



GHL Systems Berhad (199401007361)

Incorporated in Malaysia

GHL GROUP PERSONAL DATA PROTECTION POLICY

18th October 2023

INTRODUCTION OF THE POLICY

We collect your Personal Data when you apply for any of our products and/or services or communicate with us as part of our business here at GHL Systems Berhad and any of our subsidiaries (“GHL Group”, “GHL”, “we”, “us”, or “our”). In return, we may utilise this information to provide you with our products or services, maintain our records, or send you relevant information. We at GHL Group respect the privacy of individuals with regard to Personal Data (as defined below), and this is reflected in this Personal Data Protection Policy (“Policy”).

This Policy is formulated in accordance with the Malaysia Personal Data Protection Act 2010 (“PDPA”), which we believe is applicable to the ASEAN region and similar to policies in other countries, 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.

This Policy describes our practices regarding the Personal Data we collect through your application forms opting for any of our products and/or services (“Application Form”), your interaction or communication with us on any of our Help Desks, your download and use of any of our mobile device applications (the “App”), or your use of or access to our website (the “Website”) (either individually or collectively, the Platform) for opting our products and/or services and the physical or functionalities available at or through the Platform (collectively, together with, the “Services”).

This Policy is aimed to explain:

- the type of Personal Data we collect and how we collect it;
- how Personal Data is used;
- the parties that we disclose the Personal Data to; and
- the rights and choices you have.

Generally, we process your Personal Data for one or more of the specific purposes identified in this Policy based on the consent we have obtained from you. Where GDPR applies, the legal basis for our processing of your Personal Data could also be that it is necessary for the legitimate interests pursued by us, or a third party which is described in paragraph 2.7 of this Policy. These legitimate interests include providing services to you where you are our client, managing the relationship between GHL and you, and facilitating internal business and administrative purposes. In some cases, the provision and processing of your Personal Data may be a statutory and/or contractual requirement or may be necessary in order to perform any contract you have agreed with us or perform services that you have requested.

In addition, if your Personal Data has been collected, used or disclosed by us in a particular jurisdiction which has specific requirements or exceptions to the definition of Personal Data, including sensitive Personal Data, we will comply with those requirements under the applicable data protection regulations in that jurisdiction.

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 Policy at any time by placing the updated Policy on its Website. Continuing communication or use of GHL’s services shall signify your acceptance of the Policy, unless you inform us otherwise.

This Policy supplements and does not supersede or replace any other consents you may have previously provided to us in respect of your Personal Data. This Policy also does not affect

any rights that any member of the GHL Group may have in law in connection with the collection, use, or disclosure of your Personal Data.

1. COLLECTION OF PERSONAL DATA

1.1. **“Personal Data”** refers to any data or information about you that you have provided to GHL from which you can be identified either (a) from that data alone or (b) from that data combined with other information. Examples of such Personal Data which you may provide us include (depending on the nature of your interaction with us):

- a) your name, national registration identification number, passport number or other identification number, telephone number(s), mailing address, email address, facial image in a photograph or video recording, fingerprint and any other information relating to you which you have provided us in any form you may have submitted to us, or in other forms of interaction with you;
- b) information about your use of our websites and services, including cookies, IP addresses, subscription account details and membership details;
- c) your employment history, education background, and income levels; and
- d) your payment related information, such as your bank account or credit card information, and your credit history.

1.2. 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 websites owned or operated by us;
- c) when you interact with our customer service officers or any of our staff, for example, via face-to-face meetings, business interactions in events and exhibitions, telephone calls, letters, online forms (such as any “Contact Us” forms on our websites), online reservation chat, social media platforms and emails;
- 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 website.

We may monitor or record phone calls and customer-facing interactions for quality assurance, employee training and performance evaluation, and identity verification, receiving feedback, responding to your queries, requests and complaints and other related purposes. Such monitoring or recording will be done in accordance with the applicable law.

- 1.3. If you provide Personal Data of a third party (e.g., information about your dependent, spouse, children, and/or parents) to us, you represent and warrant that the collection, use, and disclosure of that Personal Data to us, as well as the further processing of that Personal Data by us for the purposes set out in this Policy, is lawful.

