

PRIVACY NOTICE FOR MAGMA GROUP BERHAD

Magma Group Berhad ("Magma"), formerly known as Impiana Hotels Berhad, together with its subsidiaries, affiliates, related and associated companies (collectively "Magma Group" and any reference to "we", "us" or "our" shall include any member of the Magma Group) respects and is committed to the protection of your personal data and your privacy. This Personal Data Protection Notice ("Privacy Notice") explains how the Magma Group collects and handles your personal data following the Personal Data Protection Act 2010 of Malaysia. Please note that Magma may amend this Privacy Notice at any time without prior notice and will notify you of any such amendment via our website or by such other means of communication as deemed suitable by Magma.

1. Personal Data

1.1. Types of Personal Data

"Personal data" means any information which relates to you (or in the case of a third party as authorized by such third party) and which was collected or provided to the Magma Group for any of the purposes stated in Section (2) below ("Purposes").

Your personal data may include but is not limited to, your name, NRIC number, passport number, contact details (such as phone number and email address), financial and banking account details, occupation, citizenship, information in audio and/or video format (including voice, video recording, closed-circuit television ("CCTV") or security recording), images (including photographs) and location tracking/global positioning system ("GPS") information.

1.2 Source of personal data

- i. Customer or potential customer: The Magma Group, whether directly or through our authorized agents and representatives, collects your personal data whether directly from you or indirectly from third parties such as our authorized agents, dealers or representatives, your legal representatives, agents (e.g. travel agents), credit reporting agencies and/or your employer when you whether directly or through your legal representatives, agents and/or employers provide your personal data to the Magma Group in any manner in connection with any transaction, arrangements and/or enquiries made with the Magma Group including when you send us completed enquiry, application and/or registration forms via various means, including online and physical hardcopies at public venues or in any of our premises. Your personal data may also be collected from cookies through the use of our website.
- ii. Vendor, supplier, tenant, or service provider: The Magma Group, whether directly or through our authorized agents and representatives, collects your personal data directly from you or indirectly from third parties such as your employer, authorized agents, or credit reporting agencies when you enter into any transactions or arrangements with the Magma Group, including in connection with the supply or proposed supply of products or services, when you send us completed enquiry and/or credit application forms via various means, including online and physical hardcopies. Your personal data may also be collected from cookies through the use of our website.

1.3 Obligatory personal data

All information requested in the relevant forms and documents is obligatory to be provided by you unless stated otherwise. Should you fail to provide the obligatory information, we may be unable to process your request and/or provide you with relevant services and products.

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2. Purposes of collecting and further processing (including disclosing) your personal data

- i. Customer or potential customer: Your personal data is collected and further processed by the Magma Group as required or permitted by law and to give effect to your requested commercial transaction, including the following:
 - to assess and process your request for our products and services;
 - to establish your identity and background;
 - to facilitate your participation in, and our administration of, any events including contests, promotions, or campaigns;
 - to administer and communicate with you about our products, services, and/or events;
 - to process any payments related to our products and services requested by you;
 - to conduct credit reference checks and establish your creditworthiness, where necessary, in providing you with the requested products and services;
 - for insurance purposes;
 - to apply for relevant travel visas in the event of overseas traveling;
 - to operate our premises in a manner that is physically safe, secure, and befitting of health and safety requirements;
 - for internal investigations, compliance, audit, or security purposes including without limitation for crime detection, prevention, and prosecution;
 - to conduct research for internal marketing analysis and analysis of customer patterns and choices;
 - to better manage our business and your relationship with the Magma Group;
 - to respond to your enquiries and to resolve any issues and disputes which may arise in connection with any dealings with the Magma Group;
 - to protect or enforce our rights under any agreements to which the Magma Group is a party to;
 - to transfer or assign our rights, interests, and obligations under any agreement entered into with the Magma Group;
 - to comply with the Magma Group's legal and regulatory obligations in the conduct of its business including to meet any disclosure requirements of any law binding upon the Magma Group;
 - to contact you and/or provide you with information regarding our products, services, upcoming events, promotions, advertising, marketing, and commercial materials that may be of interest to you;
 - to ensure that the contents on our website are presented most effectively for you and your computer and/or device;
 - for the Magma Group's internal records management; or
 - for any other purpose that is required or permitted by any laws, regulations, and guidelines including the requirements of any governmental or regulatory authorities.
- ii. Vendor, supplier, tenant, or service provider: Your personal data is collected and further processed by the Magma Group as required or permitted by law and to give effect to your requested commercial transaction, including the following:
 - to assess and process your credit account application;
 - to assess your creditworthiness and conduct credit reference checks;
 - to administer and give effect to your commercial transaction (such as a tender award, contract for service, or tenancy agreement);
 - to process any payments related to your commercial transaction;
 - for insurance purposes;

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- for internal investigations, compliance, audit, or security purposes (including without limitation for crime detection, prevention, and prosecution);
- to better manage our business and your relationship with the Magma Group;
- to respond to your enquiries and to resolve any issues and disputes which may arise in connection with any dealings with the Magma Group;
- to protect or enforce our rights under any agreements that any Magma Group member is a party to;
- to transfer or assign our rights, interests, and obligations under any agreement entered into with the Magma Group
- to comply with the Magma Group's legal and regulatory obligations in the conduct of its business including to meet any disclosure requirements of any law binding upon the Magma Group;
- to contact you and/or provide you with information regarding our products, services, upcoming events, promotions, advertising, marketing, and commercial materials that may be of interest to you;
- to ensure that the contents on our website are presented most effectively for you and for your computer and/or device; and
- for the Magma Group's internal records management.

