

SPB DEVELOPMENT BHD

PRIVACY NOTICE

1. Personal Data Protection Act 2010

- 1.1 This Privacy Notice ("**Notice**") is issued pursuant to the Personal Data Protection Act 2010 ("**PDPA**"). It outlines how SPB Development Bhd and its group of companies as well as their representatives (collectively, "**we**", "**our**", "**us**") collect, use, disclose and process personal data in accordance with the PDPA.
- 1.2 For the purpose of this Notice, the term "**Personal Data**" shall have the same meaning as defined in the PDPA (as amended from time to time), and shall include such information concerning your personal details (such as name, identity card number, passport number, date of birth, age, gender, race, nationality), contact details and any other relevant information that you had disclosed to us as may be updated from time to time.
- 1.3 This Notice applies to any person (which will be referred to as "**you**", "**your**") who provides us with Personal Data or whose Personal Data is otherwise collected, used or processed by and/or disclosed to us in connection with and/or for the purposes of our operations.

2. Notice

- 2.1 This Notice serves to inform you of the following:
- (a) what, how and why we collect, store, gather, use, share and process your Personal Data;
 - (b) your rights in relation to the Personal Data which you have consented to us;
 - (c) ways of contacting us in the event you have any request or complaint; and
 - (d) the data protection measures which we have put in place.
- 2.2 This Notice applies in conjunction with other notices, contractual clauses and consent clauses that apply in relation to the collection, use, disclosure and/or processing of your Personal Data by us, and is not intended to override them unless we state expressly otherwise.
- 2.3 In the course of your dealings with us, you may have furnished your Personal Data to us and in doing so, you acknowledge and confirm that you are providing to us accurate, complete, not misleading and up-to-date Personal Data and further agree and consent to us collecting, using, disclosing and processing your Personal Data. We and/or our employees ("**Employees**") shall not be liable for any inaccurate, incomplete, misleading or not up-to-date Personal Data provided by you.
- 2.4 In the event you furnish or make available to us any Personal Data relating to a third-party, e.g. information of spouse, children, parents, directors, shareholders and/or guarantors (collectively the "**Relevant Persons**"), you represent and warrant that you have obtained the consent of the Relevant Persons to provide us with their Personal Data which are accurate, complete, not misleading and up-to-date and for us to collect, use, disclose and process their Personal Data for the respective purposes.

3. Collection and Source

- 3.1 We collect your Personal Data in various ways, in printed or electronic forms through digital and mobile platforms, such as:
- (a) when you register your interest for purchase of products, or information or enquiry or updates via telephone call, emails or face to face meetings;

- (b) when you register or update an online profile or when you complete or update your information with us;
- (c) when you submit forms and/or documents to us relating to any of our products and/or services as well as products and/or services by third-party service providers;
- (d) when you enter into any transactions with us;
- (e) when you make payment related to any transactions with us;
- (f) when you visit our premises or interact with our staff;
- (g) from your personalised preference through the use of our website;
- (h) when you attend or participate in any contests, events, market research and surveys organised by us;
- (i) when you submit a job application to us; and
- (j) from information obtained independently by us from other lawful sources e.g. credit reporting agencies such as CTOS or equivalent and public domain.

3.2 In the event where Personal Data is requested by us, you have an option not to provide additional information requested other than the information which is indicated as necessary to facilitate the commercial transaction. If insufficient Personal Data is provided or your consent or the consent of any Relevant Person given herein is withdrawn, we will not be able to provide you with our products and services and/or fulfil any of your request for any of the purposes as set out above.

4. Purpose of Personal Data Collection and Processing

4.1 We may collect, use, disclose or process your Personal Data for the following purposes:

- (a) considering and processing your application for and providing you with products and/or services;
- (b) facilitating, implementing and/or formalising any transaction with us;
- (c) processing any payments related to any transaction with us;
- (d) responding to queries, requests and/or complaints;
- (e) facilitating our customers loyalty programmes;
- (f) updating your Personal Data;
- (g) facilitating your participation in our contests and events;
- (h) conducting market research and surveys with the aim of improving our products and/or services;
- (i) providing you with on-going information, events, programmes or activities, our products and/or services;
- (j) conducting credit/trade checks and other background checks on you and where applicable, any Relevant Persons with any registered credit reporting agency at any time for the purpose of processing a transaction with us or for as long as any dues remain unpaid and outstanding with us;
- (k) for the purpose of credit evaluation, review or reporting and carrying out debt-collection or assisting other institutions to do so;

- (l) prevention and detection of crime including without limitation to money laundering, terrorism and fraud prevention, detection and prosecution;
- (m) compliance with applicable laws, rules, regulations, by-laws, order, guidelines and/or directives;
- (n) enforcing our legal rights and/or obtaining legal advice;
- (o) facilitating business transactions which may include mergers, acquisitions or asset sales;
- (p) compliance with internal policies and procedures including without limitation to risk management, product planning, insurance, audit and administrative purposes;
- (q) for all ancillary purposes relating to the provision of facilities including the provision of computer, telecommunications and technology services;
- (r) human resource applications; and/or
- (s) any other incidental purpose relating to any of the above.

