

H.T.T. TRAVEL (M) SDN BHD

(214696-H)



K.K.K.P. NO: 2110

PERSONAL DATA PRIVACY POLICY

In H.T.T. Travel (M) Sdn Bhd (“HTT”), we are committed to a trust based cooperation with all parties whom we deal with such as our customers, suppliers, employees and other individuals who trust us with information. Keeping information in particular personal information secure is an aspect of this trust which we take seriously.

In Malaysia, HTT is subject to data protection principles under the Personal Data Protection Act 2010 (“the Act”) and this notice is intended to outline how we intend to keep secure the personal data of individuals (“data subjects”) and to ensure that the rights of data subjects are protected.

In this policy, we seek to inform data subjects of the purpose for which their personal data is collected and processed and the data subject’s right to access or refuse to provide such personal data.

1. POLICY STATEMENT

1.1 Everyone has rights with regard to how their personal information is handled. During the course of the activities HTT may collect, store and process personal information about staff, customers, suppliers, vendors, and HTT recognises the need to treat this data in an appropriate and lawful manner. HTT is committed to complying with its obligations in this regard in respect of all personal data it handles.

1.2 The types of information that HTT may be required to handle include details of current, past and prospective employees, suppliers, customers, and others that the HTT communicates with. The information, which may be held on paper or on a computer or other media, is subject to certain legal safeguards specified in the Personal Data Protection Act 2010 (‘the Acts’) and other regulations. The Acts impose restrictions on how HTT may collect and process that data.

1.3 This policy does not form part of any employee's contract of employment and it may be amended at any time. Any breach of this policy will be taken seriously and may result in disciplinary action up to and including dismissal on any HTT employees.

2. DEFINITION OF DATA PROTECTION TERMS

2.1 Data is information which is stored electronically, on a computer, or in certain paper-based filing systems. This would include IT systems.

2.2 Data subjects for the purpose of this policy include all living individuals about whom HTT holds personal data.

2.3 Personal data means data relating to a living individual who can be identified from that data (or from that data and other information that is in, or is likely to come into, the possession of the data controller). Personal data can be factual (such as a name, address or date of birth) or it can be an opinion (such as a performance appraisal).

- 2.4 Data controllers are the individual or organisations who control and are responsible for the keeping and use of data.
- 2.5 Data users include employees whose work involves using personal data. Data users have a duty to protect the information they handle by following HTT's data protection and security policies at all times.
- 2.6 Processing means performing any operation or set of operations on data, including:
- obtaining, recording or keeping data,
 - collecting, organising, storing, altering or adapting the data,
 - retrieving, consulting or using the data,
 - disclosing the information or data by transmitting, disseminating or otherwise making it available,
 - aligning, combining, blocking, erasing or destroying the data.
- 2.7 Sensitive personal data includes information about a person's racial or ethnic origin, political opinions, religious or similar beliefs, trade union membership, physical or mental health or condition or sexual life, criminal convictions or the alleged commission of an offence. Sensitive personal data can only be processed under strict conditions, and will usually require the express consent of the person concerned.

3. GENERAL PRINCIPLE

- 3.1 The data subject must be told who the data controller is, the purpose for which the data is to be processed by HTT, and the identities of anyone to whom the data may be disclosed or transferred.
- 3.2 For personal data to be processed lawfully, HTT shall ensure that all conditions have to be met. These may include, among other things, requirements that the data subject has consented to the processing, or that the processing is necessary for the legitimate interest of the data controller or the party to whom the data is disclosed. When sensitive personal data is being processed, more than one condition must be met. In most cases the data subject's explicit consent to the processing of such data will be required.
- 3.3 The nature and type of data HTT collects and the source of such data varies depending on the nature of the relationship of HTT has with the data subject and may include:
- personal data which HTT collects from its website, if such data has been voluntarily provided or where such data is required for the purposes of providing the service which a data subject requires
 - personal data which we collect on application forms or other information forms such as name, address, email, telephone, occupation, income
 - personal data from trade associations, marketing agencies, credit bureau reports and credit reporting agencies
 - personal data from governmental agencies.

3.4 Personal data is used to provide products and services and to inform about products and services offered by HTT and may include:

- profiling and determining service and supply preferences
- for the purposes of technical administration of HTT website
- statistical analysis
- developing new products and services
- providing goods and services offered to customers and consumers
- payment processing for purchases
- job application for employee recruitment
- protection against or identifying possible fraudulent transactions
- developing and providing advertising adapted to our customers
- finance and marketing operations and/or as required by the terms and conditions of business and other business administration purposes including credit monitoring and control purposes
- to meet regulatory and legal requirements
- for risk management
- for all other purposes incidental and associated with the above.

