

PRIVACY POLICY

1. INTRODUCTION

- 1.1 This is the privacy policy (“**Privacy Policy**”) of CKL Holdings Sdn Bhd (which includes all its subsidiaries, related and/or associated companies) (“**Company**”). This Privacy Policy applies to personal data about you our customers, students, landlords, tenants, drivers, workshop attendees, directors, shareholders, vendors, distributors, suppliers, contractors, service providers, business partners, etc, and/or individuals provided by you or that we obtain about you, whether now or in the future.
- 1.2 To process, administer or manage your relationship with us, we will necessarily need to collect and process your personal data. We will only process your personal data in accordance with the Personal Data Protection Act 2010 (“**PDPA**”).
- 1.3 If you are a corporate entity/an organisation, references to the term “you” and “your” shall also include your employees, representatives and agents.
- 1.4 By providing your personal data to us, using our services or products or continuing access to our website at www.limtayar.com.my or any other website owned by us (“**Site**”), you declare that you have read and understood this Privacy Policy and agree to us processing your personal data in accordance with the manner as set out in this Privacy Policy.
- 1.5 We reserve the right to modify, update and/or amend this Privacy Policy from time to time. We will notify you of any material amendments via announcements on the Site or other appropriate means. Please check the Site from time to time to see if there are amendments to this Privacy Policy. By continuing to communicate with us, use our services, purchase our products and/or access to the Site after being notified of any amendments to this Privacy Policy, you will be treated as having agreed to and accepted those amendments.
- 1.6 It is necessary for us to collect and process your personal data. If you do not provide us with your personal data, or do not consent to this Privacy Policy, we may not be able to render all services or sell products to you and you may be required to terminate your relevant agreement with us and/or stop accessing or using the Site.

2. COLLECTION OF PERSONAL DATA

- 2.1 The term “**personal data**” means any information that relates to an individual to the extent that the individual can be identified from that information including but not limited to name, address, telephone number, NRIC No, date of birth, email address, vehicle number, vehicle model etc and where relevant, may include sensitive personal data such as your personal beliefs, religion, mental or physical conditions etc. The types of personal data collected depend on the purpose of collection.
- 2.2 Your personal data may be collected from you during your course of dealings with us in any way or manner including pursuant to any transactions or communications made with us. We may also collect your personal data from a variety of sources, including publicly available sources, any third

parties, credit reference bodies, regulatory and law enforcement authorities.

3. PURPOSE OF ACQUIRING AND PROCESSING YOUR PERSONAL DATA

3.1 We may collect and process your personal data for the following purposes (collectively referred to as the “**Purposes**”):

- to assess, process and provide products and/or services to you;
- to manage and maintain your relationship with us;
- to process your application/transaction with us;
- to respond to your enquiries or complaints;
- to administer and process any payments related to products or services requested by you;
- to provide teaching and training, schedule classes and workshops, issue certification;
- to facilitate your participation in any events including meetings, seminars, conferences, talks, road shows, contests, promotions or campaigns organised by us;
- to conduct credit reference checks and establish your credit worthiness, where necessary, in providing you with the products or services;
- to carry out due diligence or other monitoring or screening activities (including background checks) in accordance with legal or regulatory obligations or risk management procedures that may be required by law or that may have been put in place by us;
- to administer and give effect to your commercial transactions with us;
- to engage you to provide products or services to us or on our behalf;
- to process any payments related to your commercial transactions with us;
- to provide you with information or updates on our products, services, upcoming promotions offered by us or events organised by us and selected third parties which may be of interest to you from time to time by SMS, phone call, email, fax, mail, social media or any other appropriate communication channels;
- to send you seasonal greetings messages, gifts, newsletters from time to time;
- to send you invitation to join our membership program, events and promotions;
- to conduct market research or surveys, internal marketing analysis, customer profiling activities, analysis of customer patterns and choices, planning and statistical and trend analysis in relation to our products and/or services;
- to share any of your personal data with the auditor for our internal audit and reporting purposes;
- to share any of your personal data pursuant to any agreement or document which you have duly entered with us for purposes of seeking legal or financial advice or for purposes of commencing legal action;
- to share any of your personal data with a third party necessary for the preparation of legal documents or contract to be entered by you;
- to share any of your personal data with our business partners to jointly develop products and/or services or launch marketing campaigns;
- to share any of your personal data with insurance companies necessary for the purpose of applying and obtaining insurance policy(ies), if necessary;

