

Privacy Notice

Personal Data Protection Notice for STC Group

The Straits Trading Company Limited and its group of companies (“STC” or “We” or “Our”) respect and are committed to protecting your personal information and privacy. This Privacy Notice/ Personal Data Protection Notice (“Privacy Statement”) explains how we collect and handle your personal information in accordance with the Malaysian Personal Data Protection Act 2010 (“Act”). Please note that STC may amend this Privacy Notice at any time without prior notice and any amendment to this Privacy Statement shall be posted in our website. .

(1) Personal information

1.1 Type of personal information

Personal information means any information which relates to you and which was collected or provided to STC for the purposes stated in Section (2) below. Your personal information may include but not limited to your name, identification card number, birth certificate number, passport number, nationality, address, contact number, fax number, race, gender, date of birth, marital status, resident status, education background, financial background, personal interests, email address, your occupation, photograph, video images, your designation in your company, your company details, the industry in which you work in, CCTV/security recordings, location tracking/GPS information, any information about you which you have provided to us in registration forms, application forms or any other similar forms and/or any information about you that has been or may be collected, stored, used and processed by us from time to time.

1.2 Source of personal information

STC collects your personal information directly from you or indirectly from your representatives, agents (e.g. real estate agents) and/or employer when you, your representatives, agents and/or employers send us completed enquiry, application and/or registration forms via various means, including online and physical hardcopies at public venues or in any of our premises. Your personal information may also be collected from cookies through the use of our website.

1.3 Obligatory personal information

All information requested for in the relevant forms is obligatory to be provided by you voluntarily when you access to our website unless stated otherwise. Should you fail to provide the obligatory information, we would be unable to process your request and/or provide you with relevant services such as preparation of the documentations, application , agreement etc.

(2) Purposes of collecting Personal Data

Your personal information is collected and further processed by STC as required or permitted under the Act and to give effect to your requested commercial transaction, including the following:

- to process your requested products and/or services;
- to facilitate your participation in any contests or events;
- to administer and communicate with you in relation to our product, services and/or events;
- to process any payments related to your requested product and/or service;
- to operate our premises in a manner which is physically safe, secure and befitting of health and safety requirements;
- for internal investigations, audit or security purposes;
- to conduct internal marketing analysis and analysis of customer patterns and choices;
- to comply with STC's legal and regulatory obligations in conducting its business;
- to contact you regarding products, services, upcoming events, promotions, advertising, marketing and commercial materials which we may feel interest you;
- to ensure that the content from our website is presented in the most effective manner for you and for your computer and/or devices;
- for STC's internal records management, customer relations events and activities, and customer loyalty reward program.;
- For the prevention of fraud or any criminal activity and to enable us to comply with any applicable law, regulation, direction, court order, by-law, guideline, circular, code or to assist in law enforcement and investigation by relevant authorities; or
- For such purposes that are necessary or directly related to your relationship with us or where it is permitted under the applicable laws.

In the event you have indicated your consent to receive marketing or promotional updates from STC, you may opt-out from receiving such marketing or promotional material at any time by selecting the "unsubscribe" option provided in STC's email blasts or you may contact STC at the details provided in Section (9) below.

(3) Disclosure of personal information

3.1 Entities within STC

Your personal information provided to us is processed by entities (in or outside of Malaysia) within STC (including related companies, subsidiaries, holding companies, associated companies and outsourcing partners). STC will ensure that:

1. access to your personal information is restricted to staff who are contractually required to process your personal information in accordance with their respective job requirements; and
2. only necessary information is released to the relevant employees.

3.2 Classes of third parties

Your personal information may be disclosed to relevant third parties (in or outside of Malaysia) as required under the law, pursuant to relevant contractual relationship (for example, where we appoint third party service providers) or for the purposes stated in Section (2) above (or directly related to those purposes).

In the event of a potential, proposed or actual sale of business, disposal, acquisition, merger or re-organisation (“Transaction”), your personal information may be required to be disclosed or transferred to a third party as a result of the Transaction. You hereby acknowledge that such disclosure and transfer may occur and permit STC to release your personal information to the other party and its advisers/representatives.

