

Privacy Notice

Lim Seong Hai Capital Berhad (**LSH Capital**) together with its subsidiaries and associated companies (collectively, **LSH Capital Group**) are committed to the protection of your personal information that we collect from you in our dealings with you. In this personal data protection notice, “we”, “us” and “our” refer to LSH Capital Group, and “you” and “your” include third parties whose personal information you have provided to LSH Capital Group.

This privacy notice explains how we collect and handle your personal data, including your sensitive personal information in accordance with the Personal Data Protection Act 2010 of Malaysia (**Privacy Notice**). Please note that LSH Capital may amend this Privacy Notice at any time without prior notice and will publish the amended or revised Privacy Notice on our website and by such other means of communication as deemed suitable by LSH Capital.

1. Personal Information

1.1. Type of personal data collected

Personal information means any information which relates to you or any other third party related to you which was collected or provided to LSH Capital Group for the purposes stated in Section 2 below. Such personally identifiable information may be collected and processed by us, which may variously include but is not limited to the following:

- (a) Contact information (i.e. name, address, email address, phone number)
- (b) Demographic information (i.e. gender, age, nationality, date of birth, profession, race)
- (c) National identifiers (i.e. identity card number/ passport number, tax number)
- (d) Commercial information (i.e. information in connection with products and services which you may have purchased from us or registered your interest with us for purchase, enquiry, updates, information)
- (e) Payment information (i.e. bank account, debit or credit card numbers, payment service providers, payment service history)
- (f) Financial information such as your income range and risk profile
- (g) Images and biometric information
- (h) Sensory information (i.e. audio, visual information and other sensory information (photographs, audio, video and/or CCTV recordings))
- (i) Network usage data and other information gathered automatically by our computer systems (i.e. your computer IP address, links visited and other activities conducted online or using our computer systems)

The list of personal information above is not exhaustive and may include other personal information depending on the nature of dealings or transactions.

1.2. Sensitive personal information

Sensitive personal information means any information which relates to your physical or mental health condition and your religious belief. In the event that it becomes necessary to process your sensitive information for any reason, we will rely on your prior explicit consent on personal data processing which is voluntary.

1.3. Source of personal information

- (a) Customer or potential customer:

LSH Capital Group collects your personal information directly from you or indirectly from your legal representatives, agents and/or employer when you, your legal representatives, agents and/or employers send us completed enquiry, application and/or registration forms via various means, including online and physical. Your personal information may also be collected from cookies through the use of our website.

(b) Vendor, supplier, sub-contractor or service provider:

LSH Capital Group collects your personal information directly from you or indirectly from your legal representatives, agents and/or employer or credit reference agencies when tendering for projects, when you send us completed enquiry, quotations and/or credit application forms via various means, including online and physical hardcopies. Your personal information may also be collected from cookies through the use of our website.

(c) Job applicant:

LSH Capital Group collects your personal information directly from you or indirectly from your referees, recruiters and/or service provider engaged by us when submitting an application for employment, when you send us completed enquiry and/or application forms via various means, including online and physical hardcopies. Your personal information may also be collected from cookies through the use of our website and/or other hiring platforms.

1.4. Consent

By submitting your personal data in the various forms provided by LSH Capital Group you hereby authorise and consent to us processing and disclosing your personal data for the purposes as set out in Section 2 below.

All information requested for in the relevant forms is obligatory to be provided by you unless stated otherwise.

Should you fail to consent to or provide the obligatory information or subsequently withdraw your consent to the processing and disclosure of your personal data, we will not be able to fulfil our obligations to you in respect of the purposes as set out in Section 2 below.

2. **Purposes of collecting and processing your personal information**

2.1. Customer or potential customer

Your personal information is collected and further processed by LSH Capital Group as required or permitted by law and to give effect to your requested commercial transaction, including the following:

- (a) To process your requested products or services.
- (b) To communicate with you in relation to our services and/or events.
- (c) To process any payments related to your requested service.
- (d) For insurance purposes.
- (e) To operate our premises in a manner which is physically safe, secure and befitting of health and safety requirements.
- (f) For internal investigations, audit or security purposes.
- (g) To conduct and support internal marketing analysis of customer patterns, choices and engagement with LSH Capital Group.

- (h) To be collected and stored into a central repository that is accessible by LSH Capital Group.
- (i) To create and deliver personalised products and services that are unique to you to enhance your customer experience.
- (j) To provide you a more seamless customer experience.
- (k) To support research and innovation of our products and services.
- (l) To improve our products and services.
- (m) For collaboration with a business partner to advertise products and services.
- (n) To include in media engagements, whether circulated in printed form or online.
- (o) To comply with LSH Capital Group's legal and regulatory obligations in the conduct of its business.
- (p) To contact you regarding products, services, upcoming events, promotions, advertising, marketing and commercial materials which we may feel interest you.
- (q) To send you season greetings, special occasion messages or other similar communications.
- (r) To allow third parties to contact you for advertising, promotional or marketing campaigns conducted by any third-party entities.
- (s) To ensure that the content from our website is presented in the most effective manner for you and for your computer and/or device.
- (t) For LSH Capital Group's internal records management, customer relations events and activities.

