

**Privacy Policy** 

## INTRODUCTION

### IDEAL CONCEPT INTELLIGENCE SDN BHD (Company) operates

<u>http://www.idealproperty.com.my</u> (**Website**) across desktop, mobile, tablet and apps (including any subdomains).

This Privacy Policy sets out the manner in which we collect, use, disclose, store, process and manage personal information. By visiting or using the Website, subscribing to our services or entering into an agreement with us in relation to the Website, you are taken to have read and agreed and consent to the collection, use, disclosure, storage, processing and handling of your Personal Data in accordance with this Privacy Policy.

We may modify this Privacy Policy at any time. You should review this Privacy Policy periodically so that you are updated on any changes.

#### **RESPECTING INFORMATION PRIVACY**

We recognize the importance of protecting personal information in accordance with the Malaysia Personal Data Protection Act 2010 ("the Act") and any other applicable local personal data protection laws, regulations, codes of practice, guidelines or guidance notes as may be issued from time to time (as the case may be) (**Privacy Laws**).

In collecting and handling personal information, we are bound by the Privacy Laws, including the personal data protection principles/ obligations in Malaysia and applicable privacy regulations.

### THE PERSONAL INFORMATION WE COLLECT ABOUT YOU

We may collect personal information about you including, but not limited to your name, address, phone number, email, gender, occupation, personal interests and any other information provided ("Personal Data").

It is mandatory for you to provide us with your name, contact information and other details marked as mandatory as requested by us. If you choose not to furnish any mandatory personal data requested or wish to withdraw your consent or significantly limit the processing of your personal data, you agree that (notwithstanding any other agreement between you and us) we may not be able to provide you with our services and products.

If you submit Personal Data to us in relation to an employment opportunity, we may also collect information about your employment and academic history.

We may also collect non-personal information about you including, but not limited to, data relating to your activities on the Website (including IP addresses) via tracking technologies such as cookies, web beacons and measurement software or data relating to survey responses.

You acknowledge that the personal information you provide us and which we collect from you, is your own information or information which you have been authorized to provide to us.

## HOW WE COLLECT YOUR PERSONLA INFORMATION

We may collect Personal Data about you from a variety of sources including, but not limited to:

- a. Registering to use the Website or parts of them through your account on the Website;
- b. Logging in to use our Website via your social networking site (SNS) account;
- c. Subscribing to receive Alerts/e-brochures and filling in forms, applications surveys or research, participating in promotions and competitions on the Website or websites of our service providers;
- d. Contacting us or our service providers including, but not limited to, reporting a problem with the Website, requesting further services or seeking our assistance;
- e. Posting or contributing material on our Website;
- f. By disclosing the information to debt collection agencies to recover any amounts you owe us; and
- g. Applying for an employment opportunity with us directly, via an SNS site (eg. LinkedIn) or through your nominated referees.

The Company may collect your Personal Data if you subscribe to receive email alerts, media releases and other news relating to the Company through the Website.

We may also collect your Personal Data through our related bodies corporate, our service providers and third parties so that we may provide a better or more relevant service or product to you.

## HOW WE USE YOUR PERONAL INFORMATION

We use the Personal Data we have collected largely for the purpose of providing you with products and services that you have requested, responding to your inquiries and maintaining your account and ensuring you comply and adhere to our website terms of use.

We may use personal information which we have collected to:

- a. Ensure that content from the Website is presented in the most effective manner for you;
- b. Provide a better or more relevant service or product to you;
- c. Combine your Personal Data with information that we have collected from its service providers, third parties, cookies or web beacons in order to provide you with a better or more relevant and personalized experience and to improve the quality of its services and the services of third parties;
- d. Respond to or provide you with service, products, information and assistance that you request from us;
- e. Contact you to conduct surveys, research and feedback about our products, services or the Website;
- f. Verify your identity when you register or log into our Website via your SNS account and remind you of your password and username;
- g. Allow you to participate in interactive features of our service, when you choose to do so;
- h. Help carry out our obligations arising from any contracts entered into between you and us;
- i. Notify you about changes to our products and services; and
- j. Use your personal information in direct marketing and/or provide your personal information to another person for gain and/or for use by that person in direct marketing as set out in the USING AND DISCLOSING YOUR PERSONAL INFORMATION FOR MARKETING PURPOSES section below.

If all or part of this information is not provided, we may not be able to provide these services.

If you submit personal information to us in relation to an employment opportunity with us, we may also use your personal information to:

- a. Consider you for the position for which you have submitted your personal information to us or any other positions that are or become available in the future;
- b. Respond to you in relation to any future application you make for an employment opportunity with us; and
- c. Contact your referees in order to collect the information you have consented to us collecting about you in order to consider you for employment opportunities with us.

### **USING AND DISCLOSE YOUR PERSONAL INFORMATION FOR MARKETING PURPOSES** We may:

- a. use your Personal Data to provide you with information about offers, promotions, goods or services and for direct marketing relating to the Company's products/ services, which we believe may be of interest to you; and
- b. provide your Personal Data to (i) the Company's estate agents or agencies, property developers, builders, landlords, financial and investment providers that have listings or advertising on our Website and which you have requested information from by submitting an enquiry; and (ii) our service providers (so that they can provide you with products or services on our behalf or products or services that you have requested directly from them, or to help us to provide you with our products or services) for gain and/or for use by that person in direct marketing relating to the Company's products/services (and we may not so provide the data unless we have received your written consent to the intended provision); and
- c. share your Personal Data with our service providers and other third parties (who are our clients or financial services companies, investment service providers and telecommunications services providers) so that they can provide you with products or services on our behalf or help us to provide you with the requested products or services including contacting you in relation to the products or services.

