

PRIVACY AND PERSONAL DATA PROTECTION POLICY

Jesin Group ("Jesin") respects and is committed to the protection of your personal information and your privacy. This Privacy and Personal Data Protection Policy Notice is issued to all our immediate and/or prospective customers, suppliers and employees, and explains how we collect and handle personal information in accordance with the Malaysian Personal Data Protection Act 2010.

1. COLLECTION OF PERSONAL DATA

In the course of your dealings with Jesin Group and/or any of its subsidiaries or associated companies, affiliates and/or members within the Jesin Group of Companies (collectively, referred to as "Jesin", "we," "us," or "our") in this Personal Data Protection Policy), we will request that you provide data and information about yourself ("Personal Data") to enable us to negotiate, enter into, process, communicate and complete any transaction with you or to deliver and/or communicate the necessary notices and/or information on our services and/or products in connection with our business. These are relevant in connection with our business process, execution, including communication and delivery of notices, services and/or products, client relationship management, planning purposes in connection with any existing or future products, market research/analysis, new product launches and events including promotional events with business partners within our projects or townships.

2. PERSONAL DATA

2.1 Type of Personal Information

Such Personal Data may be subject to applicable data protection, privacy and other similar laws and may include but not limited to the following information, where permitted by applicable law:

- a) name, date of birth, NRIC/passport number, address, gender, race, religion, nationality, marital status, contact information, e-mail address, occupation;
- b) type of loans applied for and information of third parties such as your emergency contact person, authorised representatives, contractors, lawyers, and financiers;
- c) introducer's name, address, NRIC number and contact information;
- d) work history and compensation records, education, employer feedback, performance reviews, disciplinary actions, references and any other details of past employers or referrals provided to us, your employer's name and contact details;
- e) your preferred mode of communication, financial/banking account details, credit card and other pertinent banking information, tax file identification number, EPF number, SOCSO number;
- f) any other relevant personal data which may be supplied by you (if any).

2.2 Source of Personal Information

Jesin collects your personal information directly from you or indirectly from your representatives, legal representatives/agents and/or employer through various means, including but not limited to:

- a) agreements and contracts for sale and purchase, or sub-sale of our properties, or for our services;
- b) our forms (either electronic or hardcopy) for new launches, property roadshows, showcases, exhibitions or any other promotional events;
- c) official forms requesting for information that are provided to you by our employees, sales and marketing/other agents or associates;
- d) any emails or any correspondences that we have received from you 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 written or verbal communications or documents delivered to us prior to and during the course of our dealings with you;
- g) any referrals from a person which have included their verifiable personal contact details;
- h) letters of offer from financial institutions (local and foreign) for pre-approved/approved loans;
- i) business cards or other information provided to us or that were dropped at our premises/roadshows or given to our employees, sales and marketing/other agents or associates;
- j) any documents (including but not limited to statutory forms and returns) that were submitted to us for processing;
- k) any such information as we deem necessary or appropriate from time to time in connection with your commercial relationship with us.

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.

3. PURPOSES OF COLLECTING AND PROCESSING PERSONAL DATA

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

- a) the delivery of notices, information in connection with our current and future services or products and the marketing of such services or products as well as new product launches, events, promotional events and contests;
- b) preparing and executing all necessary documents and agreements with you such as in relation to the sale and purchase transactions, and to carry out the obligations under the agreement, for our products, services, and/or properties necessary for purposes of

- conducting and administering our business including but not limited to sales administration and property management purposes as well as sub-sale transactions, refinancing and sales by auction;
- c) collection of outstanding payments;
 - d) those purposes specifically provided for in any particular service or product offered by us or our partners;
 - e) to administer customer relationship management procedures and maintain the records of our customers and prospective customers;
 - f) for our internal record keeping and audit purposes;
 - g) conducting marketing, client profiling and business development activities as well as market research and statistical analysis and customer surveys regarding our projects, products and/or services;
 - h) credit assessments, financial and background investigation as and when deemed necessary;
 - i) complying with any legal or regulatory requirements and to make the necessary disclosures under the requirements of any applicable law, regulation, direction, court order, by-law, guideline, circular and/or code which are applicable to us or any member companies of our Group and for the prevention of crime;
 - j) enable us to send you 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 doing so we maintain control over your Personal Data and we will not disclose your Personal Data to any third parties without your prior consent;
 - k) vacant possession, keys handover, property/estate management, customer care and/or defect rectification works;
 - l) post vacant possession services, such as security, customer loyalty/reward programmes and/or other value-added service as we may offer to you (if any and where applicable);
 - m) any subsequent commercial transactions in relation to any projects, products and/or services.