- to share any of your personal data with financial institutions necessary for the purpose of applying and obtaining credit facility(ies), if necessary;
- to maintain and update internal record keeping, files and contact lists;
- to meet any applicable legal or regulatory requirements and making disclosure under the requirements of any applicable law, regulation, direction, court order, by-law, guideline, circular or code applicable to us;
- for direct marketing purposes via SMS, phone call, email, fax, mail, social media and/or any other appropriate communication channels;
- for internal administrative purposes;
- for audit, risk management and security purposes;
- for registration for a user account with us;
- for our storage, hosting back-up (whether for disaster recovery or otherwise) of your personal data, whether within or outside Malaysia; and/or
- for other purposes required to operate, maintain and better manage our business and your relationship with us,

and you agree and consent to us using and processing your personal data for the Purposes in the manner as identified in this Privacy Policy. If you do not consent to us processing your personal data for one or more of the Purposes, please notify us at the contact details below.

4. CONSEQUENCES OF NOT CONSENTING TO THIS PRIVACY POLICY

It is necessary for you to provide us with your personal data, and if you fail or choose not to provide us with such data, we will not be able to provide our products or services or otherwise deal with you, if at all.

5. DISCLOSURE OF YOUR PERSONAL DATA

We will not sell, rent, transfer or disclose any of your personal data to any third party without your consent. However, we may disclose your personal data to the following third parties, for one or more of the above Purposes:

- the Company's group of companies including the Company's subsidiaries, related and/or associated companies;
- your immediate family members and/or emergency contact person as may be notified to us from time to time;
- successors in title to us;
- (for our students) academic professional bodies, donors of scholarships and prizes, student bodies such as student alumni and associations, companies providing internships or employment opportunities, our third party trainers and lecturers;
- any person under a duty of confidentiality to which has undertaken to keep your personal data confidential which we have engaged to discharge our obligations to you;
- any party in relation to legal proceedings or prospective legal proceedings;
- our auditors, consultants, lawyers, accountants or other financial or professional advisers appointed in connection with our business on a strictly confidential basis, appointed by us to provide services to us;

- any party nominated or appointed by us either solely or jointly with other service providers, for purpose of establishing and maintaining a common database where we have a legitimate common interest;
- data centres and/or servers located within or outside Malaysia for data storage purposes;
- storage facility and records management service providers;
- payment channels including but not limited to banks and financial institutions for purpose of assessing, verifying, effectuating and facilitating payment of any amount due to us in connection with your purchase of our products and/or services;
- government agencies, law enforcement agencies, courts, tribunals, regulatory/professional bodies, industry regulators, ministries, and/or statutory agencies or bodies, offices or municipality in any jurisdiction, if required or authorised to do so, to satisfy any applicable law, regulation, order or judgment of a court or tribunal or queries from the relevant authorities;
- our business partners, third party product and/or service providers, suppliers, vendors, distributors, contractors or agents, on a need to know basis, that provide related products and/or services in connection with our business, or discharge or perform one or more of the above Purposes and other purposes required to operate and maintain our business;
- insurance companies for the purpose of applying and obtaining insurance policy(ies), if necessary;
- financial institutions for the purpose of applying and obtaining credit facility(ies), if necessary;
- financial institutions, merchants and credit card organisations in connection with your commercial transactions with us;
- any third party (and its advisers/representatives) in connection with any proposed or actual reorganization, merger, sale, consolidation, acquisition, joint venture, assignment, transfer, funding exercise or asset sale relating to any portion of the Company; and/or
- any other person reasonably requiring the same in order for us to operate and maintain our business or carry out the activities set out in the Purposes or as instructed by you.

6. ACCURACY OF YOUR PERSONAL DATA

We take it that all personal data provided by you is accurate and complete, and that none of it is misleading or out of date. You will promptly update us in the event of any change to your personal data.

7. YOUR RIGHTS

- 7.1 To the extent that the applicable law allows, you have the right to request for access to, request for a copy of, request to update or correct, your personal data held by us. We may charge a small fee (such amount as permitted by the PDPA) to cover the administration costs involved in processing your request to access your personal data.
- 7.2 You have the right at any time to request us to limit the processing and use of your personal data (for example, requesting us to stop sending you any marketing and promotional materials).
- 7.3 In addition, you also have the right, by notice in writing, to inform us on your withdrawal of your

consent given previously to us subject to reasonable duration of time for the withdrawal of consent to be effected. However, your withdrawal of consent could result in certain legal consequences arising from such withdrawal. In this regard, depending on the extent of your withdrawal of consent, it may mean that we will not be able to continue with your existing relationship with us or the contract that you have with us will have to be terminated.

