



TH PROPERTIES SDN. BHD.

(Registration No: 198001010120 (63904-D))

PERSONAL DATA PROTECTION NOTICE

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This Personal Data Protection Notice outlines how TH Properties Sdn. Bhd. ("TH Prop") and its subsidiaries (collectively referred to as "TH Prop Group") collect, use, disclose, process, secure and retain your Personal Data in respect of the commercial transactions.

For the purposes of this Personal Data Protection Notice, the terms "we", "our" and "us" shall refer to TH Prop Group and the terms "you" and "your" shall refer to yourself and/or such other persons or entities represented by you of which you are providing Personal Data.

For the purposes of this Personal Data Protection Notice, the terms "Personal Data", "Sensitive Personal Data", "biometric data", "collect", "use", "disclose", "process" and "correction" shall carry the same meanings as defined under the Personal Data Protection Act 2010 and Personal Data Protection (Amendment) Act 2024 (collectively referred to as "PDPA"), including any amendments to it from time to time, as well as any relevant regulations, standards, guidelines, notices, and/or practices issued pursuant to the PDPA.

1. **COLLECTION OF PERSONAL DATA**

- 1.1 "Personal Data" refers to any information we hold that relates to you directly or indirectly, and that enables your identity to be determined, either on its own or when combined with other data in our possession. This may also include Sensitive Personal Data, such as information about your physical or mental health, political views, religious or philosophical beliefs, biometric identifiers, details of any criminal records (actual or alleged), or any other information classified as sensitive by the Minister from time to time.
- 1.2 We may collect your Personal Data through various means, including but not limited to:
- 1.3 **Indirectly** from third-party(ies) sources such as:
 - a) Government departments, agencies, or authorities.
 - b) Regulatory bodies and agencies.
 - c) Licensed credit reporting agencies.
 - d) Operators of industry-specific registers or external databases.
 - e) Our commercial partners, service providers, or related organisations.

- f) Any party from whom you have authorised the sharing of your data with us.

1.4 **Directly** from you, for example, when you:

- a) Submit the registration forms (whether electronic or physical) for our products or services.
- b) Participate in events such as property launches, exhibitions, roadshows or promotional activities.
- c) Use or register for our services via our websites or mobile applications.
- d) Make payments or engage in any transactions with us.
- e) Contact our customer service representatives.
- f) Join our contests, surveys, or market research activities.

1.5 **Automatically** Collected Data:

When you interact with our websites, we may use technologies to automatically gather certain data about your usage and preferences. These technologies may include:

- a) Cookies and analytical tools.
- b) Web beacons, pixel tags, and tracking scripts.
- c) Geo-location features.
- d) QR code scanning.

- 1.6 This information helps us monitor usage trends, enhance functionality, and improve your overall experience with our digital platforms.

2. **TYPES OF PERSONAL DATA THAT MAY BE COLLECTED**

- 2.1 In the course of our dealings with you, we may collect various types of Personal Data, including but not limited to:

- a) **Identification Information:** Such as your full name, date of birth, identification or passport numbers.
- b) **Contact Details:** Including your address, phone numbers, and email addresses.
- c) **Financial Information:** Payment details, bank account numbers, credit history, and transaction records.
- d) **Employment and Professional Information:** Job title, employer, and related details when relevant.
- e) **Sensitive Personal Data:** Such as health information, political or religious beliefs, biometric data, or any criminal records (actual or alleged) as defined under applicable laws.
- f) **Online Interaction Data:** Details about your usage of our websites, mobile applications, and digital services, including IP addresses, device information, browsing patterns, and location data collected via cookies and tracking technologies.
- g) **Communication Records:** Any correspondence, feedback, or communications you have with us, including calls, emails, and messages.
- h) **Other Relevant Data:** Any additional information necessary to provide you with our services or comply with legal and regulatory obligations.
- i) **Personal Data of Third Parties and Minors:** In certain circumstances, you may be required to provide Personal Data relating to other individuals such as your spouse, children, parents, directors, shareholders, or guarantors (collectively referred to as the “Relevant Persons”) for the purpose of completing your transaction with us. By submitting such information, you represent and warrant that:
 - i. You have obtained the necessary consent from the Relevant Persons to disclose their Personal Data to us.
 - ii. The Personal Data provided is accurate, complete, not misleading, and up to date.
 - iii. The Relevant Persons have consented to the collection, use, disclosure, processing, and retention of their Personal Data for the purposes relevant to your transaction.

