

HO HUP CONSTRUCTION COMPANY BERHAD (Company No: 14034-W)

PERSONAL DATA PROTECTION NOTICE & POLICY

**HO HUP CONSTRUCTION COMPANY BERHAD (HO HUP)** recognizes the importance of privacy and the sensitivity of personal information.

Whilst **HO HUP** is not required to be registered under the provisions of the Personal Data Protection Act, 2010, nevertheless we conform to the relevant provisions of the Personal Data Protection Act, 2010 (**PDPA**).

In compliance with the provisions of the **PDPA**, this Personal Data Protection Notice is to inform you of how we collect and process your personal data when you engage or communicate with us or when you access or use our website and/or Facebook page (if applicable) or interact with us through various forms of communication including meetings, email correspondence, fax transmissions, written communications, seminars, conferences, events or promotions including responses to advertisements or oral communications.

For the purposes of this Notice & Policy, the term “data subject” means an individual who is the subject of the personal data and “personal data” means any information in respect of commercial transactions, which –

- (a) is being processed wholly or partly by means of equipment operating automatically in response to instructions given for that purpose;
- (b) is recorded with the intention that it should wholly or partly be processed by means of such equipment; or
- (c) is recorded as part of a relevant filing system or with the intention that it should form part of a relevant filing system,

that relates directly or indirectly to a data subject, who is identified or identifiable from that information or from that information and any other information in our possession.

By communicating or engaging with us or by responding to our advertisements, brochures or other forms of promotion or marketing or by accessing our website or by interacting with us, you consent to us using, collecting and processing your personal data in the manner contemplated in this Notice.

This Notice may be amended or updated from time to time and you are advised to check our website for updates or amendments from time to time. By continuing to engage with us or by continuing to communicate with us or by using our website to communicate with us after any amendments or updates, you are deemed to confirm and accept the amendments or updates to this Notice.

**HO HUP** values the need to safeguard the privacy of the personal data of those with whom we engage with and is committed to the following principles:

1. The General Principle;
2. The Notice and Choice Principle;
3. The Disclosure Principle;
4. The Security Principle;
5. The Retention Principle;
6. The Data Integrity Principle; and
7. The Access Principle.

### The General Principle

We only process your personal data subject to your consent whether implied or express. However, your personal data may be processed if it is necessary:

- (a) for the performance of a contract to which you are a party; or
- (b) for the taking of steps at your request with a view to entering into a contract; or
- (c) for compliance with any legal obligation to which you are the subject, other than an obligation imposed by a contract; or
- (d) for the exercise of any functions conferred on us or relevant parties such as our Solicitors, Bankers, Auditors or relevant Government Departments under any law.

We are committed in ensuring that your personal data shall not be processed unless it is for a lawful process directly related to our business, is necessary for or directly related to our business and that such data is adequate but not excessive for such purpose.

### The Notice and Choice Principle

The data that is being processed may include (in the case of individuals), your name, your age, your address, your Identity Card or Passport Number, your occupation, your employer, and (in the case of Companies or Firms or Partnerships) the Company's name, Company Number, the Firm's name (and registration Number if applicable) and address and any other information that you furnish or which we acquire which is deemed necessary for the purposes for which you engage or communicate with us.

You have the right to request access to the said data and to request correction of the said data. The contact details of the Officer responsible for entertaining any requests for access or correction is furnished below.

The personal data may, for the purposes of your engagement with us, be disclosed to relevant parties such as our Solicitors, Bankers, Auditors or relevant Government Departments as permissible in law. We will not disclose your personal data to any other party save for the purposes of your engagement with us unless you specifically consent to such disclosure.

You may limit the contents of the data which you furnish to us by notifying the relevant Officer in writing specifying the limits that you intend to impose and we declare that the furnishing of

such information is voluntary. However, certain information is essential if you intend to engage with us, such as information regarding your personal details, name, NRIC or Passport Number, Company or Firm's registration Number, address and contact details as such information is required for the processing of any contract, proposal, quotation or proposed dealings with us with the contemplation of entering into any contract, relationship, Joint-Venture, business dealings or any form of dealings or engagement with us whether current, proposed or contemplated.

In the event you choose to limit such data and/or information, the consequences are that we may not be able to adequately process any contemplated contract and/or proposed engagement and/or dealings with yourself.

#### The Disclosure Principle

We are committed to ensure that no personal data shall, without your consent, be disclosed for any purpose other than for the purposes stated above.

#### The Security Principle

We value the need to ensure the integrity of the personal data processed by us and have in place security measures to ensure that access to personal data is limited to certain designated Officers only, that the data is Password protected and that there are suitable anti-virus software to prevent theft of data or unauthorized access to data.

#### The Retention Principle

The personal data that will be processed and/or stored by us shall not be kept longer than is necessary to fulfill the purpose for which it is disclosed by you or acquired by us except where required by law. We shall take all reasonable measures to ensure that all personal data is destroyed or permanently deleted if it is no longer required for the purpose for which it was to be processed.

#### The Data Integrity Principle

We shall take all steps to ensure that your personal data is accurate, complete, not misleading and kept up to date by having regard to the purpose (including any directly related purpose) for which the personal data was collected and further processed. You agree to notify us of any changes to your personal data so that we can fulfill our commitment to keep your personal data up to date.

#### The Access Principle

Subject to the limitations imposed under the Data Protection Act, 2010, you have every right to have access to the personal data of yourself and to correct the data if it is inaccurate, incomplete, misleading or not up-to-date. Request for access or correction should be in writing and addressed to the designated Officer.

The designated Officer for requests for access or correction of personal data is as follows:

Designation of Officer : Assistant Manager - Legal  
Address : Ho Hup Construction Company Berhad,  
No.18, Jalan 17/155C, Bandar Bukit Jalil,  
57000 Kuala Lumpur.  
Tel No. : 03 – 89939168  
Fax No. : 03 – 89939268  
Email : norfaisfa@hohupgroup.com.my  
Website : www.hohupgroup.com.my

#### How do we use your personal data

Your personal data is collected and processed by us for our business activities including for the following purposes:

- (a) to verify your identity;
- (b) to forward to our Solicitors for the purposes of the preparation of any proposed Contract, Deed or other business arrangements;
- (c) to forward to our Bankers and/or Solicitors and/or Accountants and/or Professional advisors for the purposes of any one or more of the following, namely, risk assessment, valuation, verification, financial assessment of proposed contract and/or due diligence;
- (d) to communicate with you including responding to your enquiries;
- (e) for all purposes related to our business but solely with reference to your engagement and/or communication with us;
- (f) to comply with any legal and or regulatory requirements or court orders;
- (g) to send materials or publications or advertisements, brochures, promotions, invitations or materials that may be of interest to yourself. [Materials will only be sent out to you if you opt to receive it and you may decline to receive materials by opting out]
- (h) for security and internal audit purposes;
- (i) for such other purposes as may be directed or consented by you; and
- (j) for all other purposes in relation to or incidental to the above.

#### Express consent

Where the provisions of the PDPA require your express consent to the processing of your personal data, we shall only process your personal data upon obtaining your formal consent to the same.

#### Saving provisions

HO HUP reserves the right to amend this PDPA Notice and Policy as and when we deem fit or when obliged to do so under any law or Regulation in which event a publication of the said amended Notice and Policy in any form will be deemed effective.

Date of Notice : 15 April 2014

**HO HUP CONSTRUCTION COMPANY BERHAD (Company No: 14034-W)**