

Effective date: [13 February 2026]

Last review date: [13 February 2026]

This Privacy and Personal Data Protection Policy ("Policy") is issued to all our immediate and/or prospective customers, suppliers and employees pursuant to the Personal Data Protection Act 2010 ("the Act") which came into effect on 15th November 2013 and serves as our personal data protection notice in accordance with the Act. By submitting your Personal Data to us you hereby consent to and authorize the collection, use, disclosure, transfer and/or processing of your personal data by us in accordance with this Policy and the personal data protection laws of Malaysia.

## **1. Collection of Personal Data**

In the course of your dealings with Mah Sing Group Berhad and/or any of its subsidiaries ("Mah Sing"), we will request that you provide data and information about yourself ("Personal Data") to enable us to enter into commercial transaction with you or to deliver the necessary notices, services and/or products in connection with our business. These are relevant in connection with our business process and execution, including delivery of notices, services and/or products, client relationship management, planning purposes in connection with future products, new product launches and events including promotional events with business partners within our projects or townships.

## **2. Personal Data**

Such Personal Data may be subject to applicable data protection, privacy and other similar laws and the Personal Data that we collect from you may include but not limited to information concerning your name, date of birth, identity card number, passport number, address, gender, race, nationality, contact information, e-mail address, work history, education, compensation currently and historically, employer feedback, performance reviews, disciplinary actions, references and any other details of past employers or other people you provided to us, residential or postal addresses, your current or previous vocations, your employer's name, address, telephone or fax number, your previous addresses and preferred mode of communication, any previous names you may have used or aliases, tax file identification number, EPF number and SOCSO number; where permitted by applicable law. Where you are providing the Personal Data of any third party to us, you are required to first obtain their consent for the processing of their personal data by us in the manner described in this Policy and to communicate a copy of this Policy to any such third party where feasible. By providing the Personal Data of any third party to us, you are deemed to have obtained the consent of such third party on our behalf.

In addition to the Personal Data mentioned above, we also collect the following sensitive Personal Data from you:

- a. Your physical or mental health conditions;
- b. Your political opinions;
- c. Your religious beliefs or other beliefs of similar nature;
- d. Your biometric data;
- e. Current and savings account number, credit card details, bank name and other pertinent banking information; and
- f. Criminal history.

By agreeing to this Policy or by providing us with the requested sensitive Personal Data or procuring our products or services or continuing to engage us with in relation to our business, you are deemed to have given us your explicit consent for us to collect, use, disclose or process the requested sensitive Personal Data.

### 3. Purpose of Collection of Personal Data

The Personal Data will be collected, processed and used by us for the following purposes:

- a. the delivery of notices, services or products and the marketing of such services or products whether present or future, to you;
- b. in order for you to enter into the necessary agreement and/or contract to purchase the products, services and/or properties from us;
- c. the maintenance and upkeep of customer records and development;
- d. those purposes specifically provided for in any particular service or product offered by us or our partners;
- e. marketing and client profiling activities regarding our latest projects, products and/or services;
- f. preparation and execution of all necessary documents and agreements and/or contracts for our projects, products and/or services with you;
- g. credit assessments, financial and background investigation as and when deemed necessary;
- h. our internal record keeping;
- i. prevention of crime (including but not limited to fraud and money-laundering);
- j. meeting any legal or regulatory requirements relating to our provision of services and products and to make disclosure under the requirements of any applicable law, regulation, direction, court order, by-law, guideline, circular, code applicable to us or any member companies of Mah Sing;
- k. enable us to send you information by e-mail, 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 we think may interest you but doing so we maintain control over your Personal Data and we will not disclose your Personal Data to any third parties without your prior written consent;
- l. enable us to send you information by e-mail, regular postal mail, telecommunication means (telephone calls, SMS messages or social chat applications) or internet social media about our online questionnaire, customers' survey and / or research programme offered by selected third parties to improve products, processes, and services in Mah Sing but doing so we maintain control over your Personal Data and we will not disclose your Personal Data to any third parties without your prior written consent;
- m. vacant possession, keys handover, property/estate management, customer care and/or defect rectification works;
- n. post vacant possession services, such as club house services, security and customer loyalty card programmes;
- o. any subsequent commercial transactions in relation to any projects, products and/or services;
- p. enable us to furnish and submit your Personal Data to the following relevant parties, please refer to "Appendix A1 – List of Government bodies/agencies/local authorities and institutions"; and
- q. enable us to furnish and submit your Personal Data to the following relevant parties, please refer to "Appendix A2 – List of Non-Governmental bodies/agencies and private

institutions”.

