

## **PRIVACY POLICY TUNGLING GROUP**

We, Tunbling Corporation Sdn Bhd (427481-D), our subsidiaries and associated companies (collectively, "TUNGLING GROUP"), respect your right to privacy and are committed to protecting all Personal Information we collect. TUNGLING GROUP is bound by the Personal Data Protection Act 2010 ("PDP Act") and all other applicable laws in Malaysia with respect to privacy protection that set out a number of principles concerning Personal Information and consumer protection in Malaysia.

For the purpose of this Privacy Policy:

"Authorised Third Parties" means TUNGLING GROUP's contractors, agents or third party suppliers or service providers with whom TUNGLING GROUP enters into an agreement;

"TUNGLING GROUP", "we", "us" or "our" means collectively, TUNGLING CORPORATION SDN BHD (427481-D), a company incorporated in Malaysia and having its registered address at Unit 31-8 31st Floor, Menara Permata Damansara No.685 Jalan Damansara, 60000 Kuala Lumpur, its subsidiaries and associated companies;

"Personal Information" means any personal information relating to you that you have provided to TUNGLING GROUP or made available to TUNGLING GROUP;

"Sensitive Personal Information" comprises information as to your physical or mental health or condition, political opinions, religious beliefs or other beliefs of a similar nature, commission or alleged commission of any offence, or any other Personal Information designated as such; and

"Products" means the properties or residential, commercial, industrial or mixed development projects developed or to be developed by TUNGLING GROUP.

### **1. PERSONAL INFORMATION**

#### **1.1 Type of Personal Information**

The types of Personal Information we may obtain about you are:

- a) Personal details such as name, identity card number, age, gender, nationality, date of birth and other details;
- b) contact information;
- c) business contact information;
- d) email address;
- e) other information (such as shopping behaviour and preferences and language preference).

#### **1.2 Source of Personal Information**

TUNGLING GROUP may collect your Personal Information:

- a) when you sign up to purchase the Products or register your interest with us to purchase the Products or to obtain information and updates on the Products;
- b) when you visit our website or social networking sites;
- c) when you enter contests or respond to surveys, promotions or questionnaires;
- d) from third party sources such as credit reference agencies, fraud prevention agencies and publicly available sources of information;
- e) from any company within TUNGLING GROUP;
- f) pursuant to any transaction or inquiry or communication made with or to us.

### **1.3 Obligatory Personal Information**

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

Should you fail to provide the obligatory information, this may render us unable to carry out the Purposes as mentioned in this Privacy Policy.

## **2. USE OF PERSONAL INFORMATION**

We require this information to understand your needs and provide you with a better service, and in particular for the following reasons:

- a) to assess and process any registrations and/or applications that you have submitted to TUNGLING GROUP;
- b) to provide you with the information on the Products;
- c) to communicate with you;
- d) for marketing activities regarding our latest projects or projects undertaken within TUNGLING GROUP (subject to the prior consent given by you);
- e) to notify you of any developments, updates on the Products and other events of TUNGLING GROUP from time to time;
- f) to conduct market surveys and statistical analysis;
- g) any other purposes required by law and/or regulations; and
- h) such other administrative purposes which relate to the above.

(collectively, "Purposes").

## **3. DISCLOSURE OF PERSONAL INFORMATION**

3.1 We do not sell or otherwise use, process, record, hold, store, share and disclose ("process") your Personal Information which we collect about you, except as described in this Privacy Policy or otherwise disclosed to you at the time the Personal Information is collected.

### **3.2 Classes of Third Parties**

To facilitate the Purposes above and the provision of the Products to you, we may process, use and disclose your Personal Information to the following classes of third parties:

- a) companies within TUNGLING GROUP;
- b) third party service providers, including but not limited to, service providers for electricity, water, sewerage, cable and broadcast TV, telecommunications and other utilities, and their respective contractors/agents;
- c) credit reporting agencies or credit providers;
- d) payment channels, including without limitation, financial institutions for purposes of maintaining financial records, assessing or verifying credit and facilitating payments due to us;
- e) regulatory authorities and enforcement agencies;
- f) any court of law or any relevant party in connection with any claim or legal proceedings; and
- g) our contractors, service providers, consultants, auditors and advisors on a need to know basis.

#### **4. PERSONAL INFORMATION PROTECTION PRINCIPLES**

- 4.1 We will process Personal Information provided to TUNGLING GROUP by you when you register or apply for or express an interest in our Products.
- 4.2 We may use your Personal Information for the Purposes.
- 4.3 If you are below the age of 18, you should ensure that you obtain the prior consent of your parents or legal guardian before using TUNGLING GROUP's Products.
- 4.4 Any individual who have provided his/her Personal Information prior to this Policy, may contact TUNGLING GROUP using the contact details set out below to know what types of Personal Information have been processed and the purpose for the processing.
- 4.5 You will be given the opportunity to 'opt-out' of having your Personal Information used for purposes not directly related to the Products at the point where TUNGLING GROUP asks for information. If you do not wish to receive our promotional updates you may opt-out of receiving these communications by emailing us at [corporate@tungling.com](mailto:corporate@tungling.com). Please note that should you decide to "opt-out", we may not be able to provide you with certain Products and your subscription to or application for certain Products may be declined, denied or refused by TUNGLING GROUP.
- 4.6 TUNGLING GROUP will not sell or rent your Personal Information to third parties. Other than as provided in this Policy, TUNGLING GROUP will not disclose your Personal Information to any third party without your consent.
- 4.7 TUNGLING GROUP may from time to time contact you on behalf of external business partners about particular goods, offers or services that may be of interest to you. In those cases, Personal Information that may identify you will not be transferred to the third party. All communication from TUNGLING GROUP will be sent to you by TUNGLING GROUP.

