

HARPS HOLDINGS SDN BHD

PERSONAL DATA PROTECTION ACT POLICIES (WEBSITE VERSION)



HARPS HOLDINGS SDN BD

ORIGINATION

Internal Review Date	Name	Designation	Signature	Date

REVISION HISTORY

Revision Code	Revision Description	Person in Charge	Effective Date
00	New procedure in-place	Peter Cheong	01 st Jan 2021

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PREAMBLE

Policy Statement

HARPS HOLDINGS SDN BHD (“HARPS”) and its subsidiaries (collectively referred as “HARPS Group” or “the Group”) respects your privacy. This Privacy Policy sets out how HARPS collects, stores and handles personal information (as defined below) of individuals in accordance with the Personal Data Protection Act 2010 ("PDPA") and the laws of Malaysia.

Please read this Privacy Policy to understand how we use the personal information we may collect from you. By providing your personal information to us, you are consenting to this Privacy Policy and the collection, use, access, transfer, storage and processing of your personal information as described in this Privacy Policy. If we change our Privacy Policy, we will publish the amended version on this page. Continued use of the service will signify that you agree to any such changes.

Objectives

We value your trust and are committed to protecting your personal information. To ensure that you can make informed decisions and feel confident about supplying your personal information to us when using HARPS websites, and/or Services, we provide you with this Privacy Policy outlining our practices and the choices you have concerning how your personal information is being collected and used by us.

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1.0 Defining Personal Information

Personal information refers to any information which relates directly or indirectly to you. This includes any information that can be used to distinguish, identify or contact you. For the purposes of this Privacy Policy, personal information encompasses sensitive personal information which relates to information relating to your health, political opinions, religious beliefs, etc. For the avoidance of doubt, please note that this Privacy Policy is applicable only if you are a natural person / an individual.

2.0 Personal Information We Collect

- 2.1. In order for us to provide you with the best possible services and to operate in an efficient and effective manner, we need to collect relevant personal information from you. The personal information collected by us may include (but is not limited to) the following:
 - Sensitive information such as your name, date of birth, identification supporting documents (including NRIC or passport number), gender, nationality and race.
 - Contact information such as current private and/or business address, telephone or mobile phone number, fax number, email address and physical address.
- 2.2. For general web browsing, although no personal data is revealed to us, certain technical and statistical information is available to us via our internet service provider such as cookies, your IP address, the time, date and duration of your visit.
- 2.2.1. COOKIES

We collect information about your use of our websites from cookies. Cookies are electronic packets of information stored on your computer and used by websites to keep track of visitors and registered users, and this is one of the methods of uniquely tracking visitors for different purposes. Cookies in themselves do not identify the individual user, just the computer used to access the website. You are not obliged to accept cookies. If you are concerned, you can change your browser setting either to accept all cookies, to notify you when a cookie is issued, or not to receive cookies at any time. However, rejection of cookies may affect your use of our website and you will not be able to take advantage of all the features presented on our website.

3.0 How We Collect Personal Information

- 3.1. We may collect personal information directly from you, your authorised representatives, or from publicly available sources:
 - When you communicate with us (for example when you submit a contact form on our website, or when you contact us for any enquiries by phone).
 - When you visit any of our offices.
 - When you visit or browse our websites.
 - When you provide feedback to us.

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- When you interact with us via social media or interactive applications including but not limited to Facebook, Twitter, and Instagram.
- Other than personal information obtained from you directly (as detailed above), we may also obtain your personal information from third parties we deal with. We may also collect information from such other sources where you have given your consent for the disclosure of personal data relating to you, and/or where otherwise lawfully permitted.

4.0 Use of Personal Information

- 4.1. Upon reading this Privacy Policy you agree or consent granted that we may use your personal information as permitted by applicable laws. We may collect and use your personal information for one or more of the following purposes:
 - To comply with any legal or regulatory obligations under the applicable laws, regulations, guidelines or industry codes that applies to us.
 - To verify your identity.
 - To detect and prevent fraudulent activity.
 - To establish and better manage any business relationship we may have with you.
 - To consider applications for employment
 - To produce data, reports and statistics which shall be anonymised or aggregated in a manner that does not identify you as an individual.
 - To analyse statistical data from website and advertisement analytics.
 - To conduct marketing activities (for example, market research).
 - To investigate, respond to, or defend claims made against, or involving HARPS.
 - To maintain records required for security, claims or other legal purposes.
 - To any other purposes that is required or permitted by any law, regulations, guidelines and/or relevant regulatory authorities.

5.0 Disclosure of Personal Information

- 5.1. We assure you that HARPS will not provide or sell your personal information to any third party and will keep all information confidential. However, we may be required or need to disclose information about you to the following third parties:
 - HARPS and its subsidiaries, related or affiliated companies
 - HARPS authorised personnel or representatives, auditors, advisers, consultants, professional firms or entities

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- Companies and/or organisations that act as our agents, contractors, service providers and/or professional advisers.
- Law enforcement agencies.
- Government agencies.
- Other parties in respect of whom you have given your express or implied consent.

6.0 Security

- 6.1. We shall keep and process your personal data in a secure manner and in strict confidence. We endeavour, where practicable, to implement the appropriate security measures and procedures in accordance with the Act and relevant regulations.

7.0 Duration

- 7.1. We will retain your personal information in compliance with this Policy for the duration of your relationship with us. We are required to keep this information as it may be necessary to protect the interests of HARPS and/or its customers. Therefore, we reserve the right to keep your personal information when it is required by the law and/or by HARPS's relevant policies.

8.0 Your Obligations

- 8.1. You are responsible for providing accurate and complete information to us about yourself (or any other person whose personal information you provide us).
- 8.2. If you fail to supply to us the personal data as requested by us above, we may not be able to process your personal data to carry out the Purpose(s) set out above.

9.0 Your Rights

- 9.1. We can assist you to access and correct your personal information held by us.
 - If you wish to have access to your personal information in our possession, or if you are of the opinion that such personal information held by us is inaccurate, incomplete, misleading, not relevant or not up-to-date, or revoke any previous consent being given, you may make a request to us by emailing to compliance@harps.com.my. You should quote your name, address and phone/account number and provide brief details of the information you want to correct.
 - We will use reasonable efforts to comply with your request to access or correct your personal information.
- 9.2. Please note that we may have to withhold access to your personal information in certain situations, for example when we are unable to confirm your identity, when information requested for is of a confidential commercial nature or in the event we receive repeated requests for the same information. Nevertheless, we will notify you of the reasons for not being able to accede to your request.

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10.0 Updates to Privacy Policy

- 10.1. We may amend this Privacy Policy from time to time and the updated version shall apply and supersede any and all previous versions, including but not limited to, leaflets or hard copy versions. Please check our website for our most up-to-date practices.

11.0 Our Contact Details

- 11.1. Should you have any queries, concerns or complaints in relation to Privacy Policy section, kindly email us at compliance@harps.com.my

- END OF POLICY -