

Kobay Group Privacy and Data Protection Notice

This Notice is prepared in accordance with the compliance of the Personal Data Protection Act 2010 (“PDPA”).

Kobay Group (Kobay Technology Bhd. and all subsidiaries and associates within the Group incorporated in or outside Malaysia jointly or severally) is committed to deal with your personal information in proper and secure manner whether it is collected, recorded or used on paper, in a computer or recorded on other material or mode under the PDPA. We will inform you of the purpose for which personal data is collected and processed and your right to access or refuse to provide such personal data under this Notice. We may also continue to process such data collected from you in certain services we provide or transaction we dealt with thereafter.

1) Personal data

1.1 Type of personal data

Personal data means any information which relates to you and which was collected by or provided to Kobay Group for the purposes stated in the section below. Your personal information may include your name, NRIC/company registration number, ethnic/nationality, date of birth, medical information, contact details, financial and banking account details, photographs, CCTV/security recordings and location tracking/GPS information etc.

1.2 Source of personal data

1.2.1 Employee/customer or potential employee/customer:

Kobay Group collects your personal information directly from you or indirectly from your legal representatives, agents (e.g. travel agents, government agents) and/or employer when you, your legal representatives, agents and/or employers 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 information may also be collected from cookies through the use of our website.

1.2.2 Vendor, supplier, tenant or service provider:

Kobay Group collects your personal information directly from you or indirectly from your employer or parent company, credit reference agencies when submitting proposal/quotation, tendering for projects, when you send

us completed enquiry and/or credit application forms via various means, including online and physical hardcopies. Your personal information may also be collected from cookies through the use of our website.

1.2.3 Third party consent

In the event you have provided personal data of third parties (e.g. your emergency contact person, tenant, authorised representatives, contractors, lawyers, financiers) to us, we rely on you to have sufficiently obtained the prior consent of such third parties to allow us to process their personal data in relation to the Purpose.

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, we would not be able to process your request and/or provide you with the relevant services.

2) Purposes of collecting and further processing (including disclosing) your personal information:-

2.2.1 Employee/customer or potential employee/customer :

Your personal information is collected and further processed by Kobay Group as required or permitted by law and to give effect to your requested commercial transaction, including the following:

- to process your requested services;
- to process your application of job or enquiry of our product and/or services;
- to facilitate your participation in any contests or events or programmes;
- to administer and communicate with you in relation to your application, requested services our services, programmes and/or events;
- to process any payments related to your requested services, programmes and/or events;
- for insurance purposes;
- to meet regulatory and legal requirements;
- to apply for relevant travel visas in the event of travel overseas;
- to operate our premises in a manner which is physically safe, secure and befitting of health and safety requirements;

- for internal investigations, audit or security purposes, statistical analysis;
- to conduct internal marketing analysis and analysis of customers patterns and choices;
- to comply with Kobay's legal and regulatory obligation in the conduct of its business;
- to contact you regarding products, services, upcoming events, promotions, advertising, marketing and commercial materials;
- to ensure that the content from our website is presented in the most effective manner for your computer and/or devices;
- to protect against or identifying possible fraudulent transactions;
- where permitted by law, to supply customized, unsolicited offers and information about Kobay's services;
- to develop and provide advertising adapted to our customers;
- to profile and determine service preferences;
- to support finance and marketing operations and/or required by the terms and conditions of business and other business administration purposes including credit monitoring and control purposes;
- for risk management;
- for Kobay's internal records management, customer relations events and activities or programmes; and
- for all other purposes incidental and associated with the above.

2.2.2 Vendor, supplier, tenant or service provider:

Your personal information is collected and further processed by Kobay as required or permitted by law and to give effect to your requested commercial transaction, including the following:

- to process your requested services;
- to process your credit account application;
- to assess your credit worthiness;
- to administer and give effect to your commercial transaction (tender award, contract for service, tenancy agreement);
- to process any payments related to your commercial transaction;
- for insurance purposes;
- for internal investigations, audit or security purposes;
- to comply with Kobay's legal and regulatory obligations in the conduct of its business;

- to contact you regarding products, services, upcoming events, promotions, advertising, marketing and commercial materials which we may feel interest you;
- to ensure that the content from our website is presented in the most effective manner for your and for your computer and/or device; and
- for Kobay's internal records management, customer relations events and activities, and customer loyalty reward program.

3) Disclosure of personal information

3.1 Within Kobay Group

Kobay, will ensure that your personal information provided to us of which was processed by the body corporate within Kobay Group (including approved outsourcing partners) whether inside or outside of Malaysia, that:

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

3.2 Third parties in connection with Kobay Group

Your personal information may be disclosed to relevant third parties (inside 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 stated in Section 2 above (or directly related to those purposes).

