



# SYCAL VENTURES BERHAD

## DATA PROTECTION AND PRIVACY POLICY

Sycal Ventures Berhad and its subsidiaries (“Sycal”), are committed to protecting your privacy in accordance with the Personal Data Protection Act 2010 of Malaysia (“Act”). For the purpose of this policy, "Personal Data" shall have the meaning as ascribed to it in the Act. Then, “we”, “our” or “us” shall refer to any of the companies within Sycal and “you” shall refer to yourself and such other persons or companies represented by you of which you are providing the Personal Data.

### **Section A: Information Collected**

The Personal Data about you may include information such as your photograph, name, contact details, address, national registration identity card number or passport number, gender, race, nationality, ethnic origin, occupation or profession, employer’s details, date of birth, email address, marital status, children’s details, age, income, salutation, sociological and/or lifestyle data including but not limited to car registration details, introducer’s details, property details and loan details.

Personal Data we may collect from you include (but not limited to):

- personal information to establish your identity and background such as your full name, passport or identity card number, nationality and religion;
- contact information such as billing address, premises address, telephone number, mobile phone number, fax number and email address;
- payment information such as your debit or credit card information, including the name of cardholder, card number, billing address, expiry date and other bank account details;
- any other sensitive information such as your racial or ethnic origin, health, criminal background or trade union membership (if relevant);
- recording of your image/video via CCTV cameras installed within our premises;
- recording of your photograph during any of our corporate events or third party events ;
- recording of calls placed by you to our customer services
- function, event or post when you commence a business relationship with us; and
- resume or CVs when you apply job with us.

Your Personal Data are collected from various sources including but not limited to:

- our existing customers/ suppliers lists, business cards and/ or any past or future events organized/ to be organized by us;
- information or comments or messages you have provided to us by whatsoever means and/or in whatever manner;
- information input submitted to online facilities such as search tools and calculators;
- information provided to us via survey or questionnaires;
- information from third parties including referral; and
- information obtained independently by us from other lawful sources.

Certain technical and statistical information related to you will be revealed to us via our internet service provider (i.e., such as cookies, your IP address, the time, date and duration of your visit) when you are browsing our websites. Note that if you had provided us with any personal data relating to a third party (e.g., information of your spouse, children, parents, and/ or employees), you had represented to us that you have obtained the consent from the third party to provide us with their personal data.

## **Section B: Purpose of Collection of Personal Data**

By providing any of your Personal Data to Sycal you hereby agree that Sycal shall collect, retain and use your Personal Data for the following purposes:

- To verify your identity;
- To process your job application;
- To maintain your account with us, to facilitate credit assessment and background check (as the customer, the supplier, agent, business/joint venture partner);
- To carry out and/ or discharging our contractual obligations;
- To provide you the relevant services, products or benefits offered by Sycal or by selected third parties that we think may be of interest to you;
- To notify you any changes to the services and policies by Sycal;
- To process invoices and payments (including debit/credit card payments);
- To assess financial and insurance risks;
- To facilitate response to your enquiries and feedbacks;
- For the marketing of products and services and sending any updates, new products, special offers, advertising, promotional material and/or commercial material to you;
- For the conduct of in-house research or any other sort of statistical, create directories/database, benchmarking analysis, development and improvement to our products and services;
- For the general operation, administration, management, development, record-keeping, contractual enforcement of the business transactions and communication with you; and
- For any other purposes that is incidental or ancillary or in furtherance to the objectives of Sycal.

Where required by laws (or rules, regulations, by-laws and/ or guidelines), Sycal will consider about the use or disclosure of your Personal Data as necessary to respond to any claims or legal process. Similarly, the disclosure of your Personal Data will be deemed necessary should Sycal suspects that fraud or unlawful activity has been, is being or may be engaged in.

