

PRIVACY POLICY

Your Personal Data is important to us. We are in the process of undertaking a review of our personal data protection practices. Please therefore note that this Privacy Policy is a temporary policy which may be subject to amendment following the completion of our personal data protection compliance exercise, which is estimated to end in April 2014.

1. INTRODUCTION

1.1 This is the privacy policy (“Privacy Policy”) of LBS Bina Group Bhd and its affiliates (including but not limited to its subsidiaries, related, associated and affiliated companies, whether such companies are residing, situated, carrying on business, incorporated or constituted within or outside Malaysia) (“LBS Group”).

1.2 This Privacy Policy applies to personal information about individuals held by the LBS Group. The LBS Group will only process your Personal Data in accordance with the Personal Data Protection Act 2010, the applicable regulations, guidelines, orders made under the PDPA and any statutory amendments or re-enactments made of the PDPA from time to time (collectively referred to as the “PDPA”) as well as this Privacy Policy.

1.3 The LBS Group reserves the right, at its sole discretion, to modify, update and/or amend this Privacy Policy from time to time with reasonable prior notice to you. The LBS Group will notify you of any amendments via announcements on the LBS Group’s website (“Site”) or other appropriate means as determined by the LBS Group. Please therefore remember to check this Site from time to time to see if there are amendments to this Privacy Policy. Any amendments to this Privacy Policy will be effective upon notice to you. By continuing to use the services and/or access to the Site after being notified of any amendments to this Privacy Policy, you will be treated as having agreed to and accepted those amendments.

1.4 You may obtain a copy of this Privacy Policy on <http://www.lbs.com.my/> or by contacting the LBS Group at the contact details below.

1.5 If you do not agree to this Privacy Policy or any amendments to this Privacy Policy, LBS Group may not be able to render all services to you and you may be required to terminate your relevant agreement with the LBS Group and/or stop accessing or using the Site.

2. COLLECTION OF PERSONAL DATA

2.1 The term “Personal Data” means any information in the possession of the LBS Group or control of the LBS Group that relates directly or indirectly to an individual to the extent that the individual can be identified or are identifiable from that and other information in the possession of the LBS Group such as

name, address, telephone number, NRIC, email address, etc. The LBS Group may “process” your Personal Data by way of collecting, recording, holding, storing, using or disclosing it.

2.2 Your Personal Data may be collected from you during your course of dealings with the LBS Group in any way or manner including pursuant to any transactions and/or communications made from/with the LBS Group. The LBS Group may also collect your Personal Data from a variety of sources, including without limitation, at any events, seminars, road shows, customer satisfaction surveys organised or sponsored by the LBS Group and/or from the cookies used on the Site.

2.3 In addition, the LBS Group may also receive, store and process your Personal Data which are provided or made available by any third parties, credit reference bodies, regulatory and law enforcement authorities, for reasons including delivery of the LBS Group’s products and/or services, performance of conditions of agreements and/or to comply with the LBS Group’s legal and regulatory obligations.

3. PURPOSE OF ACQUIRING AND PROCESSING YOUR PERSONAL DATA

Your Personal Data may be processed for the following purposes:

- (a) to communicate with you;**
- (b) to provide products and/or services to you;**
- (c) to respond to your enquiries or complaints;**
- (d) to process your purchase and/or contest entry;**
- (e) to provide you with information and/or updates on the present and future property developments, other products, services and/or promotions offered by the LBS Group and selected third parties which may be of interest to you from time to time by SMS, phone call, email, fax, mail, social media and/or any other appropriate communication channels;**
- (f) to send you seasonal greetings messages from time to time;**
- (g) to send you invitation to join the LBS Group’s membership, events and promotions and property launch events;**
- (h) to monitor, review and improve the LBS Group’s membership, events and promotions, products and/or services;**

(i) to provide you with post vacant possession services, such as club house services, security and customer loyalty programmes;

(j) to process and analyse your Personal Data either individually or collectively with other individuals;

