

## Personal Data Protection Notice for Freshtel Group Sdn Bhd

Freshtel Group Sdn Bhd ("FG") together with its subsidiaries, affiliates, related and associated companies (collectively "FG" and any reference to "we", "us" or "our" shall include any member of FG) respects and is committed to the protection of your personal data and your privacy. This Personal Data Protection Notice ("Privacy Notice") explains how FG collects and handles your personal data in accordance with the Personal Data Protection Act 2010 of Malaysia. Please note that FG may amend this Privacy Notice at any time without prior notice and will notify you of any such amendment via our website or by such other means of communication as deemed suitable by FG.

### (1) Personal Data

#### *1.1 Type of personal data*

Personal data means any information which relates to you (or in the case of a third party as authorized by such third party) and which was collected or provided to FG for any of the purposes stated in Section (2) below ("Purposes").

Your personal data may include, but is not limited to, your name, NRIC number, passport number, contact details, financial and banking account details, occupation, citizenship, information in audio and/or video format (including voice, video recording, closed-circuit television ("CCTV") or security recording), images (including photographs) and location tracking/global positioning system ("GPS") information.

#### *1.2 Source of personal data*

- i. Customer or potential customer: FG, whether directly or through our authorized agents and representatives, collects your personal data whether directly from you or indirectly from third parties such as our authorised agents, dealers or representatives, your legal representatives, agents (e.g. travel agents), credit reference agencies and/or your employer when you whether directly or through your legal representatives, agents and/or employers provide your personal data to FG in any manner in connection with any transaction, arrangements and/or enquiries made with FG including when you 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 data may also be collected from cookies through the use of our website.
- ii. Vendor, supplier, tenant or service provider: FG, whether directly or through our authorized agents and representatives, collects your personal data directly from you or indirectly from third parties such as your employer, authorized agents or credit reference agencies when you enter into any transactions or arrangements with FG, including in connection with the supply or proposed supply of products or services, when you send us completed enquiry and/or credit application forms via various means, including online and physical hardcopies. Your personal data may also be collected from cookies through the use of our website.

### *1.3 Obligatory personal data*

All information requested for in the relevant forms and documents is obligatory to be provided by you unless stated otherwise.

Should you fail to provide the obligatory information, we may be unable to process your request and/or provide you with relevant services and products.

#### **(2) Purposes of collecting and further processing (including disclosing) your personal data**

- i. Customer or potential customer: Your personal data is collected and further processed by FG as required or permitted by law and to give effect to your requested commercial transaction, including the following:
  - to assess and process your request for our products and services;
  - to establish your identity and background;
  - to facilitate your participation in, and our administration of, any events including contests, promotions or campaigns;
  - to administer and communicate with you in relation to our products, services and/or events;
  - to process any payments related to our products and services requested by you;
  - to conduct credit reference checks and establish your credit worthiness, where necessary, in providing you with the requested products and services;
  - for insurance purposes;
  - to apply for relevant travel visas in the event of overseas travelling;
  - to operate our premises in a manner which is physically safe, secure and befitting of health and safety requirements;
  - for internal investigations, compliance, audit or security purposes including without limitation for crime detection, prevention and prosecution;
  - to conduct research for internal marketing analysis and analysis of customer patterns and choices;
  - to better manage our business and your relationship with FG;
  - to respond to your enquiries and to resolve any issues and disputes which may arise in connection with any dealings with FG;
  - to protect or enforce our rights under any agreements which FG is a party to;
  - to transfer or assign our rights, interests and obligations under any agreement entered into with FG;
  - to comply with FG's legal and regulatory obligations in the conduct of its business including to meet any disclosure requirements of any law binding upon FG;
  - to contact you and/or provide you with information regarding our products, services, upcoming events, promotions, advertising, marketing and commercial materials which may be of interest to you;
  - to ensure that the contents on our website are presented in the most effective manner for you and for your computer and/or device;

- for FG's internal records management; or
- for any other purpose that is required or permitted by any laws, regulations and guidelines including the requirements of any governmental or regulatory authorities.

Where you have indicated your consent to receiving marketing or promotional updates from FG, you may opt-out from receiving such marketing or promotional material at any time. You may select the "unsubscribe" option provided in our email blasts or you may contact FG at the contact details provided in Section (6) below.

- ii. Vendor, supplier, tenant or service provider: Your personal data is collected and further processed by FG as required or permitted by law and to give effect to your requested commercial transaction, including the following:
- to assess and process your credit account application;
  - to assess your credit worthiness and conduct credit reference checks;
  - to administer and give effect to your commercial transaction (such as tender award, contract for service, tenancy agreement);
  - to process any payments related to your commercial transaction;
  - for insurance purposes;
  - for internal investigations, compliance, audit or security purposes (including without limitation for crime detection, prevention and prosecution);
  - to better manage our business and your relationship with FG;
  - to respond to your enquiries and to resolve any issues and disputes which may arise in connection with any dealings with FG;
  - to protect or enforce our rights under any agreements that any FG member is a party to;
  - to transfer or assign our rights, interests and obligations under any agreement entered into with FG
  - to comply with FG's legal and regulatory obligations in the conduct of its business including to meet any disclosure requirements of any law binding upon FG;
  - to contact you and/or provide you with information regarding our products, services, upcoming events, promotions, advertising, marketing and commercial materials which may be of interest to you;
  - to ensure that the contents on our website are presented in the most effective manner for your and for your computer and/or device; and
  - for FG's internal records management.

