

PRIVACY POLICY

(Updated in compliance with the Personal Data Protection Act 2010 and the Personal Data Protection (Amendment) Act 2024)

This Privacy Policy is issued to you by and on behalf of **SHL CONSOLIDATED BHD** and its related companies* (hereinafter referred to as the “SHL Consolidated Group”) pursuant to the **Personal Data Protection Act 2010** and the **Personal Data Protection (Amendment) Act 2024** (“PDPA”). SHL Consolidated Group takes your right to privacy seriously and commits to protecting your personally identifiable information (“personal data”) in line with existing laws and other applicable laws. This Privacy Statement sets out SHL Consolidated Group’s approach in handling personal data.

1. Definitions

In this Privacy Policy:

- **“SHL Consolidated Group”** refers to SHL Consolidated Bhd and includes its subsidiaries, related and associate companies.
 - **“We”, “our”, “us”** refers to any of the companies within the SHL Consolidated Group.
 - **“Personal Data”** refers to any information in our possession or control that relates directly or indirectly to you (or any other individual) and can identify you (or such individual), whether alone or in combination with other information.
 - **“Sensitive Personal Data (SPD)”** includes data related to biometric data, health, religious beliefs, political opinions, commission of any offence, or other information as defined under applicable laws.
 - **“Services”** means any services provided by SHL Consolidated Group and/or its agents.
-

2. Types of Personal Data Collected

We may collect the following personal data, including but not limited to:

- Name, NRIC/passport number, gender, nationality, date of birth, contact details
- Marital status, financial and credit information
- Employment history, residential or mailing address
- Transactional data related to property purchases, service subscriptions or enquiries
- Preferences such as language, product interest, development interest
- Surveillance footage (CCTV) at our premises
- Login credentials for our websites or portals
- Data of third parties (e.g., family members), where you confirm you have obtained their consent

SHL Consolidated Group will only collect and process personal data to the extent that such personal data is necessary for the relevant purpose.

3. Collection and Use of Sensitive Personal Data

SHL Consolidated Group may collect personal data directly from you where it is necessary, reasonable or practical to do so. When we collect your personal data, we will inform you how we may use or disclose your personal data unless it is apparent at the point of collection. In some cases, it may be necessary, reasonable or practical for SHL Consolidated Group to collect your personal data from other persons, with or without your knowledge or involvement as part of our statutory functions, in exercise of our legal rights and for other purposes such as recruitment or procurement.

For visitors to SHL Consolidated Group's premises, SHL Consolidated Group may collect personal data prior to entry for identity verification and security purposes. SHL Consolidated Group also operates CCTVs at exterior perimeters and within our premises which may collect photo videos or voice recordings of individuals for safety of the visitors and our employees, crime prevention and crime detection.

Should you provide any Sensitive Personal Data (SPD), it shall be treated as Personal Data and processed strictly in accordance with this Privacy Policy and the PDPA, including express consent where required.

4. Purpose of Collection and Processing

Your data is collected and processed for purposes such as:

- Processing your application, registration, transaction, or enquiry
- Provision and management of our services
- Verification and credit assessments
- Billing, debt recovery, and other financial purposes
- Legal and regulatory compliance
- Risk management and internal record-keeping
- Customer service and communication
- Notification of project updates, promotional content, or future developments (with consent)
- Security monitoring, including surveillance cameras

The legal basis we rely on for processing of your personal data may be:

- your consent;
 - performance of contracts or in order to enter into a contract with you;
 - compliance with SHL Consolidated Group's legal obligations;
 - protection of your vital interests as well as the vital interests of other individuals;
 - SHL Consolidated Group's performance of statutory duties; or
 - SHL Consolidated Group's legitimate interests.
-

5. Disclosure of Personal Data

Efforts will be made to prevent your data being made available to third parties. However, we may share personal data with third parties if -

- it is provided for in this Privacy Statement;
- your consent is obtained;
- a service provided requires interaction with a third party, or is provided by a third party on our behalf and/or your behalf;
- it is pursuant to legal action or law enforcement; or
- it is to perform our statutory functions and exercise powers under the law.

