

## **PRIVACY NOTICE**

The Personal Data Protection Act 2010 (“**PDPA**”) was introduced by the Government for the purposes of regulating the processing of personal data in respect of commercial transactions.

Under the **PDPA**, AmFIRST Real Estate Investment Trust (“**AmFIRST REIT**”) is required to inform you on the following:

- (i) The type of Personal Information collected and the method of collecting it;
- (ii) The use your Personal Information;
- (iii) The parties that AmFIRST REIT disclose and/ or share the Personal Information to;
- (iv) The choices you have with regards to the extent of Personal Information you provide;
- (v) The difference between information that is considered mandatory or optional; and
- (vi) How you access and update your Personal Information.

This Privacy Notice outlines how AmFIRST REIT collects, uses, discloses and retain your Personal Information in respect of your commercial transactions with AmFIRST REIT and how AmFIRST REIT safeguards your Personal Information.

Your privacy is therefore important to AmFIRST REIT and AmFIRST REIT is committed to protecting your Personal Information by collecting and using your Personal Information in accordance with the **PDPA**.

For the purposes of this Privacy Notice, the following definitions shall apply:

<b>Term</b>	<b>Definition</b>
<b>Personal information</b>	Refers to any information which relates directly or indirectly to you and/ or your transactions with AmFIRST REIT who is identified or identifiable from that information or from other information in the possession of AmFIRST REIT. This information may include your name, NRIC number, address, occupation, contact details, details of your account(s) and such other necessary information regarding yourself and your transaction(s) including Sensitive Personal Information.
<b>Sensitive Personal Information</b>	Refers to information relating to your health, political opinions, religious beliefs etc.

### **1.0 Collection of Personal Information**

AmFIRST REIT maybe requires to collect, use, disclose and store your Personal Information with the purpose of processing your requested commercial transaction(s).

Such Personal Information is required amongst others to:

- (i) Establish your personal identification and background.
- (ii) Establish your financial standing and creditworthiness where required.

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### **1.0 Collection of Personal Information – Cont'd**

The Personal Information that AmFIRST REIT collected can be obligatory or voluntary. Obligatory Personal Information is the information that AmFIRST REIT requires in order to provide you with the commercial transaction you requested. Failure to provide the Personal Information may result in the following which AmFIRST REIT shall not be held liable for any consequences arising therefrom:-

- (i) Inability to process your application;
- (ii) Inability to assist on your enquiries/ complaint;
- (iii) Inability to formalize any agreement;
- (iv) Inability to provide you with any documents, changes and/ or updates; and
- (v) Inability to comply with any applicable laws, regulations, court orders and/ or other applicable laws.

The Personal Information about you, which are collected for the purpose as stated under Item 2.0 below, can be collected from the following sources:

- (i) Via your verbal, written and/ or electronic communications with Am ARA REIT Managers Sdn Bhd as the Manager for AmFIRST REIT, Maybank Trustees Berhad as the Trustee for AmFIRST REIT and/ or its authorized agents.
- (ii) Via online Forms available at our website. By assessing AmFIRST REIT's website, you are deemed to have consented to the retention and processing of your Personal Information by AmFIRST REIT for the purpose as stated under Item 2.0 below.
- (iii) Third parties connected with you such as your legal representative(s) and/ or agent(s).
- (iv) Other third parties such as credit reference agency(s), regulatory and law enforcement authorities
- (v) Any other sources which you have given your consent to disclose information relating to you and/ or where not otherwise restricted.

### **2.0 Purpose of Collecting the Personal Information**

By providing any of your Personal Information to AmFIRST REIT, you hereby agree that AmFIRST REIT shall process the Personal Information for one or more of the following purposes:

- (i) To assess your application in relation to your commercial transaction with AmFIRST REIT.
- (ii) To conduct background and credit assessment to facilitate the provision of commercial transaction between you and AmFIRST REIT.
- (iii) To process your commercial transactions with AmFIRST REIT with the purpose of entering into any agreements with AmFIRST REIT.
- (iv) To send documents, changes and/ or updates in connection with your commercial transaction with AmFIRST REIT.
- (v) To process any payment in connection with your commercial transaction with AmFIRST REIT.
- (vi) Internal record keeping and maintenance of customer databases to enable AmFIRST REIT to contact you in order to response to your enquiries and/ or complaints.
- (vii) For analytical purposes, data mining and analyses of your transactions to better understand your current and future needs. AmFIRST REIT will also produce data, reports and statistics from time to time, however such information will be aggregated so that your identity will remain confidential.

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### **2.0 Purpose of Collecting the Personal Information – Cont'd**

- (viii) To comply with the requirements of any laws binding on AmFIRST REIT such as conducting on anti-money laundering & terrorism financing checks, crime detection/prevention, prosecution, protection or enforcement of our rights to recover any debt owing by you to AmFIRST REIT including transferring or assigning our rights, interests and obligations under any of your agreement with AmFIRST REIT;
- (ix) Any other purpose(s) that is required or permitted by any laws, regulations, guidelines and/ or relevant regulatory authorities.

AmFIRST REIT will seek your consent prior to using your Personal Information for a purpose other than outline above and/ or in the terms of any of your agreement(s) with AmFIRST REIT.

