

# **PRIVACY AND PERSONAL DATA PROTECTION POLICY**

This Privacy and Personal Data Protection Policy is issued to all our immediate and/or prospective customers, suppliers and employees pursuant to the Personal Data Protection Act 2010 ("**the Act**") which came into effect on 15th November 2013.

## **1. Collection of Personal Data**

In the course of your dealings with Iskandar Waterfront City Berhad (formerly known as Tebrau Teguh Berhad) and/or any of the following:

- a) Bayou Bay Development Sdn Bhd;
- b) Tebrau Bay Constructions Sdn Bhd;
- c) Bayou Management Sdn Bhd;
- d) Tebrau Bay Sdn Bhd.

(collectively shall form as part of Iskandar Waterfront City Berhad Group or "**IWCity Group**"), we will request that you provide data and information about yourself ("**Personal Data**") to enable us to enter into commercial 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 projects or townships.

## **2. Personal Data**

Such Personal Data may be subject to applicable data protection, privacy and other similar laws and may include but is not limited to information concerning your name, date of birth, identity card number, passport number, address, gender, race, nationality, contact information, e-mail address, work history, education, compensation currently and historically, employer feedback, performance reviews, disciplinary actions, references and any other details of past employers or other people you provided to us, residential or postal addresses, your current or previous vocations, your employer's name, address, telephone or fax number, your previous addresses and preferred mode of communication, any previous names you may have used or aliases, religion, current and savings account number, credit card details, bank name and other pertinent banking information, tax file identification number, EPF number, SOCSO number; and criminal history, where permitted by applicable law.

## **3. Purpose of Collection of Personal Data**

The Personal Data will be collected, processed and used by us for 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;
- c. the maintenance and upkeep of customer records and development;
- d. those purposes specifically provided for in any particular service or product offered by us or our partners;
- e. marketing and client profiling activities regarding our latest projects, products and/or services;
- f. preparation and execution of all necessary documents and agreements and/or contracts for our projects, products and/or services with you;
- g. credit assessments, financial and background investigation as and when deemed necessary;
- h. our internal record keeping;

- i. prevention of crime (including but not limited to fraud and money-laundering);
- 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. 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 written consent;
- l. vacant possession, keys handover, property/estate management, customer care and/or defect rectification works;
- m. post vacant possession services, such as club house services, security and customer loyalty card programmes;
- n. any subsequent commercial transactions in relation to any projects, products and/or services; and
- o. enable us to furnish and submit your Personal Data to the relevant parties Government bodies, agencies, local authorities and financial and private institutions.

#### 4. **Source of Personal Data**

- 5. The Personal Data will be collected, processed and used by us are sourced from wholly legitimate and transparent means such as:
  - a. agreements and contracts for sale and purchase of our properties or for our services;
  - b. official registration forms (either electronic or printed) for new launches or property roadshows, showcases, exhibitions or any other promotional events;
  - c. official Request for Information forms that are provided to you by our employees or agents;
  - 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 referrals from a person which have included their verifiable personal contact details;
  - g. letters of offer from financial institutions (local and foreign) for pre-approved loans;
  - h. Business cards that were dropped or given to our employees, agents, brokers or associates; or
  - i. any documents (including but not limited to statutory forms and returns) that were submitted to us for processing.

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.

#### 6. **Rights of Access and Correction**

You have the right to request access to and if required, correction of your Personal Data in our records. You have the right to:

- a. request access to your Personal Data in our records for verification purposes. You may access and review all of your Personal Data held by us in person at our corporate offices located at the address given in (h) below;
- b. request the correction of your Personal Data in our records in the event the information is inaccurate, misleading, out-of-date or incomplete upon validation and verification of the new information provided in person at our corporate offices located at the address given in (h) below;

- c. request that your Personal Data shall only be kept for the fulfilment of the purpose of the collection of such information;
- d. request for proof of policy and procedure in relation to the safeguard and guarantee of your Personal Data in our records;
- e. request that we specify or explain its policies and procedures in relation to data and types of Personal Data handled by us;
- f. 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 in person at our corporate offices located at the address given in (h) below; and
- g. withdraw, in full or in part, your consent given previously, in each case subject to any applicable legal restrictions, contractual conditions and a reasonable time period in person at our corporate offices located at the address given in (h) below.