We may not so use your personal information for direct marketing or share your information with others for direct marketing unless we have received your consent. Further, we will give you the opportunity to request that your information not be used for further direct marketing in the future in our communications with you.

If you do not consent to the Company to process your Personal Data for the purposes listed in the above, please notify the Company's marketing department.

## WHO WE DISCLOSE YOUR PERSONAL INFORMATION TO

Consent given under this Privacy Policy will be deemed to also be the consent to the disclosure of Personal Data to the class of third parties.

The class of third parties may include our related bodies corporate, service providers or business partners. We may also disclose your personal information:

- a. To the Company's estate agents or agencies, property developers, builders, retirement community operators, landlords, financial and investment providers that have listings or advertising on our Website and which you have requested information from by submitting an enquiry;
- b. To our service providers (who are our clients or financial services companies, investment service providers and telecommunications services providers), so that they can provide you with products or services on our behalf or products or services that you have requested directly from them, or to help us to provide you with our products or services;
- c. To third parties where you have requested information, services or products from them;
- d. In conjunction with a sale or similar transfer of a business;
- e. Relevant regulatory authorities, our legal representatives or other concerned parties, in special situations where we have reason to believe that disclosing your personal information is necessary to help identify, contact or bring legal action against anyone damaging, injuring, or interfering

(intentionally or unintentionally) with our rights or property, users or anyone else who could be harmed by such activities; and

- f. Where we are otherwise authorized or required by law to do so.
- g. If you request information from any organization through our Website, you will need to check their privacy policy to find out how they handle your personal information. We are not responsible for the way these organization's collect, use, disclose, store, process or handle personal information you provide to them through our Websites.

## SECURITY

We fully acknowledged your rights of confidentiality regarding your Personal Data and has taken practical steps, both administrative and technical to safeguard your Personal Data from misuse, modification, unauthorized or accidental access or disclosure, alteration, loss or even destruction.

Regarding this, we will ensure secure access and retrieval to your Personal Data and access to your Personal Data is available only to persons who have the need to access it.

However, please note that no data transmission over the internet can be guaranteed to be totally secure.

# **RETENTION OF DATA**

We retain your Personal Data in accordance with this Privacy Policy and in line with applicable legislation and the Act. We will not retain longer than necessary unless required or permitted by law.

## **CORRECTION AND ACCESS**

We will endeavor to take all reasonable steps to keep accurate and up to date, any information which we hold about you. If, at any time, you discover that information held about you is incorrect or you would like to review and confirm the accuracy of your personal information, please contact us.

### **COMPLAINTS RESOLUTION**

If you have any enquiries regarding this Privacy Policy; or if you have any concern on how your Personal Data had been handled or collected by us; or if you wish to request access to your Personal Data; or if you wish to amend your Personal Data; or if you wish to withdraw consent in processing your Personal Data or transfer of your Personal Data to the other party, you may send your request in writing to / contact our Data Protection Officer at +604-645 6888 or email us at ipisales@idealhomes.cc so that we may resolve your concerns.

### COOKIES AND WED CEACONS

We use cookies, web beacons and measurement software and tools on the Website and so do our services providers and third parties such as our analytics, advertising or ad serving partners. We use and disclose the information collected through the use of cookies, web beacons and measurement software and tools in accordance with this Privacy Policy. This includes using the information to report statistics, analyze trends, administer our services, diagnose problems and target and improve the quality of our products and services. We may allow other third parties to use their own cookies and web beacons to collect information about your visits to the Website. We have no control over such cookies and their use.

We may combine our cookies, information collected through the cookies and web beacons on the Website with other information (including information collected by third parties using their own cookies and web beacons and providing our cookies and information to third parties) and use analytics services – to provide better or more relevant services and advertising to you on the Website and third party websites. Our service

providers and other third parties may do the same in order to provide more relevant services and advertising to you through other websites that you may visit.

## **COOKIE CHOICES**

If you do not want information collected through the use of cookies or other web beacons, you may be able to delete or reject Cookies through your browser or the settings section of your mobile or tablet device. Disabling these features may cause some of the functions on the Website or products and services not to work properly.

## APPLICATIONS, WIDGETS OR LINKS TO OTHER WEBSITES

We provide links to websites outside of the Website, as well as to third party websites. We also allow some third parties to display widgets and applications on our Website that allow you to interact and share content. These linked sites, applications and widgets are not under our control, and we do not accept responsibility for the conduct of companies linked to the Website, or their collection of information through these third party applications or widgets. Before disclosing your personal information on any other website, or using these applications or widgets we advise you to examine the terms and conditions of using that website and the relevant third party's data collection practices and controls in their privacy policy.

### © <u>IDEAL CONCEPT INTELLIGENCE SDN BHD</u> Last updated in January 2019