



PRIVACY POLICY

(VERSION 2.0)

APPROVED BY THE BOARD OF DIRECTORS OF THE COMPANY ON 26 NOVEMBER 2025

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1. THIS PRIVACY POLICY

Paragon Globe Berhad, its subsidiaries and related companies, as defined under the Companies Act 2016 (“PGB”, “we”, “us”, “our”) are committed to protect the privacy and security of personal data provided to us by individuals including but not limited to vendors, customers, suppliers, contractors, service providers, business partners, agents, tenants, employees and job applicants (“you” or “your”) whom we encounter in the course of our business. We process such personal data in compliance with the Personal Data Protection Act 2010 (“Act”) and all applicable regulations, guidelines, codes of practice, amendments or re-enactments of the Act from time to time.

This Privacy Policy sets out how we collect, use, disclose, store, process and manage your personal data.

By providing your personal data to PGB, you are deemed to have read, understood and agreed to the collection, use, disclosure, storage, processing and management of your personal data in accordance with this Privacy Policy.

We may collect personal data from you through various channels, including but not limited to:

- i. PGB’s official website at www.pgbgroup.com.my and any affiliated or integrated third-party sites;
- ii. arrangement, agreement and/or contract with PGB;
- iii. mobile applications operated by PGB;
- iv. electronic or physical forms issued by PGB;
- v. emails, telephone calls, SMS, WhatsApp or other communication platforms;
- vi. social media platforms; and/or
- vii. job applications, interviews, employment records and HR-related platforms.

PGB shall not be held liable nor responsible for any personal data that has been revealed and/or abused at large and/or already within the public knowledge and for any risks and/or occurrences by publishing any of the data therein.

2. SOURCE OF PERSONAL INFORMATION

PGB collects your personal data in various ways whether through printed or electronic means including digital and mobile platforms. The manner in which your personal data is processed may vary depending on the type of service requested. All personal data collected shall be processed in accordance with the Act, applicable privacy laws and this Privacy Policy.

Your personal data may be obtained from one or more of the following sources:

(a) Information Provided Directly or Indirectly by you

Personal data that you provide to us through, among others, options to purchase, sales orders, applications, forms, consents, job application and/or employment related documents, human resources administration documents, surveys and personal documents including but not limited to:

- (i) name, identity card number, passport number, date of birth, age, gender, race, nationality, marital status, occupation;
- (ii) contact information such as residential address, email address and telephone numbers;
- (iii) employment history, qualifications, professional licences, education background, human resources related information such as salary, benefits, medical information, attendance and leave records, demographic information; and
- (iv) any other personal data permitted by applicable law.

By providing such personal data to PGB, you acknowledge, agree and consent to PGB collecting, using, disclosing and processing your personal data for the purposes stated in this Privacy Policy.

(b) Personal Data of Third Parties (Relevant Persons)

Personal data relating to third party including but not limited to your spouse, children, parents, directors, shareholders, guarantors (collectively as "Relevant Persons"). In providing such data, you represent and warrant that you have obtained the necessary consent from the Relevant Persons and are authorized to disclose their personal data to PGB and you consent PGB collecting, using, disclosing and processing their personal data for the respective purposes described in this Privacy Policy;

(c) Billing and Financial Information

Information relating to your transaction with PGB including account status, account balance, payment records and data obtained from credit bureau reports, credit reporting agencies or financial institutions.

(d) Transactional and Contractual Information

Personal data provided directly or indirectly by you, your authorized representatives, agents, financial institutions, governmental agencies or your employer through completed enquiries, applications, sale and purchase agreements, tenancy agreements, bank statements or registration forms submitted via any medium.

(e) Other Sources of Personal Data

Any other personal data relating to you that is captured, collected or obtained by PGB, directly or indirectly, whether through physical means, electronic systems, digital platforms, social media or via other communication and messaging platforms.