### **3.0 Disclosure of the Personal Information.**

Your Personal Information held by AmFIRST REIT will be kept confidential at all time. However, in order to provide you with your requested commercial transaction with AmFIRST REIT, AmFIRST REIT may need to disclose your Personal Information to the following:

- (i) Am ARA REIT Managers Sdn Bhd as the Manager for AmFIRST REIT to assist AmFIRST REIT in the processing of your Personal Information in relation to your requested commercial transaction with AmFIRST REIT.
- (ii) Maybank Trustees Berhad as the Trustee for AmFIRST REIT to assist AmFIRST REIT in the processing of your Personal Information in relation to your requested commercial transaction with AmFIRST REIT.
- (iii) AmFIRST REIT's appointed agents service providers, vendors and /or professional advisers who assist AmFIRST REIT in processing, administering, fulfilling transactions or providing value added services that you have requested;
- (iv) any person authorized or appointed by you to give instructions to AmFIRST REIT on your behalf such as your agents, accountants, auditors, lawyers and financial advisers.
- (v) any person(s) connected to the enforcement or preservation of any of AmFIRST REIT's rights or transferring the rights and obligations under your agreement(s) with AmFIRST REIT.
- (vi) any rating agency(is), credit reporting agencies and/ or debt collection agency(is) in the event of default of payments by you to AmFIRST REIT; and
- (vii) any competent authority(is) and/ or regulator(s), including foreign regulator(s) for the performance of their functions, subject at all times to any laws, including foreign laws applicable to AmFIRST REIT.

Otherwise, AmFIRST REIT will not disclose your information to others, except where:

- (i) you have not opted-out for receiving marketing material(s) from AmFIRST REIT;
- (ii) AmFIRST REIT is required or permitted to do so by law;
- (iii) AmFIRST REIT is required or authorised by any order of court, tribunal or authority, whether governmental or quasi-governmental with jurisdiction over AmFIRST REIT; and/or
- (iv) AmFIRST REIT is required to meet it obligations to any relevant regulatory authority.

But rest assured, that at all times, AmFIRST REIT will respect and protect the privacy and confidentiality of your Personal Information.



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### **4.0 Security Of Your Personal Information**

AmFIRST REIT place great importance in ensuring the security and confidentiality of your Personal Information and regularly reviews and implement up-to-date technical and organizational security measures when processing your Personal Information. If AmFIRST REIT discloses any of your Personal Information to the authorized third parties, AmFIRST REIT will require them to appropriately safeguard the Personal Information provided to them.

### **5.0 Retention Of Personal Information**

Your Personal Information will be retained in compliance with this Privacy Notice and/ or the terms and conditions of your agreement(s) with AmFIRST REIT for the duration of your relationship or for such period as may be necessary to protect the interest of both AmFIRST REIT and you. Such retention is also necessary as required by law or in accordance with our internal policies.

### **6.0 Rights To Access And Correct Personal Information**

If you wish to request access, make changes, withdraw your consent for the processing of your Personal Information and/ or make any complaints, you may contact the officer as per stated below under item 10.0 to assist you within twenty one (21) days of receiving your request. Please note that depending on the information requested, AmFIRST REIT may charge a small fee. The contact details are as per stated below under item 10.0.

Please note that AmFIRST REIT may withhold access to your Personal Information in certain situations, for example when AmFIRST REIT is unable to confirm your identity, where the information requested is of a confidential commercial nature or when there are repeated requests for the same information. Nevertheless, AmFIRST REIT will notify you of the reason(s) for not being able to accede to your request. AmFIRST REIT may also request for more documentary evidence to avoid incidence of fraud and/ or inaccurate information.

In order to enable AmFIRST REIT to serve you better, AmFIRST REIT seeks your assistance to continuously keep your Personal Information up to-date.

### **7.0 Exercising Your Choice In Respect Of The Disclosure And Use Of Your Personal Information For Purposes Of Marketing**

You may exercise your choice in respect of the disclosure and use of your Personal Information with AmFIRST REIT. In the event you choose not to receive any marketing material(s) from AmFIRST REIT, you may either (i) contact AmFIRST REIT at the contact details provided below; or (ii) by choosing to opt out from receiving marketing material, a choice provided for in the relevant application forms.

Please note that irrespective of the choice you make in relation to the above, you may still contact AmFIRST REIT subsequently through the channels provided below in order to change your choice. Your latest choice communicated to AmFIRST REIT will apply. AmFIRST REIT shall update your most recent marketing preference in AmFIRST REIT's database within a reasonable period of time after receiving the communication of your choice.

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### **8.0 Revisions To The Privacy Notice**

This Privacy Notice may be revised from time to time without prior notice. Any revision(s) will be posted on AmFIRST REIT's website at [www.amfirstreit.com.my](http://www.amfirstreit.com.my) and/ or other means of communication deemed suitable by AmFIRST REIT. However any revision(s) will be in compliance with **PDPA**. Do periodically review this Privacy Notice to stay informed on how AmFIRST REIT is protecting your Personal Information.

### **9.0 Language**

In the event of any conflict between the English language of this Privacy Notice and its corresponding Bahasa Malaysia Privacy Notice, the terms in this English version shall prevail.

### **10.0 Enquiries / Complaints on This Privacy Notice**

If you have any enquiries concerning this Privacy Notice, you may contact:

Designation	: Compliance Officer
Telephone No.	: 03-7955 8780/8782
Mailing Address	: Am ARA REIT Managers Sdn Bhd The Managers For AmFIRST Real Estate Estate Investment Trust Penthouse, Menara AmFIRST, No. 1, Jalan 19/3, 46300 Petaling Jaya.
E-Mail Address	: <a href="mailto:jayasuraes-naidu@ambankgroup.com">jayasuraes-naidu@ambankgroup.com</a>

**This Privacy Notice was issued on 12 February 2014.**