## 4. Source of Personal Data

The Personal Data that will be 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 that we have received 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 person which have included their verifiable personal 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; or
- i. any documents (including but not limited to statutory forms and returns) that were submitted to us for processing.

At no time will any Personal Data be purchased by us or in any way commercially acquired through the purchase or trading of illegitimate and illegal Personal Data databases or lists.

## 5. Rights of Access and Correction

You have the right to request access to and if required, correction and update of your Personal Data in our records. You have the right to:

- a. request access to your Personal Data in our records for verification purposes;
- b. request the correction or update of your Personal Data in our records in the event the information is inaccurate, misleading, out-of-date or incomplete
- c. request for proof of policy and procedure in relation to the safeguard and guarantee of your Personal Data in our records;
- d. request that we specify or explain its policies and procedures in relation to data and types of Personal Data handled by us;
- e. communicate to us your objection to the use of your Personal Data for marketing purposes whereupon we will not use your Personal Data for these purposes; and
- f. withdraw or limit, in full or in part, your consent given previously for the processing of your Personal Data, in each case subject to any applicable legal restrictions, contractual conditions and a reasonable time period and in accordance with section 7 of this Policy;

You may exercise any of your rights as described above by writing to our Data Protection Officer below.

## 6. Disclosure of Personal Data

The information we gather is not sold, given to, or otherwise shared with other organisations for commercial or any other purposes. We do, however, send out emails on behalf of selected organisations to those of our subscribers who have opted in to receive these messages. We send the messages directly, so at no time do the advertisers get to see users' personal information – unless if users respond or reply to these advertisements or mailings themselves.

The Personal Data provided to us may be disclosed or transferred to relevant third parties, whether located within or outside of Malaysia, for the purposes set out in this Policy. By continuing to engage with us, you are deemed to have consented to the disclosure and cross-border transfer for your personal data to these third parties within or outside of Malaysia, where such disclosure or transfer is necessary to fulfil the purposes described in this Policy. The list of third parties are as follows and may be updated from time to time:

- a. any persons, government agencies, statutory authorities and/or industry regulators whom we are compelled or required to do so pursuant to any law, please refer to “Appendix A1 – List of Government bodies/agencies/local authorities and institutions”;
- b. relevant parties, please refer to “Appendix A2 – List of Non-Governmental bodies/agencies and private institutions”.
- c. any related companies and/or subsidiaries of Mah Sing, including those incorporated in the future;
- d. our business partners, service providers and affiliates that provide related services or products in connection with our business;
- e. our auditors, consultants, lawyers, accountants or other financial or professional advisers appointed in connection with our business;
- f. third party service providers, third party management companies, sub-contractors or other parties as may be deemed necessary by us to facilitate your dealings with us;
- g. our appointed service providers in relation to our loyalty programmes, for the purpose of enrolling you into any prize awards that you are eligible to take part in (if applicable) or to send you the incentive you are eligible to receive (if applicable), delivery of gift redemption and services; and
- h. our appointed service providers in relation to our online questionnaire, customers’ survey and / or research programme, for the purpose of research reporting in order for Mah Sing to improve its products, processes, and services in Mah Sing;

We shall take all reasonable steps to ensure that the disclosure is carried out in a safe and secure manner.

## **7. Choices to Limit Processing of Personal Data**

The Personal Data provided to us undergoes processing as and when required. The definition of processing is defined as “any operation or set of operations which is performed upon Personal Data, whether or not by automatic means, such as collection, recording, organization, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, blocking, erasure or destruction”.

You have the right to limit in part or wholly, any of the processes by which your data is subjected to in terms of the operations allowed to be performed upon it, the period of time allowed or alternatively the duration of the consent given.

The responsibility for compliance rests on the shoulders of Mah Sing who determines the purposes and means of the processing of Personal Data.

You may at any time withdraw or amend, in full or in part, your processing consent given previously, in each case subject to any applicable legal restrictions, contractual conditions and a reasonable time period. Any such request may be submitted to our Data Protection Officer at

the contact details set out in section 12 below.