Where you have indicated your consent to receiving marketing or promotional updates from the Magma Group, you may opt out from receiving such marketing or promotional material at any time. You may select the "unsubscribe" option provided in our email blasts, or you may contact Magma at the details provided in Section (6) below.

3. Disclosure or transfer of personal data (within or outside of Malaysia)

3.1 Entities within Magma Group

Your personal data provided to us is processed by entities (within or outside of Malaysia) within the Magma Group (including related companies, subsidiaries, holding companies, associated companies, and outsourcing partners).

The Magma Group will ensure that:

- i. access to your personal data is restricted to staff who are required to process your personal data following their respective job requirements; and
- ii. only necessary information is released to the relevant employees.

3.2 Classes of third parties

Your personal data may be disclosed or transferred to relevant third parties (within or outside of Malaysia) as required under law, under relevant contractual relationships (for example, where we appoint third-party service providers), or for the Purposes (or purposes directly related to Purposes).

In the event of a potential, proposed, or actual sale/disposal of business or interest, acquisition, merger, reorganization, or funding exercise relating to any member of the Magma Group (Transaction), your personal data may be required to be disclosed or transferred to a third party as a result of the Transaction. You hereby acknowledge that such disclosure and transfer may occur and permit the Magma Group to release your personal data to such third parties and their advisers/representatives.

- i. Customer or potential customer: Your personal data may be disclosed to the following classes of third parties:

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- Third parties appointed by us to provide services to us or on our behalf (such as banks or financial institutions, auditors, lawyers, company secretaries, printing companies, information technology (IT) systems, or software vendors, contractors, conference, or training, or event organizer, other advisers, travel agencies, credit reporting agencies, and insurance companies);
 - Our business partners or affiliates who may jointly provide the service requested (such as third-party hotels or resorts, shopping mall tenants, or applications resellers);
 - Foreign embassies (including agencies appointed by foreign embassies to carry out their services) if the Magma Group assists you in your visa application as part of your requested travel services;
 - Any financial institutions, merchants, and credit card associations in connection with your use of any credit or debit card in any transactions made with us;
 - Law enforcement agencies including courts, tribunals, or authorities, whether governmental or quasi-governmental having jurisdiction over the Magma Group;
 - Relevant governmental agencies, statutory authorities, management corporations, joint management bodies, industry regulators, and local councils; and
 - Any persons, authorities, or regulators to whom the Magma Group is permitted or required to disclose under the laws of any country.
- ii. Vendor, supplier, tenant, or service provider: Your personal data may be disclosed to the following classes of third parties:
- Third parties appointed by us to provide services to us or on our behalf (such as banks or financial institutions, auditors, lawyers, company secretaries, printing companies, IT system or software vendors, contractors, conference, or training, or event organizers, other advisers, travel agencies, credit reporting agencies, and insurance companies);
 - Any financial institutions, merchants, or credit card associations in connection with your use of any credit or debit card in any transactions made with us;
 - Law enforcement agencies including courts, tribunals, or authorities, whether governmental or quasi-governmental having jurisdiction over the Magma Group;
 - Relevant governmental agencies, statutory authorities, industry regulators, and local councils; and
 - Any persons, authorities, or regulators to whom the Magma Group is permitted or required to disclose under the laws of any country.

4. Websites

4.1 Links to other sites

Content in any website of the Magma Group (Magma Websites) may include links to third-party websites. The Magma Group is not responsible for the content on such linked third-party websites and users should observe the separate privacy policies applicable to the respective third-party website.

4.2 Cookies

The Magma Group may collect information about your visits to the Magma Websites without you actively submitting such information. Unidentifiable information may be collected using various technologies, such as cookies, and web beacons. Cookies are small text files that are transferred to your computer's hard disk by a website. Web beacons (also referred to as GIF files, pixels, or Internet tags) help the Magma Group recognize a unique cookie on your browser. Your internet browser

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automatically transmits to the Magma Group some of this unidentifiable information, such as the URL of the website you just visited and the browser version your computer is operating.

Passive information collection technologies can make your use of the Magma Websites easier by allowing the Magma Group to provide better service, customize the Magma Websites based on consumer preferences, compile statistics, analyze trends, and otherwise administer and improve the Magma Websites. Certain features of the Magma Websites may not work without the use of passive information collection technologies. Information collected by these technologies cannot be used to identify you without additional identifiable information and the Magma Group will not collect additional identifiable information with information collected through the use of such tracking technologies.

5. Right to access, correct, or remove personal data

You have the right to access, correct, or remove your personal data held by us subject always to certain exemptions and payment of the prescribed fee. We will make every endeavor to ensure your personal data is accurate and up to date and therefore we ask that if there are changes to your information you should notify us directly at the contact details set out in Section (6) below and identify the relevant entity/division within the Magma Group with whom you have dealing.

If you would like to access your personal data, please complete our data access form available here and send us the completed form or query to the contact details in Section (6) below.

6. Limiting the processing of personal data, further enquiries, and complaints

If:

- i. you would like to obtain further information on how to limit the processing of your personal information or withdraw your consent on personal data processing;
- ii. you would like to request to limit your personal information or withdraw your consent on personal data processing (note that we may retain your data where there is a legal basis to do so);
- iii. you have any further queries; or
- iv. you would like to make a complaint in respect of your personal information,

You may contact the Magma Group Strategic Communication Department:

Designation: Strategic Communication Officer

Address: D5-5-5, Solaris Dutamas, No.1 Jalan Dutamas 1, 50480 Kuala Lumpur, Malaysia

Tel: +603 6211 3686

Email: jylee@magma.my

This Privacy Notice was last updated on 14 December 2023