

## **PERSONAL DATA POLICY**

### **PERSONAL DATA COLLECTION PRIVACY**

Hatten Group Sdn Bhd respects and values the privacy of individuals with regard to personal data of our customers and prospective customers. It is our top priority to protect your personal information and privacy. This Personal Data Protection Policy is issued pursuant to the Personal Data Protection Act 2010 ("PDPA") which came into effect on 15th November 2013. The following discloses our information and gathering and dissemination practices.

#### **1. COLLECTION OF PERSONAL DATA**

In the course of your dealings with Hatten Group Sdn Bhd and/or any its the subsidiaries, associates, affiliates and/or members within the Hatten Group Sdn Bhd (collectively refers as "us", "our" or "we" in this Personal Data Protection Policy), we will request that you provide your personal data ("Personal Data"), to enable us to enter into transactions with you or to communicate with you on the services and/or products related to our business. These may be done through various means, including but not limited to:

- a. agreements for sale and purchase or sub-sale of our properties or for our services;
- b. our forms whether in electronic or hardcopy format;
- c. any correspondence that we have received from you requesting for information or making any inquiries;
- d. business cards or other information provided to us dropped at our premises or given to our employees or sales and marketing or leasing or other agents; and/or
- e. guest book sign ins at our property launches or roadshows, showcases, exhibitions or any other promotional events.

#### **2. TYPES OF PERSONAL DATA**

Such Personal Data may include but are not limited to your personal details (such as name, age, date of birth, identity card number, passport number, gender, race, nationality), contact details (such as address, telephone number, fax number, e-mail address), occupation details (such as salary slip, income range, income tax information, EPF statement, Form BE) and other information such as credit card information, bank account details, types of loans applied for in relation to the purchase of property, and information of third parties such as your emergency contact person, tenant, authorised representatives, contractors, lawyers and financiers, recording of your image via CCTV/security recordings when you visit us, which may be subject to applicable data protection and other similar laws.

#### **3. SOURCE OF PERSONAL DATA**

Personal Data collected, processed and used by us are sourced from wholly legitimate and transparent means such as:

- a. agreements and contracts for sale and purchase of our properties or for our services;
- b. official registration forms (either electronic or printed) for new launches or property roadshows, showcases, exhibitions or any other promotional events;
- c. official request for information forms that are provided to you by our employees or agents;
- d. any emails or any correspondences from you requesting for information or making any inquiries;
- e. any forms that you have submitted on our website or any websites contracted by us;
- f. any referrals from a third party which have included their verifiable contact details;
- g. letters of offer from financial institutions (local and foreign) for pre-approved loans;
- h. Business cards that were dropped or given to our employees, agents, brokers or associates;
- i. from cookies through the use of our website;
- j. any contest forms or survey forms received from you; or
- k. any documents (including but not limited to statutory forms and returns) that were submitted to us for processing.

#### **4. PURPOSE OF COLLECTION OF PERSONAL DATA**

The Personal Data that you provide to us voluntarily will be collected, processed and used by us for one or more of the following purposes (collectively, "**Purpose**"):

- a. the delivery of notices, invitations, information in connections with our current and future services or products and the marketing of such services or products whether present or future as well as new products and project launches, events, promotional event and contests, to you;
- b. preparation and execution of the necessary documents and/or agreement and/or contract in relation to the sale and purchase transaction, tenancy, to carry out obligations under the agreement, to purchase our services, products and/or properties, necessary for the purpose of conducting and administering our business including but limited to sales administration, tenancy administration and property management purpose as well as sub-sale transactions, refinancing and sale by auctions;
- c. the maintenance and upkeep of customer and prospective customers records;
- d. collection of outstanding payments;
- e. those purposes specifically provided for in any particular service or product offered by us or our business partners;
- f. to administer and carry out our customer and prospective customer relationship management procedures;
- g. marketing, client profiling and business development activities, market researching and statistical analysis and customer surveys regarding our projects, products and/or services;
- h. complying with any legal or regulatory requirements and to make disclosure under the requirements of any applicable law, regulation, direction, court order, by-law, guideline, circular, code that are applicable to us and for the prevention of crime;

- i. to send invitations or information by email, regular postal mail, telecommunication means (telephone calls, SMS messages or social chat applications) or internet social media about products and services offered by selected third parties that may interest you without disclosing any Personal Data to any third parties without your prior written consent;
- j. vacant possession, keys handover, property/estate management, customer care and/or defect rectification works;
- k. post vacant possession services, such as club house services, security and customer loyalty card programmes;
- l. enable us to furnish and submit your Personal Data to the following relevant third parties for the Purpose or statutory compliance, included but not limited to the "Appendix A1 – List of Government bodies/agencies/local authorities and institutions".
- m. enable us to furnish and submit your Personal Data to the following relevant third parties for the Purpose or statutory compliance, included but not limited to the "Appendix A2 – List of Non-Governmental bodies/agencies and private institutions".

