

PERSONAL DATA PROTECTION NOTICE

A. Introduction

1. Kuruvilla, Yeoh & Benjamin ("**Firm**") is dedicated to protecting personal information and data of its clients irrespective of whether local or foreign. This personal data protection notice ("**Notice**") explains the Firm's policy ("**Policy**") in relation to the type of data the Firm collects or have collected and how the Firm collects the data, the purposes of processing such data, the parties the Firm discloses or have disclosed the data to and the choices available to you including how to access and correct such personal data pursuant to the Personal Data Protection Act 2010 ("**PDPA 2010**").
2. By visiting our website or by interacting with us or by providing your personal data to us, you are deemed to have read and consent to our Policy and the using, collecting and processing of your personal data in the manner described in this Notice by the Firm or on behalf of the Firm.

B. Collection of Personal Data

3. During your course of dealings with the Firm, the Firm will collect and process your personal data and/or personal data held by you for various purposes, which may include your name, national registration identification card number, passport number, photograph, email address, postal address, age, telephone number, mobile number, EPF details, SOCSO details, income tax details, employment details and history including details of present and past income, bank account details, credit card details, marital status, gender, nationality, children's details, names of relatives and how related including personal and contact details of relative, personal interests, hobbies, skills, languages, education or other related qualifications, achievements, ethnic origin, details of referees, medical records, physical, mental health or condition, political opinions, religious beliefs or other beliefs of similar nature, commission or alleged commission of offence, sexual orientation, directorship in companies, shareholding in companies, assets, involvement in legal

proceedings including details of such legal proceedings, details of loans and other financial transactions, solvency, financial status, ownership of property, car registration details and all other related information necessary and incidental to our business.

(Collectively referred to as "**Personal Data**")

4. We may collect Personal Data through several methods which include but are not limited to:-
- (a) information or comments you have provided to us by whatsoever means and/or in whatsoever manner;
 - (b) information obtained independently by us or given to us from other lawful sources including without limitation at any events organised by the Firm and/or from the cookies used on the Firm's website.

C. Purposes

5. The Personal Data collected by the Firm may be used for, but not limited to the following purposes:-
- (a) the Firm's internal record keeping;
 - (b) the Firm's internal investigations;
 - (c) to provide you with information and/or updates on the law and the scope of services offered by the Firm;
 - (d) to send you materials such as season greeting cards, newsletters, articles, write-ups and other updates including but not limited to information of events, conferences, talks and seminars which may be of particular interest to you;

- (e) to pursue the legitimate interests of the Firm including processing which is necessary and incidental to the carrying out of the conduct of the business of the Firm;
- (f) to comply with laws and regulations including requirements of any government or quasi-government or regulatory authorities or court of law; and
- (g) all other purposes necessary and/or incidental to our business and all purposes necessary for or related to any of the above purposes.

D. Disclosure

6. When processing your Personal Data, we may disclose such Personal Data to the following persons including but without limitation to:
- (a) departments within the Firm including any of our partners, lawyers and employees on a need-to-know basis;
 - (b) our auditors, lawyers, consultants, insurers, proposed insurers, advisers, bankers, agents, third party service providers (including law firms in other jurisdictions), business partners or associates or legal referral guides who are under a duty of confidentiality to us;
 - (c) government or quasi-government and regulatory authorities in Malaysia and in countries where we, our auditors, lawyers, advisers, bankers, agents, third party service providers (including law firms in other jurisdictions), business partners or associates or legal referral guides have a presence or require approvals or are required to submit such information;

(d) all other persons or bodies who provide us with services necessary and/or incidental to our business.

7. We may process your Personal Data including contacting you for the purpose(s) stated herein via telephone calls, text messaging, emails, cross-platform mobile messaging applications, post, facsimile, social media or by whatsoever form of available modes of communication.

E. Transfer Abroad

8. We may transfer your Personal Data to places outside Malaysia when carrying out any of the purposes stated herein.

F. Access and Update

9. Under the PDPA 2010, you have the right of access to your Personal Data upon payment of a prescribed fee and you may request that we correct any of your Personal Data which is inaccurate, incomplete or out-of date unless compliance is refused under the PDPA 2010. We will notify you of the reasons for not being able to accede to your request. We may also exercise our discretion in allowing the corrections requested and/or may require further documentary evidence of the new data to avoid fraud and inaccuracy.

10. You may also withdraw your consent or restrict the purposes and methods in which we process your Personal Data and the personal data relating to other persons who may be identified from your Personal Data.

11. If you have any questions regarding our Policy or if you wish to request access to your Personal Data or correct your Personal Data or withdraw your consent or restrict the purposes and methods in which we process your Personal Data, you may send your request in writing to the Firm at the details provided for in paragraph 17 of this Notice.

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12. Please note that notwithstanding the withdrawal of your consent, we may still process your Personal Data under circumstances permitted by law.

G. Review and Updates of the Policy

13. We may review and update our Policy from time to time to reflect the changes in law and business practices. We would advise you to obtain the latest version of our Policy by contacting us or visiting our website to ensure that you are familiar with the latest version. By continuing to instruct us/use our services, you are deemed to have accepted and consented to the revision and update to our Policy.

H. Non-provision of Personal Data

14. Please note that:-
- (a) in the event your Personal Data is not supplied or is insufficiently supplied to us, your instructions may not be accepted or your request to browse the information on our website may be denied.
 - (b) if you withdraw your consent or restrict the purposes and methods in which we may process your Personal Data, we may not be able to continue to act on the instructions.

I. Personal Data of third parties

15. You hereby confirm that you have obtained the consent from the person(s) whose personal data may be given to us by you or identified from your Personal Data which may be processed by us for the purposes stated herein including disclosure to the parties stated herein.

J. Consent

16. Please ensure that you obtain the necessary consents for us to process such Personal Data before instructing us/we proceed to act on the instructions and, in that connection, we shall assume that you have obtained such consent when we are instructed/if you do not inform us to the contrary.

K. Inquiries

17. For all further queries, complaints or request(s) kindly attention your queries, complaints or request(s) to both:

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Benjamin Chia

Partner

benjamin@kyblegal.com