We may disclose your Personal Data to:

- Other companies within the SHL Consolidated Group
- Government and regulatory authorities
- Financial institutions and credit reporting agencies
- Legal and professional advisors
- Auditors, consultants, insurers

- Debt recovery agencies
- Any party to whom we assign, transfer, or novate any part of our business
- Other parties authorised by you
- Data processors, contractors or service providers who process data on our behalf (on a need-to-know basis)

Where SHL Consolidated Group appoints a third party service provider to process personal data on behalf of SHL Consolidated Group, SHL Consolidated Group will instruct such third party service provider to only process such personal data for the specific purposes as required by SHL Consolidated Group.

If we disclose any of your personal data to any person, we will require such person to appropriately safeguard the personal data provided to them.

6. Retention of Personal Data

We retain your personal data for as long as necessary to fulfil the purposes for which it was collected and/or to comply with legal, regulatory, and internal policy requirements. Thereafter, data is securely deleted or anonymized.

7. Cross-Border Transfer

Your Personal Data may be transferred to and processed in countries outside Malaysia, including jurisdictions where data protection laws may differ. We shall endeavour to ensure that appropriate safeguards are in place to protect your data.

8. Rights of Access, Correction, Withdrawal, and Data Portability

You have the right to:

- Access your personal data held by us
- Correct or update any inaccurate, incomplete, or outdated data
- Withdraw your consent at any time (except where processing is necessary). However, such withdrawal or request may result in SHL Consolidated Group being unable to assess any information / application submitted by you or continue to engage you on certain matters. If you do not wish to receive any marketing information or promotions on SHL Consolidated Group future events, you may request us to exclude you from our marketing communications. This would not affect the dealings, arrangement or contract we have with you.
- Provided it is technically feasible, and the data format is compatible, you may have the right to request SHL Consolidated Group to transmit your personal data to a third party and or another data controller
- Object to processing based on automated decision-making or profiling (if applicable)

To exercise your rights, please contact us (see Section 11). We may charge a fee ~~as where~~ permitted under the PDPA.

9. Children's Data

We do not knowingly collect personal data of individuals below 18 years of age without the consent of a parent or legal guardian. If you are below the age of 18 years, please do not submit personal data without such consent.

10. Data Breach Notification

In the event of a data breach that may cause harm to data subjects, we will notify the Personal Data Protection Commissioner and the affected individuals within 72 hours, as required under the PDPA Amendment 2024.

11. Contact Us

We can be contacted at:

Address	:	6th Floor, Wisma Sin Heap Lee No. 346, Jalan Tun Razak 50400 Kuala Lumpur
E-mail	:	enquiry@shlcb.com.my
Attention to	:	Corporate Division
Telephone no. Website	:	www.shlcb.com.my

12. Updates to This Policy

This policy may be amended from time to time. Any changes will be posted on our website. Please review this policy periodically to stay informed.

13. Language

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

14. Other Information

When you visit SHL Consolidated Group's website, details about your visit may be recorded by SHL Consolidated Group and our third-party service providers, including through the setting and usage of cookies.

The website may display content of, and provide links to, our advertising partners, content partners, third party social media and third-party video websites such as Facebook, Instagram and Youtube. The practices on handling information and cookies by third parties are governed by the privacy statements of such other third party and you are expected to refer to their privacy statements. SHL Consolidated Group does not collect or use any information stored in cookies that may be set by any third party from their websites and such third parties do not have access to cookies set by SHL Consolidated Group's website.

You are able to manage or delete cookies directly from your browser history (cache). For instructions on how to manage or delete cookies, please check the support website for your browser.

15. Acknowledgement and Consent

I/We hereby acknowledge and confirm that I/we have read and understood this Privacy Policy and consent to the collection, use, retention, disclosure, transfer, and processing of my/our personal data (including sensitive personal data, if any) in accordance with the terms herein.

Signature: _____

Name:

NRIC No.:

Date:

*Includes: SHL Consolidated Bhd, Sin Heap Lee Construction Sdn Bhd, SHL-M Sdn Bhd, Sin Heap Lee Development Sdn Bhd, Sungai Long Golf Resort Berhad, Sungai Long Golf & Country Club Cheras, Sukma Pesona Sdn Bhd, Sin Heap Lee Brickworks Sdn Bhd, Kajang Granite Quarry Sdn Bhd, Integrated Management Corporation Sdn Bhd and other related companies.