

PERSONAL DATA PROTECTION POLICY FOR CUSTOMERS / PROSPECTIVE CUSTOMERS

We, THRIVEN GLOBAL BERHAD [Registration No. 198901005042 (182350-H)] and its subsidiaries, associates, affiliates and/or members within the Thriven Global Berhad group of companies (collectively, referred to as “us“, “our” or “we” in this Personal Data Protection Policy) value the personal data of our customers and prospective customers. This Personal Data Protection Policy is issued to all our customers and prospective customers, pursuant to the Personal Data Protection Act 2010 (“PDPA“).

1. Source of Personal Data

You will be required to provide your personal data (“Personal Data“), to enable us to enter into transactions with you or to communicate with you on our products and/or services. These may be done through various means, including but not limited to:

1. any agreements or other documents signed or executed between you and us or in relation to our products and/or services;
2. any forms whether in electronic or printed format;
3. any correspondence (including emails) that we have received from you requesting for information or making any inquiries;
4. third parties including your legal representatives, agents, event companies or your past employers; and/or
5. business cards or other information provided to us or that were given to us, our employees or sales and marketing or other agents.

2. Type of Personal Data

Personal Data may include, but is not limited to information concerning your name, age, national registration identity card number, passport number, address, email address, sex/gender, date of birth, marital status, occupation, employment history, education background, income, EPF number, SOCSO number, income tax file reference number, contact information such as telephone, mobile and facsimile number, race, nationality, salutations, credit card details, bank account number, type of loans applied for in relation to the purchase of property, information of third parties such as your emergency contact person, tenant, authorised representatives, contractors, lawyers, and financiers, which may be subject to applicable data protection and other similar laws and any other personal data or information given by you and/or collected by us.

3. Purpose of Collecting and Processing Personal Data

We will process the Personal Data for, inter alia, the following purposes (collectively, “Purpose“):

1. delivery to you of notices, information in connection with our current and future services or products and the marketing of such services or products as well as new product launches, events, promotional events and contests;
2. preparing and executing all necessary documents and agreements with you such as in relation to the sale and purchase transactions, and to carry out the obligations under the agreement, for our products, services, and/or properties necessary for purposes of conducting and administering our business including but not limited to sales administration and property management purposes as well as sub-sale transactions, refinancing and sales by auction;
3. billing and financial purposes, accounting and tax;
4. meet legal and statutory requirements and to make disclosure under any applicable law, regulation, direction, court order, by-law, guideline and/or circular;
5. collection of outstanding payments;

6. those purposes provided for in any particular service or product offered by us or our business partners;
7. to administer and carry out our customer and prospective customer relationship management procedures;
8. maintaining our records of our customers and prospective customers and our internal record keeping;
9. 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;
10. 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;
11. vacant possession, keys handover, property/estate management, customer care and/or defect rectification works; and/or
12. post vacant possession services, such as club house services and security services.

For the list of Thriven Global Berhad's subsidiaries, associates, affiliates and/or members within the Thriven Global Berhad group of companies which are processing your Personal Data for the Purpose, please visit our website at www.thriven.com.my.

4. Disclosure

You consented to the following disclosures of the Personal Data by us to these third parties which may be located within or outside Malaysia for reasons relating to the Purpose:

1. any parties to whom we are under a legal requirement to disclose the Personal Data to by applicable law or 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 or legal process;
2. public amenities and utilities providers, including but not limited to Indah Water Konsortium, Syarikat Bekalan Air Selangor Sdn Bhd and Tenaga Nasional Berhad;
3. 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. our subsidiaries, associates, affiliates and/or members within the Thriven Global Berhad group of companies;
5. our joint venture and business partners; and/or
6. the relevant landowner, Joint Management Body and/or management corporation.

5. Protection of Personal Data

As your Personal Data is important to us, we are committed to keeping and processing the Personal Data in a secure matter. We will implement appropriate steps or procedures in accordance with the laws, rules and regulations to secure and protect your personal data and prevent unauthorized and unlawful use, loss or accidental disclosure.

6. Consequences of Refusal or Failure to Supply Personal Data

In the event that you fail to supply the Personal Data to us, or insufficient Personal Data is supplied to us or is not to our satisfactory, your application or request for any purpose stated in Part 3 above may not be accepted or acted by us upon your request or your request to browse some information on Thriven Global Berhad's website may be denied or we will not be able to provide full range of benefit of our services and/or products to you and/or perform our obligations under the existing or potential contracts and/or agreements with you.

7. Access to and Correction of Personal Data

Under the PDPA, you have the right of access to your Personal Data held by us and you may request for correction of the Personal Data that is inaccurate, incomplete, misleading or not up to date. If you have any questions regarding Personal Data Protection Policy or if you wish to request access to your Personal Data or if you wish to correct your personal data or if you wish to request that your personal data is retained by us only as long as necessary for the fulfillment of the Purpose for which it was collected or if you wish to 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 or if you wish to withdraw, in full or in part, your consent to us for processing of your Personal Data for the purpose stated in Part 3 above or for the transfer of your Personal Data to parties stated in Part 4 above, you may send your request in writing to our Personal Data Protection Officers as follows:

Thriven Global Berhad

[Registration No. 198901005042 (182350-H)]

PS1-08, Lumi Tropicana

No.2, Persiaran Tropicana

PJU 3, 47410 Petaling Jaya

Selangor Darul Ehsan

Tel No. +603 7688 1266

Fax No. +603 7688 1277

Email: pdpa@thriven.com.my

Any inquiries or complaints with respect to your Personal Data should also be channeled to us in this manner.

Notwithstanding your withdrawal of your consent, we may keep your Personal Data and process your Personal Data in circumstances which are recognized and permitted by law and/or as required under the contractual conditions.

8. Third party consent

In the event you have provided personal data of third parties (e.g. your emergency contact person, tenant, authorised representatives, agents, contractors, lawyers, financiers) to us, we trust that you have obtained the prior consent of such third parties to allow us to process their personal data in relation to the Purpose.

9. Changes to our Personal Data Protection Policy

We may, from time to time and at any time, change or be required to change our Personal Data Protection Policy to comply with or be consistent with changes in applicable law and regulations as well as our business operations or policies. As such, you may wish to review any changes to our Personal Data Protection Policy at our website from time to time.