3. PURPOSES OF COLLECTION AND PROCESSING OF PERSONAL DATA

PGB may collect, use, disclose and process your personal data for one or more of the following purposes, whether directly or indirectly, related to our business, operations or legal obligations, including, but not limited to the following:

- (a) to process, provide and administer the products or services requested by you including products or services offered by third-party service providers through PGB or that may be of interest to you;
- (b) to facilitate, implement, perform formalise and/or manage any services, transactions or dealings with you;
- (c) to administer, process payments, billing, refunds, invoicing and other financial or transaction matters;
- (d) to communicate with you in relation to our products, services, transactions, events, notices or updates;
- (e) to administer, manage, maintain and improve our customer or prospective customer relationships, products, services and service quality;
- (f) to maintain, update and manage our customer and prospective customer records, internal databases and for internal record-keeping;
- (g) to respond to and handle your queries, requests, complaints, feedback, issues or disputes in relation to any dealings with PGB;
- (h) for internal and external audit, compliance review, due diligence or investigation purposes;
- (i) to facilitate your participation in contests, events, promotions or programmes organized by PGB;
- (j) to conduct market research, surveys, customer profiling, business development activities, statistical analysis or any other research relating to our products or services;
- (k) to comply with PGB's internal policies, standard operating procedures and all applicable legal, regulatory and industry requirements;
- (l) for recruitment purposes including assessing your job application, verifying information provided, conducting background checks and managing the recruitment and selection process;
- (m) to send you promotional materials, marketing information, special offers, newsletters or updates in accordance with your marketing preference;
- (n) to administer and give effect to any commercial transaction between you and PGB (including but not limited to tender award, service contract, tenancy agreement or other commercial arrangements);
- (o) to conduct credit assessments, trade checks, due diligence and other background checks on your creditworthiness, financial standing or suitability;

- (p) to maintain your account history with PGB for present and future reference (where applicable);
- (q) for the purpose of credit evaluation, credit review or reporting and for debt-collection or assisting other institutions to perform such functions;
- (r) to detect, investigate and prevent or address fraud, unlawful, prohibited or illegal activities or breaches of PGB's terms, policies or security systems;
- (s) for any purpose clearly communicated to you at the time of collection of your personal data;
- (t) to comply with any legal, regulatory, governmental or statutory obligations including relating to disclosure required under applicable laws, rules, regulations, by-laws, order, guidelines or directives;
- (u) to evaluate and assess eligibility for sponsorships, grants or financial assistance and to prepare and execute the related documents;
- (v) for collaborating with business partners or third parties for advertising, marketing, promotional or business development purposes;
- (w) to send you season's greetings, notices of special occasion, festive messages or similar communications;
- (x) to allow authorized third-parties to contact you for advertising or promotional campaigns, where permitted under the law in accordance with your marketing preferences;
- (y) to ensure that the content from our website or digital platforms is presented in the most effective and user-friendly manner for your device;
- (z) to enable PGB to perform its obligations, enforce its rights and obtain legal advice or representation (where necessary); and/or
- (aa) for any other purposes necessary for operating, maintaining, managing and improving our business and your relationship with PGB.

Where personal data is requested, you have an option not to provide information other than what is indicated as mandatory. If insufficient personal data is provided or if you withdraw your consent (including the consent of any Relevant Person), PGB may be unable to provide the requested products or services, process your transactions or applications, fulfil any contractual obligations or respond to any requests or enquiries.

PGB may use and share your personal data for analytical, measurement and optimisation purposes including understanding how our products and services are used, improving our offerings, operations, customer service and digital platforms, personalising your experience with targeted recommendations and content, measuring the effectiveness of advertisements, promotions and marketing campaigns and enabling advertisers or partners (where permissible) to understand performance of campaigns you engage with.

4. DISCLOSURE OF PERSONAL INFORMATION

Your personal data may be disclosed, transferred or made accessible to the following person or entities, whether located within or outside Malaysia, for the purposes set out in Section 3 or for purposes directly related thereto or where such disclosure is otherwise permitted or required under the laws of Malaysia:

- (a) PGB's subsidiary companies, associated companies and/or affiliates companies;
- (b) real estate agents, negotiators or property agencies engaged in connection with your transactions with PGB;
- (c) PGB's professional advisors including without limitation, legal advisors, financial advisors, consultants and other professional service providers;
- (d) government ministries, departments, agencies, statutory bodies, local authorities, law enforcement agencies, regulatory bodies, courts, tribunals and any other authorities to whom disclosure is required or authorized under any applicable law, regulation, order, directive, guideline or judgement;
- (e) PGB's business partners, investors, third party service providers, suppliers, vendors, contractors, outsourced service providers, data processors and any third parties who provide goods or services to PGB or act on PGB's behalf in connection with our business operations;
- (f) third parties with whom PGB has commercial, business development, cooperative, marketing or advertising relationships for purposes of promoting or marketing products and/or services;
- (g) third-party credit reporting or credit reference agencies, background screening providers or employment verification agencies for the purpose of recruitment, selection or employment-related assessments; or
- (h) in the event of any potential, proposed or actual corporate exercise involving PGB including any sale, disposal merger, acquisition, consolidation, joint venture, re-organization, restructuring, funding exercise, or winding-up (collectively as "Transaction"), your personal data may be disclosed or transferred to (i) the relevant third parties involved in the Transactions; (ii) their advisors, representatives or financiers; and (iii) any other person who reasonably requires such information for purposes relating to the Transaction.

