

# **PERSONAL DATA PROTECTION POLICY FOR CUSTOMERS / PROSPECTIVE CUSTOMERS**

## **1. Introduction**

a. Seni Nusantara Sdn Bhd (“SNSB”) is committed to protecting the personal data (“Personal Data”) supplied by you to SNSB to ensure compliance with the legal and regulatory requirements in accordance with the Personal Data Protection Act 2010 (“Act”)

b. For the purpose of this Personal Data Protection, personal data shall have the meaning as ascribed to it in the Act which means any information in respect of commercial transactions, which:-

(i) is being processed wholly or partly by means of equipment operating automatically in response to instructions given for that purpose;

(ii) is recorded with the intention that it should wholly or partly be processed by means of such equipment; and/or

(iii) is recorded as part of a relevant filing system or with the intention that it should form part of a relevant filing system,

that relates directly or indirectly to a data subject, who is identified or identifiable from that information or from that and other information in the possession of a data user, including any sensitive personal data and expression of opinion about the data subject; but does not include any information that is processed for the purpose of a credit reporting business carried out by a credit reporting agency under the Credit Reporting Agencies Act 2010.

## 2. Collection and Source

a. In the course of your transaction and dealings with us, SNSB and its associates and affiliates (collectively, referred to as "**us**", "**our**" or "**we**" in this Personal Data Protection Policy), you may be required to furnish from time to time to SNSB, your personal data ("**Personal Data**"), to enable us to enter into transactions with you or to communicate with you on the services and/or products relating to our business. These may be done through various means, including but not limited to:

(i) agreements for sale and purchase or sub-sale of our properties or for our services;

(ii) our forms whether in electronic or hardcopy format;

(iii) any correspondence that we have received from you requesting for information or making any inquiries; and/or

(iv) business cards or other information provided to us or that were dropped at our premises or given to our employees or sales and marketing agents or any other agents.

## 3. Types of Personal Data

a. Such personal data may include, but is not limited to information concerning your name, age, identity card number, passport number, visa information, correspondence address, email address, gender, date of birth, marital status, occupation, income range, contact information such as telephone, mobile and facsimile number, race, nationality, credit card or bank account information, financing details in relation to the purchase of property, and information of third parties such as your emergency contact person, tenant, authorised representatives, contractors, lawyers, and financiers,



which may be subject to applicable data protection and other similar laws.

- b. The types of personal data collected will depend on the nature of your dealings or transaction with SNSB.

#### 4. Purposes of Collection

We may collect, retain, use and otherwise process your personal data for, amongst others, the following purposes (collectively, “**Purpose**”):

- a. processing your application or registration under any program and / or activities organized or conducted by SNSB or in connection with your employment application;
- b. delivering you of notices, information in connection with our current and future services or products and the marketing and / or advertising of such services or products as well as new product launches, events, promotional events and contests (including notices through social medias);
- c. 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;
- d. preparing and executing tenancies entered between SNSB and you, which shall include all matters relevant for the completion of the tenancies, delivery of vacant possession of the tenanted premises, and other matters with regards thereto;

- e. entering into any transactions, agreements or instruments in the ordinary course of business of SNSB;
- f. discharging SNSB's contractual obligations in the ordinary course of business of SNSB;
- g. collecting outstanding payments due and payable to SNSB including late interest charges;
- h. sending you services, products or promotional information related to other third parties which you may be interested in;
- i. administering and carrying out our customer and prospective customer relationship management procedures;
- j. maintaining our records of our customers and prospective customers for our internal record keeping;
- k. 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;
- l. carrying out credit assessments and other background verification that may be necessary or appropriate for SNSB's business or employment purposes;
- m. 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 and for the prevention of crime;
- n. attending to all matters relevant for the completion of the sale and purchase transactions, delivery of vacant possession, keys handover, property/estate management, customer care and/or defect rectification works;



- o. attending to post vacant possession services, such as club house services and security services. and / or
- p. for any other purpose that is incidental or ancillary or in furtherance to the above purposes.