Your personal information may be disclosed to the following classes of third parties:

- Third parties appointed by us to provide services to us or on our behalf (such as auditors, lawyers, company secretary, consultants, contractors, sub-contractor, professional advisors, service providers, printing companies, conference/training/event organiser, other advisers, real estate agencies);
- Our business partners or affiliates who may jointly provide the service requested for (such as third-party hotels or resorts or shopping mall tenants);
- Utility companies;
- Our advertisers and advertising networks that require the data to select and serve relevant adverts to your and others;
- Property management companies for management of property purchased;
- Law enforcement agencies; and
- Relevant governmental authorities, statutory authorities, local council and industry regulators.

(4) Websites

4.1 Links to other sites

Links to other sites is provided for your convenience and information. These sites may have their own privacy statement in place, which we recommend you to review prior visiting any linked websites. We are not responsible for the content on the linked sites or any use of the site.

4.2 Location enabled products or applications

Location enabled products or applications transmit your location information to us. We do not use the information sent or provided other than to provide the service you request. Location enable features are opt-in and you have control over your participation and can turn these services off at any time or uninstall them.

Some mobile applications will utilize Google Analytics (or similar tool) to help us better serve you through improved products, services, and revisions to the mobile applications. This collected information will not identify you to us. It may, however, let us know anonymously, which services and features you are using the most within the application, as well as device type and hardware features, country and language of download.

4.3 Cookies

A cookie may be used in the processing of your information. A cookie is a text file placed into the memory of your computer and/or device by our computers. A copy of this text file is sent by your computer and/or device whenever it communicates with our server where we will use cookies to identify you. We may also collect the following information during your visit to our website and/or the fully qualified domain name from which you accessed our site, or alternatively, your IP address:

1. the date and time you accessed each page on our web site;
2. the URL of any webpage from which you accessed our site (the referrer); and
3. the web browser that you are using and the pages you accessed.

Some web pages may require you to provide a limited amount of personal information in order to enjoy certain services on our websites (system login credentials, email address and contact, etc). This personal information will only be used for its intended purposes only, i.e. to respond to your message or deliver the requested services.

(5) Security

STC will take reasonable steps to protect the information provided by you against loss, misuse, and/or alteration of information under our control. While we cannot guarantee that loss, misuse or alteration to the information will not occur, we ensure that our systems adhere to market security standard governing the processing so as to help safeguard against such occurrences.

(6) Storage & Retention Period

Your personal information shall be stored either in hard copies in our office within the group or stored electronically in servers. We will retain your Personal Data for the period necessary to fulfil the purposes outlined in this Personal Data Protection Notice unless a longer retention period is permitted or required by law and thereafter the Personal Data shall only be retained for statistics and research purposes. During the period of communication between you and us, you will be deemed to have consented to allow us to collect, record, hold, store, process and deal with your Personal Data until and unless we receive written notice to the contrary from you.

(7) Data Integrity & Right to Access

You have the right to access and correct your personal information held by us (subject always to certain exemptions).

We endeavour to take reasonable precautions to ensure that the Personal Data that we collect and/or process is accurately reflected in our system in accordance with the details provided by you. Therefore, the accuracy of the Personal Data depends to a large extent on the information you provide. Should there be any change to the information contained in your Personal Data supplied to us, kindly inform us as soon as possible.

You have the right to request access to your Personal Data held by us and make correction(s) thereto by contacting STC at the details provided in Section (9) below.

In particular, 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 outdated and supply you with a copy of the Personal Data as corrected;
- c. communicate to us in written form your objection to the use of your Personal Data for any purpose whatsoever whereupon we will not use your Personal Data for these purposes; and
- d. communicate to us in written form your withdrawal, in full or in part, of your consent given.

(Collectively referred to as "**Request(s)**")

Subject to any applicable restrictions under the Personal Data Protection Act 2010 and contractual conditions, we shall comply with such Request(s) within a reasonable time period.

(8) Language

In accordance with Section 7(3) of the Act, this Privacy Notice is issued in both English and Bahasa Malaysia. In the event of any inconsistencies or discrepancies between the English Version and the Bahasa Malaysia version, the English version shall prevail.

(9) How You Can Contact Us

If you wish to access and/or make a correction / deletion or make a complain/ request or have any questions as to your Personal Information held by us, you may do so by making a written request to Marketing Department and addressed to the following:-

STC Property Management Sdn Bhd

(A wholly owned subsidiary of The Straits Trading Company Limited)

4823 - 4824 2F, Jalan Pantai,
Taman Selat, 12000 Butterworth,
Penang, Malaysia.

Tel: +604 - 3333 889

Email Address: straits-city@stcpm.com.my

Attn: Marketing Department,

Date of issuance of this Privacy Notice: 23 July 2020