(k) to conduct market research or surveys, client profiling activities, planning and statistical analysis within the LBS Group in relation to the LBS Group's present and future property developments, other products and/or services;

(l) to share any of your Personal Data with the auditor for the LBS Group's internal audit purposes;

(m) to share any of your Personal Data with a third party for purposes of assisting you pursuant to your financial application, where necessary

(n) to share any of your Personal Data pursuant to any agreement or document which you have duly entered with the LBS Group for purposes of seeking legal and/or financial advice and/or for purposes of commencing legal action;

(o) to share any of your Personal Data with a third party necessary for the preparation of legal documents or contract to be entered by you with the LBS Group;

(p) to share any of your Personal Data with a third party necessary for the purpose of applying and obtaining insurance policy(ies), where necessary;

(q) to maintain and improve customer relationship;

(r) to maintain and update internal record keeping;

(s) for registration for a user account with the LBS Group;

(t) for internal administrative purposes;

(u) for audit and risk management purposes;

(v) for detecting, investigating and preventing fraudulent, prohibited or illegal activities;

(w) for direct marketing purposes via SMS, phone call, email, fax, mail, social media and/or any other appropriate communication channels;

(x) for enabling the LBS Group to perform its obligations under the agreement or document which you have duly entered into with the LBS Group including

but not limited to attending to the registration with the relevant authorities on your behalf, delivery of vacant possession, defect rectification works and perfecting the transfer of the separate individual/strata title in your favour;

(y) for meeting any applicable legal or regulatory requirements and making disclosure under the requirements of any applicable law, regulation, direction, court order, by-law, guideline, circular or code applicable to the LBS Group;

(z) to enforce or defend the LBS Group's rights and your rights under, and to comply with, the LBS Group obligations under the applicable laws, legislation and regulations; and/or

(aa) for other purposes required to operate and maintain the LBS Group's business,

(collectively referred to as the "Purposes"), and you agree and consent to the LBS Group using and processing your Personal Data for the Purposes in the manner as identified in this Privacy Policy. If you do not consent to the LBS Group processing your Personal Data for one or more of the Purposes, please notify the LBS Group at the contact details below.

4. CONSEQUENCES OF NOT CONSENTING TO THIS PRIVACY POLICY

It is obligatory for the LBS Group to collect and to retain your Personal Data unless stated otherwise. If you do not supply the LBS Group with your Personal Data, or do not consent to the above or this Privacy Policy, the LBS Group will not be able to:

(a) to process your purchase of any of the LBS Group's products and/or services;

(b) communicate with you;

(c) provide you with the LBS Group's products and/or services requested;

(d) accept and process your entry to any contest;

(e) update you on the LBS Group's latest products, services and/or promotions; and/or

(f) allow you to access certain sections of the Site where log in is required,

and you may be required to terminate your agreement or discontinue your business relationship with the LBS Group.

5. DISCLOSURE OF YOUR PERSONAL DATA

The LBS Group will not disclose any of your Personal Data to any third party without your consent except to the following third parties, for one or more of the above Purposes:

- (a) companies within the LBS Group and their respective employees;**
- (b) your immediate family members and/or emergency contact person as may be notified to the LBS Group from time to time;**
- (c) successors in title to the companies within the LBS Group;**
- (d) any party who is involved in connection with corporate exercises, such as a potential or actual sale/disposal of any business or interest of any companies within the LBS Group, merger, consolidation, re-organisation or funding exercise relating to any companies within the LBS Group, or asset sale, or in the event of winding-up of any companies within the LBS Group;**
- (e) the LBS Group's business partners and affiliates that provide related products and/or services in connection with the LBS Group's business for joint promotions and/or contests;**
- (f) any person under a duty of confidentiality to which has undertaken to keep your Personal Data confidential which the LBS Group has engaged to discharge the LBS Group's obligations to you;**
- (g) any party in relation to legal proceedings or prospective legal proceedings;**
- (h) the LBS Group auditors, consultants, lawyers or other financial or professional advisers on a need to know basis for the purpose of those advisers providing advice to the LBS Group;**
- (i) any party nominated or appointed by the LBS Group either solely or jointly with other service providers, for purpose of establishing and maintaining a common database where the LBS Group has a legitimate common interest;**
- (j) data centres and/or servers located within or outside Malaysia for data storage purposes;**
- (k) payment channels including but not limited to financial institutions for purpose of assessing, verifying, effectuating and facilitating payment of any amount due to the LBS Group in connection with your purchase of the LBS Group's products and/or services;**
- (l) government agencies, law enforcement agencies, courts, tribunals, regulatory bodies, ministries, and/or statutory agencies or bodies, offices or**