- 2.2 By providing the Personal Data to us, you acknowledge and confirm that such data is accurate, complete, not misleading, and up to date. We shall not be responsible for any inaccurate, incomplete, misleading, or outdated Personal Data provided by you.
- 2.3 Notwithstanding the foregoing, we are not required to verify the accuracy and completeness of the Personal Data provided by you and we entitled to treat the Personal Data provided by you as accurate, complete, not misleading and up-to-date.
- 2.4 If you are under the age of 18 years old, you confirm that you have obtained the consent of your parent or legal guardian to provide your Personal Data to us.

3. PURPOSES FOR THE COLLECTION AND PROCESSING OF PERSONAL DATA

- 3.1 The Personal Data (including Sensitive Personal Data) collected from you in the course of our dealings is, and will continue to be, processed for the purposes of facilitating our business operations and fulfilling our obligations to you. This includes, but is not limited to, the following:
- a) Delivering notices, products, and services to you, as well as promoting our current and future offerings.
 - b) Facilitating your entry into agreements, contracts, or bookings related to property purchases, tenancy, event management, or venue hire.
 - c) Assisting with financing matters, such as bank loans, mortgages, and other housing-related financing applications.
 - d) Managing and enhancing our relationship with you by providing customer service and support through customer relationship management systems.
 - e) Carrying out any activities specifically related to the particular product or service you engage with.
 - f) Conducting marketing, profiling, and promotional campaigns to better understand your needs and offer relevant products and services.
 - g) Performing credit evaluations, financial, and background checks where necessary, to assess eligibility or manage risk.
 - h) Maintaining records for reporting, audit, and compliance purposes.

- i) Collecting outstanding payments and managing financial obligations.
- j) Preventing and detecting criminal activities including fraud, money laundering, and bribery.
- k) Complying with all applicable legal, regulatory, and governmental requirements, including disclosures mandated by law or court orders.
- l) Engaging in research, statistical analysis, and benchmarking related to our services and customer base.
- m) Communicating marketing information via email, phone calls, SMS, social media, or other channels regarding products or services from us or selected third parties, with your consent and without disclosing your data to these parties without approval.
- n) Managing property-related processes such as vacant possession handover, key delivery, estate management, defect rectification, and customer care.
- o) Providing ongoing services after possession, including clubhouse access, security, and customer loyalty programmes.
- p) Facilitating access to properties or facilities within our developments.
- q) Enabling property management, maintenance, and repair works through our service providers, contractors, or relevant property owners.
- r) Supporting the maintenance and development of our business systems, infrastructure, and internal operations.
- s) Transferring and sharing your data with affiliated companies within our group or trusted third parties acting on our behalf, including those located outside Malaysia.

3.2 Please note that the collection and processing of your Personal Data is essential for us to provide you with our services and manage our relationship effectively. Failure to provide your Personal Data may result in our inability to proceed with your requests or complete the necessary transactions.

4. DISCLOSURE OF PERSONAL DATA TO THIRD PARTIES

4.1 In the course of commercial transactions, it may be necessary for us to disclose your Personal Data to third parties. These disclosures are made only where

required, permitted, or reasonably necessary in connection with our businesses, and may include parties located within or outside Malaysia.

4.2 Your Personal Data may be disclosed to the following categories of recipients:

- a) **Authorities and Regulators:** Government bodies, statutory authorities, regulatory agencies, law enforcement agencies, and any party to whom we are legally required to disclose information under applicable laws, regulations, or directives.
- b) **Related Entities:** Our subsidiaries, affiliates, and associated companies (including those established in the future), for purposes aligned with the delivery of services, internal operations, or customer engagement.
- c) **Utilities and Property Management:** Joint management bodies, management corporations, utility service providers (electricity, water, sewerage), property managers, and security service providers in relation to the management and maintenance of properties you have purchased or occupied.
- d) **Business Partners and Service Providers:** Third party vendors, suppliers, surveyors, marketing agencies, loyalty programme operators, or other partners who support our business functions, such as customer service, property handovers, repairs, renovations, and defect rectification.
- e) **Professional Advisors:** Our appointed auditors, tax consultants, legal advisors, financial consultants, and other professionals engaged to provide services in the normal course of business.
- f) **Financial and Insurance Institutions:** Banks, financial institutions, insurers, insurance brokers, benefit plan administrators, and credit reporting agencies, particularly in connection with financing, loan applications, or insurance-related matters.
- g) **Technology and Operations Providers:** Third parties to whom we outsource data processing, IT support, communications, database management, or customer relationship management functions.
- h) **Marketing and Research Partners:** Selected external parties engaged to carry out marketing activities, surveys, statistical research, promotional campaigns, or customer profiling (only where you have given consent for such purposes).
- i) **Parties Involved in Corporate Transactions:** Potential business partners, acquirers, investors, or transferees in the event of any

