

# **PRIVACY AND PERSONAL DATA PROTECTION POLICY**

## **1. Collection of Personal Data**

In the course of your dealings with us and/or our subsidiaries or associates, we will request that you provide data and information about yourself (“Personal Data”) to enable us to enter into commercial transaction with you or to deliver the necessary notices, services and/or products in connection with our business. These are relevant in connection with our business process, execution, including delivery of notices, services and/or products, client relationship management, planning purposes in connection with future products, new product launches and events including promotional event with business partners within our projects.

## **2. Personal Data**

Such Personal Data may be subject to applicable data protection, privacy and other similar laws and may include but not limited to information concerning your name, date of birth, identity card number, passport number, address, gender, race, nationality, contact information, e-mail address, residential or postal address, telephone or fax number, tax file identification number, EPF number, SOCSO number; where permitted by applicable law.

## **3. Purpose of Collection of Personal Data**

### **i. Customer or potential customer**

The Personal Data will be collected, processed and used by us for the following purposes:

- (a) the delivery of notices, services or products and the marketing of such services or products whether present or future, to you;
- (b) in order for you to enter into the necessary agreement and/or contract to purchase the products and/or properties from us;
- (c) the maintenance and upkeep of customer records and development;
- (d) those purposes specifically provided for in any particular service or product offered by us or our partners;
- (e) marketing and client profiling activities regarding our latest projects, products and/or services;
- (f) preparation and execution of all necessary documents and agreements and/or contracts for our projects, products and/or services with you;

- (g) credit assessment, financial and background investigations and when deemed necessary;
- (h) our internal record keeping;
- (i) prevention of crime (including but not limited to fraud and money-laundering);
- (j) 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;
- (k) enable us to send your information by e-mail, regular postal mail, telecommunication means (telephone calls, SMS messages or social chat applications) or internet social media about products and services offered by selected third parties that we think may interest you but in doing so we maintain control over your Personal Data and we will not disclose your Personal Data to any third parties without your prior written consent;
- (l) vacant possession, keys handover, property/estate management, customer care and/or defect rectification works;
- (m) post vacant possession services, such as security services;
- (n) any subsequent commercial transactions in relation to any projects, products and/or services; and
- (o) enable us to furnish and submit your Personal Data to the following relevant parties, *please refer to "Appendix A1-List of Government bodies/agencies/local authorities and institutions"*.
- (p) enable us to furnish and submit your Personal Data to the following relevant parties, *please refer to "Appendix A1-List of Non-Government bodies/agencies/local authorities and institutions"*.

ii. Vendor, supplier, tenant or service provider

Your personal information is collected and processed as required and used by us for the following purposes:-

- (a) to process your credit application;
- (b) to assess your credit worthiness;
- (c) to administer and validate your business transaction (tender award, contract for service, tenancy agreement)
- (d) to process any payments related to your business transaction;
- (e) for insurance purposes;
- (f) for internal analysis, audit or security reasons;

- (g) for communication with you on products, services, upcoming events, advertising, marketing and commercial materials which may interest you;

#### **4. Source of Personal Data**

##### **i) Customer or potential customer**

The Personal Data will be collected, processed and used by us are sourced from wholly legitimate and transparent means such as:

- (a) agreements and contracts for sale and purchase or tenancy of our properties or for our services;
- (b) official registration forms (either electronic or printed) for new launches or property roadshows, showcases, exhibitions or any other promotional events;
- (c) official request for Information forms that are provided by you by our employees or agents;
- (d) any emails or any correspondences that we have received from your requesting for information or making any inquiries;
- (e) any forms that you have submitted on our website or any websites contracted by us;
- (f) any referrals from a person which have included their verifiable personal contract details;
- (g) letters of offer from financial institutions (local and foreign) for pre-approved loans;
- (h) business cards that were dropped or given to our employees, agents, brokers or associates; or
- (i) any documents (including but not limited to statutory forms and returns) that were submitted to us for processing.

At no time will any Personal Data be purchased by us or in any way commercially acquired through the purchase or trading of illegitimate and illegal Personal Data databases or lists.

##### **ii) Vendor, supplier, tenant or service provider**

Your personal information will be collected directly from you or indirectly from your employer or credit reference agencies when tendering for projects, when you send us completed inquiry and/or credit application forms via various means, including online and physical hardcopies.

## **5. Rights of Access and Correction**

You have the right to request access to and if required, correction of your Personal Data in our records.

You have the right to:

- (a) request access to your Personal Data in our records for verification purposes. You may access and review all of your Personal Data held by us in person at our corporate offices;
- (b) request the correction of your Personal Data in our records in the event the information is inaccurate, misleading, out-of-date or incomplete upon validation and verification of the new information provided in person at our corporate offices;
- (c) request that your Personal Data shall only be kept for the fulfillment of the purpose of the collection of such information;
- (d) request for proof of policy and procedure in relation to the safeguard and guarantee of your Personal Data in our records;
- (e) request that we specify or explain its policies and procedures in relation to data and types of Personal Data handled by us;
- (f) communicate to us your objection to the use of your Personal Data for marketing purposes whereupon we will not use your Personal Data for these purposes in person at our corporate offices;
- (g) withdraw, in full or in part, our consent give previously, in each case subject to any applicable legal restrictions, contractual conditions and reasonable time period in person at our corporate offices.

