

# edotco Malaysia Sdn Bhd

## DATA PRIVACY NOTICE FOR LANDLORDS

**Statement of Confidentiality:**

The information in this policy is the sole property of edotco Malaysia Sdn Bhd (“**edotco**”) and is strictly confidential. This document shall not be used for any other purposes except as permitted in the document and shall not be disclosed to unauthorized parties without the prior written consent of edotco Group.

## Privacy Notice for Landlords

edotco Malaysia Sdn Bhd is a subsidiary of edotco Group Sdn Bhd (together referred to as “edotco”, “us” or “we” or “our”), which in turn is a subsidiary of Axiata Group Berhad (“Axiata”). Respecting and protecting your Privacy is an integral part of our business and we do not view this as an obligation, but rather as a commitment to maintain your confidence and trust on us.

In edotco, we take Privacy seriously and all our activities are underpinned by our **T.R.U.S.T** principles of being Transparent, respecting your Rights, in our Use of your personal data, through robust cyber Security practices and we take due care when Transfer of data is required.

This notice applies to your personal data which we collect, generate or use when you visit our website, submit any application through our website or enter into any discussion with us in relation to proposed acquisition of land, long term lease, tenancy agreement, license agreement, master access agreement and/or any other agreements by whatever name called which capture the rights to grant edotco to use the land or site for the purposes of construction, installation, operation and maintenance of telecommunication infrastructure (“**Proposed Transaction**”).

### **1. Collection and use of your data**

edotco may collect and use your personal data when:

- you contact us with any question
- you visit our website
- you submit any application through our website
- you contact us through various methods for the purposes of the Proposed Transaction
- you contact us for any other purpose(s).

The types of personal data that edotco may collect include, but are not limited to:

- contact information (such as name, address, email address, mobile number and telephone number)
- identification information (such as identity card or passport number, tax registration number or social security number, driver’s license, date of birth etc.)
- banking information

- information required for the purposes of entering into and engaging in discussions relating to the Proposed Transaction.

edotco collects and uses your personal data with your knowledge and consent and typically when you:

- respond to communications from us (such as SMS, emails, questionnaires or surveys)
- interact with edotco's website, such as submitting an application form, completing survey form, use online services (if your browser has Internet cookies enabled, it can facilitate edotco's tracking of personal preferences, pages visited etc.)
- participate on edotco's social media pages such as Facebook etc. provide information for the purposes of the Proposed Transaction or any other affiliates or business dealings with edotco by which you have consented to provide your personal data
- enter into and engage in discussions with us in respect of the Proposed Transaction
- enter into definitive agreement in respect of the Proposed Transaction.

Your personal data may be collected, used or otherwise processed by us for the following purposes:

- to enter into and engage in discussions relating to the Proposed Transaction with you
- process and manage the Proposed Transaction
- respond to your comments and inquiries
- to enforce any terms of the Proposed Transaction
- to provide you with communications relating to the Proposed Transaction.

If you give us information about another person (including, without limitation, the co-owner of the real property, which is the subject matter of the Proposed Transaction), you confirm that the other person has appointed you to act on his/her behalf and has agreed that you can:

- give consent on his/her behalf to the processing of his/her personal information
- receive in his or her behalf any data protection notices
- warrant that you have obtained his/her consent for us to store his or her personal information or have the right to allow us to process his or her personal information.

## 2. Disclosure

We keep your personal data confidential and do not share it with non-affiliated companies, except: (a) to progress or facilitate the Proposed Transaction, (b) when we have your consent or (c) under the following circumstances:

- We may share your personal data to meet our legal and regulatory obligations.
- We may share your personal data to prevent and detect crime as per the law.
- When we believe it is necessary to share the information or enforce edotco's rights, usage terms, intellectual or physical property and for safety of edotco or associated parties.
- We may share your personal data if edotco is acquired by or merged with another company or for any legal claim, where edotco is required to do so.