## **Section C: Use and Disclosure**

Your Personal Data provided to us will be kept confidential but you agree that Sycal may disclose, share or transfer (whether in Malaysia or abroad) data to the following parties:

- Any company within Sycal, parent company, subsidiaries, related and associated companies as defined in the Companies Act 2016 in Malaysia;
- The directors, company secretaries, advisers, auditors, tax agents, share registrars and professional agents/firms/entities;
- Any company that assist Sycal in processing and/or otherwise fulfilling all business transactions and providing you with services/products that you have requested;
- Sycal's consultants, solicitors, auditors, employers, contractors, suppliers, partners, joint venture partners, advertisers, purchasers, network operators, property management companies, service and product providers, associated companies, any relevant authorities (governmental and/or non-governmental);
- Organizations who provide archival, auditing, professional advisory, debt collection, insurance, banking, marketing, advertising, delivery, recruitment, call centre, technology, research, utility, loyalty programme and security services;
- Federal or state government, embassies, statutory bodies, regulatory bodies, law enforcement agencies, government agencies, or any relevant regulator; and
- Any other parties in respect of whom you have given your express or implied consent.

## **Section D: Non-Provision or Provision of Incomplete Personal Data**

It is obligatory to provide your personal data to us to enable us to process your application for our services. Should you fail to provide a complete and obligatory personal data, we may not be able to process your application or provide you with our services.

You may make a request to us at any time at the address stated below in the event if:

- You wish to access/enquire about your personal data; or
- You wish to make correction to your personal data; or
- You wish to withdraw your consent for us to process your personal data.

Please note that Sycal does not offer any online portal/facilities for you to delete your Personal Data held by us. Sycal reserves the right to charge you a reasonable fee for the processing of any data access request.

### **Section E: Storage and Retention of the Personal Data**

Your Personal Data shall be stored either in hard copies in Sycal's offices or stored in servers located in or outside Malaysia and operated by Sycal or its service and product providers in or outside Malaysia.

Any Personal Data supplied by you will be retained by Sycal for as long as necessary for the fulfilment of the purposes stated in (B) above or is required to satisfy any legal, regulatory and/or accounting requirements or to protect Sycal's interests.

### **Section F: Confidentiality**

Personal Data held by Sycal will be kept confidential in accordance with this Privacy Notice pursuant to any applicable law that may from time to time be in force.

Any questions, comments, suggestions or information other than Personal Data submitted to us in whatever manner (including those sent or posted in Sycal's website and/or any other systems) will be deemed voluntarily provided to Sycal on a non-confidential and non-proprietary basis.

Sycal reserves the right to use, reproduce, disclose, transmit, publish, broadcast and/or post elsewhere such information freely as set out in (C) above.

### **Section G: Safety of Personal Data**

Sycal uses a number of mechanisms to protect the security and integrity of your Personal Data.

For the internet, unfortunately, no data transmission over the internet can be guaranteed as completely secure. While Sycal strives to protect such Personal Data, Sycal cannot ensure or warrant the security of any Personal Data transmitted to Sycal and individuals do so at their own risk. Once any Personal Data comes into Sycal's possession, Sycal will take reasonable steps to protect that information from misuse, loss and from unauthorised access, modification or disclosure.

A username and password may be essential for you to access certain sections of Sycal's website and/or any other systems. For your own protection, Sycal requires you to keep these confidential (do not share with anyone else - including your spouse, family members, colleagues or even superiors) and to change your password regularly (if required).

### **Section H: Right of Access to Personal Data**

Under the Act, you have the right of access to your Personal Data held by Sycal on payment of a prescribed fee and you may request that Sycal correct any of your Personal Data that is inaccurate, incomplete or out-of-date, subject to any applicable legal restrictions and contractual conditions.

If you have any questions regarding this Policy or if you wish to request access to your Personal Data or if you wish to correct your Personal Data or if you wish to withdraw your consent to Sycal for the processing of your Personal Data for the purposes as set out in (B) above or for the transfer of your Personal Data to the parties stated in (C) above, you may send your request to the email address: [corporate@sycalberhad.com](mailto:corporate@sycalberhad.com)

**Section I: Personal Data Given by You**

By submitting your personal data, you consent to the use of that personal data as set out in this Policy. Besides, you hereby confirm that you have obtained the consent from the persons and/or companies represented by you for you to provide their respective Personal Data to us for the purposes as set out in (B) above and disclosed to parties stated in (C) above.

Please note that notwithstanding the withdrawal of your consent, Sycal may still proceed to process your Personal Data in circumstances recognized and permitted by law and as required under the contractual conditions.

**Section J: Changes to this Policy**

Sycal reserves the right to amend this Policy from time to time without prior notice. Sycal advises that you check this Policy on our website on a regular basis.

**Section K: Review**

This Data Protection and Privacy Policy was reviewed and approved by the Board of Directors on 23rd February 2023.

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