

PARAGON PREMIUM SDN. BHD.

201601021916 (1192855-H)

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PRIVACY POLICY

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1. THIS POLICY

Paragon Premium Sdn. Bhd. and its subsidiary or related companies as defined in the Companies Act 2016 ("Paragon Premium Sdn. Bhd.", "We", "Us") is committed to protect the privacy and security of the personal data that may be provided by the individuals (include but not limited to vendors, customers, suppliers, contractors, service providers, business partners, agents, tenants, employees and job applicants) that we encounter in the course of carrying out our business. We will process the personal data in accordance with the Personal Data Protection Act 2010 ("Act") and such other applicable regulations, guidelines, code of practice, amendments, re-enactments of the Act from time to time.

This Privacy Policy applies to personal data that we hold about the individuals and sets out the manner in which we collect, use, disclose, store, process and manage the personal data. By visiting our website at www.paragongateway.com.my or entering into any arrangement, agreement and/or contract with us, you are taken to have read and agreed to the collection, use, disclosure, storage, processing and managing your personal data in accordance with the Privacy Policy and we shall not be held liable nor responsible for any personal data that has been revealed and/or abused at large and/or already within the public knowledge and for any risks and/or occurrences by publishing any of the data therein.

2. SOURCE OF PERSONAL INFORMATION

Paragon Premium Sdn. Bhd. collects your personal data in various ways either printed and/or electronic form through digital and/or mobile platforms and such personal data will be process differently based on the type and service requested. The personal data shall subject to the Act, privacy and other similar laws and may include but not limited to information which you have provide or make available to us: -

- (a) personal data which may be provided directly or indirectly from the option to purchase, sales orders, application, forms, consents, survey and personal documents as provided by you including but not limited to name, identity card number, passport number, date of birth, age, gender, race, nationality, marital status, occupation, contact details, email address, work history, education, level of personal income, demographic information and such other personal data which permitted by applicable law. In doing so, you agree and consent to Paragon Premium Sdn. Bhd. collecting, using, disclosing and processing your personal data;
- (b) third party's information that may be provided or make available to us relating to a third party including but not limited to information of spouse, children, parents, directors, shareholders, guarantors (collectively known as the "Relevant Persons"). In such circumstances, you represent that you have obtained the consent of the Relevant Persons and are authorized to provide to us with their personal data therein and for us to collect, use, disclose and process their personal data for the respective purposes;
- (c) billing information about your transaction with us such as the account status., account balance, payment records, data collected from credit bureau reports and credit reporting

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2. SOURCE OF PERSONAL INFORMATION (continued)

- (d) transaction information which may be provided directly or indirectly by you, your legal representatives, agents, bank/financial institutions, governmental agencies and/or employer from the completed enquiry, application, sale and purchase agreement, bank statements, registration forms via various means.

3. PURPOSES OF COLLECTION OF PERSONAL INFORMATION

Paragon Premium Sdn. Bhd. may collect, use, disclose or process the personal data including but not limited to the following purposes: -

- (a) to process your requested products and/or services as well as products and/or services by third party service providers provided through us or which may be of interest to you from time to time;
- (b) to facilitate, implement and/or formalise any services and/or transactions;
- (c) to process any payments related to your requested service;
- (d) to administer and process payments related to transaction, products and/or services requested by you;
- (e) to administer and communicate with you in relation to the products and/or services;
- (f) to administer, carry out, maintain and improve our customer and prospective customer relationship management, products and/or services;
- (g) to maintain and update of our customers and prospective customers and our internal record keeping;
- (h) to respond to any queries, requests and/or complaints and resolve any issues and disputes which may arise in connection with any dealings with us;
- (i) for internal/external audit and/or investigation purposes;
- (j) to facilitate your participation in any contests and/or events;
- (k) to conduct market research and surveys with clients profiling and business development activities as well as market research and statistical analysis and regarding our research, products and/or services;
- (l) to comply with Paragon Premium Sdn. Bhd.'s internal policies and procedures and legal and regulatory obligations in the conduct of its business;

