

NOTICE OF PERSONAL DATA AND INFORMATION TO OUR VALUED CUSTOMERS/PROSPECTIVE CUSTOMERS

1. COLLECTION OF PERSONAL DATA

Pursuant to the requirement of the Personal Data Protection Act 2010 (Act 709) as amended by the Personal Data Protection (Amendment) Act 2024 (“Act”), we are issuing this notice to all our valued customers/prospective customers.

When dealing with us as our valued customers/prospective customers, we will request you to provide us your data and information (“personal data”) so that we can enter into transaction with you and/or to deliver services, notices, facilities and/or products whether present or future to you.

We collect your personal data when you purchase properties/products through our show units or launches, when you register your user account or when you telephone or email or correspond with us.

2. NATURE AND DEFINITION OF PERSONAL DATA

Personal Data means information in respect of commercial transaction that relates directly or indirectly to an individual (“data subject”), who is identified from that information alone or with other information including any sensitive personal data and expression of opinion about a data subject. Examples of Personal Data includes but not limited to information such as name, age, address, identity card number, photo, passport number, gender, date of birth, race, ethnic origin, nationality, marital status, occupation, contact number, email address, children’s details, financier’s details, credit card, bank account details, photographs, CCTV images and recordings.

3. NATURE AND DEFINITION OF SENSITIVE PERSONAL DATA

Sensitive Personal Data means any personal information consisting information including but not limited to physical or mental health or condition of a data subject, political views, his religious beliefs or other beliefs of a similar nature, the commission or alleged commission by him of any offence, biometric data or any other personal data as the Minister may determine by order published in the Gazette. We shall not process any of your sensitive personal data unless explicit consent has been obtained from you.

4. PURPOSE OF COLLECTING YOUR PERSONAL DATA

Your personal data will be/is being collected, used and otherwise processed for but not limited to the following purposes:-

- (a) for administration purposes;
- (b) for granting access to any relevant premises/facilities, including without limitation to our premises;
- (c) for communication purposes with you vide SMS, WhatsApp, fax, phone call, email and/or other appropriate communication channels;
- (d) for delivery of notices, services, facilities or products whether present or future to you;
- (e) for the purpose of sending you invites and/or information of our current and/or future property launches, events, promotional events and products, contests, advertisement for marketing purposes, subject to your right to opt-out;
- (f) for providing you with our products and/or services, including preparing and executing all necessary documents and agreements with you (including but not limited to sale and purchase agreements, deed of mutual covenants, tenancy agreements etc.) and carrying out the obligations under the agreements;
- (g) for the purpose of liaising with your bank agent with regards to the financing taken by you to purchase our products and insurance agency to ensure that you are adequately covered by the relevant insurance;
- (h) for the purpose of conducting background checks of yourself with the relevant financial institution and credit reference/reporting agencies;
- (i) to process your payment transactions;
- (j) for the purposes of exercising or performing any right or obligation which is conferred or imposed by law on us;
- (k) for the purposes of meeting any legal or regulatory requirements relating to our services and products and making such disclosures under the requirements of any applicable law, regulation, direction, court order, by laws, guideline, circular or code applicable to us or any member of our board of directors;
- (l) for direct marketing purposes;
- (m) for the purposes of our corporate governance;
- (n) for the purposes in providing integrated services, maintaining and storing records;
- (o) for security and fraud prevention purposes;
- (p) for the purposes of delivering of vacant possession, keys handover, property/estate management services, customer care and/or defect rectification works;
- (q) for the purposes of delivering post vacant possession service, such as club house services, property/estate management services, security services and customer loyalty programmes or such similar programs organized by us;
- (r) for the purpose of 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;
- (s) for the purposes of sharing photos or video recordings taken during promotional events, surveys, promotions, contests, campaigns, competitions, or loyalty programs on our website and/or social media platforms (if any);
- (t) to monitor, review and improve our products, facilities and/or services;
- (u) for the purposes of enabling us to furnish and submit your personal data to the following relevant parties, *please refer to “Appendix A1-List of Governmental bodies/agencies/local authorities and institutions”*;
- (v) for the purposes of enabling us to furnish and submit your personal data to the following relevant parties, *please refer to “Appendix A2-List of Non-Governmental bodies/agencies and private institutions”*; and
- (w) such other purposes relevant or incidental to the products and services provided by us.
(these purposes shall collectively be referred to as “the Purposes”).

5. SOURCE OF PERSONAL DATA

Your 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 road shows, 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 or providing us with your feedback or lodging a complaint with us;
- (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;
- (i) your visit to any relevant premises/facilities, including without limitation to our premises (including through recordings via CCTV); or

- (j) 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/or illegal Personal Data databases or lists.

6. FAILURE OF NOT PROVIDING YOUR PERSONAL DATA

The personal data provided by you 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 preparation and execution of a sale and purchase agreement, deed of mutual covenant or a letter of award requires certain personal details and information beforehand.

The failure to obtain your personal data will lead to the following:-

- (a) we will not be able to provide you with updates in relation to our products and/or services and/or launches;
- (b) we will not be able to provide you with any notice, services and/or products which you have requested;
- (c) affect the ability of the parties to enter necessary agreements and documentations in respect of the sale of our properties and/or any related transactions; and
- (d) affect the ability for us to comply with any applicable law, regulation, direction, court order, by-laws, guidelines, circulars and/or codes applicable to us or any member of our board of directors.

7. DISCLOSING YOUR PERSONAL DATA

The information we gather is not sold, given to, or otherwise shared with other organizations for commercial or any other purposes. We do, however, send out emails on behalf of selected organizations 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 data unless users respond or reply to the advertisements or mailing themselves.

