above shall not use the Personal Data other than for that part of the purpose and to adequately ensure the confidentiality of the Personal Data.

#### **5. Access or Update your Personal Information**

- 5.1 Under the Act, you are responsible for providing accurate and complete information about yourself and any other person whose personal information you provide us (for e.g., your spouse, children, relatives or third parties), and as such, as and when such information becomes incorrect or outdated you should correct or update such information by contacting us or submitting fresh information.

For the avoidance of doubt, we and/or the Group and/or its employees or authorized officers or agents will not be responsible for any personal data submitted by you to us that is inaccurate, misleading, incomplete and not updated.

- 5.2 You may, by writing to us at the address set out in Section 6 below:

- a) to request for a copy of the Personal Information we hold about you; and
- b) request to rectify or update your Personal Information.

**Please provide proof of your identity, address and sufficient information to enable us to identify you when submitting your request to us.**

- 5.3 On receipt of your written request, we may:

- a) comply or refuse your request to access or rectify your Personal Information. If we refuse, we will notify you the reasons for such refusal; and
- b) charge a fee for processing your request for access or rectification.

## **6. How to Contact Us**

Write in to us at: Customer Relations Management

Address: Level 2, Menara Glomac, Glomac Damansara, Jalan Damansara, 60000 KL

Email: [cs@glomac.com.my](mailto:cs@glomac.com.my)

Telephone no: 03-77239000

Fax no: 03-7723 9190

## **7. Confidentiality Clause**

Personal Data held by GLOMAC will be kept confidential in accordance with this Policy pursuant to any applicable law that may from time to time be in force.

Any questions, comments, suggestions or information other than Personal Data sent or posted to the website, or any part of the website by visitors will be deemed voluntarily provided to GLOMAC on a non-confidential and non-proprietary basis.

GLOMAC reserves the right to use, reproduce, disclose, transmit, publish, broadcast and/or post elsewhere such information freely, including passing it to any associated company for example, in connection with the development, manufacture and marketing of products and services and to meet customer needs.

## **8. Safety and Security Of Personal Data**

We have implemented reasonable technology, policies and measure designed for securing and protecting your privacy from unauthorised access, improper use, disclosure and alteration, we will make reasonable updates to its security measures from time to time and ensure authorised third parties use the Personal Data for the purpose set herein and to adequately ensure the confidentiality of the Personal Data.

Whilst we will use its best endeavours to maintain a security plan deemed adequate by us to protect your Personal Data, we make no guarantee that the website will be free from security breaches, especially due to unauthorised actions of third parties such as, but not limited to spoof attacks, session hacking, sniffing or tampering. We shall not be held responsible for any loss or damage, misuse, modification, unauthorized or accidental access or disclosure, alteration or destruction as a result of such actions.

Our web site may contain links to other sites and pages. By activating a link, such as for example by clicking on the banner of an advertiser, you leave our web site and GLOMAC does not exercise control over any Personal Data or any other information you give to any other entity after you have left our web site.

For further info on PDPA

(insert link to PDPA Act)

<http://www.kkmm.gov.my/pdf/Personal%20Data%20Protection%20Act%202010.pdf>