



SJ SECURITIES SDN BHD

Company No.: 198501009222 (141671-T)

Client Personal Data Protection Policy

1. Purpose

- 1.1 SJ Securities Sdn Bhd (hereinafter ‘SJ Securities’ or ‘our’ or ‘us’), strives to comply with the applicable laws and regulation related to the Personal Data protection of its clients. SJ Securities shall ensure that the Personal Data (as defined below) of its Clients are protected at all times in accordance with the laws of Malaysia. SJ Securities is committed to ensuring that it treats Personal Data lawfully and shall maintain the appropriate physical, technical and organisational measures that are necessary to ensure the security and confidentiality of the Personal Data of its Clients.
- 1.2 SJ Securities shall store and process the Personal Data of its Clients on its computers wherever located and in any other medium (e.g. mobile devices). SJ Securities shall retain the Personal Data for legitimate business purposes, legal, regulatory and internal requirements and may retain these records for at least seven (7) years upon the termination of any account or legal contract or for as long as permissible according to any legal and regulatory requirements.
- 1.3 Some pages on our website may include links to third party websites. These third party sites are governed by their own privacy statements that are external to our policies and SJ Securities is not responsible for their privacy practices, operations and contents of these third party links. SJ Securities cannot accept any responsibility for any unauthorised access by a third party and/or the corruption of information/data being sent by any individuals to SJ Securities via internet communications or electronic mail.
- 1.4 SJ Securities shall collect, process and use the Personal Data of its clients in accordance with this Client Personal Data Protection Policy (“CPDPP”). All Personal Data will be handled and dealt with appropriately however it is collected, recorded and used, and whether it is on paper, in electronic records or recorded in other formats, on other media, or by any other means. The purpose of this CPDPP is to help you understand the types of Personal Data SJ Securities collects, why SJ Securities collects it and the usage of the Personal Data. It will also help you to identify what your rights are including how to access and update your Personal Data and the communication channels used to acquire information or to lodge a complaint.

2. Definitions and Interpretations

- 2.1 SJ Securities will categorise the following terms to be relevant and applicable in this CPDPP for reference:

“Client” means a person or organisation using the products and/or services of SJ Securities.

“Collection / collect” in relation to personal data, means an act by which such personal data enters into or comes under the control of SJ Securities;

“Correction” in relation to personal data, includes amendment, variation, modification or deletion made by SJ Securities.

“Disclosure / disclose” in relation to personal data, means an act by which such personal data is made available by SJ Securities.

“Personal Data” means any information in respect of commercial transactions, which (a) is being processed wholly or partly by means of equipment operating automatically in response to instructions given for that purpose; (b) is recorded with the intention that it should wholly or partly be processed by means of such equipment; or (c) is recorded as part of a relevant filing system or with the intention that it should form part of a relevant filing system.

“Processing” in relation to personal data, means collecting, recording, holding or storing the personal data or carrying out any operation or set of operations on the personal data, including (a) the organisation, adaptation or alteration of personal data; (b) the retrieval, consultation or use of personal data; (c) the disclosure of personal data by transmission, transfer, dissemination or otherwise making

available; or (d) the alignment, combination, correction, erasure or destruction of Personal Data.

“SJ Securities” means SJ Securities Sdn Bhd [Company No.: 198501009222 (141671-T)]

“Use” in relation to personal data, does not include the act of collecting or disclosing such personal data;

2.2 In the interpretation of this CPDPP, unless the context requires otherwise, the following shall apply:

- i. Gender - words of one gender include the other gender, and words denoting natural persons include corporations and firms and all such words are to be construed interchangeably in that manner;
- ii. Reference to legislation - a reference to any Acts is deemed to include references to any subsequent amendments, consolidation or replacement of the Acts;
- iii. Singular and Plural - words importing the singular also include the plural and vice versa where the context requires;
- iv. Where any word or phrase is given a defined meaning, any other grammatical form of that word or phrase has a corresponding meaning;
- v. Capitalised terms used herein and not otherwise defined herein shall have the meanings assigned to them in this CPDPP, unless the context shall otherwise require; and
- vi. Any schedules, appendices executed as supplemental to this CPDPP, issued by SJ Securities from time to time shall through incorporation by reference, form and be construed as part of this CPDPP.

3. Collection and processing

This CPDPP serves to inform you that your Personal Data is being processed by or on behalf of SJ Securities and you hereby give your consent to the processing of your Personal Data.