3. PURPOSES OF COLLECTION OF PERSONAL INFORMATION (continued)

- (m) to assess your job application and carry out verification and background checks as part of any recruitment and selection process in connection with your application for employment with us;
- (n) to send you promotional message, marketing information and special offers about other products/services based on your privacy preference;
- (o) to administer and give effect to your commercial transaction (including but not limited to tender award, contract for service, tenancy agreement) with us;
- (p) to conduct credit/trade checks and other background checks and establish your creditworthiness;
- (q) for the purpose of credit evaluation, review or reporting and carrying out debt-collection or assisting other institutions to do so;
- (r) to detect, investigate and prevent fraudulent, prohibited or illegal activities;
- (s) for meeting any applicable legal requirements and making disclosure as required by laws, rules, regulations, by-laws, order, guidelines and/or directives which are applicable to us;
- (t) if you are applying for sponsorship, in addition to the purposes set out here, for evaluating and assessing your eligibility for sponsorship as may be provided by us and if you are successful, for the subsequent preparation and execution of the relevant agreements and documents and administration of the sponsorship;
- (u) for enabling us to perform our obligations and enforce our rights and/or obtaining legal advice; and/or
- (v) any other purposes required to operate, maintain and better manage our business and your relationship with us.

In the event where personal data is requested by us, you have an option not to provide additional information requested therein other than the information which is indicated as necessary to facilitate the commercial transaction. If insufficient personal data is provided or your consent or the consent of any Relevant Person given herein is withdrawn, we will not be able to provide you with the products and services and/or fulfil any of your request to us for any of the purposes therein.

We will use and share your data for analytics and measurement purposes to understand how our products and services are used, to help improve the products and services we offer, to provide you with more personalised products and services, and provide a more seamless customer experience. For example, we analyse data about your choices and preferences in relation to the products and services you purchase from us to send you targeted advertisements and promotional materials. We also process data about the ads you interact with to help us and advertisers understand the performance of various ad campaigns.

4. DISCLOSURE OF PERSONAL INFORMATION

The personal data provided to us may be include but not limited to disclose as follows: -

- (a) to Paragon Premium Sdn. Bhd.'s subsidiary companies, associated companies and/or affiliates companies;
- (b) to the real estate agents or agencies;
- (c) to the credit reporting agencies;
- (d) to the professional advisors, external auditors including without limitation to legal advisors, financial advisors and consultants;
- (e) to the government agencies, law enforcement agencies, regulatory authorities, courts, tribunals, and/or as required or authorized to do so under the law to satisfy any applicable law, regulation, order or judgement of a court or tribunal or queries from the relevant authorities;
- (f) to our joint venture/business partners and investors, third party product and/or service providers, suppliers, vendors, contractors, data processors that provide related products and/or services to us or on our behalf in connection with our business;
- (g) to other third parties with whom we have commercial relationships for marketing, advertising and related purposes, unless you did not intend to disclose to such third parties for marketing and advertising purposes;
- (h) to third-party credit reporting or employment agencies as part of the recruitment and selection process in connection with your application for employment with us;
- (i) in the event of a potential, proposed or actual sale/disposal of any of our business or interest, merger, acquisition, consolidation, re-organisation, funding exercise or asset sale relating to us, or in the event of winding-up ("Transaction"), your personal information may be required to be disclosed or transferred to a third party as a result of or in connection with the Transactions in which you hereby acknowledge that such disclosure and transfer may occur and permit us to release your personal data to such third party and its advisors/representatives and/or any other person reasonably requiring the same in order for us to operate and maintain our business or carry out the activities set out in the Purposes.

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, our service providers, or for the purposes stated in Section 3 (Purposes of collection of personal information) above (or directly related to those purposes).

5. CONSEQUENCES OF REFUSAL OR FAILURE TO SUPPLY

The refusal or failure to provide the Personal Data may result in the following:

- a) The inability of parties to formalize and/or carry out the relevant agreement or transaction in relation to the sale of our property, products and/or services;
- b) The inability for us to provide you with the information, products and/or services requested; and/or
- c) The inability to provide you the information about our products and/or services and obtaining your feedback on our products and/or services.