- b. If you may make a request to access, review, amend and correct your Personal Data through:

Iskandar Waterfront City Berhad  
*(formerly known as Tebrau Teguh Berhad)*  
 #G08-Block 8,Danga Bay,  
 Jalan Skudai,  
 80200 Johor Bahru,  
 Fax No : (6) 07-233 3819  
 Email : [pdpa@iwcity.com.my](mailto:pdpa@iwcity.com.my)

## **7. Disclosure of Personal Data**

The information we gather is not sold, given to, or otherwise shared with other organisations for commercial or any other purposes. We do, however, send out emails on behalf of selected organisations to those of our subscribers who have opted in to receive these messages. We send the messages directly, so at no time do the advertisers get to see users' personal information – unless of course users respond or reply to these advertisements or mailings themselves.

The Personal Data provided to us will be kept confidential and we will seek your agreement, consent and authorisation to disclose your Personal Data to the following classes of parties:

- a. any persons, government agencies, statutory authorities and/or industry regulators whom we are compelled or required to do so pursuant to any law, please refer to "Appendix A1 – List of Government bodies/agencies/local authorities and institutions";
- b. relevant parties, please refer to "Appendix A2 – List of Non-Governmental bodies/agencies and private institutions".
- c. any related companies and/or subsidiaries of IWCity 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. our third party service providers, third party management companies, sub-contractors or other parties as may be deemed necessary by us to facilitate your dealings with us; and
- g. our appointed service providers in relation of our loyalty programmes, for the purpose of delivery gift redemption and services.

Third parties are legally tasked with processing your Personal Data in line with principles specified by IWCity Group. Third parties are also held legally responsible for securing your Personal Data at an

appropriate level of security in relation to applicable data protection laws and widely accepted industry standards.

You may at any time withdraw, in full or in part, your disclosure consent given previously, in each case subject to any applicable legal restrictions, contractual conditions and a reasonable time period in person at our corporate offices located at the address given in 5(h) above.

#### 8. **Choices to Limit Processing of Personal Data**

The Personal Data provided to us undergoes processing as and when required or upon scheduled maintenance. The definition of processing defines it as "any operation or set of operations which is performed upon Personal Data, whether or not by automatic means, such as collection, recording, organization, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, blocking, erasure or destruction;"

You have the right to limit in part or wholly any of the processes by which your data is subjected to in terms of the operations allowed to be performed upon it, the period of time allowed or alternatively the date line of the consent given.

The responsibility for compliance rests on the shoulders of IWCity Group who determines the purposes and means of the processing of Personal Data.

You may at any time withdraw or amend, in full or in part, your processing consent given previously, in each case subject to any applicable legal restrictions, contractual conditions and a reasonable time period in person at our corporate offices located at the address given in 5(h) above.

#### 9. **Consequences of Refusal / Failure to Provide 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 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; and
- e. the inability to comply with any applicable law, regulation, direction, court order, by laws, guidelines and/or codes applicable to us.

#### 10. **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.

IWCity Group is committed to taking appropriate technical, physical and organisational measures to protect your Private Data against unauthorised access, unlawful processing, accidental loss or damage, and unauthorised destruction of your Private Data.

To safeguard against unauthorised access to Private Data by third parties outside IWCity Group, all electronic Private Data held by IWCity Group is maintained on systems that are protected by secure networks. IWCity Group entities limit access to internal systems that hold Private Data to a select group of authorised users who are given access to such systems through the use of a unique identifier and password. Access to Private Data is limited to and is provided only to relevant users for the purpose of performing their official duties.

Compliance with these provisions will be required of all third-party administrators who may access your Private Data, as described in the 'Disclosure of Personal Data' in Section 6 above.

#### 11. **Language**

In accordance to Section 7(3) Personal Data Protection Act 2010, this Policy is issued in both Bahasa Malaysia and English languages. In the event of any inconsistency, the English language version of this Policy shall prevail.

#### 12. **Your Privacy Preferences and How to Contact Us:**

To learn more about our Privacy Policy, please read our Privacy Policy at <http://www.iwcity.com.my/corporate/PrivacyPolicy.asp>

If you wish for any clarification by us via any mode of communication, you may -

- (a) email us to: [pdpa@iwcity.com.my](mailto:pdpa@iwcity.com.my); or
- (b) write or fax to us at the following address –

Iskandar Waterfront City Berhad ((formerly known as Tebrau Teguh Berhad)  
#G08-Block 8,Danga Bay,  
Jalan Skudai,  
80200 Johor Bahru,  
Fax No : (6) 07-233 3819

#### 13. **Changes to this Policy**

IWCity Group reserves the right and may need to modify this Policy as needed, for example, to comply with changes in business operations or laws and regulations. IWCity Group will post all changes to this policy on its website.