

## Privacy Notice (“Notice”)

We at GHL (“GHL” and “GHL Group” refers to GHL Systems Berhad and any of our subsidiaries, as defined in section 7 of the Companies Act 2016) respect the privacy of individuals with regard to Personal Data. This Notice is formulated in accordance with Malaysia Personal Data Protection Act (“PDPA”) 2010 which we believe is applicable and similar to the ASEAN region in particular the Philippines Data Privacy Act, Indonesia PDPA, Thailand PDPA, Singapore PDPA, Australia PDPA and other applicable data protection laws, including the European Union (“EU”) General Data Protection Regulation (“GDPR”), where applicable.

Pursuant thereto, this Notice is designed to explain and elaborate upon some of our policies and principles pertaining to the privacy of your personal information, all of which we have adopted as a sign of our commitment to respecting, maintaining, protecting and safeguarding the privacy of your personal information.

By interacting with us on our websites, e-payment portals, or by using websites owned or operated by us (“Websites”), you consent to the processing of your Personal Data by GHL and all persons involved in the provision of services by GHL.

## Collection of Personal Data

1. “Personal Data” refers to information about you that you have provided to GHL, such as your name, address, telephone number, identity card number, email address, personal preferences, and any information that may identify you that has been or may be collected, stored, used and processed by GHL from time to time.
2. Generally, we collect your Personal Data in the following ways:
  - a) when you submit forms relating to any of our products or services, or submit any online queries;
  - b) when you register for or use any of our services on the Websites;
  - c) when you interact with our customer service officers or any of our staff;
  - d) when you use or purchase our services or products;
  - e) when you establish any online accounts with us;
  - f) when you request that we contact you;
  - g) when you respond to our request for additional Personal Data;
  - h) when you ask to be included in an email or other mailing list;
  - i) when you respond to our promotions or other initiatives;
  - j) when you respond to our market surveys;
  - k) when you submit a job application or a scholarship application;
  - l) when we receive references from business partners and third parties, for example, where you have been referred by them;
  - m) when you submit your Personal Data to us for any other reason; and
  - n) when you browse our Websites.

3. The provision of your Personal Data is voluntary. However, if you do not provide your Personal Data, we may not be able to communicate with you or provide you with the services you require.

#### **Purposes of Processing**

4. To meet your needs and provide you with the products and services that you require, you hereby agree that GHL may collect, retain, and process your Personal Data for the below-stated purposes, which include but are not limited to:
  - communication with you;
  - sending updates of events, promotions, marketing materials and information of our future expansions;
  - conducting research on your preference or performing statistical and analysis of your behaviour to try to meet your needs better; and/or
  - making such disclosures as may be required by law.
5. If you do not consent to GHL processing your Personal Data for the purposes listed above, please notify us using the contact details as stated below in Paragraph 14.

#### **Disclosure to Third Parties**

6. GHL may engage other companies, service providers, individuals, or any third party to perform functions on its behalf and consequently may provide access to or disclose your Personal Data to the third parties such as those listed below, which is not exhaustive:
  - other divisions or entities within GHL Group;
  - our joint venture/ alliance partners;
  - our agents, contractors, third party service providers and specialist advisers who have been contracted to provide us with administrative, financial, research, operational or other services such as telecommunications, information technology, data entry, payment, payroll, training, market research, storage and archival;
  - any third party business partners who offer goods and services or sponsor contests or other promotional programmes, whether in conjunction with us or not, and where permitted by applicable laws;
  - insurers or insurance investigators and credit providers;
  - the Credit Bureau, or in the event of default or disputes, any debt collection agencies or dispute resolution centres;
  - any business partner, investor, assignee or transferee (actual or prospective) to facilitate business asset transactions (which may extend to any merger, acquisition or asset sale) involving the GHL Group;
  - our professional advisors such as our auditors and lawyers;
  - relevant government regulators or authority or law enforcement agency to comply with any laws or rules and regulations imposed by any governmental authority;

- anyone to whom we transfer or may transfer our rights and obligations, including, for example, where we obtain the services of a third party organisation to handle any aspect of the processing of your Personal Data for the purposes notified to you in accordance with this Notice;
- banks, credit card companies and their respective service providers; and any other party as may be consented to by you, as specified by you or as may be notified to you by us in subsequent notices.

### **Confidentiality & Privacy Principles**

7. Personal Data held by GHL will be kept confidential in accordance with our Group Personal Data Protection Policy and this Notice, pursuant to applicable law that may from time to time be in force.
8. We only collect personal information that we believe is relevant and necessary to understand your requirements.
9. We will only use your personal information to provide you with better options and services.
10. We will not disclose your personal information to any external organisation unless we have your consent, are required by law, or have previously informed you.
11. All staff and any third parties with permitted access to your information are specifically required to observe our confidentiality obligations.
12. All reasonable efforts and practical steps are made to ensure that any Personal Data held is kept up-to-date and is protected against any loss, misuse, modification, unauthorized or accidental access or disclosure, alteration, or destruction.

### **Retention of Personal Data**

13. We may retain your Personal Data for as long as it is necessary for the purposes for which it has been collected, up to seven (7) years, unless otherwise permitted by applicable law or in order to defend legal claims.

### **Right of Access to Personal Data and Inquiries**

14. Subject to any exceptions under applicable laws, you may at any time hereafter request access to, or correction or rectification of your Personal Data that is inaccurate, incomplete, misleading or not up-to-date, or seek further information from GHL on Personal Data and this Notice by contacting the relevant Data Protection Officers:

**All countries (except Thailand and The Philippines)**

Name: Nur Amirah Binti Mat Luwi

Address: C-G-15, Block C, Jalan Dataran SD1, Dataran SD, PJU 9, Bandar Sri Damansara, 52200 Kuala Lumpur, Malaysia.

Email: [pdpamy@ghl.com](mailto:pdpamy@ghl.com)

Tel. No.: +603 - 6286 3388

**Thailand**

For individuals residing in Thailand, please contact the Data Protection Officer below:

Name: Nannapat Tantinantawat

Address: 77/161, 37th Floor, Sinn Sathorn Tower, Krungthoburi Road, Klongtong Sai, Klongsan, Bangkok 10600 Thailand.

Email: [pdpath@ghl.com](mailto:pdpath@ghl.com)

Tel. No.: +66(0)2 440 0111

**Philippines**

For individuals residing in the Philippines, please contact the Data Protection Officer below:

Name: Kristine Jane A. Ferriol

Address: 6F One Corporate Plaza Building, 845 Arnaiz Avenue, Legaspi Village, 1224 Makati City, Philippines.

Email: [pdpaph@ghl.com](mailto:pdpaph@ghl.com)

Tel. No.: +63-2 7744 9449

15. Where we rely on your consent to use your Personal Data, you have the right to withdraw that consent at any time. This withdrawal will, however, not affect the lawfulness of processing based on your consent before your withdrawal. If you withdraw your consent to any or all purposes, and depending on the nature of your request, we may not be in a position to continue to provide our products or services to you.
16. GHL reserves the right to charge you a reasonable fee for processing any data access request.
17. In the event of any conflict between the English version and versions in other languages, the English version shall prevail. GHL shall have the right to modify, update, or amend the terms of this Notice at any time by placing the updated Notice on its Website. Continuing communication or use of GHL services shall signify your acceptance of the Notice, unless you inform us otherwise.