

Shiya Group Privacy Statement

PRIVACY POLICY

This Privacy Statement sets out the basis which Shiya Sdn Bhd, Shiya Machinery Sdn Bhd, Shiya Concrete Sdn Bhd, Shiya Development Sdn Bhd, Shiya Construction Sdn Bhd and Cystal Assets Sdn Bhd (collectively known as “**Shiya**”, “**we**”, “**us**”, or “**our**”) may collect, use, disclose or otherwise process personal data of person in accordance with the applicable personal data law and regulations. This Privacy Statement applies to personal data in our possession or under our control, including personal data in the possession of organisations which we have engaged to collect, use, disclose or otherwise process personal data for our purposes.

1. Personal Data

1.1 Personal data means any information in respect of commercial transactions, which is being processed or recorded for the purpose of processing or filing, that relates directly or indirectly to you, and which you are identified or identifiable from that information and/or other information in Shiya's possession. Personal data includes any sensitive Personal Data and expression of opinion.

1.2 Depending on the nature of your interaction with us, Shiya may collect your Personal Data when you submit a form, visit our website or at various other places where you may request for our information or services. These Personal Data may include your:

- ❖ Name
- ❖ Designation
- ❖ Identity Card No. or Passport No.
- ❖ Nationality
- ❖ Gender
- ❖ Age and Date of Birth
- ❖ Postal Address
- ❖ Phone No. and Fax No.
- ❖ Email Address
- ❖ Property Details
- ❖ Loan Details
- ❖ Lifestyle Data

The list above is not exhaustive and may include other Personal Data depending on the nature of your dealings with us.

2. Collection and Sources of Personal Data

- 2.1 Shiya generally collects personal data from our customers, business partner, contractors, vendor, supplier, tenant, service provider, employees and other individuals such as job applicants. We would only collect personal data that has been provided to us voluntarily by you or via a third party who has been duly authorised by you to disclose your personal data to us (your “authorised representative”).
- 2.2 These personal data may be furnished to us in forms filled by you, face to face meetings, emails or telephone conversations. We may also keep a record of any contact you have with us. These data would be collected only for business purpose or for the purpose(s) stated by us when we gather the personal data from you.

3. Purposes of Collection

- 3.1 The personal data collected may be used for any or all of the following purposes:
 - 3.1.1 in connection with any particular service or product offered by us or our business partners;
 - 3.1.2 to administer and carry out our customer and prospective customer relationship management procedures;
 - 3.1.3 maintaining our records of our customers and prospective customers and our internal record keeping;
 - 3.1.4 conducting marketing, client profiling and business development activities as well as market research and statistical analysis and customer surveys regarding our projects, products and/or services;
 - 3.1.5 processing your application under any of our programmes;
 - 3.1.6 for internship / employment application and recruitment
 - 3.1.7 for follow-up action regarding any complaint, feedback, query or request received;

- 3.1.8 complying with any legal or regulatory requirements and to make the necessary disclosures under the requirements of any applicable law, regulation, direction, court order, by-law, guideline, circular and/or code which are applicable to us and for the prevention of crime;
 - 3.1.9 for any other purposes for which you have provided the personal data; and
 - 3.1.10 for any other incidental business purposes
- 3.2 Where you have indicated your consent to receiving marketing or promotional updates from Shiya, you may subsequently opt-out from receiving such marketing or promotional material at any time. You may contact or email Shiya at wisel@shiya.com.my.

4. Disclosure of Personal Data

- 4.1 Generally, we will keep the Personal Data provided to us as confidential. Nevertheless, you consent to the following disclosures of the Personal Data by us to these classes of third parties which may be located within or outside Malaysia:
- 4.1.1 any parties to whom we are under a legal requirement to disclose the Personal Data to by applicable law or in response to an authoritative body, including government agencies, statutory authorities, local councils and/or industry regulators including but not limited to the land office, the land registry, the Ministry of Urban Wellbeing, Housing and Local Government, the Employees Provident Fund Board, the Inland Revenue Board, as well as to any other third party pursuant to any court order;
 - 4.1.2 contractors and service providers, including but not limited to auditors, consultants, accountants, lawyers, financial and professional advisers, lenders, insurance companies and property management companies;
 - 4.1.3 our subsidiaries, associates, affiliates and/or members within the Shiya group of companies; and/or
 - 4.1.4 our joint venture and business partners.
- 4.2 The purposes listed in Section 3 may continue to apply even in situations where your relationship with us (for example, pursuant to a contract) has been terminated or altered in

any way, for a reasonable period thereafter (including, where applicable, a period to enable us to enforce our rights under any contract with you).

5. Consequences of Refusal or Failure to Supply

5.1 The refusal or failure to provide the Personal Data may result in the following:

5.1.1 the inability of parties to formalize and/or carry out the relevant agreement or transaction in relation to the sale of our property, products and/or services;

5.1.2 the inability by us to provide you with the information, products and/or services requested; and/or

5.1.3 the inability by us to provide you with information about our products and/or services and obtain your feedback on our products and/or services.