2.2. Vendor, supplier, subcontractor or service provider

Your personal information is collected and further processed by LSH Capital Group as required or permitted by law and to give effect to your requested commercial transaction, including the following:

- (a) To process your requested services.
- (b) To process your credit account application.
- (c) To assess your credit worthiness.
- (d) To administer and give effect to your commercial transaction (tender award, contract for service).
- (e) To process any payments related to your commercial transaction.
- (f) For insurance purposes.
- (g) To operate our premises in a manner which is physically safe, secure and befitting of health and safety requirements.
- (h) For internal investigations, audit or security purposes.
- (i) To be collected and stored into a central repository that is accessible by LSH Capital Group.
- (j) To comply with LSH Capital Group's legal and regulatory obligations in the conduct of its business.
- (k) To contact you regarding products, services, upcoming events, promotions, advertising, marketing and commercial materials which we may feel interest you.
- (l) To send you season greetings, special occasion messages or other similar communications.
- (m) To ensure that the content from our website is presented in the most effective manner for you and for your computer and/or device.
- (n) For LSH Capital Group's internal records management, customer relations events and activities.

2.3. Job applicant

Your personal information is collected and further processed by LSH Capital Group as required or permitted by law and to give effect to your application of employment, including the following:

- (a) To process your application.
- (b) To consider, evaluate and select for a position within LSH Capital Group.
- (c) To administer and communicate with you in relation to your application of employment.
- (d) For internal investigations, audit or security purposes.
- (e) To operate our premises in a manner which is physically safe, secure and befitting of health and safety requirements.
- (f) To be collected and stored into a central repository that is accessible by LSH Capital Group.
- (g) To contact you regarding your application of employment.
- (h) To comply with LSH Capital Group's legal and regulatory obligations in the conduct of its business.
- (i) To ensure that the content from our website is presented in the most effective manner for your and for your computer and/or device.
- (j) For LSH Capital Group's internal records management.

3. Disclosure of personal information

3.1. Entities within LSH Capital

Your personal information provided to us is processed by and disclosed to entities within LSH Capital Group for the purposes in Section 2. LSH Capital will ensure that access to your personal information is restricted to staff who are contractually bound to protect your personal information and that they can only process your personal information under our instructions.

3.2. Classes of third parties

Your personal information may be disclosed to relevant third parties (in or outside of Malaysia) as required under law, pursuant to relevant contractual or business relationships, or for the purposes stated in Section 2. The aforesaid relevant third parties may include the following:

- (a) Professional advisors and corporate service providers, including auditors, lawyers, company secretary and consultants.
- (b) Advertising and marketing partners.
- (c) Payment processors.
- (d) Cloud and hosting services.
- (e) Customer support and communication.
- (f) Market research and survey.
- (g) Logistics and shipping partners.
- (h) Social media platforms.
- (i) Business partners and affiliate networks.
- (j) Other service providers and entities, including printing companies, conference/training/event organisers, travel agencies, insurance companies, insurers, utility companies, contractors, property management companies or credit agencies (debt recoveries).
- (k) Law enforcement agencies including the local police.
Relevant governmental authorities, statutory authorities, local council and industry regulators

3.3. Transfer of your personal data outside Malaysia

It may be necessary for us to transfer your personal information outside of Malaysia if any of the third parties mentioned in Section 3 including our service providers or business partners who are involved in providing any services to us are located or have processing facilities in countries outside of Malaysia.

You consent to us transferring your personal information outside Malaysia to such third parties and for the purposes set out in Section 2.

We shall take necessary steps to ensure that any such third parties are contractually bound to protect your personal information and that they can only process your personal information under our instructions.

4. Websites

4.1. Links to other sites

Links to other sites are 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.

4.2. Cookies

A cookie may be used in the processing of your information. A cookie is a text file placed into the memory of your computer and/or device by our computers. A copy of this text file is sent by your computer and/or device whenever it communicates with our server. We use cookies to identify you. We may also collect the following information during your visit to our website and/or the fully qualified domain name from which you accessed our site, or alternatively, your IP address:

- (a) Date and time you accessed each page on our web site.
- (b) URL of any webpage from which you accessed our site (i.e. the referrer).
- (c) Web browser that you are using and the pages you accessed.

Some web pages may require you to provide a limited amount of personal information in order to enjoy certain services on our websites (i.e. system login credentials, email address and contact, etc). This personal information will only be used for its intended purposes only (i.e. to respond to your message or deliver the requested services).

5. Right to access and correct personal information

You have the right to access and correct your personal information held by us (subject always to certain exemptions). We will make every endeavour to ensure your personal information is accurate and up to date therefore we ask that if there are changes to your information you should notify us directly. If you would like to access or correct your personal information, please submit your written request to the contact details in Section 6 below.

6. Limiting the processing of personal information, withdrawing consent, further enquiries and complaints

If:

- (a) you would like to obtain further information on how to limit the processing of your personal information or withdraw your consent on personal data processing;
- (b) you would like to request to limit your personal information or withdraw your consent on personal data processing (note that we may retain your data where there is a legal basis to do so);
- (c) you have any further query; or
- (d) you would like to make a complaint in respect of your personal information, you may contact –

Designation : Legal Department
Address : Wisma Lim Seong Hai,
33 Jalan Gombak,
53000 Kuala Lumpur.
Email : legal@limseonghai.com

7. Data Security

We have implemented reasonable physical, technical and procedural measures to secure your personal information from accidental loss and from unauthorised or accidental access, use, alteration, and disclosure. All personal information you provide to us is stored on our secure servers.

8. Retention of personal information

We will retain your personal information for such period or duration as required to fulfil the purposes stated in Section 2, for such other period as may be necessary to protect the interests of LSH Capital Group, or where otherwise required by the law (**Retention Period**).

Upon the expiry of the Retention Period, we will ensure that your personal information is permanently deleted or remove the means by which the data can be associated with you.

9. Conflict

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