

English Version

PASB GROUP

Personal Data Privacy Policy

This Personal Data Privacy Policy (“**Privacy Policy**”) was formulated for PASB Group which refers to Permodalan ASSAR Sdn Bhd [Company No. 199401004044 (289723-H)] and its group of companies (hereinafter referred to as “**PASB Group**”, “**our**”, “**us**” or “**we**”) in accordance with the provisions of the Personal Data Protection Act 2010 (“**Act**”).

This privacy policy sets out how we collect, process, use, disclose, retain, maintain and protect your personal data.

WHAT KIND OF INFORMATION WE COLLECT

1. We may collect information from you from a variety of sources, including but not limited to, information that we collect from you directly or/and with your authorization when you enter into business and contractual relationship with us; by virtue of your employment, appointment and attachment with PASB Group; subscription to our product(s) and/or use our services; from various companies within PASB Group; and information provided by third party authorized by you and from other sources permitted by law. Information which we collect generally includes various data, which include but not limited to:-
 - your name, home address, e-mail address, phone number, date of birth, age, gender, race, nationality, religion, NRIC, employment, financial information or that of related to your family members, relatives, associate or any person nominated by you;
 - information in regard to your company name, company registration and incorporation details, registered or business or branch address, particulars of shareholder and directors, company profile, financial information and/or all related information in respect to transaction, negotiations, agreements or joint venture with PASB Group;
 - personal data or information when you commence and/or proposing to commence a business or contractual relationship with us;
 - information from resume or curricular vitae submitted to us;
 - information submitted where you participate in the programme conducted by us;
 - recording of your image via closed circuit television cameras installed at our premises;
 - recording of your photograph during any of our corporate events;
 - for general web browsing of our website 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; and
 - any comments, feedback, complaints or messages submitted via form, email, fax or mail to us.

2. The personal data and information that we gather shall only be used in the ordinary course of our business. Please note that in the event that sufficient information is not supplied and/or is not satisfactory or updated and inaccurate, thereby for any of the purposes stated in paragraph (3) below may not be accepted or processed and may adversely affect our dealings with you. Group shall not be held responsible for any resulting loss incurred thereof (if any).

HOW WE USE YOUR PERSONAL DATA

3. By providing your personal data and/or other information relevant to the purposes as listed below, you hereby agreed that PASB Group shall process, use, disclose, retain and maintain the said personal data and information for the following purposes:-
 - to verify your identity, background checks and due-diligence purposes
 - to discharge contractual obligations and perform all ordinary functions related to our business transactions and contractual relationship;
 - to assess your application/request for our product(s) or services and to discharge contractual obligations and perform all ordinary functions related to our processing of your application/request for our products and services;
 - engaging and disclosing information to third party service provider with whom we have contracted incidental for the performance of our function;
 - to disclose your personal information to person who have been identified as being your authorized representative(s) pursuant, for the performance of our business and contractual relationship;
 - to consider applications for employment, internship and graduate development programme;
 - to conduct research on any of our products and services and to process your information under any of our programme and to provide you with information and/or the latest updates on our services, product(s), events, activities and programme;
 - to produce data, reports and statistics which have been aggregated in a manner that does not identify you as an individual;
 - for administrative and internal management incidental to our business and contractual relationship;
 - for audit, compliance, risk management and corporate governance purposes;
 - to maintain records required for security, claims and other legal purposes;
 - to update, consolidate and improve the accuracy of our records;
 - to comply with any applicable legislations, laws, rules, regulations, guidelines and/or relevant regulatory authorities; and
 - for any other purpose that is incidental, ancillary or in furtherance to the above purposes.

All of the purposes stated above shall hereinafter referred to collectively as the “**Purposes**”. Kindly note that the above list is not exhaustive.

WHO TO AND FOR WHAT REASON WE DISCLOSE YOUR PERSONAL DATA

4. You further agree that we may disclose and transfer (whether in Malaysia or abroad) to our employees, agents, contractors, partners, third party service providers, advertisers, network operators, companies within our group, any relevant institutions, law enforcement agencies, regulators and any other persons under a duty of confidentiality to PASB Group. Kindly be advised your personal data and relevant information shall only be disclosed for reasons necessary for the performance of our function as stated herein and for our compliance with any legal requirements or court orders or legal processes.

HOW WE ENSURE CONFIDENTIALITY & SECURITY OF YOUR PERSONAL DATA

5. Personal data and information (be it in physical or digital form) held by us will be kept secure and confidential. We have appropriate physical, technical and administrative procedures and security measures in place to protect your information from loss, misuse or alteration. While we shall use our best endeavors to ensure the privacy of all information, we cannot guarantee that your information will never be disclosed in a manner inconsistent with this privacy policy due to unauthorised or illegal acts by any of our employees or third parties.

HOW WE RETAIN YOUR PERSONAL DATA

6. Any information supplied by you will be retained in accordance with our record retention policy and shall be kept for as long as necessary for the fulfilment of the purposes stated herein or as and when required in order to satisfy legal, regulatory and accounting requirements.

HOW WE ENSURE ACCURACY OF YOUR PERSONAL DATA

7. We take steps to ensure your information is accurate, complete, not misleading and up to date. Please ensure the accuracy and completeness of all information which you initially disclose or share and update us of any changes on information on a timely basis or if you believe that the information we have about you is inaccurate, incomplete, misleading or outdated.
8. Please note that PASB Group may use its discretion in allowing any correction/update requested or may require further documentary evidence to avoid possible fraud and inaccuracy.

YOUR RIGHT OF ACCESS AND HOW TO CONTACT PASB GROUP

9. You have the right to access and update and/or correct or limit the processing or withdraw your consent for the processing of your personal data by sending your notice in writing to us. However, the withdrawal of your consent may affect the services that we can extend to you and/or if you do not provide all of the personal data as requested, we may not be able to fulfill any or all of the purposes as set out above, or in some cases, may not be able to continue with our relationship.
10. PASB Group may charge you a reasonable fee in accordance with the provisions of the Act for the processing of any data access request.
11. Should you have any feedbacks, concerns or complaints regarding this privacy policy, you may send your request in writing to us at the following address by providing your name, NRIC number, organization particulars and contact details:

**Permodalan ASSAR Sdn Bhd
Lot 357, Section 5, KTLD, Jalan Satok,
93400, Kuching,
Sarawak, Malaysia**

WE MAY REVISE OUR PRIVACY POLICY

12. In line with our on-going commitment to ensure the protection of data and privacy of our data subject, PASB Group reserves the right to review its privacy policy from time to time. Notice of such revision will be communicated via means deemed suitable by PASB Group.

In the event of any inconsistency between the English version and the Bahasa Malaysia version of this policy, the English version shall prevail.