2. USE AND DISCLOSURE OF PERSONAL DATA

- 2.1. Our business is to understand and meet your needs and provide you with the products and services that you require. To do this effectively, we need to collect a range of Personal Data about you.
- 2.2. In general, we will, subject to applicable law, use and disclose your Personal Data for the following purposes:
 - a) provide you with the products or services that you have requested;
 - b) help us review, develop, improve, manage the delivery of and – to the extent this requires the use of Personal Data – enhance our products and services, including analysing future customer needs, conducting market research and data analytics (which does not involve automated profiling or result in automated decision-making activity which is regulated under the GDPR);
 - c) communicate with you and respond to your queries, requests and complaints;
 - d) provide ongoing information about our products and services which may be of interest to you;
 - e) handle disputes and conduct and facilitate investigations and proceedings;
 - f) protect and enforce our contractual and legal rights and obligations;
 - g) prevent, detect and investigate crime, including fraud and money-laundering, and analyse and manage other commercial risks;
 - h) manage our infrastructure and business operations and comply with internal policies and procedures;
 - i) facilitate business asset transactions (which may extend to any merger, acquisition or asset sale) involving any GHL Group entity; and

- j) comply with any applicable rules, laws and regulations, codes of practice or guidelines or assist in law enforcement and investigations by relevant authorities.

2.3. In addition, we may use and disclose your Personal Data for the following purposes, depending on the nature of our relationship with you:

a) **If you are applying, subscribing and using our services as a Merchant:**

- (i) process your application for the account;
- (ii) maintain your account with us;
- (iii) verify your personal particulars and process payment requests in relation to provision of the services which you may be entitled to or which you may have requested for;
- (iv) provide you with the goods and services which you have signed up for;
- (v) communicate with you of changes and development to our policies, terms and conditions and other administrative information, including for the purposes of servicing you in relation to products and services offered to you;
- (vi) resolve complaints and handle requests and enquiries;
- (vii) conduct market research for statistical, profiling and statistical analysis for the improvement of services provided to you; and
- (viii) process your Personal Data in relation to any of the purposes stated above.

b) **If you download or use any of our mobile applications (apps):**

- (i) process your application for subscription services if they are provided in the apps;
- (ii) maintain your account with us;
- (iii) verify and process your personal particulars and process payment requests in relation to provision of goods and services connected to the app;
- (iv) provide you with the goods and services which you have signed up for;
- (v) communicate with you changes and development to our policies, terms and conditions and other administrative information, including for the purposes of servicing you in relation to products and services offered to you;
- (vi) resolve complaints and handling requests and enquiries;
- (vii) conduct market research for statistical, profiling and statistical analysis for the improvement of services provided to you; and
- (viii) process your Personal Data in relation to any of the purposes stated above.

c) **If you are a prospective user or a user of our data centres and for any reasonable purpose for the servicing of your agreement, occupation, or**

good management of our data centres by us or any of our authorised service providers:

- (i) conduct due diligence checks;
- (ii) prepare agreements and any other documents as may be required for your use of our data centre;
- (iii) perform administration of agreements that you have with us, including access to our data centre;
- (iv) perform financial transactions such as payments;
- (v) communicate with you changes and development to our policies, terms and conditions and other administrative information; and
- (vi) any other purpose related to any of the above.

d) If you are a shareholder or unitholder of our shares:

- (i) administer the relationship, including the verification of your identity and/or the identity of your proxy (as may be applicable);
- (ii) inform you of our performance and the products and services that we provide to our customers through circulars, reports, newsletters and communications;
- (iii) communicate with you changes and development to our policies, terms and conditions and other administrative information; and
- (iv) any other purpose related to any of the above.

e) If you are a vendor, a prospective vendor or a contractor:

- (i) evaluate your proposal;
- (ii) conduct background checks on you;
- (iii) communicate with your deployed staff, after award of contract, who are in our properties to carry out work or services, and for any emergency or/and security concerns; and
- (iv) any other purpose related to any of the above.

