

PRIVACY POLICY AND PERSONAL DATA NOTICE

We at Enolil Loo (“Enolil Loo”) recognise the importance of protecting your personal information and we are committed to the compliance of the Malaysian Personal Data Protection Act 2010 (“Act”). This Privacy Policy and Personal Data Notice explains how we collect and handle your personal information in accordance with the Act.

(1) Personal information

1.1 Type of personal information

Personal information means any information which relates to you and which was collected or provided to Enolil Loo for the purposes stated in Section 2 below.

The personal data includes but is not limited to the following information:

- a. name, job title and company name;
- b. age, gender, date of birth, national registration identity card number, passport number;
- c. race, ethnic origin, nationality;
- d. contact information including address, email address, social media address and phone number;
- e. marital status, details of spouse or children or immediate family, education, occupation, income range, employer name and contact details;
- f. income range and financial and banking account details;
- g. photographs; and
- g. directorships and shareholdings in companies and interests in businesses and other investments; and
- h. such other relevant information from time to time requested by Enolil Loo to enable us to provide you with our services, or to enter into business/contractual transactions (including employment, where relevant) with you.

1.2 Source of personal information

(i) Clients or potential clients: Enolil Loo collects your personal information directly from you or indirectly via completed enquiry, application, registration and/or other forms, or by way of declarations, emails or facsimile transmissions, via various means, including online and physical hardcopies at public venues or in any of our premises. Your personal information may also be collected from cookies through the use of our website or at any of our marketing events.

(ii) Vendor, supplier, tenant or service provider: Enolil Loo collects your personal information directly from you or indirectly when you send us completed enquiry 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 or at any of our events.

(iii) Employee: Enolil Loo collects your personal information directly from you or indirectly via completed enquiry and/or job application forms via various means, including online and physical hardcopies. Your personal information may also be collected via background checks customarily conducted in respect of employees.

We may also verify or source personal information about you from third party sources (both public and private) including but not limited to credit reporting agencies, Companies Commission Malaysia and the Insolvency Department of Malaysia.

1.3 *Obligatory personal information*

Certain information requested for, for example for purposes of incorporation into legal documentation, etc., may be obligatory to be provided by you.

Should you fail to provide the obligatory information, we may be unable to provide you with the relevant services or enter into business/contractual transactions (including employment) with you, as the case may be.

(2) Purpose of collection of Personal Data

The purposes for which we collect your personal data include the following:

- To give effect to your requested provision of services or enter into business/contractual transactions (including employment) with you;
- To process any payments related to your requested services/transactions;
- For internal investigations, external credit checks, audit or security purposes;
- To comply with Enolil Loo's legal and regulatory obligations in the conduct of its business;
- To contact you regarding our services, upcoming events, or matters which we may feel to be of interest to you;
- To ensure that the content from our website is presented in the most effective manner for you and your computer and/or device;
- For Enolil Loo's internal records management, client relations events and activities;
- To enforce our legal rights and/or obtaining legal advice wherever necessary;
- To adhere to our human resource policies in respect of employees of Enolil Loo;
- For any ancillary purposes directly related to the above,

(collectively "the Purposes").

The personal data collected will be retained by us for the duration required / permitted under Malaysian law, which may extend to periods after termination of your contractual relationship with us. In accordance with the Act, it shall be the duty of Enolil Loo to take all reasonable steps to ensure that all personal data is destroyed or permanently deleted if it is no longer required for the Purposes stated herein.

(3) Disclosure of personal information

Enlil Loowill maintain the security of your personal data as follows:

- (i) access to your personal information is restricted to relevant staff on a need-to-know basis;
- (ii) maintain adequate security control systems to safeguard the confidentiality and security of your personal data;
- (iii) take reasonable steps to ensure that the personal data is accurate, complete, not misleading and kept up-to-date by having regard to the Purposes herein, including any directly related purposes, for which the personal data is collected and processed;
- (iv) Where we appoint third party service providers, agents or contractors to provide services to us, we ensure that these third parties observe similar security measures as adopted by us.

