PRIVACY POLICY (FOR CUSTOMERS)

We, TIMES24 MALAYSIA SDN BHD (Registration No.: 199401037199(322881-M)) (hereinafter referred to as "T24MY", "we", "us", "our" and other similar expressions), value and respect the privacy rights of all our customers across all aspects of our business and we strive to protect your personal data incompliance with the laws of Malaysia.

T24MY will only collect and use your personal data in accordance with the Personal Data Protection Act 2010 (and any other such laws that may be enacted from time to time), with this Privacy Policy and such other term(s) in the agreement(s) that you may contract with us or have contracted with us.

We highly encourage that you carefully read this Privacy Policy to allow you to understand how we collect, use, handle, retain, disclose, and protect your personal data. Succinctly, this Privacy Policy explains:

- 1. The type of personal data that we collect;
- 2. How we collect your personal data;
- 3. How we use your personal data;
- 4. The parties that we may disclose your personal data to; and
- 5. The choices that we offer for you to access and update your personal data.

Kindly take note that unless stated otherwise, the words used herein shall have the same meaning and definition as in the Personal Data Protection Act 2010 (hereinafter referred to as "PDPA").

1. <u>The Personal Data That We Collect</u>

- 1.1 In order to provide you with our service(s), deal with your inquiry(ies), open and operate an account with us, and/or to inform you of current and upcoming promotion(s), we need to collect and use your personal data or the personal data of a third person. In the event that we are not provided with all the personal data that we request, we may not be able to provide you with our service(s) or continue to provide you with our service(s).
- 1.2 The extent and type of personal data that we collect from you depends on our service(s) that you subscribe to and/or the purpose of the collection of the personal data. The personal data that we collect may include but not limited to, your name, NRIC number, nationality, passport number, address, email address, mobile phone number, date of birth, gender, photograph, video, employment status, employer's details, parking habits and lifestyle preferences, motor vehicle registration number, credit card details, and/or debit card details. If you are a company, we may collect such data including, but not limited to, your company registration number, your phone and/or fax number, your business and/or registered address, and/or your employee's personal data.

2. How We Collect Your Personal Data

- 2.1 We will collect your personal data when you register with us for the Parking License Application. We may also collect your personal data such as a photo and/or video of you and your vehicle when you enter our parking area, make payment at the parking ticket payment machine, and/or when you exit our parking area.
- 2.2 We may also collect your data from third party related application(s) or software(s) for the purpose of providing you with our services or related services. We may also collect your personal data from your employer where the services we provide are related to your employer-employee relationship and we may collect your personal data from your employees. In addition to the above, we may also collect your personal data from any third-party that you have authorised to disclose your personal data to us.

3. The Purpose of The Collection of Your Personal Data

- 3.1 We collect your personal data for the following purposes: -
 - 3.1.1 to identify users of our service, potential users and their representatives;
 - 3.1.2 to provide our services;
 - 3.1.3 to provide related services;
 - 3.1.4 to manage and maintain your account with us;
 - 3.1.5 for administration purpose(s);
 - 3.1.6 to develop and/or implement initiatives to improve our services;
 - 3.1.7 to seek your opinions or comments about our services;
 - 3.1.8 to inform you about promotions, offers and/or other benefits (including third party benefits) that may become available;
 - 3.1.9 to carry out our management, administrative, quality assurance and complaint handling activities in a professional and efficient manner;
 - 3.1.10 conduct consumer and market research;
 - 3.1.11 to follow up or pursue any queries you make;
 - 3.1.12 for any other purpose(s) related thereto; and
 - 3.1.13 for any purpose(s) required or permitted by any law, regulations, guidelines, and/or relevant regulatory authorities.

4. Use and Disclosure of Personal Data

- 4.1 We shall use and disclose your personal data for such purpose(s) that the personal data was collected, as indicated above and for any other secondary purpose(s).
- 4.2 We shall disclose, where necessary, your personal data to our related entities, landlord(s), service providers and/or contractors, who assists us in providing and/or supplying our product(s) and service(s).
- 4.3 Notwithstanding the above, we may be required, as a result of our contractual obligation(s) to you or to any other third-party, to disclose your personal data to the landlords of a particular car parking facility that we manage and operate and to our auditors who shall conduct audits of our business and services.
- 4.4 Except where indicated above, we will not use and/or disclose your personal data unless:
 - 4.4.1 we have obtained the consent from the individual concerned;
 - 4.4.2 the third-party we disclose the personal data to are our agent, service provider and/or contractor, in which case we will require them to only use and disclose the personal data only for the purpose for which it was provided to them;
 - 4.4.3 the third-party is a person involved in a dealing or proposed dealing (including but not limited to a sale) of all or part of our assets and/or business;
 - 4.4.4 the third-party is a credit reporting agency, your creditor, banker, financier, and/or credit provider; and
 - 4.4.5 the disclosure is permitted, required and/or authorised by or under law.

5. <u>Marketing</u>

- 5.1 In addition to the above, we may use your personal data to advise and inform you of new product(s), service(s) and/or marketing initiative that we think may be of interest to you. This may include but not limited to, product and/or service offerings, newsletters and general information about us and/or third parties.
- 5.2 If you prefer not to receive information about such product(s) and service(s), you can contact our Data Protection Officer and request to be removed from the relevant circulation list (the contact details of the Data Protection Officer are provided at the end of this Privacy Policy).
- 5.3 We would like to highlight to you that your act of unsubscribing will not end the transmission of service related emails from us, such as administrative email alerts in relation to your account settings except where you have terminated your account with us.