By providing your personal data, you acknowledge and consent to such disclosure or transfer in connection with the Transaction.

5. CONSEQUENCES OF REFUSAL OR FAILURE TO SUPPLY

The provision of your personal data is necessary for us to process your request, to enter into transactions with you and to provide our products and/or services.

If you refuse or fail to provide the personal data, the following consequences may arise:

- (a) we may be unable to initiate, formalise, perform or fulfill any agreement, contract or transaction with you including those relating to the sale, purchase, leasing or provision of our properties, products and/or services;
- (b) we may be unable to process your requests, applications, enquiries or to provide you with the information, products and/or services that you require;
- (c) we may be unable to provide you updates, notices, promotions, marketing materials or information relating to our products, services, events or to obtain your feedback for improvement purposes; and/or
- (d) depending on circumstances, your relationship or continued engagement with us may be delayed, disrupted or otherwise affected.

6. SECURITY OF YOUR PERSONAL DATA

We are committed to ensuring that your personal data is protected and secured in accordance with the Act. We implement reasonable and appropriate administrative, technical, physical and organizational security measures to safeguard your personal data against loss, misuse, modification or accidental access, disclosure, alteration, destruction or other similar risks.

All employees, business partners, agents, contractors, vendors, suppliers, data processors, third-party service providers who process or have access to your personal data are required to observe strict confidentiality obligations and to handle such personal data in accordance with our instructions and applicable data protection requirements.

While we strive to protect the security and integrity of your personal data, no method of transmission over the internet or method of electronic storage is completely secure. Accordingly, we cannot guarantee that unauthorized access, interception or loss of personal data will never occur. We shall not be liable for any such incidents which occur beyond our reasonable control.

7. ACCURACY OF YOUR PERSONAL DATA

We take reasonable steps to ensure that the personal data we collect, use and disclose is accurate, complete, not misleading, up-to-date and reliable for its intended purposes. However, the accuracy of such personal data largely dependent on the information you provide to us.

Accordingly, as a condition of our provision of products, services and/or facilities to you, you hereby:

- (a) represent, warrant and declare that all personal data submitted to us are accurate, not misleading, up-to-date, and complete in all respects and that no material information has been withheld. You further acknowledge that we are entitled to assume the accuracy and currency of all personal data provided by you for the purposes of processing such data;
- (b) undertake to promptly notify and update us as and when any personal data previously provided becomes inaccurate, incomplete, misleading, outdated or is otherwise subject to change by contacting us at the contact details provided in Section 14; and
- (c) confirm that all personal data provided to is either your own personal information or information that you are duly authorized to disclose and provide to us for the purposes stated in this Privacy Policy.

8. DATA SECURITY

We implement reasonable and appropriate physical, technical, administrative and procedural measures to protect your personal data from accidental loss, unauthorised or accidental access, use, alteration, disclosure and destruction in accordance with the Act. All personal data provided to us is stored on secure servers with controlled access.

Our security measures include but are not limited to the following:

- (a) registering and authorizing personnel who handle personal data before access is granted and maintaining an updated access control register;
- (b) revoking or adjusting access rights upon an employee's resignation, termination, change of role or when access is no longer required;
- (c) controlling and restricting employees' access to personal data strictly on a need-to-know basis for the purposes of collecting, processing, storage and other permitted uses;
- (d) issuing unique user IDs and passwords (under domain) to authorised personnel to access systems containing personal data;
- (e) immediately deactivating access credentials of personnel who cease handling personal data or whose employment has ended;

- (f) implementing physical and technical safeguards including but not limited to:
 - (i) controlled entry and exit at data storage locations;
 - (ii) securely storing personal data in a protected area against physical, environmental or natural risks;
 - (iii) providing closed-circuit cameras at storage sites (where necessary);
- (g) maintaining up-to-date back-up/recovery systems and anti-virus/malware protection software, to safeguard IT infrastructure through the implementation of security protocols and safeguards to prevent malware, cyber threats or unauthorized attacks;
- (h) prohibiting the transfer of personal data through removable media devices and cloud computing services unless prior approval is obtained from PGB's top management and appropriate safeguards are implemented;
- (i) maintaining proper records of access to personal data and making such records available for inspection or submission if required by the Personal Data Protection Commissioner;
- (j) ensuring confidentiality obligations are observed by all employees handling personal data at all times; and
- (k) requiring third parties engaged by us to process personal data to be bound by appropriate contractual obligations consistent with PDPA requirements and our security standards.

