

PERSONAL DATA & INFORMATION NOTICE FOR SPLENDID PAVILION SDN BHD'S VALUED CUSTOMERS / PROSPECTIVE CUSTOMERS



1. COLLECTION OF PERSONAL DATA

This Personal Data & Information Notice is issued to all our valued customers / prospective customers, pursuant to the requirements of the Malaysian Personal Data Protection Act 2010.

We treat and view your personal data seriously.

In the course of your dealings with Splendid Pavilion Sdn Bhd and/or our associated or related companies, as our valued customer / prospective customer, we will request that you provide data and information about yourself ("Personal Data") to enable us to enter into 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 events with business partners within our project/townships.

2. NATURE OF PERSONAL DATA

Such Personal Data may be subject to applicable data protection, privacy and other similar laws and may include information concerning name, age, identity card number, passport number, address, gender, date of birth, children basic details, marital status, occupation, income range, contact information, email address, employer, race, ethnic origin, nationality, type of loans applied for in relation to the purchase of property, introducer' name, address and identity card number.

In the event that you have provide personal data of third parties (e.g. your emergency contact person, tenant, joint purchaser, authorized representatives, company directors, contractors, lawyers, financier) to us, we rely on you to have sufficiently obtained the prior consent of such third parties to allow us to process their personal data in relation to the purposes stated therein

3. IMPACT RESULTING FROM FAILURE TO SUPPLY PERSONAL DATA

The failure to supply such Personal Data will:-

- a. result in us being unable to provide customers / prospective customers with the notices, services and/or products requested;
- b. affect the ability of the parties to enter into the necessary Sales and Purchase Agreement in relation to the sale of property and/or product; and/or
- c. result in us being unable to update you on our latest product and/or launches.

4. PURPOSE OF COLLECTING PERSONAL DATA

Personal Data you provide will be collected, used and otherwise processed by us for, amongst others, 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 (for real estate customers);
- c. user or customer relationship management procedures;
- d. those purposes specifically provided for in any particular service or product offered by us;
- e. conducting marketing and client profiling activities in connection with our services and related products;

- f. credit assessments and other background checks of users as we may determine to be necessary or appropriate;
- g. our internal record keeping;
- h. collection of outstanding payments from clients;
- i. prevention of crime (including but not limited to fraud, money-laundering, bribery);
- 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. purposes relating to any of the above (including but not limited to research, benchmarking and statistical analysis);
- l. enable us to send you information by e-mail, telecommunication means (telephone calls or text messages) or 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 such third parties without your prior consent;
- m. vacant possession, keys handover, property/estate management, customer care and/or defect rectification works; and/or
- n. post vacant possession services, such as club house services, security and customer loyalty programmes.

5. DISCLOSURE

Personal Data provided to us will generally be kept confidential but you hereby consent and authorize us to provide or disclose your Personal Data to the following categories of parties:-

- a. any person to whom we are compelled or required to do so under law or in response to a competent or government agency;
- b. any related companies and subsidiaries of our company, including those established in the future;
- c. our business partners and online affiliates that provide related services or products in connection with our business;
- d. government agencies, statutory authorities and industry regulators;
- e. our auditors, consultants, accountants, lawyers or other financial or professional advisers;
- f. our sub-contractors or third party service or product providers as may be determined to be necessary or appropriate;
- g. third party property management companies/entities in respect of the management of property that customers have purchased; and/or
- h. our appointed service providers in relation of our loyalty programs, for the purpose of delivery of gift redemption and services.

6. SAFEGUARDS

We shall keep and process your data in a secure manner. We endeavour, where practicable, to implement the appropriate administrative and security safeguards and procedures in accordance with the applicable laws and regulations to prevent the unauthorized or unlawful processing of your Personal Data and the accidental loss or destruction of, or damage to, your Personal Data.

7. DATA TRANSFER & SHARING

Where we consider it necessary or appropriate for the purposes of data storage or processing or providing any service or product on our behalf to you, we may transfer your Personal Data to another member of our group of companies or third party service or product providers within or outside the country in which we are established, under conditions of confidentiality and similar levels of security safeguards.

8. YOUR RIGHTS OF ACCESS AND CORRECTION

8.1 You have the right to request access to and correction of information about you held by us and in this respect, you may:

- a. check whether we hold or use your Personal Data and request access to such data;
- b. request that we correct any of your Personal Data that is inaccurate, incomplete or out-of-date;
- c. request that your Personal Data is retained by us only as long as necessary for the fulfillment of the purposes for which it was collected;
- d. request that we specify or explain its policies and procedures in relation to data and types of Personal Data handled by us;
- e. 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; and
- f. withdraw, in full or in part, your consent give previously , in each case subject to any applicable legal restrictions, contractual conditions and a reasonable time period.

8.2 The department to whom written requests for access to Personal Data or correction and/or deletion of Personal Data or for information regarding policies and procedures and types of Personal Data handled by us is:

Department Name	Splendid Pavilion Sdn Bhd Marketing Department
Contact No.	03-6279 6205
Email Address	property@gadang.com.my
Address	Wisma Gadang, No. 52, Jalan Tago 2, Off Jalan Persiaran Utama, Sri Damansara, 52200 Kuala Lumpur.