6. <u>Access</u>

- 6.1 You have the right to request access to your stored data at any time. If you wish to do so, you may at any time, log in into your online account with us at *https://times-parking-monthly.com.my/login* and view all your data within our storage.
- 6.2 In the event that such data of yours is not made available to you via your online account or that you are unable to access your personal data, kindly contact our Customer Privacy Officer. Our Data Protection Officer shall do their best to grant you access where possible within twenty-one (21) days from when our Data Protection Officer receives your request. In the event that we are unable to comply with your request within the aforementioned twenty-one (21) days, we shall try out best to comply within thirty-five (35) days from when our Data Protection Officer receives your request.
- 6.3 However, where: -
 - 6.3.1 the identity of the data subject is unidentifiable from the information given;
 - 6.3.2 the access impacts on the privacy of others;
 - 6.3.3 the request for access is frivolous or vexatious;
 - 6.3.4 the cost incurred is far too great;
 - 6.3.5 there are confidential commercial information that may be disclosed in the process;
 - 6.3.6 the personal data is with another data user and such data user are unable to comply;
 - 6.3.7 there are existing or anticipated legal proceedings; or
 - 6.3.8 such access can be denied under law or by a law enforcement agency

we may not be able to provide you with access to the personal data we hold about you. In the event that we deny and/or are unable to comply with your request for access, we will inform you the reason(s) of our denial and/or inability to comply.

6.4 Please note that in processing your request, we may charge you a reasonable fee as prescribed under the Personal Data Protection (Fees) Regulations 2013 or its amendment from time to time to cover any cost incurred by us.

7. Quality and Correction

7.1 We strive to ensure that your personal data with us are accurate, complete and up-to-date at all times. If at any point in time you believe that any of the personal data of yours that we hold is inaccurate, incomplete or not up-to-date, you should immediately inform us with the correct, complete and accurate data. We will use all reasonable efforts to correct the data within twenty-one (21) days

from when our Data Protection Officer receives your request for correction. In the event that we are unable to make such correction within the aforementioned twenty-one (21) days, we will inform you of our inability to make such correction within reasonable time as well as the reason as to why we are unable to do so. We shall, however, try our best to comply within thirty-five (35) days from when our Data Protection Officer receives your request for data correction.

7.2 Alternatively, you may log into your online account with us at *https://times-parking-monthly.com.my/login* and update your details there as this method of correction would be much faster and more convenient for you. In the event that you are unable to correct your details there or such detail is locked from being altered, kindly contact our Data Protection Officer and our Data Protection Officer shall do their best to make the necessary amendment(s) for you.

8. How We Store Your Personal Data

- 8.1 As we strive to protect your personal data, we limit the personnel that can access your data and the amount of data accessible by them. Only personnel that specifically requires your personal data may access it to carry out their business responsibilities. Our employees are at all times obliged to respect the confidentiality of any personal data held by us.
- 8.2 We take reasonable steps to keep your personal data secure and protect it from loss, misuse, or unauthorized alteration. Any of the personal data you electronically provide to us are stored on secure servers. We also maintain a reasonable physical security procedure to manage and protect the use and storage of records containing personal data.

9. <u>Website and Cookies</u>

- 9.1 In order to ensure that we meet the needs and wants of our website users in addition to further develop our online services, we may collect aggregated information by using cookies or similar electronic tools.
- 9.2 Cookies are small amounts of information sent from a web server to your computer. These cookies are used to retain login and location information in order to make your experience more convenient and personal. We do not use cookies to track your internet activity before or after you leave our website. No other company has access to our cookies.

10. Amendment To Our Privacy Policy

10.1 We reserve the right to update or modify this Privacy Policy as needed. Any changes will be published on our website and will replace the previous version. The updated Privacy Policy will apply to our relationship with you, regardless of whether we notify you directly of the changes.

11. Complaint Resolution

- 11.1 We are committed to constantly improve our procedures to ensure that personal data that we process are kept secured and treated appropriately. If you feel that we have failed to deal with your personal data in accordance with this Privacy Policy, please speak to us so that we have an opportunity to resolve the issue to your satisfaction.
- 11.2 We will log your complaint and our Data Protection Officer will: -
 - 11.2.1 listen to your concerns and grievances;
 - 11.2.2 discuss with you the ways in which we can remedy the situation; and
 - 11.2.3 put in place an action plan to resolve your complaint and improve our personal data handling procedures if appropriate.

12. <u>Disclosure to Overseas Recipients</u>

12.1 We will not disclose your personal data to recipients located outside of Malaysia except where we are required to do so by our parent company and for administrative purposes.

13. Discrepancies

13.1 This Privacy Policy is prepared in two languages, Bahasa Malaysia and English. Should there be any inconsistencies between the two versions, the version in English shall prevail and be referred to.

14. <u>Contact Us</u>

14.1 If you wish to access any of your personal data that we hold about you, or have a query about this Privacy Policy, please contact our Data Protection Officer:-

Name: Mr. Anuar Bin Ismail – Data Protection Officer

Email: <u>anuar.ismail@times24.com.my</u>

Address: TIMES24 MALAYSIA SDN. BHD. L-G-05, Block L, Pusat Dagangan NZX No. 2, Jalan PJU 1A/41B, Ara Jaya 47301 Petaling Jaya, Selangor

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