4. NOTICE AND CHOICE PRINCIPLE

HTT is aware that data subjects have the right to make a choice not to provide their personal data and may revoke their consent to the collection and processing of personal data. In this regards, HTT is aware that certain services it provides and the continuation thereof may require the processing of such data. Failure to process such data may results in discontinuation of such services.

5. DISCLOSURE PRINCIPLE

Personal data should only be collected to the extent that it is required for any of the specific purposes stated in 3.4 which should be duly notified to the data subject. Any data which is not necessary for that purpose should not be collected in the first place. Personal Data will be kept confidential but may be disclosed to the following categories of parties for the purposes set out:

- to our advisers, including consultants, advocates and solicitors for purposes of determining our rights and enforcing any agreement with data subjects
- any agent, contractor or service provider to whom we may have outsourced services to, subject always that such parties acknowledge the confidentiality and rights of the data user and to comply with the provisions of the Act
- to regulatory authorities or notified bodies including bodies providing quality certification of our products upon their request
- to such other parties as may be permitted under Malaysian law.

6. SECURITY PRINCIPLE

6.1 HTT and its employees must ensure that appropriate security measures are taken against unlawful or unauthorised processing of personal data, and against the accidental loss of, or damage to, personal data.

6.2 The Acts require HTT to put in place procedures and technologies to maintain the security of all personal data. Personal data may only be transferred to a third-party data processor if the third party has agreed to comply with those procedures and policies or has adequate security measures in place.

6.3 HTT and its data users must demonstrate and put into practice the following core values to ensure:

- (a) Confidentiality - that only people who are authorised to use the data can access it. HTT will ensure that only authorised persons have access to an employee's personnel file and any other personal or sensitive data held by HTT. Employees are required to maintain the confidentiality of any data to which they have access.
- (b) Integrity - that the personal data is accurate and suitable for the purpose for which it is processed.
- (c) Availability - that authorised users should be able to access the data if they need it for authorised purposes.

6.4 Security procedures to be put in place within HTT include:

- (a) Secure workplace, lockable desks and cupboards. Desks and cupboards should be kept locked if they hold confidential information of any kind. (Personal information is always considered confidential.). Access rights to workplace are restricted to employees after office hours.
- (b) Methods of disposal. Paper documents should be shredded. Computer disk (CD) should be physically destroyed when they are no longer required.
- (c) Data users should ensure that individual monitors do not show confidential information to passers-by and that they log off from their PC when it is left unattended.

7. RETENTION PRINCIPLE

- 7.1 Data Subject's personal data shall be stored either in hard copies in HTT's office or stored in servers located in or outside Malaysia and operated by HTT or its service providers in or outside Malaysia. Any personal data supplied to HTT will be retained by the HTT as long as necessary for the fulfillment of the purposes stated in 6.4 above or to protect the interest of HTT. HTT currently does not offer any online facilities for data subject to delete their personal data held by HTT.
- 7.2 It shall be the duty of a data user to take all reasonable steps to ensure that all personal data is destroyed or permanently deleted if it is no longer required for the purpose for which it was to be processed of which the method of disposal is stated in 6.4(b).

8. DATA INTERGRITY PRINCIPLE

Personal data must be accurate, complete, not misleading and kept up to date. Information which is incorrect or misleading is not accurate and steps should be taken to check the accuracy of any personal data at the point of collection and at regular intervals afterwards. Inaccurate or out-of-date data should be destroyed. Employees should ensure that they notify their manager/Human Resources of any relevant changes to their personal information so that it can be updated and maintained accurately. Examples of relevant changes to data would include a change of address.

9. ACCESS PRINCIPLE

- 9.1. Data subjects including employees may request access to and correct their personal data held by HTT. If they wish to obtain a copy of any of their personal data; if they believe that the personal data relating to their which HTT collect and maintain is incorrect; or if they believe that the personal data held by HTT was used beyond the scope of the purposes described in 3.4 or was acquired by fraudulent or unlawful means or provided to a third party without their prior consent, data subjects may write to HTT at the addresses below.
- 9.2. A request for access or correction to, or deletion of personal data or for information regarding policies and practices and kinds of personal data held by HTT must be in writing and sent to HTT via htttravel@prime-htt.com.my or via postal mail to the following address:

H.T.T. TRAVEL (M) SDN BHD
SUITES 11.02 & 11.03, LEVEL 11, MENARA HAW PAR
JALAN SULTAN ISMAIL
50250 KUALA LUMPUR.
MALAYSIA.

10. REVIEW OF POLICY

HTT will continue to review the effectiveness of this policy to ensure it is achieving its stated objectives on at least every three years or more frequently if required taking into account changes in the law and organisational or security changes.