

INVERFIN SDN BHD PERSONAL DATA PROTECTION POLICY

This Personal Data Protection Policy (this “Policy”) is issued by us, Inverfin Sdn Bhd (Company No. 132205-A) pursuant to the **Personal Data Protection Act 2010 (“PDPA”)** to persons whose personal data is processed by us or on our behalf. For the purpose of this Policy, “data subject”, “personal data” and “processing” shall have the meaning as defined in the PDPA.

We are subject to the Data Protection Principles under the PDPA and this Policy seeks to outline how we intend to deliver all the rights and protection which you are entitled to.

In this Policy, your personal data includes personal data about yourself and such other persons represented by you of which you are providing the personal data. This include, but is not limited to, the personal data of your guarantors and other parties providing any security to secure your obligations to us and where you are an entity (for example, if you are a company, partnership, society, club or other incorporated or unincorporated entity), the personal data of your shareholders, directors, officers, attorneys, managers, partners and officer bearers.

Personal data includes any information that relates directly or indirectly to a data subject by which the data subject’s identity could be deduced from the information including but not limited to the data subject’s name, age, gender, date of birth, address, email address, telephone / mobile phone number and any other personal information processed by us from time to time.

Personal data also includes any sensitive data such as information as to a data subject’s physical or mental health or condition, a data subject’s political opinions, a data subject’s religious beliefs or other beliefs of a similar nature.

1. You Have Choices

- 1.1. You have the opportunity to make choices. As you consider this, we encourage you to make choices that enable us to enter into and maintain the commercial and business transactions with you.
- 1.2. Failure to consent to the processing of your personal data may result in us being unable to enter into and maintain any commercial transactions or contractual relationship with you.

2. Collection of Personal Data

- 2.1. We collect your personal data both at the beginning of and throughout the commercial transaction or contractual relationship between us and you.
- 2.2. Such personal data will be collected and recorded through your relationship with us, for example information obtained when you are applying to enter into a commercial/business transaction with us, verbal, written and online communication between you and us, and sometimes we may obtain the personal data from other sources such as your legal representatives, agents, credit reference agencies and regulatory bodies which could provide and supply us with the personal data and any other sources which you have given your consent to the disclosure of the personal data.
- 2.3. In relation to any personal data of any third party provided by you to us, you confirm that you have obtained his or her consent to the collection and processing of his or her personal data for the purposes set out in this Policy.

3. Purpose of Collection of Personal Data

- 3.1. By providing your personal data to us, you agree that the personal data collected by us, whether from you or otherwise, may be processed for the purposes set out in the PDPA and the following purposes:-
 - (a) for assessment of your application or request to enter into any commercial and business transaction with us;
 - (b) for entering into agreements, tenancy, licence and other contractual documents with us,
 - (c) for evaluation and due diligence purposes;
 - (d) for servicing you and the provision of products and services to you;
 - (e) for evaluating and monitoring provision of services;
 - (f) for responding to inquiries from you;
 - (g) for insurance purposes;
 - (h) for enforcement of our rights, and the obligations of other parties to us;

- (i) for communication with you and to send documents and updates to you in respect of your commercial and business transaction with us,
- (j) for billing whether individually or collectively with other customers' information;
- (k) for audit and record keeping purposes;
- (l) for a party to evaluate any actual or proposed assignment, novation or transfer of our rights or obligations;
- (m) for account collection purposes;
- (n) for risk management purposes;
- (o) for use as authorized by or under law (domestic or foreign);
- (p) for fraud prevention and detection;
- (q) for compliance with laws (domestic or foreign), including anti-money laundering and anti-terrorism financing laws;
- (r) for data processing;
- (s) for appointing and instructing our panel lawyers for legal recovery and enforcement;
- (t) for security reasons;
- (u) for any other purposes related to our business;
- (v) for any other purposes to which you may consent or incidental to or associated with any of the above purposes.