4. Types of Personal Data (“Collection”)

The types of Personal Data SJ Securities receives from you including but not limited to:

- a) Personal information to establish your identity and background (including your photo);
- b) Personal information to establish your contact details;
- c) Personal information to establish your financial standing;
- d) Personal information that you provide when you apply for any of our products and services;
- e) Personal information that may be required and you provide for risk/fraud/corruption management;
- f) Personal information of any past breaches of or convictions under any law;
- g) Any other information supplied by you that can indirectly or directly identify you, in order for us to carry out our business with you.

5. Sources of Personal Data

Your Personal Data is being or is to be collected: -

- a) from your Malaysian Identification Card and/or Passport,
- b) when you fill in any forms, letters, agreements and/or contracts for our products and/or services;
- c) from you directly when you submit your Personal Data to us;
- d) from any company representative of SJ Securities.
- e) from recordings of Closed-Circuit Television (CCTV) installed at our premises;

- f) from any analysis of the way the Client uses and manages his/her account/facility with SJ Securities;
- g) from any other forms, cards and documents through which we collect information from you;
- h) from publicly available sources or registries;
- i) from any third parties (including credit reference bodies, regulatory and law enforcement authorities) or other sources in respect of which you have given your consent to disclose the Personal Data and/or where not otherwise restricted;
- j) from any information that is supplied and/or collected when you visit our websites which includes your mobile device(s) or your computer(s)'s IP address(es); and
- k) from all other information that you may provide us from time to time.

6. Use of Client Personal Data

6.1 SJ Securities shall collect, process, use and/or disclose the Personal Data within and/or outside Malaysia for the following reasons ("Purposes"): -

- i. to assess and process the Client's application(s) for SJ Securities' products and/or services;
- ii. to manage and maintain the Client's accounts/facilities with SJ Securities;
- iii. to evaluate the Client's financial needs;
- iv. for detection of crime or fraud, investigation, prevention, prosecution and compliance with sanctions, including Customer Due Diligence (CDD) and regular politically exposed persons (PEP) screening;
- v. for audit, compliance and risk management;
- vi. to support our business, financial and risk monitoring, planning and decision making;
- vii. to conduct credit checks and/or to assist other financial institutions to conduct credit checks;
- viii. for debt collection and enforcement of the Client's obligations to SJ Securities;
- ix. to respond to the requirements of a civil or criminal legal process and/or for regulatory compliance purpose and/or as required by Malaysian law or regulation;
- x. to compare information/data for accuracy of our record, and verify with third parties;
- xi. to provide the Client with information on our and third party products and services which may be of interest to the Client;
- xii. to research, design and improve our products and services, operational and business processes;
- xiii. for market research and statistical analysis and surveys with the aim of improving our products and services;
- xiv. to handle complaints and queries;
- xv. to transfer or assign our rights and duties under any governing terms and conditions between SJ Securities and the Client;
- xvi. to perform shared services within SJ Securities;
- xvii. for the outsourcing of business and back-office operations of SJ Securities;
- xviii. for security reasons in particular, Personal Data collected from CCTVs installed at our premises;
- xix. to transfer the Client's Personal Data to foreign jurisdictions to enable any cross border transactions, for the performance of a contract, for the purposes of legal proceedings, upon written request from any regulatory or government authority or body, to protect the Client's vital interest or where it is in the public interest to do so; and/or
- xx. for any other reason that is required or permitted by any Malaysian law, regulation, order and/or guidelines.

6.2 In the event of a sale of business, disposal, acquisition, merger or reorganisation involving SJ Securities and/or the assets/business or part thereof of SJ Securities to another party (whether within Malaysia or otherwise), your Personal Data may be deemed by SJ Securities as required, to be disclosed and/or transferred to the other party in the course of or with a view to the sale, disposal, acquisition, merger or reorganisation of SJ Securities. You hereby consent and confirm to SJ Securities making such disclosure and transfer and hereby permit SJ Securities to release your Personal Data to the other party and its advisers, agents and representatives and that the other party has your consent to process your Personal Data.

6.3 You may have provided personal and financial information relating to others (including but not limited

to spouse, related parties and/or emergency contact persons) for any of the Purposes. In such cases, you represent and warrant that you have their consent or are otherwise entitled to provide their information to SJ Securities to be used, processed and/or disclosed in accordance with this CPDPP.

- 6.4 In the event if the Personal Data has been provided to a Bursa entity (which shall include Bursa Malaysia Berhad, Bursa Malaysia Securities Berhad, Bursa Malaysia Securities Clearing Sdn Bhd, Bursa Malaysia Depository Sdn Bhd, Bursa Malaysia Derivatives Clearing Berhad, and Bursa Malaysia Derivatives Berhad) (collectively as “Bursa”) or the Securities Commission of Malaysia (“SC”) for any of the Purposes above, including any legal and regulatory purposes, the Client hereby agrees for the processing of his/her/their/its Personal Data by Bursa or the SC.