- 4.8 TUNGLING GROUP may however, need to work with Authorised Third Parties for the Purposes or to provide part or all of TUNGLING GROUP's Products and/or other services to you or to perform market research and statistical analysis. In such situations, TUNGLING GROUP will share your Personal Information as is necessary for the Authorised Third Party to perform these services, on a strictly confidential basis. These parties are not allowed to process your Personal Information disclosed to them except for the limited purpose of providing the particular service for TUNGLING GROUP.
- 4.9 TUNGLING GROUP may use or disclose your Personal Information for accounting or reporting purposes, subject to the terms of this Privacy Policy.
- 4.10 It may be necessary to transfer your Personal Information to other entities or service providers located in countries outside Malaysia. This may happen where TUNGLING GROUP's servers or suppliers and service providers are based outside Malaysia or where you use the Products from countries outside Malaysia. In these instances TUNGLING GROUP will take steps to ensure that your privacy rights are respected in accordance with this Policy.
- 4.11 You may at any time remove your personal details from our database, amend or correct your Personal Information. If you remove your Personal Information from our records, we will no longer be able to provide the Products to you.

## **5. SENSITIVE PERSONAL INFORMATION**

- 5.1 We do not collect Sensitive Personal Information from you unless required by applicable laws. If you do not want your Sensitive Personal Information collected by us, please do not submit it.
- 5.2 Where required under Malaysian law, TUNGLING GROUP will obtain consent from you before we process your Sensitive Personal Information.

## **6. TUNGLING GROUP'S WEBSITE**

- 6.1 TUNGLING GROUP provides products and services via its website. When you visit TUNGLING GROUP's site, its web servers generally record anonymous information such as the time, date and URL of the request. This information assists TUNGLING GROUP to improve the structure of its website and monitor performance. From time to time TUNGLING GROUP may also use Authorised Third Parties to analyse this anonymous information.
- 6.2 By browsing our website and providing us with your Personal Information, you are consenting TUNGLING GROUP to collect, process and store the data in accordance with the above.

## **7. IP ADDRESSES AND COOKIES**

- 7.1 TUNGLING GROUP also collects Internet Protocol (IP) addresses. IP addresses are assigned to computers on the internet to uniquely identify them within the

global network. TUNGLING GROUP collects and manages IP addresses as part of the service of providing internet session management and for security purposes.

- 7.2 TUNGLING GROUP's website may transmit to any customer's computer a "cookie". A cookie is a package of data that allows TUNGLING GROUP's server to identify and interact more effectively with the customer's computer having to spend time on identifying each customer user, thereby also providing additional login convenience. You may configure and personalize its current browser to refuse, reject or delete such cookies.

## **8. PROTECTION AND RETENTION OF PERSONAL INFORMATION**

- 8.1 TUNGLING GROUP has implemented security policies, rules and technical measures to protect your Personal Information from unauthorised access, improper use or disclosure, unauthorised modification, unlawful destruction or accidental loss. All our employees and data processors, who have access to and are associated with the processing of Personal Information, are obliged to respect the confidentiality of your Personal Information.
- 8.2 Personal Information that TUNGLING GROUP collects from you will be stored and backed up securely in a location which is accessible by TUNGLING GROUP's authorised personnel.
- 8.3 TUNGLING GROUP will store your Personal Information as long as the purpose it was collected for remains valid and thereafter for a period of time required and/or permitted by Malaysian law.
- 8.4 TUNGLING GROUP takes all reasonable precautions to ensure that the Personal Information that we collect, use and disclose is accurate, complete and up-to-date. However, the accuracy of that information depends to a large extent on the information that you provide.

## **9. LIMITING THE PROCESSING OF PERSONAL INFORMATION, FURTHER ENQUIRIES AND COMPLAINTS**

You can have access to your Personal Information that TUNGLING GROUP has in its possession or control and may request that your Personal Information be amended for purposes of accuracy and completeness. You may be required to put your request in writing or email to us for security reasons. We reserve the right to charge a fee for searching for and providing access to your information.

You may submit your written request or contact us, between 9.00AM and 6.00PM, Monday to Friday, if:

- (a) you have any questions in relation to this Privacy Policy; or
- (b) for access to, or correction of, your Personal Information or limit the processing of your Personal Information upon payment of a prescribed fee; to us by post or email as set out below:

TUNGLING CORPORATION SDN BHD (427481-D)  
Unit 31-8 31st Floor  
Menara Permata Damansara  
No.685 Jalan Damansara  
60000 Kuala Lumpur  
Tel : +603 7735 6111  
Fax : +603 7732 6082

Email: [corporate@tungling.com](mailto:corporate@tungling.com)

## **10. CONFLICT**

In the event of any conflict between this English language Personal Data Protection Notice and its corresponding Bahasa Malaysia Personal Data Protection Notice, the terms in this English language Notice shall prevail.