## **5. RIGHTS OF ACCESS AND CORRECTION**

You have the right to request to access and correct your Personal Data in our records (subject always to exemptions provided under the PDPA or other laws). We will make every endeavour to ensure that your personal information is accurate and up to date but you are responsible for informing us about changes in your Personal Data and for ensuring that such information is accurate and current. You have the right to:

- a. request access and access to your Personal Data in our records for verification purposes;
- b. request the correction of your Personal Data in our records in the event the information is inaccurate, misleading, out-of-date or incomplete upon validation and verification of the new information;
- c. request that your Personal Data shall only be kept for the fulfilment of the purpose of the collection of such information;
- d. request for proof of policy and procedure in relation to the safeguard and guarantee of your Personal Data in our records;
- e. request that we specify or explain our policies and procedures in relation to data and types of Personal Data handled by us;
- f. communicate to us your objection to the use of your Personal Data for marketing purposes; and
- g. withdraw, in full or in part, your given consent, subject to any applicable legal restrictions, contractual conditions and a reasonable time;

You may request for access to or correction of your Personal Data or limit the processing thereof by submitting your written request to us via:

**Personal Data Protection Officer**  
Hatten Land Limited  
53 Mohamed Sultan Rd #04-02

Singapore 238993  
Tel : +65 6690 3136  
Fax : +65 6690 3137  
Email : pdpa@hattengrp.com

We reserve the rights to impose an administrative fee for access of your Personal Data by you in the amount as permitted under the Personal Data Protection Act.

In respect of your right to access and/or correct your Personal Data, we have the right to refuse the request to access and/or make any correction to your Personal Data for the reasons permitted under the law, such as where the expense of providing access to you is disproportionate to the risk to your or another person's privacy.

## **6. DISCLOSURE OF PERSONAL DATA**

Personal Data provided to us will be kept confidential. Unless otherwise notified by you, you are deemed to have consented and authorised the disclosure of your Personal Data by us to the following classes of third parties which may be located within or outside Malaysia for reasons relating to the Purpose:

- a. any persons, government agencies, statutory authorities and/or industry regulators whom we are compelled or required to do so pursuant to any law, including but not limited to as per the list in "Appendix A1 – List of Government bodies/agencies/local authorities and institutions";
- b. public amenities and utilities providers and relevant parties, including but not limited to as per the list in "Appendix A2 – List of Non-Governmental bodies/agencies and private institutions";
- c. our auditors, consultants, accountants, lawyers, financial and professional advisers, lenders, insurance companies and property management companies;
- d. our subsidiaries, associates, affiliates and/or members within Hatten Group Sdn Bhd group of companies;
- e. our joint venture, business partners and affiliates;
- f. our service providers, contractors and sub-contractors;
- g. the relevant landowner, Joint Management Body and/or management corporation.
- h. Other parties in respect of whom you have given express written consent.

## **7. CHOICES TO LIMIT PROCESSING OF PERSONAL DATA**

The provision of your personal data to us is voluntary. If you do not provide your personal data to us, we may not be able to provide you the services which you require, may not be able to accomplish the Purpose and may not be able to communicate with you.

You have the right to limit in part or wholly any other processes of your personal data other than the Purpose it was initially given. If you wish to limit, kindly inform us immediately your request and the details on how the processing of your personal data is to be limited.

You may at any time withdraw or amend, in full or in part, your processing consent given subject always to any applicable legal restrictions, contractual conditions by contacting us at the details provided in Section 5 above. Kindly inform us immediately your request for withdrawal or amendment.

If you do not wish to receive updates on our upcoming projects or marketing or promotional updates from us, you may opt-out from receiving such project updates or marketing or promotional materials at any time. You may select the “unsubscribe” option provided in our email blasts or you may contact us at details provided in Section 5 above.

Your visit to our public website may be recorded for analysis on the number of visitors to the site and general usage patterns. Some of this information will be gathered through the use of “cookies”.