In the event of a potential, proposed or actual sale of business, disposal, acquisition, merger or re-organisation ("Transaction"), your personal information 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 Kobay to release your personal information to the other party and its advisers/representatives.

3.2.1. Employee/customer or potential employee/customer:

Your personal information 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 auditors, lawyers, company secretary, consultants,

contractors, professional advisors, service providers, printing companies, 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 or shopping mall tenants);
- Utility companies;
- Property management companies for management of property purchased;
- Foreign embassies (including agencies appointed by foreign embassies to carry out their services) if Kobay assists you in your visa application as part of your requested travel services;
- Law enforcement agencies, including the local police; and
- Relevant governmental authorities statutory authorities, local council and industry regulators.

3.2.2. Vendor, supplier, tenant or service provider:

Your personal information 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 auditors, lawyers, company secretary, software designer, printing companies, contractors, conference/training/event organiser, other advisers, travel agencies and insurance companies) to whom we may have outsourced services to, subject always that such parties acknowledge the confidentiality and rights of the data user and to comply with the provisions of the Act;
- Law enforcement agencies, including the local police; and
- Relevant governmental authorities, statutory authorities, local council and industry regulators.

4) Websites

4.1 Links to other sites

Our Kobay Group websites do consist of links to other sites of which was provided for your convenience and information. These sites may have their own privacy statement in place, which we recommend you to review their privacy statement when you visit any linked websites. We are not responsible for the content on the linked sites or any use of the site.

4.2 Location enabled products or applications

Location enabled products or applications transmit your location information to us. We do not use the information sent or provided other than to provide the service you request. Location enable features are opt-in and you have control over your participation and can turn these services off at any time or uninstall them.

Some mobile applications will utilize Google Analytics (or similar tool) to help us better serve you through improved products, services, and revisions to the mobile applications. This collected information will not identify you to us. It may, however, let us know anonymously, which services and features you are using the most within the application, as well as device type and hardware features, country and language of download.

4.3 Cookies

A cookie may be used in the processing of your information. A cookie is a text file placed into the memory of your computer and/or device by our computers. A copy of this text file is sent by your computer and/or device whenever it communicates with our server. We use cookies to identify you. We may also collect the following information during your visit to our website and/or the fully qualified domain name from which you accessed our site, or alternatively, your IP address:

- (i) the date and time you accessed each page on our web site;
- (ii) the URL of any webpage from which you accessed our site (the referrer); and
- (iii) the web browser that you are using and the pages you accessed.

Some web pages may require you to provide a limited amount of personal information in order to enjoy certain services on our websites (system login credentials, email address and contact, etc). These personal information will only be used for its intended purposes only, i.e. to respond to your message or deliver the requested services.

5) Right to access and correct personal information

You have the right to access and correct your personal information held by us (subject always to certain exemptions). We will make every endeavour to ensure your personal information is accurate and up to date therefore we ask that if there are changes to your information you should notify us directly. If you would like to access or correct your personal information, please send us your query to the contact details in Item 6 below.

6) Limiting the processing of personal information, further enquiries and complaints

If:

- (i) you would like to obtain further information on how to limit the processing of your personal information;
- (ii) you would like to amend or update your personal information;
- (iii) you have any further query; or
- (iv) you would like to make a complaint in respect of your personal information,

you may contact :-

For Manufacturing Division

Corporate Affairs Department

Tel.: 604-3711350

Fax : 604-2261363

or email to :-

publicrelation@kobaytech.com

For Property Development Division

Sales & Marketing Department

Tel.: 604- 2917888

Fax : 604- 3711341

or email to :-

salesmarketing_kg@kobaytech.com

7) Security of Personal Data

The protection of your personal information is important to us. Kobay Group take practical steps to protect the personal data from any loss, misuse, modification, unauthorized or accidental access or disclosure, alteration or destruction. All authorised disclosure of your personal information to our authorised agents or Kobay Intermediaries, we have and will require them to appropriately safeguard your personal data provided to them.

8) Retention of Personal Data

Your personal data will not be kept longer than is necessary for the fulfilment of the purpose for which it was collected unless such retention is necessary for their operational, audit, legal, regulatory, tax or accounting

requirements. We will take all reasonable steps to ensure that your personal data are destruct or permanently delete such information.

However, Personal data can be retained for a longer period of time if such retention is necessary for the following purposes:

- legal proceedings or a regulatory or similar investigation or obligation to produce the said information;
- a crime or misconduct is suspected or detected;
- information is relevant to a company in liquidation or receivership, where a debt is due to the Insurers/Operators; or
- Information is considered to be of potential historical importance including but not limited to the purposes described above.

9) Conflict

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

Kobay reserves the right to amend and update this Privacy and Data Protection Notice at any time and the updated notice will be posted on Kobay website or via any other mode Kobay views suitable.

By providing to us your personal data, you hereby consent to the processing of your personal data in accordance with all of the foregoing.