Your personal data will be kept confidential at all times by us but you hereby irrevocably consent and authorise us to disclose your personal data to the following categories of parties for the Purposes set out under Section 4 above to the following either in Malaysia or out of Malaysia:

- (a) to any related, affiliated and subsidiaries of Gunung Impian Development Sdn. Bhd. in or out of Malaysia, including those to be incorporated in the future;
- (b) to our business partners and online affiliates that provide related service or products in connection of our business;
- (c) to our advisers, including auditors, consultants, advocates and solicitors, lawyers or other financial or professional advisers;
- (d) to any agent, contractor or service provider to whom we may have outsourced services to, subject always that such parties acknowledge the confidentiality and rights of the data controller and to comply with the provisions of the Act;
- (e) to regulatory authorities or notified bodies including bodies providing quality certification of our products upon their request;
- (f) to any persons, government agencies, statutory authorities and/or industry regulators whom we are compelled or required to do so pursuant to Malaysian law, *please refer to "Appendix A1-List of Governmental bodies/agencies/local authorities and institutions"*;
- (g) to any relevant parties, *please refer to "Appendix A2-List of Non-Governmental bodies/agencies and private institutions"*;
- (h) our appointed service providers in relation to our loyalty programme, for the purpose of delivery of gift redemption and services; and/or
- (i) 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.

Third-parties are legally tasked with processing your personal data in line with the principles specified by us. When using your personal data for the Purposes stated in Section 4, we will require the third-parties to handle your personal data using the same level of care that we apply. We will also require them to only use your personal data according to our instructions and directions.

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.

8. TRANSFER AND SHARING OF PERSONAL DATA OUT OF MALAYSIA

We may, where necessary, transfer and share your personal data to a place outside Malaysia if the classes of persons in paragraph 7 above are located or have processing facilities in countries outside of Malaysia. Your personal data may be transferred and shared to any place outside Malaysia for any of the above Purposes. You consent to us transferring and sharing your personal data to a place outside Malaysia in these instances under conditions of confidentiality and similar levels of security safeguards.

9. DATA INTEGRITY

It is your responsibility to ensure that all your personal data submitted to us are accurate, not misleading, updated and complete in all aspects. You shall by notice in writing to us inform us of any changes to your personal data supplied by you to us to ensure that all your personal data is kept up-to-date. We shall not be held liable or responsible for any personal data submitted by you to us that is inaccurate, misleading, incomplete or not updated.

10. RETENTION OF YOUR PERSONAL DATA

We shall retain your personal data for as long as necessary for the Purposes abovementioned and/or as otherwise permitted by applicable law. We shall destroy and/or delete any personal data from our system in the event such data is no longer required for the Purposes and/or as otherwise permitted by applicable law.

11. SECURITY MEASURES

We respect every customer's right of privacy and security of information. As such, we shall take appropriate and reasonable measures to protect the personal data from any loss, misuse, modification, unauthorized or accidental access or disclosure, alteration or destruction when processing the personal data.

12. ACCESS TO YOUR PERSONAL DATA

It is your right as a data subject any time after the submission of your personal data to us, send your request in writing to the Personal Data Protection Officer at Gunung Impian Development Sdn. Bhd., Wisma Impian Emas, No. 55, Jalan Impian Emas 5/1, Taman Impian Emas, 81300 Skudai, Johor or to the email of the Personal Data Protection Officer at dpo@impianemas.my in the event you wish to:

- (a) enquire about your personal data;
- (b) request for correction of any of your personal data which is inaccurate, incomplete or not up to date provided such enquiries are permitted under the Act and/or the existing laws;
- (c) request for explanation on the policies or procedures in respect of your personal data which has been provided to us;
- (d) make complaints in relation to the processing of your personal data by us;
- (e) request us to stop processing your personal data;

- (f) request us to limit the process of your personal data;
- (g) inform us on your withdrawal (in full or in part) of your consent given previously to us subject to any legal restrictions, contractual conditions and a reasonable duration of time for the withdrawal of consent to be effected; and/or
- (h) request us to transfer your personal data you have provided to another organization.

13. OPT-OUT CHOICE

If you do not wish to receive information from us and want to be removed from our mailing list, please email us at enquiry@impianemas.my.

14. LANGUAGE

This Notice of personal data is issued in English language and Bahasa Malaysia. If there are any inconsistencies between the English version and the Bahasa Malaysia version, the English version shall prevail.

15. CHANGES TO THIS NOTICE

We reserve the right to amend or modify this Notice at any time at our sole discretion and such amendment or modification shall be effective immediately upon being published on our website (<https://www.impianemas.my/>) and/or made available through other reasonable means, such as at the sales office or via direct communication. You agree to review this Notice periodically to be aware of such modifications, and you accept and consent to be bound by the modified Notice.

Appendix A1- List of Governmental bodies/agencies/local authorities and institutions

- i. Kumpulan Wang Simpanan Pekerja;
- ii. Lembaga Hasil Dalam Negeri;
- iii. Bahagian Pinjaman Perumahan Perbendaharaan;
- iv. Land Office;
- v. High Court, lower courts or tribunals;
- vi. Insurance companies;
- vii. ISO auditors; and
- viii. Local Authorities.

We shall notify you accordingly, if there is any change or amendment.

Appendix A2- List of Non- Governmental bodies/agencies/local authorities and institutions

- i. Indah Water Konsortium;
- ii. Syarikat Air Johor Sdn. Bhd/Ranhill SAJ Sdn. Bhd.;
- iii. Tenaga Nasional Berhad;
- iv. Banks and financial institutions (local or foreign);
- v. Insurance companies;
- vi. Auditors;
- vii. Legal firms; and
- viii. Credit Reporting Agencies.

We shall notify you accordingly, if there is any change or amendment.

This Notice was last updated in **1 July 2025**.