

PERSONAL DATA PROTECTION NOTICE

Your personal data ("Personal Data"), collected through various forms but not limited to, online registrations, surveys, sales forms, advertisements, sales and marketing agents and/or any other form of information collection method, which we Aspen Group and our subsidiaries, affiliates, associates, and/or other members within the Aspen Group of companies (collectively referred to as "us", "our" or "we" in the Privacy Policy), will be processed for the purpose of providing you with information(s) on our products and/or services but not limited to others matters for the purpose of providing you with competent and/or complete information(s) that may be of interest to you and/or other purposes stated in our Personal Data Protection Policy ("Purpose").

Personal Data may be disclosed to third parties such as to subsidiaries, holding company, associates, affiliates, related company and/or members within Aspen Group of companies, Joint Venture Partners, proprietors, the Management Corporation, Project Manager, authorities, local council, banks, Building Corporative/Society, Government bodies, Tax Agent, public amenities and utilities providers, sale and/or sub-sale and/or refinancing solicitors, our contractors and consultants, and/or service providers and such other classes of third parties referred to in our Personal Data Protection Policy, which may be located within or outside of Malaysia.

Should you intend to withdraw your consent or revise your Personal Data or limit the processing thereof at any time, you are hereby requested to submit a written request to us via:-

Person-in-Charge : Personal Data Protection Officer
Tel No. : +(604)227 5000
Fax No. : +(604)227 5005
Email : pdpa@aspen.com.my

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

Please be advised that your withdrawal of consent to process your Personal Data will be effective only after you have communicated such withdrawal to us effectively and we shall have reasonable period of time to act upon your withdrawal. Your consent shall remain in full force until withdrawn in the manner prescribed herein. Upon withdrawal, your personal data will be automatically removed from our databases and will be destroyed in due course.

You represent and warrant that the consent of third parties (e.g. your emergency contact person, tenant, authorised representatives, contractors, lawyers, financiers) whose personal data you have provided and disclosed to us have been sufficiently obtained to allow us for processing.

Please note that it will be necessary for us to process your Personal Data for the Purpose, without which we will not be able to carry out the Purpose.

OUR PURPOSE(S) FOR THE COLLECTION OF PERSONAL DATA

Where applicable, the Personal Data we have collected will be used for, but not limited to, the Purpose(s) as below:-

- To inform existing customers/potential customers/individuals that have registered their interest(s) of our current and future services or products as well as the introduction of new launch products, activities, and promotions;
- To prepare and implement all the necessary documents and agreements such as sale & purchase transaction and obligations under the Agreement, if necessary, the use and management of our business nature including, but not limited to sales management and property management, as well as the resale of the transaction, the auction to finance and sales;

- To inform and collect outstanding payments from purchasers upon claims of progress billing as stipulated in the agreements;
- To inform purchasers during vacant possession, keys handover, property management, customer care and/or defect rectification works;
- For property management services, such as club house services, security services and others;
- For our internal record keeping, to maintain and update our customers and potential customers' details;
- For the purpose of surveys, the products and/or services of market research, statistical analysis and as well as conducting marketing, client profiling and business development activities;
- To inform customers of any particular service(s) or product(s) offered by our business partner(s);
- To administer and carry out our customer and prospective customer relationship management procedures;
- For any legal or regulatory requirements, and shall be in accordance with any applicable legal requirements such as the law, by-law-regulation(s), court order, direction, guideline, circular and/or code for the purpose of crime preventions;
- In respect of any Personal Data collected in connection with any contests, competitions and/or promotional activities, to enable us, our affiliates and authorized agents (including media and advertising agencies, social media websites and third party IT service providers contracted by us) to make or carry out any announcement, publication, advertisement, promotion or marketing internally or externally including but not limited to the internet social media about our contests, competitions, promotions, products and/or services generally; and
- In respect of any Personal Data collected in connection with any application and software, to enable us and our third party service providers contracted by us to provide, maintain, protect and improve our services and to enhance user's experience.

INFORMATION/DATA COLLECTED

To process your information/data as best as we can, the following information/data are collected:-

- Name;
- Age;
- NRIC number;
- Passport number (if applicable);
- Address;
- Email address;
- Gender;
- Date of birth;
- Marital status;
- Occupation;
- Income range;
- Telephone number;
- Mobile/ hand phone number;
- Race;
- Nationality;
- Recorded image/footage;
- Loans/financing taken in relation to purchase of property;
- Social networking address;
- Device-specific information;
- Cookies and similar technologies;
- Internet protocol address; and
- Location.

* NOTE:- The above information/data are not exhaustive and we may be required to collect additional information/data for better processing

OUR DISCLOSURE POLICY

Your Personal Data are kept confidential. However, by acknowledging, you consent to the disclosure of Personal Data to the following third party within or outside of Malaysia for such for or relating to the following purpose(s):-

Our subsidiaries, associates, affiliates and/or members within the Aspen Group of companies, our joint venture and/or business partners, the relevant landowner, management corporation, contractors and service providers, including but not limited to auditors, consultants, accountants, lawyers, financial and professional advisers, lenders, insurance companies and property management companies, public amenities and utilities providers, including but not limited to Indah Water Konsortium, Perbadanan Bekalan Air Pulau Pinang Sdn Bhd and Tenaga Nasional Berhad; and/or any party(ies) 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.

GENERAL POLICY

This Personal Data Protection Notice is in compliance with Personal Data Protection Act 2010 of Malaysia or any modification or statutory re-enactment thereof ("PDPA 2010"). For more information of PDPA 2010 or to contact the Personal Data Protection Commissioner, you may visit to www.pdp.gov.my.