If you do not wish your Personal Data to be collected via cookies on the Websites, you may deactivate cookies by adjusting your internet settings to disable, block or deactivate cookies, by deleting your browsing history and clearing the cache from your internet browser.

## **8. LINKS TO THIRD PARTY WEBSITE**

The Websites may contain links to third parties’ websites. Please note that Hatten Group Sdn Bhd is not responsible for the collection, use, maintenance, sharing or disclosure of data and information by such third parties. If you provide information directly to such sites, the privacy policy and terms of service on those sites are applicable and we are not responsible for the information processing practices or privacy policies of such sites.

## **9. PROTECTION OF PERSONAL DATA**

Your Personal Data will be kept and processed in a secured manner. The appropriate administrative and security safeguards, policies and procedures will be implemented, as far as practicable, in accordance to the applicable laws and regulations. We will, as far as practicable, aim to prevent any unauthorized and/or unlawful processing of, and the accidental loss, destruction or damage to your Personal Data.

To safeguard against unauthorised access to Personal Data by third parties outside Hatten, all electronic and hard copy Personal Data held by us are kept in secured filing area and maintained on systems that are protected by secure networks with limited access to a select group of authorised users for the purpose of performing their official duties.

## **10.CONSEQUENCES OF REFUSAL / FAILURE TO PROVIDE PERSONAL DATA**

The Personal Data provided to us are wholly voluntary in nature. However should your refusal or failure to provide the Personal Data results in the following, we shall not be held liable for any of the consequences arising therefrom:

- a. the inability of parties to formalize and/or carry out the relevant agreement or transaction in relation to the sale or tenancy of our property, product and/or services;
- b. the inability for us to provide you with the information, notices, services and/or products requested;
- c. the inability for us to update you with the latest product and/or launches and/or services and obtaining your feedbacks on our products and/or services;
- d. the inability of the relevant third parties to prepare your sale or tenancy or loan documents in relation to the sale or tenancy of our property, product and/or services;
- e. the inability of the relevant third parties to process or grant financial loans applied for in relation to the purchase of property.

## **11.INCONSISTENCY**

In the event of any inconsistency between the English language version of the Personal Data Protection Notice and Policy and their corresponding Bahasa Malaysia and Chinese language version, the terms in the English language version shall prevail.

## **12.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 and deem that you have sufficiently obtained the prior consent of such third parties to allow us to process their personal data in relation to the Purpose.

## **13.CHANGES TO OUR PERSONAL DATA PROTECTION POLICY**

We may, from time to time, without prior notice to you, be required to change our Personal Data Protection Policy to comply with or be consistent with changes in the applicable law and regulations as well as our business operations or policies. As such, we encourage you to check our Personal Data Protection Policy at this website from time to time.

### **Appendix A1 - List of Government bodies/agencies/local authorities and institutions**

- i. Housing and Local Government;
- ii. Bahagian Pinjaman Perumahan Perbendaharaan;
- iii. Employees Provident Fund Board;
- iv. Inland Revenue Board;
- v. Land Office;
- vi. Land Registry;

- vii. Local authorities; and
- viii. Pursuant to court order from the High court, lower courts or tribunals.

**Appendix A2 - List of Non-Government bodies/agencies and private institutions**

- i. Indah Water Konsortium;
- ii. Syarikat Bekalan Air Melaka Berhad;
- iii. Tenaga Nasional Berhad.

**WHISTLEBLOWING POLICY & PROCEDURE**

Hatten Land Limited ("Hatten Land") is committed to upholding a high standard of integrity in conduct of its business and good corporate governance standards. In line with this commitment, the Board of Directors ("Board") of Hatten Land has approved the adoption of the Whistle-blowing Policy ("Policy") to provide clear guidelines and procedures in handling whistle-blowing reports.

The Policy aims to provide employees, vendors and partners with a trusted avenue to report in confidence, any valid concerns, such as possible malpractice or impropriety in the workplace without the fear of reprisal. The Policy also protects the complainant from termination, penalisation or discrimination when he/she raises any concern in good faith.

The Policy is overseen by Hatten Land's Audit and Risk Committee. Please send in your report via email to [whistleblow@hattenland.com.sg](mailto:whistleblow@hattenland.com.sg) . Your report will be reviewed by the Lead Independent Director for his independent assessment and investigation.

The Policy is available [here](#) for reference.