

Lot A Sentral Sdn Bhd

Privacy Notice for visitors and tenants of Menara CIMB

Lot A Sentral Sdn Bhd ("Lot A") is the owner of Menara CIMB, Kuala Lumpur Sentral with our registered address at 13th Floor Menara CIMB, Jalan Stesen Sentral 2, Kuala Lumpur Sentral, 50470 Kuala Lumpur, Malaysia.

We value your privacy and strive to protect your personal information in compliance with the laws of Malaysia.

If you are reading this Privacy Notice on behalf of a body corporate/business enterprise which maintains/maintained a contractual relationship with Lot A, this Privacy Notice is intended to be addressed to, without limitation, the, individual officers, employees, staff, workers including contract workers, directors, shareholders, beneficial owners (e.g. sole proprietor and partners), guarantor or obligor of the body corporate/business enterprise (the "Relevant Individuals") and "you", "your" and "yourself" shall be construed accordingly to mean the Relevant Individuals.

Pursuant thereto, this Privacy Notice is designed to explain and elaborate upon some of our policies and principles pertaining to the privacy of your personal information, all of which we have adopted as a sign of our commitment to respecting, maintaining, protecting and safeguarding the privacy of your personal information.

Lot A will only collect, record, hold, use, disclose and store (i.e. "process") your personal information in accordance with such laws (including the Personal Data Protection Act 2010 and other applicable data protection or privacy laws regulations), this Privacy Notice and the privacy terms in your agreement(s) with Lot A, if any.

This Privacy Notice explains:

- The type or kind of personal information we collect and how we collect it;
- How we use your personal information;
- The parties that we disclose the personal information to; and
- The choices we offer, including how to access and update your personal information.

Your privacy matters to us, so please read it to understand our practices regarding your personal data, and if you need further information, please contact the Management representative of Menara CIMB or our Data Protection Officer at the contact points stated at the end of the Privacy Notice.

For the purposes of this Privacy Notice, please note that:

"Personal information" refers to any information which relates directly or indirectly to you. This information includes your images and biometrics to establish your identity and background, and such other necessary information regarding yourself and/or your transaction(s) with us. For the avoidance of doubt, please note that this Privacy Notice is applicable only if you are an individual.

What Kind Of Personal Information We Collect and How We Collect It

We may need to and/or may be required to process personal information about you, including but not limited to:

- Full Name/ NRIC/ Passport Number/ contact details (phone number, e-mail address);
- Employment and financial information (for tenancy/ due diligence purposes);
- image and biometrics (for access purposes) (where required) including any access ID issued;
- Vehicle registration number (if applicable);
- Closed Circuit Television (“CCTV”) footage (for security purposes); and
- Facial recognition technology (“FR technology”) at Menara CIMB’s access points or security gates. The FR technology provides likely matches from live security camera footage with previously stored records provided to Lot A (“biometric templates”).

We may collect or obtain personal data from you and from a variety of sources, including but not limited to:

- through your relationship with us, for example vide a tenancy agreement;
- information provided by you vide QR code when you use our facilities or services;
- through your verbal and/or written communications with us, our tenants and/or our authorised agents via SMS, phone or mobile device, email, fax, mail, websites or browsers, social media and/or any other appropriate communication channels;
- from third parties connected with you, such as employers, agents and service providers, subject to your prior written consent and/or authorization or representation by your organization, employers and their authorized representatives; from recordings of CCTV or similar security devices installed at Menara CIMB or visitor logs; and/or
- from facial recognition technology (“FR technology”) used at Menara CIMB’s access points or security gates.

How We Use Your Personal Information

We may use your personal information for one or more of the following purposes:

- to better manage our business and your relationship with us;
- to respond to your enquiries and complaints and to generally resolve disputes;
- provide you with the information or services you request from us;
- to update, consolidate and improve the accuracy of our records;
- to produce data, reports and statistics which have been anonymised or aggregated in a manner that does not identify you as an individual;
- to meet the disclosure requirements of any law binding on Lot A;
- to transfer or assign our rights, interests and obligations under any of your agreements with us;
- to protect or enforce our rights to recover any debt owing to us;
- to comply with any sanction or law enforcement requirements;
- to enforce and/or defend any of our rights;
- to protect the rights, property, or safety of the CIMB Group of Companies (as defined below), our tenants, visitors or others and/or
- for any other purpose that is required or permitted by any law, regulations, guidelines and/or the order of any court and/or relevant regulatory authorities.

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Other than as stated above, for templates that serve as references for the FR technology, we may use your personal information for one or more of the following purposes, where applicable:

To identify likely facial biometric template matches for the following purposes:

- To restrict access to registered/authorized individuals to certain areas;
- To maintain the safety and security of Menara CIMB;
- To support the effective management of premises operations;
- To support investigations and inquiries as required or permitted; and/or
- To identify and/or locate individuals in the event of a (possible) emergency.