We also ensure that any third-party service provider storing or processing your personal data have implemented similar acceptable standards of security. However, as the transmission of data via the internet is inherently insecure, we cannot provide any assurance regarding the security of transmission of information you communicate to us and you do so at your own risk.

9. RETENTION OF PERSONAL DATA

We will retain and process your personal data for as long as necessary to fulfil the purposes for which it was collected or to comply with legal, regulatory, accounting or reporting requirements. Once retention is no longer required for any lawful purpose, we will take reasonable steps to ensure that such personal data is securely deleted, destroyed or anonymized in accordance with the Act and our internal policies.

To support proper retention and disposal practices, we have implemented the following measures:

- (a) maintaining a proper record-keeping system for all personal data disposal activities, to be reviewed periodically and made available for inspection or submission when required by the Personal Data Protection Commissioner;
- (b) conducting periodic reviews of data stored in our systems and databases and disposing of personal data that is no longer necessary, relevant or up-to-date in databases;

- (c) implementing a personal data disposal schedule for inactive or obsolete data under which personal data that is no longer required will be disposed of after a retention period of twenty-four (24) months, unless a longer retention period is required by law or for legitimate business purposes;
- (d) disposing of personal data collection forms used in commercial transactions within fourteen (14) days, unless such forms contain information that must be retained for legal, regulatory, evidential or contractual purposes in relation to the commercial transaction; and
- (e) prohibiting the storage of personal data on removable media devices or cloud computing services unless prior written consent has been obtained from a PGB officer authorised by top management and appropriate data protection safeguards have been implemented.

We will continue to maintain appropriate safeguards and procedures to ensure that personal data is retained only for the duration necessary and disposed of in a manner that prevents unauthorised access, disclosure, misuse, or other risks.

10. RIGHT TO ACCESS AND CORRECT PERSONAL DATA

Subject to the exemptions prescribed under Malaysia laws, you have the right to request access to and obtain a copy of your personal data held by us and to request the correction, updating, restriction or deletion of such personal data at any time.

We will provide access to your personal data or make necessary correction upon receiving your written request, provided that the requested data is in our possession or under our control. If you are able to demonstrate that the personal data we hold about you is inaccurate, incomplete, misleading or out of date, we will take reasonable steps to correct, update or delete the data as appropriate.

We will process your request to access or correct your personal data as soon as reasonably practicable subject to verifying your identity and sufficient information to locate the personal data as your requested.

We reserve the right to impose a fee for processing an access request as permitted under the law. We also reserve the right to refuse your request to access or correct your personal data in circumstances allowed under the Act including where the request is vexatious, would disclose personal data of another individual or where the data is subject to legal privilege or ongoing investigations.

11. TRANSFER OF YOUR PERSONAL DATA OUTSIDE MALAYSIA

It may be necessary for us to transfer your personal data to locations outside Malaysia in situations where any of the third parties identified in Section 4 (Disclosure of Personal Information) including our service providers, business partners, data processors or other relevant third parties are located in or maintain data processing facilities in jurisdictions outside Malaysia.

By providing your personal data, you acknowledge and consent to the transfer of your personal data to such foreign jurisdiction for the purposes set out in Section 3 (Purposes of Collection of Personal Information). Such transfers will be carried out in accordance with the requirements of the Act and any applicable regulations and guidelines.

We will take all reasonable and practicable steps to ensure that any third party located outside Malaysia is contractually bound to protect the integrity, privacy and security of your personal data, process your personal data only in accordance with our instructions and for the purposes of which the data was disclosed and provide a level of personal data protection comparable to the protection under the Act. Where required by law, we will seek your explicit consent prior to any cross-border transfer of your personal data.