### 8. Consequences of Refusal / Failure to Provide Personal Data

The Personal Data provided to us are wholly voluntary in nature and you are not under any obligation or under any duress to do so. However, in some circumstances such as the preparation and execution of a Sales and Purchase Contract, or a Supplier Letter of Award or an Employment Letter requires certain personal details and information beforehand. The failure to provide the Personal Data or your exercise of any of your rights to limit or withdraw your consent for the processing of your Personal Data may result in the following which we shall not be held liable for any of the consequences arising therefrom:

- a. the inability of parties to formalize any contract and/or agreement and/or Sale and Purchase Agreement / tenders / Letter of Awards / Employment Contract in relation to the sale of our property, products and/or services, to facilitate construction or to hire human resource;
- b. the inability for us to provide you with the notices, services and/or products requested;
- c. the inability for us to update you with the latest product and/or launches;
- d. the inability to complete commercial transactions in relation to our projects, products and/or services; and
- e. the inability to comply with any applicable law, regulation, direction, court order, by laws, guidelines and/or codes applicable to us.

### 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 with 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.

Mah Sing is committed to taking appropriate technical, physical and organisational measures to protect your Personal Data against unauthorised access, unlawful processing, accidental loss or damage, and unauthorised destruction of your Personal Data.

To safeguard against unauthorised access to Personal Data by third parties outside Mah Sing, all electronic Personal Data held by Mah Sing is maintained on systems that are protected by secure networks. Mah Sing entities limit access to internal systems that hold Personal Data to a select group of authorised users who are given access to such systems through the use of a unique identifier and password. Access to Personal Data is limited to and is provided only to relevant users for the purpose of performing their official duties. While Mah Sing implements reasonable security measures to protect your Personal Data, no system can be entirely free from risk. We will continuously review and enhance our security measures to mitigate potential threats and safeguard your data to the extent reasonably possible.

Compliance with these provisions will be required of all third-party administrators who may access your Personal Data, as described in the 'Disclosure of Personal Data' in section 6 above. However, Mah Sing shall not be responsible or be held liable for any security breaches or any unauthorised disclosures of Personal Data that may occur as a result of acts or omissions by such third parties.



### 10. Retention of Personal Data

We retain your Personal Data for as long as necessary to fulfil the purpose(s) for which it was collected, and following the fulfilment of those purpose(s), we will continue to retain your Personal Data, for a further period of up to seven (7) years to comply with legal or regulatory requirements, to protect our legitimate interests, or for any other lawful purpose. To determine the appropriate retention period for Personal Data, we consider the amount, nature, and sensitivity of the Personal Data, the potential risk of harm from unauthorized use or disclosure of your Personal Data, the purposes for which we process your Personal Data and whether we can achieve those purposes through other means, and the applicable legal requirements.

Upon the expiry of the retention period, we will take reasonable steps to ensure that your Personal Data is securely deleted or permanently removed from our records, in accordance with the requirements of applicable laws.

### 11. Language

In accordance to Section 7(3) of the Act, this Policy is issued in both Bahasa Malaysia and English languages. In the event of any inconsistency, the English language version of this Policy shall prevail.

### 12. Your Privacy Preferences and How to Contact Us:

In the event you wish to contact us regarding your Personal Data, or if you have any complaints or queries in relation to it, we would appreciate it if you give us an opportunity to resolve any issue. You may reach Data Protection Officer at [dpo\\_mahsingproperties@hhq.com.my](mailto:dpo_mahsingproperties@hhq.com.my).

### 13. Changes to this Policy

Mah Sing may need to modify this Policy as needed, for example, to comply with changes in business operations or laws and regulations. Mah Sing will post all changes to this policy on our website [www.mahsing.com.my](http://www.mahsing.com.my). You are encouraged to visit our website from time to time to keep yourself updated on our latest policy.

### 14. Consent

By agreeing to this Policy or providing us with your Personal Data or procuring our products or services or continuing to communicate and engage with Mah Sing in relation to our business, you are deemed to have consented to the collection, use, disclosure and processing of your Personal Data by us in the manner described in this Policy.

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

- i. Bahagian Pinjaman Perumahan Perbendaharaan;
- ii. Kumpulan Wang Simpanan Pekerja;
- iii. Lembaga Hasil Dalam Negeri;
- iv. Land Office;
- v. Local authorities;
- vi. Court or tribunals; and
- vii. Insurance companies.

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

- i. Indah Water Konsortium;
- ii. Pengurusan Air Selangor Sdn Bhd;
- iii. Sabah State Water Department (JANS);
- iv. Ranhill SAJ Sdn Bhd;
- v. Perbadanan Bekalan Air Pulau Pinang;
- vi. Tenaga Nasional Berhad;
- vii. Banks and financial institutions;.
- viii. Insurance companies;
- ix. International Organisation for Standardization (ISO) auditors;
- x. Survey and research platforms authorised by Mah Sing; and
- xi. Any other utilities service providers that are not mentioned hereinabove.