Enlil Loo may disclose your personal data to:

- Our partners, lawyers and staff for purposes relating to your use of our services or pertaining to our business/contractual relationship;
- Regulatory bodies such as the Malaysian Bar Council, Kuala Lumpur Bar Committee and other relevant authorities which have oversight over our activities;
- Our auditors, consultants and other advisors;
- Any party to whom Enlil Loo's rights are legally assigned/novated and/or transferred;
- Third party service providers, agents or contractors that the Enlil Loo engages for the Purposes set out in Section 2;
- Any other party to whom such disclosure is required by law or regulatory requirement; and
- Any other persons under a duty of confidentiality to Enlil Loo,

notwithstanding that any such persons may be outside Malaysia, for any of the above Purposes or any other purpose for which your personal data was to be disclosed at the time of its collection or any other purpose directly related to any of the above Purposes.

(4) Websites

4.1 Links to other sites

We are not responsible for the content on the linked sites or any use of the site that was provided for your convenience and information. However, these sites may have their own privacy statement in place, which we recommend you to review if you were to visit any such linked websites.

4.2 Location enabled products or applications

Location enabled features are opt-in and you have control over your participation and can turn these services off at any time or uninstall them.

4.3 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:

- (i) the date and time you accessed each page on our web site;
- (ii) the URL of any webpage from which you accessed our site (the referrer); and
- (iii) the 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 (system login credentials, email address and contact, etc). These 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

In accordance with the provisions of the Act, you may:

- (i) check whether Enolil Loo holds data about you and of access to such data;
- (ii) request Enolil Loo to correct any data relating to you which is inaccurate, incomplete, misleading or not updated;
- (iii) request clarification on Enolil Loo's policies and practices in relation to any personal data held by Enolil Loo,

except where compliance with a request to such access or correction is refused under the Act.

In accordance with the Act, Enolil Loo has the right to charge a fee for the processing of any data access request.

You may request for access to or correction of data or for information regarding policies and practices and kinds of data held, by mail to the address stated in Section 6 below.

(6) Amendments and Contact details

Enolil Loo reserves the right to amend this Privacy Policy and Personal Data Notice at any time and will place notice of such amendments on its website at www.enolil-loo.com or notify you via email or any other suitable mode of communication.

Complaints or enquiries relating to any matter concerning your personal data can be made to:

Enolil Loo
M-2-9 Plaza Damas
60 Jalan Sri Hartamas 1
Sri Hartamas
50480 Kuala Lumpur

email: excel@enolil-loo.com

fax: +6203 2359

(7) **Miscellaneous**

- (i) Where you are a partnership or other unincorporated body of persons, the giving of this Privacy Policy and Personal Data Notice addressed to the partnership or other unincorporated body of persons shall be deemed as a notice given to all your partners or office-bearers (as the case may be) whose data are collected and/or process by Enolil Loo for the Purposes stated herein. In this regard, you warrant that you have obtained the consent of all such individuals to the provision of their data to Enolil Loo for the foregoing Purposes and for disclosure to such parties as stipulated above and you undertake to extend a copy of this Privacy Policy and Personal Data Notice to all such individuals, which expression shall include all your existing and new partners or office-bearers (as the case may be) from time to time.
- (ii) This Privacy Policy and Personal Data Notice shall also apply (as the context shall require) in relation to the usage, processing and disclosure of the data of any other individual who is not a client, potential client, vendor, supplier, tenant or service provider as set out in Section 1.2 but whose data is required to be collected by Enolil Loo by reason of, or incidental to the provision of the services requested to be provided to you. In this regard, you confirm and warrant that you have obtained the consent of such individuals to the provision of such data to Enolil Loo for the foregoing Purposes and for disclosure to such parties as stipulated above.
- (iii) Nothing in this Privacy Policy and Personal Data Notice shall limit your rights under the Act.
- (iv) **Your continued usage of the services and/or facilities of Enolil Loo and/or continuous business/contractual relationship with Enolil Loo shall be deemed consent for Enolil Loo to collect, process and store the data in accordance with the above. Failure to consent to the above may result in Enolil Loo being unable to provide the services and/or facilities to you or to continue with the business/contractual relationship with you.**