12. WEBSITES

a. Links to other sites

Our website may contain links to third party websites for your convenience and information. These external sites operate independently from us and may have their own privacy statements or policies in place, which we strongly encourage you to review before accessing or providing any personal data on such websites. We do not control, endorse or assume responsibility for the content, security or privacy practices of any linked sites nor for any use of such websites by you.

b. Location enabled products or applications

Certain products, services or applications we provide may include location-enabled features that transmit your device's location information to us. Such information is used solely for the purpose of providing specific service or functionality requested by you.

These features operate strictly on an opt-in basis. You retain full control over your participation and may disable location services at any time through your device settings or by uninstalling the relevant application.

Some mobile applications may also incorporate Google Analytics or similar analytical tools to help us improve user experience. The information collected is anonymized and does not personally identify you. It may include usage patterns, device type and settings and the country and language of download.

c. Service Providers

We may engage third-party companies and individuals (collectively as “Service Providers”) to support the operation of our websites and mobile applications, to perform functions on our behalf or to assist us in analysing how our services are used.

Such Service Providers may be granted access to your personal data only to the extent necessary to perform the tasks assigned to them. They are contractually obligated to protect the confidentiality of your personal data and are prohibited from using it for any purpose other than the performance of their assigned services.

d. Analytics

We may engage third-party analytics providers to monitor, measure and analyze the use and performance of our websites, mobile applications and online services. These analytics providers may collect aggregated or anonymized data to help us understand user behaviour, enhance functionality and improve the overall user experience. Such data does not personally identify you.

e. Cookies

We may use “cookies” or similar technologies to enhance your browsing experience, facilitate navigation and personalize your interactions with our websites. A cookie is a text file placed on your computer or device by our servers and it is transmitted back to our servers each time your device interacts with our website.

Cookies allow us to identify returning users, tailor website content and improve functionality. During your visit to our website, we may collect the following information:

- (i) the date and time you access each page;
- (ii) the URL or webpage that referred you to our site;
- (iii) the IP address or the fully qualified domain name from which you accessed our site;
- (iv) the type of browser you are using; and
- (v) the pages you access on our website.

Certain webpages or online services may require you to provide a limited amount of personal data such as system login credentials, email address or contact details, to enable us to deliver services requested. Such information will be used strictly for its intended purposes including responding to your enquiries or facilitating your transactions.

13. MINORS (Under the age of 18)

We do not knowingly collect, use or process personal data from individuals under the age of eighteen (18) years old. Our products, services, website and any of the channels referred to in Section 1 of this Privacy Policy are intended for use only by individuals who are eighteen (18) years old and above.

As we are unable to verify the age of every visitor to our website or users of our services, we rely on parents or legal guardians to supervise the use of our platforms by minors.

If you are a parent or legal guardian and become aware that a minor under your care has provided personal data to us without your knowledge or consent, you may contact us using the details provided in Section 14 of this Privacy Policy. Upon verification, we will take reasonable steps to remove or delete such personal data from our records in accordance with applicable laws.

14. CONTACT US

If you have any queries, wish to access or correct your personal data or would like to raise any concerns in relation to your personal data, please contact us at:

Name : Data Protection Team
Company Name : Paragon Globe Berhad
Address : No. 10-02, Level 10, Grand Paragon Hotel,
No. 18 Jalan Harimau, Taman Century,
80250 Johor Bahru, Johor
Tel : 07-2786 668
Fax : 07-2786 666
Email : dpo@pgbgroup.com.my

15. CHANGES TO THE PRIVACY POLICY

We reserve the right to amend, update or revise this Privacy Policy at any time to reflect changes in applicable laws, regulations, business practices or operational requirements. This Privacy Policy will be reviewed at least once for every three (3) years, or as and when necessary. You are encouraged to review this Privacy Policy periodically via our website at www.pgbgroup.com.my to stay informed of any updates.

Your continued use of our products, services, website or any of the channels referred to in Section 1 of this Privacy Policy following the publication of any changes shall constitute your acceptance of the revised Privacy Notice.

16. CONFLICT

In the event of any conflict or discrepancy between the English language version of this Privacy Policy and any translation or version in another language, the English language version shall prevail and take precedence.

17. DISCLAIMER

This Privacy Policy does not constitute a contract or create legally binding obligations between PGB and any individual. While we take reasonable steps to protect your personal data, we shall not be held liable for any voluntary disclosure of your personal data by you or any unauthorized access, use or loss beyond our reasonable control.



PARAGON GLOBE BERHAD

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