corporate transaction such as a merger, acquisition, joint venture, or sale of assets involving our company.

- 4.3 Where the disclosure of your Personal Data involves parties located outside Malaysia, we will ensure that such transfers are carried out in compliance with the PDPA. This includes taking reasonable steps to ensure that the receiving jurisdiction has adequate data protection safeguards in place that are comparable to those under Malaysian law.

5. DATA SECURITY AND CONFIDENTIALITY

- 5.1 We take the protection of your Personal Data very seriously. Robust security measures are in place to safeguard your information against unauthorized access, loss, or misuse. Your data will only be shared with trusted parties who are legally obligated to maintain confidentiality and are authorized to process your data strictly for the specific purposes we have outlined. We continuously review and enhance our security protocols to ensure your information remains protected throughout its lifecycle.

6. DATA ACCURACY, RETENTION AND YOUR RIGHTS

- 6.1 We are dedicated to ensuring that your Personal Data remains accurate, complete, and current. Your information will be retained only for as long as necessary to fulfil the purposes outlined in this Personal Data Protection Notice or as required by law. Once your Personal Data is no longer needed, we will securely delete or destroy it in accordance with our internal retention policies.

Under the PDPA, you have full control over your Personal Data and the following rights:

- a) **Access:** You may request to know whether we hold your Personal Data and access that information.
- b) **Correction:** You can ask us to correct any inaccurate, incomplete, or outdated Personal Data.
- c) **Retention Limitation:** You have the right to request that your Personal Data be kept only as long as necessary for the purposes it was collected.
- d) **Policy Transparency:** You can request an explanation of our data handling policies and the types of Personal Data we manage.
- e) **Marketing Preferences:** You have control over how your Personal Data is used for marketing purposes. If you have consented to receive

promotional communications or to share your information with third parties for marketing, you may withdraw or update your consent at any time. This will not affect your access to our core services.

f) **Consent Withdrawal:** You may fully or partially withdraw any consent you have previously given, subject to applicable legal or contractual conditions.

g) **Data Portability:** You can request the transfer of your Personal Data to another data controller, subject to technical feasibility.

6.2 These rights are subject to any statutory exemptions that may permit us to collect, use, or disclose your Personal Data under specific conditions.

6.3 To update your preferences, withdraw consent, or exercise any of your rights, please contact us using the details provided below. We are committed to acting promptly on your requests, ensuring that your data is used only in ways you approve. This transparency empowers you to control when and how you receive updates, offers, and information from us.

CONTACT DETAILS:

Telephone Number : 03-2687 3333

Email Address : compliance@th-properties.com

Correspondence Address : Level 26, Menara **TH** Selborn, 153,
Jalan Tun Razak, 50400 Kuala Lumpur,
Wilayah Persekutuan Kuala Lumpur

6.4 In the event that we are unable to comply with your request for access to or correction of your Personal Data, we will provide you with written notice informing you of the reasons accordingly.

7. AMENDMENTS AND UPDATES TO THE PERSONAL DATA PROTECTION NOTICE

7.1 We reserve the right to revise, modify, or update this Personal Data Protection Notice from time to time. Any significant changes will be clearly posted on our website along with the updated notice. Your continued use of our services, as well as your voluntary submission of Personal Data following such updates, will be considered your acknowledgment of and consent to the revised Personal Data Protection Notice.

8. LANGUAGE

- 8.1 In the event of any inconsistency, ambiguity, or discrepancy arising between the English version and the Bahasa Melayu version of this Personal Data Protection Notice, the English version shall take precedence and be regarded as the definitive and controlling version. This provision ensures clarity and uniformity in the interpretation and application of the terms set forth herein.

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