4. DISCLOSURE OF PERSONAL DATA

The Personal Data provided to us will generally be kept confidential. You hereby acknowledge, consent and authorize us to disclose your Personal Data to the following parties:

- a) any persons, government agencies, statutory authorities, industry regulators and/or relevant parties whom we are compelled or required to do so pursuant to any law or in response to an authoritative body;
- b) public amenities and utilities providers;
- c) any related companies and/or subsidiaries of Jesin Group, including those incorporated in the future;

- d) our business partners and affiliates that provide related services or products in connection with our business;
- e) our auditors, consultants, lawyers, accountants or other financial or professional advisers appointed in connection with our business;
- f) third party service/product providers, third party management companies/entities, sub-contractors or other parties as may be deemed necessary or appropriate;
- g) our appointed service providers in relation of our loyalty/reward programmes, for the purpose of delivery of gift redemption and services.

The information we gather is not sold, given to, or otherwise shared with other organisations for commercial or any other purposes. Please rest assured that consistent with the law, we will only disclose the minimum amount of information which we deem necessary for the Purpose and that we will take all appropriate safeguards to ensure the integrity and security of the Personal Data.

5. CONSEQUENCES OF REFUSAL/FAILURE TO PROVIDE AND/OR UPDATE PERSONAL DATA

The Personal Data provided to us are 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 a Supplier Letter of Award or an Employment Letter requires certain personal details and information beforehand. The failure to provide and/or update the Personal Data may result in the following which we shall not be held liable for any of the consequences arising therefrom:

- a) the inability of parties to formalize any contract and/or agreement and/or Sale and Purchase Agreement/tenders/Letter of Awards/Employment Contract in relation to the sale of our property, products and/or services, to facilitate construction or to hire human resource;
- 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;
- e) the inability to comply with any applicable law, regulation, direction, court order, by laws, guidelines and/or codes applicable to us.

6. 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, in accordance to the applicable laws and regulations. We will, 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.

7. DATA TRANSFER & SHARING

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

8. THIRD PARTY CONSENT

In the event you have provided personal data of third parties (e.g. your emergency contact person, authorised representatives, contractors, lawyers, financiers) 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 Purpose.

9. RIGHTS OF ACCESS AND CORRECTION

You have the right to request access to and if required, correction of your Personal Data in our records, subject to payment of a prescribed fees where applicable. You have the right to:

- a) request access to your Personal Data in our records for verification purposes;
- b) request the correction of your Personal Data that is inaccurate, out-of-date or incomplete;
- c) request that your Personal Data shall only be kept for the fulfilment of the purpose of the collection of such information;
- 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;
- f) withdraw, in full or in part, your consent, subject to any applicable legal restrictions, contractual conditions and reasonable time period.

10. CONSENT

If you give or continue to give Personal Data to us, you will be deemed to consent to your Personal Data being collected, held or processed in the way specified in this Notice and in any other notice issued under Section 7 of Personal Data Protection Act ("PDPA") by us.

11. LANGUAGE

In accordance to the Personal Data Protection Act 2010, this Policy is issued in both Bahasa Malaysia and English. In the event of any inconsistency, the English version of this Policy shall prevail.

12. YOUR PRIVACY PREFERENCES AND HOW TO CONTACT US

You may request for access to or correction of the Personal Data or limit the processing thereof at any time hereafter by submitting a written request to us via:

Department	Sales & Marketing Department
Address	No. 26 & 27, Jalan Petani, 08000 Sungai Petani, Kedah Darul Aman.
Contact No.	04-423 5800
Fax No.	04-423 5801
Email Address	pdpa@jesin.com.my

Any inquiries or complaints with respect to your Personal Data should also be channelled to us in this manner.

To learn more about our Privacy Policy, please read our Privacy Policy at:

<http://www.jesin.com.my/privacy.asp>.

13. VARIATION/CHANGES TO THIS POLICY

Jesin Group reserves the right and may, from time to time, need or be required to change our Personal Data Protection Policy to comply with or be consistent with changes in applicable law and regulations as well as our business operations or policies. Please note that Jesin may amend this Personal Data Protection Notice at any time without prior notice and will notify you of any such amendment via our website, email or through other means of contact.