municipality in any jurisdiction, if required or authorised to do so, to satisfy any applicable law, regulation, order or judgment of a court or tribunal or queries from the relevant authorities;

(m) any provider of public utility or related services, whether or not government owned and/or any corporations approved and established for the provision of utility services and facilities, which includes without limitation to Tenaga Nasional Berhad, Syarikat Bekalan Air Selangor Berhad, Syarikat Telekom Malaysia Berhad and Indah Water Konsortium Sdn. Bhd.;

(n) the LBS Group's contractors or sub-contractors as may be necessary for discharging the LBS Group's duties and obligations under any document or agreement duly entered by you with the LBS Group;

(o) the LBS Group's appointed product and/or service providers, suppliers or agents, to discharge or perform one or more of the above Purposes;

(p) any persons, authorities or regulators to whom the LBS Group is permitted or required to disclose to under the applicable laws; and/or

(q) the general public when you become a winner in a contest by publishing your name, photographs and other Personal Data without compensation for advertising and publicity purposes.

6. ACCURACY OF YOUR PERSONAL DATA

The LBS Group aims to keep all Personal Data as accurate, complete, up-to-date and reliable as possible. Therefore, the accuracy of your Personal Data depends to a large extent on the information you provide. As such, it is a condition of the LBS Group providing the products and/or services to you that you:

(a) warrant and declare that all your Personal Data submitted or to be submitted to the LBS Group are accurate, updated and complete in all respects for purposes of acquiring or using the relevant products and/or services and you have not withheld any Personal Data which may be material in any respect and that the LBS Group is authorized to assume the authenticity and updatedness of the Personal Data given by you when processing the Personal Data submitted by you to the LBS Group (and the LBS Group is not obliged to independently verify any of such Personal Data); and

(b) you understand and agree to, the importance of the need to, update the LBS Group as and when such Personal Data provided earlier to the LBS Group becomes inaccurate, incomplete, misleading, outdated or changes in any way whatsoever by contacting the LBS Group at the contact details below.

7. YOUR RIGHTS

7.1 Subject to the exceptions provided under the PDPA, you have the right to request for access to, request for a copy of, request to update or correct, your Personal Data held by the LBS Group. The LBS Group may charge a small fee (such amount as permitted by the PDPA) to cover the administration costs involved in processing your request to access your Personal Data.

7.2 In respect of your right to access and/or correct your Personal Data, the LBS Group has the right to refuse your request to access and/or correct your Personal Data for the reasons permitted under the law, such as where the expense of providing access to you is disproportionate to the risks to your privacy, or where the rights of others may also be violated, amongst other reasons.

7.3 You have the right at any time to request the LBS Group to limit the processing and use of your Personal Data (for example, requesting the LBS Group to stop sending you any marketing and promotional materials or contacting you for marketing purposes).

7.4 In addition, you also have the right to inform the LBS Group on your withdrawal (in full or in part) of your consent given previously to the LBS Group subject to any applicable legal restrictions, contractual conditions and a reasonable duration of time for the withdrawal of consent to be effected.