7. Disclosure of Client Personal Data

- 7.1 Any and all of your Personal Data held by SJ Securities shall be kept confidential. However, in order to provide you with effective and continuous products and services and subject at all times to any laws, regulations and guidelines, SJ Securities may need to disclose the Personal Data to the following parties:

- i. SJ Securities’ related companies, subsidiaries, affiliates, associates, agents, and employees;
- ii. professional advisers (including but not limited to accountants, valuers, adjustors, auditors, lawyers, financial advisers or other professional advisers), contractors, service providers, and our other agents with whom we have contractual agreements for some of our functions and services;
- iii. credit reporting agencies, rating agencies, insurers or insurance brokers;
- iv. financial service providers in relation to SJ Securities’ products and services;
- v. any actual or potential participants or assignee or transferee of our rights and/or obligations under any transaction between SJ Securities and the Client;
- vi. any guarantor or security provider for the products and/or services granted by SJ Securities to the Client;
- vii. any Malaysian authorities or regulators, or any party as required by any Malaysian law or Malaysian Federal government, State governments, administrative, court or tribunal;
- viii. strategic/business partners with whom SJ Securities have a relationship for specific products and services;
- ix. any person connected to the enforcement or preservation of any of our rights under the Client’s agreement with SJ Securities; and/or
- x. any party authorised and/or consented to by the Client;

- 7.2 The disclosure of the Personal Data may involve the transfer of your Personal Data to places outside of Malaysia, and by providing SJ Securities with your Personal Data, you agree to such a transfer where it is required to provide you with the services you have requested, and for the performance of any contractual obligations, you have with SJ Securities including for storage purposes.

8. Marketing Communications

- 8.1 SJ Securities may use your Personal Data to market SJ Securities’ products and services and to deliver targeted marketing and advertising, service updates, promotional offers and for the purposes of cross-selling upon your consent. As such, you may receive marketing communications from SJ Securities for direct marketing and cross-selling marketing activities. For the purposes of direct marketing, your Personal Data may be disclosed to third parties which would include merchants and strategic business partners of SJ Securities Sdn Bhd. You can terminate this service at any time by communicating it to SJ Securities, providing your full name, NRIC/Company number, account details and details of any products or services that you may have with us.

- 8.2 SJ Securities may, from time to time, have information on third parties’ promotions, products and services which may be of interest to you. Unless you have opted to receive marketing materials in regards to third parties’ promotions, products and/or services by communicating your interest to SJ Securities, you will not receive any marketing communications on such marketing materials. By agreeing to receive the marketing materials, you have consented to the disclosure of your Personal Data to any such third parties for marketing purposes as stipulated in this CPDPP.

- 8.4 We take reasonable steps to ensure that the third parties we are sharing your Personal Data with also have appropriate privacy and confidentiality obligations.

9. Access/Correction/Update to Information

- 9.1 You will be entitled to review your Personal Data that SJ Securities may have collected and may request Correction of the Personal Data.
- 9.2 If you believe that your Personal Data is inaccurate, incomplete, misleading or not up-to-date, you shall contact your Dealer Representative or in the event of walk-ins, our Customer Relationship Management Executives, setting out the details of your request, name and NRIC and/or company number. SJ Securities shall correct or update the information/data as soon as possible.
- 9.3 Information or documents may be requested from the person making the request to verify the authenticity of the person and any information relating to the corrections requested.

10. Enquiries and Complaints.

If you have any enquiries about this CPDPP, or have any further enquiries, or would like to make a complaint or data access or correction request in respect of your Personal Data, you may contact SJ Securities at the contact details below:

Designation: Complaints Officer
Address: 26, Jalan Pendaftar U1/54,
Temasya Glenmarie,
40150, Shah Alam.
Selangor Darul Ehsan.
Email: kfaize@sjsec.com.my
Telephone: 03 - 5567 3000

11. Changes to the CPDPP

This CPDPP shall be modified/updated/amended by the Compliance and Legal Department from time to time upon developments of the laws. You are advised to view our website from time to time for our latest CPDPP.

12. Consent

By submitting your Personal Data, you consent to the use of the Personal Data as set out in this CPDPP. If we modify/update/amend our CPDPP, we will publish the latest version on our website. Your continued use of our products or services after any such change whether or not you received an email from us notifying you of any changes, constitutes your acceptance of the changes.

13. Language

This CPDPP is issued in both the English and Malay languages. In the event of any inconsistency between these two versions, the English version shall prevail.