8. RETENTION OF YOUR PERSONAL DATA

Any of your personal data provided to us is retained for as long as the purposes for which the personal data was collected continues; we will take reasonable steps to ensure that your personal data is then destroyed or anonymised from our records and system in accordance with our retention policy in the event your personal data is no longer required for the said purposes unless its further retention is required to satisfy a longer retention period to meet our operational, legal, regulatory, tax or accounting requirements.

9. SECURITY OF YOUR PERSONAL DATA

- (a) In order to prevent unauthorised access or disclosure, accidental loss, destruction to or alteration of your personal data, we endeavour, where practicable, to implement appropriate security measures in accordance with the applicable laws and regulations to safeguard against such risks.
- (b) We cannot and do not accept responsibility for any unauthorised access or interception or loss of personal data that is beyond our reasonable control.

10. PERSONAL DATA FROM MINORS AND OTHER INDIVIDUALS

- 10.1 To the extent that you have provided (or will provide) personal data about your family members, spouse, other dependents (if you are an individual), directors, shareholders, employees, representatives, agents (if you are a corporate entity/an organisation) and/or other individuals, you confirm that you have explained (or will explain) to them that their personal data will be provided to, and processed by, us and you represent and warrant that you have obtained their consent to the processing (including disclosure and transfer) of their personal data in accordance with this Privacy Policy.
- 10.2 In respect of minors (i.e. individuals under 18 years of age) or individuals not legally competent to give consent, you confirm that you are the parent or guardian or person who has parental responsibility over them or the person appointed by court to manage their affairs or that they have appointed you to act for them, to consent on their behalf to the processing (including disclosure and transfer) of their personal data in accordance with this Privacy Policy.

11. TRANSFER OF YOUR PERSONAL DATA OUTSIDE OF MALAYSIA

Our information technology storage facilities and servers may be located in other jurisdictions outside of Malaysia. In addition, your personal data may be disclosed or transferred to entities located outside Malaysia. You hereby expressly consent to us transferring your personal data outside of Malaysia for such Purposes. We shall endeavour to ensure that reasonable steps are taken to procure that all such third parties outside of Malaysia shall not use your personal data

other than for that part of the Purposes and to adequately protect the confidentiality and privacy of your personal data.

12. WEBSITE

12.1 External links

- (a) If any part of the Site links you to other websites, those websites do not operate under this Privacy Policy and we do not accept any responsibility or liability arising from those websites.
- (b) We recommend you to read and understand the privacy/personal data protection statement/policy posted on those other websites in order to understand their procedures for collecting, processing, using and disclosing personal data and before submitting your personal data to those websites.

12.2 Cookies

- (a) We employ an industry standard technology called “cookies”. The cookie is a small piece of information stored on the hard drive of your computer or device for record-keeping purposes, and is used by us to track your visits to the Site. Cookies may be used to save your preferences for your ease and convenience when using the Site. Third party advertising networks may issue their separate cookies to your hard drive when serving advertisements.
- (b) The type of anonymous click stream data collected by us through the cookies may include your Internet Protocol address, web browser software, date and time of visit to the Site, and whether your requests (including search requests and clicking on links to parts of the Site) were met with successfully. All such information collected through cookies are not personal data and you cannot be identified from this information. Such information is only used for the purpose of managing and creating a better user experience, analysing the traffic on the Site and to identify areas for improvement on the Site.
- (c) The use of cookies is now an industry standard, and you will find them used on most major websites. Most browsers are initially set up to accept cookies. If you prefer, you can reset your browser either to notify you when you have received a cookie, or to refuse to accept cookies. You should understand that certain features on the Site will not function properly if you set your browser to not accept cookies.

13. CONTACT DETAILS

If you have any questions about this Privacy Policy or would like to make a complaint or data access or correction request in respect of your personal data, you may send us your written requests by downloading and completing our PDPA Form available on www.limtayar.com.my and mailed to:

Personal Data Compliance Officer

Address: CKL Holdings Sdn Bhd, 3rd Floor, Wisma CKL, No. 39-3 & 41-3, Jalan 23/70A, Desa Sri Hartamas, 50480 Kuala Lumpur.

Contact No. : 03-62032020

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