f) If you submit an application to us as a candidate for employment:

- (i) process your application including pre-recruitment checks;
- (ii) provide or to obtain references for background screening/vetting;
- (iii) collect information about your suitability for the position applied for;
- (iv) organise training and staff development programmes;
- (v) assess your performance;

- (vi) administer benefits and payroll processing;
 - (vii) provide you with tools to facilitate or as required for you to do your job;
 - (viii) communicate with you to comply with our policies and processes, including for business continuity purposes; and
 - (ix) any other purposes related to the aforesaid.
- g) If you are an existing employee, this Policy would also apply to you.
- 2.4. The above purposes are not exhaustive, and depending on the nature of your relationship with us, we may collect, use, and disclose your Personal Data for additional purposes, which you will be notified of in accordance with applicable terms and conditions.
- 2.5. The provision of your Personal Data is voluntary. However, if you do not provide your Personal Data, GHL may not be able to communicate with you or to provide you the services you require.
- 2.6. Where you have provided us with specific consent, we may also use and disclose your Personal Data for the following purposes:
- a) provide services and extend benefits to you, including promotions, loyalty and reward programmes, send you industry market updates, newsletters and other information on our products, services, offers or promotions which may be of interest to you and conduct market research to develop special offers, promotional and/or marketing programmes; and
 - b) administer contests, competitions, and lucky draws, including, where necessary, announcing the results of these contests, competitions, and lucky draws and identifying and contacting the winners.
- 2.7. In relation to particular products or services or in your interactions with us, we may also notify you or have specifically notified you of other purposes for which we collect, use, or disclose your Personal Data. If so, we will collect, use, and disclose your Personal Data for these additional purposes.
- 2.8. Your Personal Data will be protected and kept confidential, but subject to the provisions of any applicable law, your Personal Data may, depending on the products or services concerned, be disclosed to third parties to perform functions on our behalf as set out below, which is not exhaustive. Such disclosure may be subject to additional legal requirements under applicable law, depending on the nature of the transfer to third parties. Your Personal Data will, in each case, only be disclosed to the extent necessary and proportionate.

The third parties are:

- a) other divisions or entities within GHL Group;
- b) our joint venture/ alliance partners;
- c) 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;

- d) 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;
 - e) insurers or insurance investigators and credit providers;
 - f) the Credit Bureau, or in the event of default or disputes, any debt collection agencies or dispute resolution centres;
 - g) 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;
 - h) our professional advisors such as our auditors and lawyers;
 - i) relevant government regulators or authority or law enforcement agency to comply with any laws or rules and regulations imposed by any governmental authority;
 - j) 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 Policy;
 - k) banks, credit card companies and their respective service providers; and
 - l) 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.
- 2.9. In the event that your Personal Data is shared with a third party that acts with a member of GHL Group as joint controllers under GDPR, we will, to the extent required by law, provide you with additional information on the responsibilities of each joint controller, any particular means by which you can enforce your rights, and the primary contact person for such requests in relation to your rights.
- 2.10. We require that organisations outside GHL Group which handle or obtain Personal Data as service providers to us acknowledge the confidentiality of this data, undertake to respect any individual's right to privacy and comply with the PDPA, the GDPR and any other applicable data protection laws. As a requirement under these laws, we may be required to have specific agreements in place with such third parties to regulate and safeguard your data protection rights. We also require that these organisations use this information only for our purposes and follow our directions with respect to this information.

3. TRANSFER OF PERSONAL DATA

Your Personal Data may be stored in external servers located overseas or in countries outside of your country of residence. In addition, as described above, in carrying out our business, it may be necessary to share information about you with and between our related corporations and affiliates and third-party service providers, some of which may be located in countries

outside your country of residence. We will take reasonable steps to ensure that your Personal Data transferred outside of your country of residence is adequately protected. In addition, we will ensure that such transfers comply with the requirements of the applicable data protection laws.

4. RETENTION OF PERSONAL DATA

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.