We may disclose your personal data to the below classes of parties:

- with Axiata group companies, where necessary and within the limits of applicable law
- when we believe in good faith that disclosure is necessary to protect our rights, protect your security, investigate fraud or respond to a law enforcement request
- with edotco's service providers, field engineers, contractors who work on our behalf and who do not have an independent right to use the information to which they have access or that we disclose to them
- with our business partners for edotco's marketing activities, in such case no specific personally identifiable information is provided, as such information is generally aggregated
- with third parties for credit checks and fraud management
- with third parties for research and development purposes
- with our subsidiaries and affiliates.

We make sure that the above-mentioned parties maintain the confidentiality of your personal data and are restricted from using such information for any unauthorized purpose. edotco will ensure through formally executed contracts that these parties will provide an adequate level data protection as per the applicable data privacy laws and industry best practices.

### **3. Cross Border Data Transfer**

With your consent or in accordance with the applicable laws, we may transfer your personal data across geographical borders to other entities. The transfer of personal data is carried out under our standard contracts with appropriate data protection clauses or data transfer agreements with similar obligations for the parties receiving this information to protect the security and confidentiality of your personal data.

### **4. Data Retention**

We shall retain your personal data for as long as it is required for business, tax or legal purposes. Post that, we shall take measures to securely dispose your data.

### **5. Security**

We endeavor, where practicable, to process your personal data in a safe environment by preventing any unauthorized or unlawful processing of personal data or accidental loss or destruction of, or damage to such information. We have implemented various physical, technical and administrative security measures to protect your personal data and our network from unauthorized access. Some of these measures include:

- encryption of data in transit or at rest
- strict adherence to privacy and security practices
- periodic security assessment and reviews to upgrade our practices
- restriction of access to such data to personnel who have a need to know such data.

### **6. Exercise your Rights**

We respect your rights and privacy by taking steps to ensure that your personal data is accurate and up-to-date. In compliance with the Personal Data Protection Act 2010, we assure you that:

- you have the right to know what personal data we have about you
- you have the right to request a copy of your personal data
- you have the right to correct your personal data to ensure it is accurate, complete and up-to-date
- you have the right to withdraw your consent from our processing of your personal data

- you can also ask us to restrict how we use your personal data where it is likely to cause damage or distress
- you have a right to prevent processing of your personal data where it is so conducted or is going to be conducted for purposes of direct marketing.

For exercising your rights, you can reach out to us through the details under '**Contact Us**' section given below.

## **7. Communication Preferences and Choices**

You may request us to stop sending promotional e-mails or other edotco communications, if any, by contacting us on the below mentioned contact details. These choices do not apply to the receipt of mandatory communications that are considered as part of the Proposed Transaction, unless the Proposed Transaction has been completed or terminated.

## **8. Consequences of not providing Personal Data**

For you to enter into or engage in discussions relating to the Proposed Transaction, we may require collection of certain personal data about you and failure to provide such information may:

- result in us being unable to process your application
- result in us being unable to respond to your application
- limit or prevent access to certain features on our website/weblinks
- result in us being unable to enter into and engage in discussions relating to the Proposed Transaction with you.

## **9. By submitting your personal data to us, you acknowledge that:**

- i. You have read and understood this Privacy Notice and agree to the use of your personal data as set out herein.
- ii. All your representations are true and correct to the best of your knowledge, and you have not knowingly omitted any relevant information which may have an adverse effect.

## **10. Contact Us**

If you have any questions or complaints about this notice, our privacy and information handling practices, or would like to exercise your rights as data subjects, kindly reach out to our Data Privacy Officer via email; [privacy@edotcogroup.com](mailto:privacy@edotcogroup.com)

## **11. Updates to the Privacy Notice**

edotco reserves the right to amend, modify, vary or update this Privacy Notice, at its sole discretion from time to time, as and when the need arises. The most recently published Privacy Notice shall prevail over any of its previous versions. edotco has no obligation to inform you of any variations and you are encouraged to check this Privacy Notice from time to time to stay informed of any changes. You agree to adhere to the terms of the Privacy Notice including any variations.

## **12. Version Info**

This notice was published on 15<sup>th</sup> October 2020 and last updated on 25<sup>th</sup> August 2020.