## 5. Disclosures

Generally, we will keep the personal data provided to us as confidential. Nevertheless, you consent to the following disclosures of the personal data by us to these classes of third parties which may be located within or outside Malaysia for reasons relating to the purpose or for other legitimate purposes:

- a. any parties to whom we are under a legal requirement to disclose the personal data to by applicable law or in response to an authoritative body, including government agencies, statutory authorities, local councils and/or industry regulators including but not limited to the land office, the land registry, the Ministry of Urban Wellbeing, Housing and Local Government, Companies Commission of Malaysia, Bank Negara Malaysia, Securities Commission, Official Assignee's Office of the Insolvency Department of Malaysia, the Employees Provident Fund Board, the Inland Revenue Board, as well as to any other third party pursuant to any court order;
- b. public amenities and utilities providers, including but not limited to Indah Water Konsortium, Syarikat Bekalan Air Selangor Sdn Bhd and Tenaga Nasional Berhad;
- c. contractors and service providers, including but not limited to auditors, consultants, accountants, lawyers, financial and professional advisers, lenders, insurance companies and property management companies;
- d. our related companies, associates, affiliates;
- e. our joint venture and business partners;
- f. our agents, contractors, sub-contractors, network operations, third party service or product providers;

- g. the relevant landowner, Joint Management Body and/or Management Corporation.
- h. any referee whose details are provided by you;
- i. any financial institutions, lawyers and professional advisers appointed by you;
- j. any other persons under a duty of confidentiality to SNSB; and/or
- k. any other entities that SNSB may deem fit.

6. Protection of Personal Data

We are committed to keeping and processing the personal data in a secure matter. We will implement appropriate administrative and security safeguards, procedures and policies to the extent practicable and in accordance with the applicable laws, to prevent any unauthorized and unlawful processing of the personal data and the accidental loss, destruction or damage to the personal data at all times.

7. Consequences of Refusal or Failure to Supply

The refusal or failure to provide the personal data may result in the following:

- a. the inability of parties to formalize and/or carry out the relevant agreement or transaction in relation to the sale of our property, products and/or services;
- b. the inability for us to provide you with information, products and/or services requested; and/or
- c. the inability to provide you information about our products and/or services and obtaining your feedback on our products and/or services.



## 8. Retention Standard

Any personal data supplied by you will be retained by SNSB as long as its necessary for the fulfillment of any of the purposes stated above and otherwise permitted by any applicable laws that may from time to time be in force. If any personal data is no longer required for the purpose for which it was processed, SNSB shall take all reasonable steps to ensure that it is destroyed or permanently deleted.

## 9. Right of Access and Correction

You have the right to:

- a. check whether we hold or use the personal data and request access to the same;
- b. request that we correct any of the personal data that is inaccurate, incomplete or out-of-date;
- c. communicate to us your objection to the use of your personal data for marketing purposes;
- d. withdraw in full or in part, your consent, subject to any applicable legal restrictions, contractual conditions and a reasonable time period.

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:

Tel No.:       +(603) 6203 3338

Fax No.:       +(603) 6203 1338

Email:        kiaraview@seninusa.com.my

Any inquiries or complaints with respect to your personal data should also be channeled to us through this manner.

#### 10. Third Party Consent

In the event you have provided personal data of third parties (e.g. your emergency contact person, tenant, authorised representatives, contractors, lawyers, financiers) to us, we hope that you have sufficiently obtained prior consent of such third parties to allow us to process their personal data in relation to the Purpose.

#### 11. Changes to our Personal Data Protection Policy

We may, from time to time, need or be required to change our Personal Data Protection Policy to comply with or be consistent with the changes in the applicable laws and regulations as well as our business operations or policies. As such, you may review any changes to our Personal Data Protection Policy at this website from time to time.