5. Disclosure of Personal Data

5.1 Your Personal Data may/will be disclosed to the following parties:

- (a) any company or representative within our group of companies;
- (b) our Directors, authorised Employees or representatives;
- (c) our third-party service providers or agents (including without limitation contractors, business partners, auditors, lawyers, consultants, insurers, adjusters and utility companies);
- (d) any registered credit reporting agencies under the Credit Reporting Agency Act 2010;
- (e) our business partner, investor, assignee or transferee to facilitate business asset transactions (including without limitation to any merger, acquisition or asset sale);
- (f) any law enforcement agencies;
- (g) any governmental authorities or regulatory bodies; and/or
- (h) any other party authorised and consented by you.

5.2 We may disclose your Personal Data to any or all of the parties stated above which may be located within or outside of Malaysia.

5.3 Any Personal Data which you have disclosed and/or provided to us will be retained for the period necessary for the purposes stated in this Notice and as required by law. In the event such information retained by us is no longer required, we will take reasonable steps to ensure that such information is deleted and/or destroyed.

6. Security of Personal Data

6.1 Your Personal Data is important to us. We shall keep and process your Personal Data in a secure manner and in strict confidence.

6.2 We endeavour, where practicable, to implement the appropriate security measures and procedures in accordance with the PDPA and relevant regulations to prevent any unauthorised and unlawful processing of the Personal Data and the accidental loss, destruction or damage to the Personal Data at all times.

- 6.3 All such third-parties are prohibited from disclosing your Personal Data except to provide services to us and they are required to maintain confidentiality of your Personal Data.
- 6.4 We do not on an individual basis disclose your sensitive Personal Data to third-parties, without your explicit consent or unless required under the PDPA or other applicable law.
- 6.5 Indeed, while we use all reasonable efforts to secure your Personal Data in using our website, you hereby acknowledge that the use of the internet is not entirely secure and for this reason we cannot fully guarantee the security or integrity of any Personal Data that are transferred from you or to you via the internet.

7. Verification and Correction of Personal Data

- 7.1 We are not required to verify the accuracy and completeness of the Personal Data provided by you and we are entitled to treat the Personal Data provided by you as accurate, complete, not misleading and up-to-date.
- 7.2 We shall not be held liable for any inability on our part to provide services to you, if you failed to ensure that your Personal Data submitted to us is complete and accurate or failed to notify us of any relevant changes to such Personal Data.
- 7.3 You may, subject to a payment of a prescribed fee, any applicable legal restrictions and/or contractual conditions and where provided by law, request for correction of the Personal Data or limit the processing thereof at any time hereafter by submitting a written request to us.

8. Access to Your Personal Data

- 8.1 You may, subject to a payment of a prescribed fee, any applicable legal restrictions and/or contractual conditions and where provided by law, request in writing for access to your Personal Data.

9. Withdrawal of Consent

- 9.1 Should you wish to withdraw your consent to any use or disclosure of your Personal Data by us as set out in this Notice, you may, subject to a payment of a prescribed fee, any applicable legal restrictions and/or contractual conditions and where provided by law, notify us in writing.

10. Changes to this Notice

- 10.1 We may, from time to time, need or be required to change this Notice to comply with or be consistent with changes in applicable laws and regulations as well as our business operations or policies.
- 10.2 Notice of any such revision will be given on our website and/or by such other means of communication deemed suitable by us. By continuing your relationship with us after any amendments have been introduced and published on our website, you shall be deemed to have accepted this Notice as amended.

11. Enquiries or feedback

- 11.1 If you have any enquiries or feedback in relation to your Personal Data, or if you would like to access or correct or limit processing of your Personal Data, or if you wish to withdraw your consent given herein, you may contact or notify us in writing to:

Correspondence address : No. 16 & 17
Plaza Seri Kubu
Jalan Tan Chay Yan
75300 Melaka
Email address : info@spb.my
Telephone number : 06 - 281 0003
Attention to : Sherry Lim

- 11.2 If your request or concern relates specifically to personal data protection compliance, including data breaches, legal obligations, or rights under the PDPA, you may also contact our appointed Data Protection Officer (DPO):

Correspondence address : No. 16 & 17
Plaza Seri Kubu
Jalan Tan Chay Yan
75300 Melaka
Email address : pdpa.dpo@spb.my
Telephone number : 06 - 281 0003 (Ext 301)
Attention to : Lynnette Lim