8. RETENTION OF YOUR PERSONAL DATA

Any of your Personal Data provided to the LBS Group is retained for as long as the purposes for which the Personal Data was collected continues; your Personal Data is then destroyed unless its further retention is required to satisfy a longer retention period to meet the operational, legal, regulatory, tax or accounting requirements of the LBS Group.

9. SECURITY OF YOUR PERSONAL DATA

9.1 The LBS Group is committed to ensuring that your Personal Data is stored securely. In order to prevent unauthorised access, disclosure or other similar risks, the LBS Group endeavours, where practicable, to implement appropriate technical and organisational measures in accordance with the applicable laws and regulations to safeguard against and prevent the unauthorised or unlawful processing of your Personal Data, and the destruction of, or accidental loss, damage to, alteration of, unauthorised disclosure of or access to your Personal Data.

9.2 The LBS Group will make reasonable updates to its security measures from time to time and ensure the authorised third parties only use your Personal Data for the Purposes set out in this Privacy Policy, and to adequately safeguard your Personal Data.

9.3 The Internet is not a secure medium. However, the LBS Group will put in place various security procedures with regard to the Site and your electronic communications with the LBS Group.

9.4 Please be aware that communications over the Internet, such as emails/webmails are not secure unless they have been encrypted. Your communications may be routed through a number of countries before being delivered – this is the nature of the World Wide Web/Internet.

9.5 The LBS Group cannot and does not accept responsibility for any unauthorised access or interception or loss of Personal Data that is beyond the LBS Group's reasonable control.

10. PERSONAL DATA FROM MINORS AND OTHER INDIVIDUALS

To the extent that you have provided (or will provide) Personal Data about your family, spouse and/or other dependents, you represent and warrant that you have obtained their consent to provide their Personal Data to the LBS Group and they consent to their Personal Data being processed in accordance with this Privacy Policy and, with respect to minors (i.e. individuals under 18 years of age) or any individuals not legally competent to give consent, you consent on their behalf (and you confirm that you have the authority to do so).

11. TRANSFER OF YOUR PERSONAL DATA OUTSIDE OF MALAYSIA

The LBS Group's information technology storage facilities and servers may be located in other jurisdictions outside of Malaysia. Your Personal Data may be transferred to entities outside of Malaysia. This may include, but not limited to, instances where your Personal Data may be stored on servers located outside of Malaysia. Please note that these foreign entities may be established in countries that might not offer a level of data protection that is equivalent to that offered in Malaysia under the laws of Malaysia. You hereby expressly consent to the LBS Group transferring your Personal Data outside of Malaysia for such purposes. The LBS Group shall endeavour to ensure that reasonable steps are taken to procure that all such third parties outside of Malaysia shall not use your Personal Data other than for that part of the Purposes and to adequately protect the confidentiality and privacy of your Personal Data.

12. WEBSITE

12.1.External links

(a) If any part of the Site links you to other websites, those websites do not operate under this Privacy Policy and the LBS Group does not accept any responsibility or liability arising from those websites.

(b) Likewise, if you subscribe to an application, content or a product from a strategic partner of the LBS Group and you subsequently provide your Personal Data directly to that third party, that Personal Data will be subject to that third party's privacy policy (if they have such a policy) and not to this Privacy Policy.

(c) The LBS Group recommends you to read and understand the privacy statement/policy posted on those other websites in order to understand their procedures for collecting, processing, using and disclosing personal data and before submitting your Personal Data to those websites.

13. CONTACT DETAILS

If you have any questions about this Privacy Policy or would like to make a complaint or, access data or request for a correction, please contact the LBS Group at the contact details below:

Legal Department

Address:

**LBS BINA GROUP BERHAD
Plaza Seri Setia,
Level 2, No.1, Jalan SS 9/2,
47300 Petaling Jaya,
Selangor Darul Ehsan**

Contact No.: 03- 7861 8005 / 03-7861 8027

Facsimile No.: 03- 7861 8003

Email Address.: pdpa@lbs.com.my