6. SECURITY OF YOUR PERSONAL INFORMATION

We strive to ensure the security, integrity and privacy of personal data we collect. All our employees, joint venture/business partners, agents, contractors, vendors, suppliers, data processors, third-party product and/or service providers who have access to and are associated with the processing of your personal data are obliged to respect the confidentiality of your personal data. We do not accept responsibility for any unauthorized access or interception or loss of personal data that is beyond our reasonable control.

7. ACCURACY OF YOUR PERSONAL INFORMATION

We will take precaution steps to ensure that all personal data we collect, use or disclose is accurate, complete, not misleading, up-to-date and reliable as possible. The accuracy of your personal data depends to a large extent on the information you provide. As such, it is a condition of us providing the products, services and/or facilities to you that you:

- (a) warrant and declare that all your personal data submitted or to be submitted to us are accurate, not misleading, updated and complete in all respects for purposes of acquiring or using the relevant products, services and/or facilities, and you have not withheld any personal data which may be material in any respect and that we are authorized to assume the accuracy and up-to-datedness of the personal data given by you when processing such personal data;
- (b) promptly update us as and when such personal data provided earlier to us becomes inaccurate, incomplete, misleading, outdated or changes in any way whatsoever by contacting us at the contact details shown in Section 11; and
- (c) acknowledge that the personal data you provide us and which we collect from you, is your own information or information which you have been authorized to provide to us.

8. RIGHT TO ACCESS AND CORRECT PERSONAL INFORMATION

Subject to the exemptions provided under Malaysia laws, you have the right to request access and obtain some or all of your personal data stored by us and request for correction, updating, disabling and deletion of the same at any time.

We will grant access to and correct the personal data as requested by you in the event we hold the personal data about you and you are able to establish that such personal data is incorrect, inaccurate, incomplete and not up-to date, we will take reasonable steps to correct your personal data wherein your request to access or correct your personal data will be actioned as soon as reasonably possible from the time the access request is received.

We reserve the right to impose a fee for access to your personal data in the amounts as permitted under the law. In respect of your right to access and/or correct your personal data, we have the right to refuse your request to access and/or make any correction to your personal data for the reasons permitted under the law.

9. 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 4 (Disclosure of personal information) above 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 3 (Purposes of collection of personal information).

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.

10. WEBSITES

10.1 Links to other sites

Links to other sites is 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.

10. WEBSITES (continued)

10.2 Location enabled products or applications

Location enabled products or applications transmit your location information to us. We do not use the information sent or provided other than to provide the service you requested. 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.

Some mobile applications will utilize Google Analytics (or a similar tool) to help us better serve you through improved products, services, and revisions to the mobile applications. This collected information will not identify you to us. It may, however, let us know anonymously, which services and features you are using the most within the application, as well as device type and hardware features, country and language of download.

10.3 Service Providers

We may employ third party companies and individuals to facilitate our Service ("Service Providers"), provide Service on our behalf, perform Service-related services or assist us in analysing how our Service is used.

These third parties have access to your Personal Data only to perform these tasks on our behalf and are obligated not to disclose or use it for any other purpose.

10.4 Analytics

We may use third-party Service Providers to monitor and analyze the use of our Service.

10.5 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:

- the date and time you accessed each page on our web site;
- the URL of any webpage from which you accessed our site (the referrer); and
- 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). This personal information will only be used for its intended purposes only, i.e., to respond to your message or deliver the requested services.

11. CONTACT US

If you have any query or would like to obtain information on your personal data or make a complaint in respect of your personal data, please contact us at: -

Company Name : Paragon Premium Sdn. Bhd.
Address : No. 10-02, Level 10, Grand Paragon Hotel, No. 18 Jalan Harimau, Taman
Century, 80250 Johor Bahru, Johor
Tel : 07-278 1111
Fax : 07-278 1111
Email : paragonpremiumdeveloper@jolandgroup.com.my

12. CHANGES OF POLICY

We have the right to change this Privacy Policy at any time 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 this Privacy Policy on our website at www.paragongateway.com.my from time to time.

By continuing to engage with us in respect of our products and/or services or accessing our website after the issuance of such revision, you will be considered as having agreed to this Privacy Notice (as revised).

13. DISCLAIMER

This Privacy Policy shall not serve as a contract nor does it suggest any obligation on our part with another party. We shall not be liable for any voluntary disclosure of your personal data herein.

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