4. Disclosure of Personal Data

4.1. Your personal data will be kept protected and confidential at all material times. However, your personal data may be disclosed to the following parties for the purposes set out above:-

- (a) to our affiliates, our shareholders and their respective affiliates, in and outside Malaysia. In this Policy, a person's affiliate means any entity

controlled, directly or indirectly, by that person, any entity that controls, directly or indirectly, that person or any entity, directly or indirectly, under common control with that person;

- (b) to any person that we or our affiliates, or our shareholders or their respective affiliates, may use in connection with their respective businesses;
- (c) to any person providing services to us or our affiliates, or to our shareholders or their respective affiliates;
- (d) debt collection agencies;
- (e) credit bureaus;
- (f) to any actual or proposed assignee or transferee of any of our rights or obligations;
- (g) to any party giving or proposing to give any guarantee, indemnity or security to secure your obligations to us;
- (h) to such parties as we, our affiliates, our shareholders or their respective affiliates are required to disclose by law (domestic or foreign), court, regulator, legal process, stock exchange, clearing house or self-regulatory bodies.

4.2. Your personal data may be stored or transferred to locations and systems outside Malaysia subject to appropriate controls over information security.

5. Accuracy, Security and Updating of Personal data

- 5.1. It is important that your personal data and other information held and retained by us is at all material times accurate and up-to-date for the duration of your commercial and business transaction with us.
- 5.2. In the event if any of your personal data and other information is inaccurate or has changed, please inform us by notice in writing so we can make any necessary changes.
- 5.3. In the event of your failure to inform and update us of any inaccuracy or any changes in your personal data or information, we shall not be held liable for

any losses or damages suffered by you whatsoever resulting from the inaccurate processing of your personal data.

- 5.4. We will use our best endeavor to take all reasonable precautions to ensure that your personal data is kept safe from loss, unauthorized access, modification or disclosure.

6. Retention of your Personal Data

- 6.1. We will retain your personal data in compliance with this Policy and the terms and conditions of your agreement(s) with us for the duration of your relationship with us, or for as long as may be deemed necessary as required by law (domestic or foreign) or our policies.

7. Access to Personal Data or Request for Correction of Personal Data

- 7.1. You may ask for access to your personal data held by us ("**data access request**").
- 7.2. To help us locate and provide the personal data you request, we would ask that you be reasonably specific about the information you require.
- 7.3. We may charge you an administrative fee for providing access in accordance with your request.
- 7.4. You may request for a correction of your personal data held by us if you consider such personal data to be inaccurate, incomplete, misleading or not up to date ("**data correction request**").
- 7.5. If you have any questions, or wish to make a data access request or data correction request, please write to us at:-

Managing Director
Inverfin Sdn Bhd
Suite 22.02, Level 22,
Menara Citibank
165 Jalan Ampang
50450 Kuala Lumpur

Tel.: 03-2164 4033/34
Fax: 03-2164 4036

7.6. We may refuse your data access request and data correction request under certain circumstances allowed by law (domestic or foreign) and if we do so, we will, to the extent permitted by law (domestic or foreign) explain to you the reason(s) for our refusal.

8. Revision to Personal Data Protection Policy

8.1. We may revise and update our Personal Data Protection Policy from time to time and in the event we do revise and update our Personal Data Protection Policy, we shall notify you in writing or by such other means of communication deemed suitable by us.

8.2. Upon being notified of such revisions or updates, you shall be deemed to have agreed to such revisions or update should you not object or if you continue to maintain or enter into any commercial transactions or contractual relationship with us.

8.3. If you do not agree to such revisions or updates, please inform us within seven (7) days from the date of our notification to you.

9. Language

9.1. This Personal Data Protection Policy is issued in both English and Bahasa Malaysia and in the event of any conflict between the English version and Bahasa Malaysia version, the English version shall prevail.

**THIS PERSONAL DATA PROTECTION POLICY WAS ISSUED ON
19TH NOVEMBER 2014.**