Please be assured that we will ask for your consent before using your personal information for a purpose other than those that are set out in this Privacy Notice and in the privacy terms in your agreement(s) with Lot A.

Disclosure Of Your Personal Information

As part of providing you access to Menara CIMB and for the purposes as set out in this Privacy Notice in relation to our use of your personal information, you consent and authorise us to disclose information about you with us to:

- to our employees and property management company (where applicable);
- other entities within the corporate group of CIMB Group Holdings Berhad, whether in or outside Malaysia ("CIMB Group Companies"); to companies and persons that act as our agents, contractor, affiliates and service providers (including their sub-agents, sub-contractors, affiliates, service providers, professional advisors), and the employees, directors and officers of all the parties mentioned above, whether in or outside Malaysia (where applicable);
- to our solicitors, agents, mortgage brokers, financial advisors, court agents, surveyors, valuers and/or new owner(s) should we decide to sell Menara CIMB or enter into a joint venture or merge with another business;
- any law enforcement, government, courts, dispute resolution bodies and regulatory bodies including Bank Negara Malaysia and their appointed personnel or party, and/or
- any person connected to the enforcement or preservation of any of our rights under your agreement(s) with us, subject at all times to any laws (including regulations, guidelines and/or obligations) applicable to Lot A. The afore-mentioned third parties may in some instances be located outside of Malaysia.

Use of Automated Processing and Assisted Decision Making Methods

We may automate the processing of your personal information, with limited or without human intervention. We may use the personal data we collect in this processing to conduct data analytics, including profiling and behavioral analysis, to assist or automate decisions in our operations and to identify and evaluate potential risks. We require that rules followed by such automated systems are designed and tested to make fair and objective decisions.

We may also use specific artificial intelligence and machine learning to help improve our security operations, such as FR technology in conjunction with our CCTV and access control systems.

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Please be assured that we will ask for your consent before using your personal information for a purpose other than those that are set out in this Privacy Notice and or otherwise notified to you during your visit to Menara CIMB.

CCTV Monitoring

Menara CIMB is monitored by CCTV. The CCTV footage is processed under our legitimate interest for security, crime prevention and tenant safety. The footage is retained for thirty [30] days and then securely deleted unless there are reasonable grounds to retain it for longer, for instance, to provide evidence for a prosecution of criminal damage or other anti-social behavior.

Security

Any information gathered is retained in an environment designed to be secure and only accessible by authorized personnel of Lot A, with a valid reason to access the personal data. We have reasonable security measures in place to help protect against the loss, misuse and alteration of the information under our control. While we cannot guarantee that loss, misuse or alteration to data will not occur, we ensure that our systems adhere to market security standard so as to help safeguard against such occurrences.

We aim to keep our records as up-to-date and accurate as possible. You can review, change or delete the details supplied to us by contacting us at the contact details set out below.

Please note that if you ask us to delete your data this may impact on our ability to provide the services you request. In addition, we may keep track of certain information for legal compliance purposes, so we may not be able to fully delete it in certain circumstances.

Data Retention

We retain your data for up to seven (7) years after the end of your tenancy. This is in case of legal issues arising.

After this period of time has ended you will be entitled to inquire about the status of deletion of your data from our systems and from any data processors we have used to store your data.

For templates that serve as references for the FR technology:

- Templates are purged or rendered unreadable seven (7) years after termination, for officers, employees, staff, workers leaving under normal conditions; and
- Templates are purged or rendered unreadable after fifteen (15) years for individuals who have been denied access to Menara CIMB.

You have the right to do the following

- Ask for a copy of the information we hold about you in our records;
- Ask us to correct any inaccuracies in the information we hold; and
- Delete your personal data from our systems, subject to our right to retain information under the tenancy agreement or where we have a legitimate interest in retaining it or as required under law.

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For individuals who are not citizens or residents of Malaysia, the information which you provide to us are governed by the laws of Malaysia including the Personal Data Protection Act 2010. The data protection laws and other laws that govern the use and retention of your personal data may differ from data protection laws of your country of origin and residence. You can obtain further details about your rights in relation how we handle your personal by contacting us at the contact details set out below.

Revisions To Privacy Notice

This Privacy Notice may be revised from time to time. Notice of any such revision will be given on Lot A's website and/or by such other means of communication deemed suitable by Lot A.

Contacting Lot A about Your Privacy and How We Handle Your Personal Information

Should you have any query in relation to this Privacy Notice or how we handle your personal information during your visit to Menara CIMB or interaction with Lot A, kindly contact the Management representative of Menara CIMB or our Data Protection Officer at the following contact points:

Telephone	+603 2261 8888 ext. 8872
E-Mail	gapm@cimb.com and/or dataprotection.office@cimb.com <i>(in relation to your privacy rights)</i>
Address	Lot A Sentral Sdn Bhd 13 th Floor Menara CIMB, Jalan Stesen Sentral 2, Kuala Lumpur Sentral, 50450 Kuala Lumpur, Malaysia.