Where you have indicated your consent to receiving marketing or promotional updates from FG, you may opt-out from receiving such marketing or promotional material at any time. You may select the "unsubscribe" option provided in our email blasts or you may contact FG at the details provided in Section (6) below.

### **(3) Disclosure or transfer of personal data (within or outside of Malaysia)**

#### ***3.1 Entities within FG***

Your personal data provided to us is processed by entities (within or outside of Malaysia) within FG (including related companies, subsidiaries, holding companies, associated companies and outsourcing partners).

FG will ensure that:

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

### *3.2 Classes of third parties*

Your personal data may be disclosed or transferred to relevant third parties (within or outside of Malaysia) as required under law, pursuant to relevant contractual relationship (for example, where we appoint third party service providers) or for the Purposes (or purposes directly related to Purposes).

In the event of a potential, proposed or actual sale/disposal of business or interest, acquisition, merger, re-organisation or funding exercise relating to any member of FG (**Transaction**), your personal data 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 FG to release your personal data to such third parties and their advisers/representatives.

- i. Customer or potential customer: Your personal data 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 banks or financial institutions, auditors, lawyers, company secretaries, printing companies, information technology (IT) system / software vendors, contractors, conference/training/event organiser, other advisers, travel agencies and insurance companies);
  - Our business partners or affiliates who may jointly provide the service requested for (such as third party hotels or resorts, shopping mall tenants or applications resellers);
  - Foreign embassies (including agencies appointed by foreign embassies to carry out their services) if FG assists you in your visa application as part of your requested travel services;
  - Any financial institutions, merchants and credit card associations in connection with your use of any credit or debit card in any transactions made with us;
  - Law enforcement agencies including courts, tribunals or authorities, whether governmental or quasi-governmental having jurisdiction over FG;
  - Relevant governmental agencies, statutory authorities, management corporations, joint management bodies, industry regulators and local councils; and
  - Any persons, authorities or regulators to whom FG is permitted or required to disclose to under the laws of any country.
- ii. Vendor, supplier, tenant or service provider: Your personal data 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 banks or financial institutions, auditors, lawyers, company secretaries, printing companies, IT system / software vendors, contractors, conference/training/event organisers, other advisers, travel agencies and insurance companies);
- Any financial institutions, merchants, credit card associations in connection with your use of any credit or debit card in any transactions made with us;
- Law enforcement agencies including courts, tribunals or authorities, whether governmental or quasi-governmental having jurisdiction over FG;
- Relevant governmental agencies, statutory authorities, industry regulators and local councils; and
- Any persons, authorities or regulators to whom FG is permitted or required to disclose to under the laws of any country.

## **(4) Websites**

### ***4.1 Links to other sites***

Content in any website of FG (**FG Websites**) may include links to third party websites. FG is not responsible for the content on such linked third party websites and users should observe the separate privacy policies applicable to the respective third parties website.

### ***4.2 Cookies***

FG may collect information about your visits to FG Websites without you actively submitting such information. Unidentifiable information may be collected using various technologies, such as cookies, and web beacons. Cookies are small text files that are transferred to your computer's hard disk by a website. Web beacons (also referred to as GIF files, pixels or Internet tags) help FG recognise a unique cookie on your browser. Your internet browser automatically transmits to FG some of this unidentifiable information, such as the URL of the web site you just visited and the browser version your computer is operating.

Passive information collection technologies can make your use of FG Websites easier by allowing FG to provide better service, customise FG Websites based on consumer preferences, compile statistics, analyse trends, and otherwise administer and improve FG Websites. Certain features of FG Websites may not work without use of passive information collection technologies. Information collected by these technologies cannot be used to identify you without additional identifiable information and FG will not collect additional identifiable information with information collected through the use of such tracking technologies.

## **(5) Right to access and correct personal data**

You have the right to access and correct your personal data held by us subject always to certain exemptions and payment of the prescribed fee. We will make every endeavour to ensure your personal data is accurate and up to date and therefore we ask that if there are changes to your information you should notify us directly at the contact details set out in Section (6) below and identify the relevant

entity/division within FG with whom you have dealing.

## (6) Limiting the processing of personal data, further enquiries and complaints

If:

- you would like to obtain further information on how to limit the processing of your personal data;
- you have any further query; or
- you would like to make a complaint in respect of your personal data,

you may contact the following:

**Designation** : Personal Data Compliance Officer

Email Address : [questions@freshtel.my](mailto:questions@freshtel.my)

Please state the nature of your relationship with the relevant entity/division within FG in your communications with us to facilitate the processing of your request.