6. Withdrawal of Consent

6.1 The consent that you provide for the collection, use and disclosure of your personal data will remain valid until such time it is withdrawn by you in writing. You may withdraw your consent and request us to stop further collecting, using and/or disclosing your personal data for any or all of the purposes listed above by submitting your request to our Data Protection Officer.

6.2 Depending on the complexity of the request and its impact to our relationship with you, Shiya will cease (and instruct any of our data intermediaries and agents to cease) collecting, using or disclosing the personal data within a reasonable timeframe of receiving your request in writing, unless required or authorised under applicable laws.

6.3 Please note that you withdrawing consent does not affect our right to continue to collect, use and disclose personal data where such collection, use and disclose consent is permitted or required under applicable laws.

7. Access to and Correction of Personal Data

7.1 You are entitled to have access to information on your personal data that is being processed by or on behalf of Shiya. This can be done by you making a written application to our Data Protection Officer requesting for such information. Upon request and within a reasonable timeframe of receiving your request in writing, Shiya will provide you with the requested

information. Shiya reserves the right to charge a fee (representing our costs in administering your request) for supplying such information.

- 7.2 Shiya will also, where you have requested that we correct an error or omission in the personal data about you that is under our possession or control, correct such data as soon as practicable and send the correct personal data to every organisation to which the personal data was sent within a year before your request was made.

8. Cross-border Transfers of Personal Data

- 8.1 If we are required to transfer your personal data outside of Malaysia for the performance of a contract between you and Shiya or in your interests, we will obtain your consent for the transfer to be made and we will take steps to ensure that your personal data continues to receive a standard of protection that is at least comparable to that provided under the applicable personal data protection laws and regulations.

9. Accuracy and Protection of Personal Data

- 9.1 We generally rely on your personal data provided by you (or your authorised representative). In order to ensure that your personal data is current, complete and accurate, please update us if there is any changes to your personal data by informing our Data Protection Officer in writing or via email at wisel@shiya.com.my.
- 9.2 The Company is committed to taking steps to protect the Personal Data you provide to us, including administrative, technical, and physical measures to safeguard your Personal Data against loss, theft, and misuse, as well as against unauthorized access, disclosure, usage, alteration, and destruction.
- 9.3 Your Personal Data is accessed only by authorized staffs who are instructed to handle your information with confidentiality. It is protected by firewalls and standard industry security measures.
- 9.4 You should be aware, however, that no method of transmission over the internet or method of electronic storage is completely secure. While security cannot be guaranteed, we strive to protect the security of your personal data and are constantly reviewing and enhancing our information security measures.

10. Retention of Your Personal Data

- 10.1 Shiya will not keep personal data for longer than is necessary to fulfil the purpose(s) for which it was collected, or as required or permitted by the law. Thereafter, we will destroy or permanently de-identify the personal data.

11. Use of Cookies

- 11.1 The Company use cookies in our website to store information for your convenience so you do not have to re-enter your data upon each visit. Cookies and other technology are also used to monitor usage of the various features and services of our website, which over time give us information to improve our website, and to advertise and market our products more effectively. When you visit our website, as with most all websites, we automatically log the domain name of where you came from, the Internet Protocol (IP) address your computer is currently using, the type of web browsers that you use, Internet service provider (ISP), referring and exit pages, operating system, date/time stamp and click-stream data.
- 11.2 This information allows us to operate the website by serving the pages you visit, and we may use the information for statistical purposes and to track usage patterns. In addition, we use the data we collect to make various determinations in our systems. We may also use this information to personally identify you, the user and/or the user's organization, for reporting purposes and/or to serve relevant information to you during future browsing sessions.
- 11.3 We treat information collected by cookies and other technologies as Non-Personal Data. However, to the extent that IP addresses or similar identifiers are considered Personal Data by local law, we also treat these identifiers as Personal Data. Similarly, to the extent that Non-Personal Data is combined with Personal Data, we treat the combined information as Personal Data for the purposes of this Privacy Statement.

12. Links to Other Sites

- 12.1 Links to other sites is provided for your convenience and information. These sites may have their own privacy statement in place., which we recommend you review if you visit any linked websites. We are not responsible for the content on the linked sites or any use of the site. Shiya's Privacy Policy applies solely to the information collected by us.

13. Contacting Our Data Protection Officer

13.1 You may contact us regarding any personal data related requests or complaints at the following details:

Contact : Data Protection Officer
Telephone No. : 07-3359877
Fax No. : 07-3309396
Email : wisel@shiya.com.my

14. Third Party Consent

14.1 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 have sufficiently obtained the prior consent of such third parties to allow us to collect, use and/or disclose their personal data.

15. Conflict

15.1 In the event of any conflict between the English language Privacy Statement and its corresponding Bahasa Malaysia Privacy Statement, the terms in this English language Privacy Statement shall prevail.

16. Changes in this Policy

16.1 This notice applies in conjunction with any other notices, contractual clauses and consent clauses that apply in relation to the collection, use or disclosure of your personal data by us.

16.2 From time to time we may elect to modify or update our privacy policy without any prior notice. You may determine if any such revision has taken place by reflecting to the date on which this Notice was last updated. Your continued use of our services constitutes your acknowledgement and acceptance of such changes.