5. YOUR RIGHTS AND CHOICES

5.1. You have the following rights, under applicable data protection laws (except where the exercise of these are restricted under applicable laws – for example, due to judicial proceedings or the carrying out of investigations), which can be exercised by contacting the relevant Data Protection Officer at the contact details provided in paragraph 7.1 below:

- a) to obtain from us confirmation as to whether or not your Personal Data is being processed and request a copy of your information. Where legally required, we will provide your information in an easily accessible format and assist in transferring some of this information to third parties;
- b) rectification of your Personal Data. We endeavour to ensure that all Personal Data we have about you is accurate and up-to-date. We understand that this information changes frequently with changes of address and other personal circumstances. We encourage you to contact us as soon as possible to enable us to update any Personal Data we have about you. Incomplete or outdated Personal Data may result in our inability to provide you with products and services you have requested;
- c) where the processing of your Personal Data is carried out by automated means, you have the right to receive your Personal Data you have provided us in a structured, commonly used and machine-readable format or to demand transmission to another controller;
- d) in certain circumstances, you can request to have your Personal Data deleted or restrict the processing of it;
- e) if we process your information based on our legitimate interests explained above, or in the public interest, you can object to this processing in certain circumstances. In such cases, we will cease processing your information unless we have compelling legitimate grounds to continue processing or where it is necessary for legal reasons. Where we use your data for direct marketing purposes, you can always object using the unsubscribe link in such communications or by contacting us at the details provided in paragraph 7.1 below;
- f) prevent any processing of Personal Data that is causing or is likely to cause unwarranted and substantial damage or distress to you or another individual;
- g) be informed about any use of your Personal Data to make automated decisions about you where such decisions produce legal effects or have similarly

significant effects on you, and to obtain meaningful information about the logic involved, as well as the significance and the envisaged consequences of this processing; and

- h) to lodge a complaint about the way in which your Personal Data is being used to a supervisory authority. If you are located in the EU, you can contact the supervisory authority in the EU member state of your habitual residence or place of work or where the relevant member of the GHL Group which has used your Personal Data is located.
- 5.2. 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.
 - 5.3. If you withdraw your consent for 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.
 - 5.4. Where we process your Personal Data based on the legitimate interests referred to in paragraph 2.3 above, you can object to this processing in certain circumstances. In such cases, we will cease processing your information unless we have compelling legitimate grounds to continue processing or where it is necessary for legal reasons.
 - 5.5. Where mandated under the applicable data protection laws, your exercise of the rights described or referred to above shall be free of charge. In all other situations, we may charge a fee to cover the cost of verifying the request and locating, retrieving, and copying any material requested.
 - 5.6. If you want to exercise any of your rights or if you wish to raise a complaint on how GHL Group has handled your Personal Data, you may contact the relevant Data Protection Officer at the contact details provided in paragraph 10.1 below.

6. MANAGEMENT AND SECURITY

- 6.1. 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.
- 6.2. We have appointed Data Protection Officers to oversee our management of your Personal Data in accordance with this Policy and the applicable data protections law. We train our employees who handle your Personal Data to respect the confidentiality of your Personal Data, and we regard breaches of all applicable data protection laws very seriously.

7. CONTACT US

- 7.1. 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 Group on Personal Data and Privacy 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
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,
Krungthonburi Road, Klongtongsai, Klongsan,
Bangkok 10600 Thailand.
Email: pdpah@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
Tel. No.: +63-2 7744 9449

8. GOVERNING LAW

As Malaysia is the home jurisdiction of GHL Group, the PDPA sets the minimum standard which must be complied with across its business and operations within GHL Group in the ASEAN region. Should there be any discrepancies between the data protection laws in any of the particular offices situated in other countries with PDPA, then the said data protection laws of that country shall prevail.

9. REVIEW OF THIS POLICY

This Policy will be reviewed by us from time to time, taking into account changes in laws and regulations, changes to GHL Group's operations and practices, and the changing business environment.

Approved by Group CEO on 18th October 2023
Version Control: 1.0