## **6. Disclosure of Personal Data**

The information we gather is not sold, given to, or otherwise shared with other organizations for commercial or any other purposes. We do, however, send our emails on behalf of selected organizations to those of our subscribers who have opted in to receive these messages. We send the messages directly, so at no time do the advertisers get to see users' personal information – unless of course users respond or reply to these advertisements or mailings themselves.

The Personal Data provided to us will be kept confidential and we will seek your agreement, consent and authorizations to disclose your Personal Data to the following classes of parties:

- (a) any persons, government agencies, statutory authorities and/or industry regulators whom we compelled or required to do so pursuant to any law, please refer to “Appendix A1 - List of Government bodies/agencies/local authorities and institutions”.
- (b) relevant parties, please refer to “Appendix 2 - List of Non-Governmental bodies/agencies and institutions”.
- (c) any related companies and/or subsidiaries of us, including those incorporated in the future; our business partners and affiliates that provide related services or products in connection with our business;
- (d) our auditors, consultants, lawyers, accountants or other financial or professional advisers appointed in connection with our business;
- (e) our third party service providers, third party management companies, sub-contractors or other parties as may be deemed necessary by us to facilitate your dealings with us.
- (f) Third parties are legally tasked with processing your Personal Data in line with principles specified by us. Third parties are also held legally responsible for securing your Personal Data at an appropriate level of security in relation to applicable data protection laws and widely accepted industry standards.

## **7. Choices to Limit Processing of Personal Data**

The Personal Data provided to us undergoes processing as and when required or upon scheduled maintenance. The definition of processing defines it as “any operation or set of operations which is performed upon Personal Data, whether or not by automatic means, such as collection, recording, organization, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, blocking, erasure or destruction.

You have the right to limit in part or wholly any of processes by which your data is subjected to in terms of operations allowed to be performed upon it, the period of time allowed or alternatively the data line of the consent given.

The responsibility or compliances rests on the shoulders of Miramas who determines the purposes and means of the processing of Personal Data.

You may at any time withdraw or amend, in full or in part, your processing consent given previously, in each case subject to any applicable legal restrictions, contractual conditions and reasonable time period in person at our corporate offices.

### **8. Consequences of Refusal / Failure to Provide Personal Data**

The Personal Data provided to us wholly voluntary in nature and you are not under any obligation or under any duress to do so. However, in some circumstances such as the preparation and execution of a Sales and Purchase Contract, or Tenancy Agreement requires certain personal details and information beforehand.

The failure to provide the Personal Data may result in the following which we shall not be held liable for any of the consequences arising there from:

- (a) the inability of parties to formalize any contract and/or agreement and/or Sale and Purchase Agreement / Tenancy Agreement in relation to the sale and tenancy of our property, products and/or services;
- (b) the inability for us to provide you with the notices, services, and/or products requested;
- (c) the inability for us to update you with the latest product and/or launches;
- (d) the inability to complete commercial transactions in relation to our projects, products and/or services; and
- (e) the inability to comply with any applicable law, regulation, direction, court order, by laws, guidelines and/or codes applicable to us.

### **9. Protection of Personal Data**

Your Personal Data will be kept and processed in a secured manner. The appropriate administrative and security safeguards, policies and procedures will be implemented, as far as practicable, aim to prevent any unauthorized and/or unlawful processing of, and the accidental loss, destruction or damage to your Personal Data.

### **10. Changes to this Policy**

We may need to modify this Policy as needed, for example, to comply with changes in business operations or laws and regulations. We will post all changes to this policy.

**Appendix A1** – *List of Government bodies/agencies/local authorities and institutions*

- (i) Bahagian Pinjaman Perumahan Perbendaharaan;
- (ii) Kumpulan Wang Simpanan Pekerja;
- (iii) Lembaga Hasil Dalam Negeri;
- (iv) Land Office;
- (v) Local authorities;
- (vi) High court, lower courts and tribunals.

Any change or amendment, we shall notify you accordingly.

**Appendix A2** – *List of Non-Government bodies/agencies/local authorities and institutions*

- (i) Indah Water Konsortium Sdn Bhd;
- (ii) Kumpulan Wang Simpanan Pekerja;
- (iii) Syarikat Bekalan Air Selangor Sdn Bhd;
- (iv) Tenaga Nasional Berhad;
- (v) Telekom Malaysia Berhad;
- (vi) Banks and financial institution;
- (vii) External financial auditors;
- (viii) Law firms;
- (ix) Security firms; and
- (x) Properties Management firms.

Any change or amendment, we shall notify you accordingly.