



1. Personal Data Confidentiality

- 1.1 Hong Leong Asset Management Berhad ('HLAM') to protect the confidentiality of the personal information ('data') of customers, business counterparts and any personal data of other individuals that may be provided to HLAM (hereinafter collectively referred to as 'data subjects'), that has been provided to HLAM. This Policy is accordingly addressed to these data subjects in the jurisdiction of Malaysia.
- 1.2 This Policy is developed to assist you, as a data subject, in understanding how we collect, disclose, transfer and store your personal information and how we intend to deliver the rights and protection that you are entitled to.
- 1.3 Ensuring the security of your personal information is our priority. We strive to protect the confidentiality of this information by maintaining appropriate physical, electronic, and procedural safeguards. We invest in systems and infrastructure to minimize any risks of compromising data security. Each of our employees is also bound by our Code of Conduct and Ethics which requires them to maintain customer confidentiality.
- 1.4 When we use other companies to provide services to our customers on our behalf ('service providers'), we also require them to protect the confidentiality of your personal information that they may receive.
- 1.5 In relation to Clause 1.4 above and Clause 4.2 below, please understand that we will only share your information with our service providers and business partners* in accordance with this Policy.
**(In this policy business partners include but are not limited to third party entities who provide or offer products and services with or through HLAM)*

2. Choice to Supply Personal Data

- 2.1 As a data subject of HLAM, you are provided opportunities to make choices. We encourage you to make choices that enable us to provide you with quality products and services that help you to meet your financial needs and objectives.
- 2.2 The collection of data by HLAM may be mandatory or voluntary/optional in nature in order to establish or continue to enjoy HLAM's financial services and/or establish any other business relationships with HLAM.
- 2.3 It is necessary for you to provide data which are mandatory. If you choose not to supply such data, this may result in HLAM being unable to provide products and/or services or otherwise deal with you.
- 2.4 We endeavour to keep you informed of the latest marketing and promotional offers that we feel would be useful and beneficial to you. These may include programs you may find valuable in helping you manage your account; such as product or service upgrades, credit line increases and other benefits.
- 2.5 However, you can choose not to receive these marketing and promotional offers. You can do so by informing HLAM. Your request will be processed and no fees will be charged.

3. Types of Personal Data Collected

- 3.1 Personal data is described by the Personal Data Protection Act 2010 as information relating directly or indirectly to an individual who is identified or can be identified from that information.
- 3.2 The types of personal data collected may vary according to the business relationship that is established. Data collected may include the following:
- data collected on applications or other forms or as provided by you, such as name, IC number or passport number (for foreigners), address, e-mail address, telephone number, race, occupation, financial position such as assets and income, investment objectives, employer's details, family members and personal information about them and such other information as may be relevant for your application;
 - data about your transactions with HLAM, its service providers, business partners or other third parties, such as account balances, payment history, and account activity;
 - data from credit bureau reports;
 - data from credit reporting agencies;
 - data from governmental agencies, regulatory and statutory authorities;
 - data from your joint account holder(s);
 - data obtained from your access to HLAM's web server, for example, by the use of cookies, i.e. small text files, sent by HLAM's server to your system when you access HLAM's server; and
 - data from publicly available sources.

4. Use of Personal Data

- 4.1 HLAM collects your data for the provision of financial services or products requested by you in order to meet your financial needs and objectives.
- 4.2 In addition to the above, HLAM may also make arrangements with business partners to jointly develop, offer and provide products and services or launch marketing campaigns that may involve the sharing of your personal information.
- 4.3 Your personal data may be used or processed by HLAM or HLAM's service providers for the following purposes:-
- to establish a relationship between you and HLAM and/or companies related to or affiliated to HLAM, HLAM's service providers and business partners;
 - to process applications for products and services;
 - to evaluate and monitor credit worthiness;
 - for evaluation and due diligence purposes;
 - for carrying out your instructions and the provision of products and services to you, including but not limited to whether provided personally or through telephone or electronic means, including processing of receipts and payments;
 - for data processing purposes;
 - to evaluate and monitor provision of services;
 - to respond to inquiries from you;
 - to understand your needs and offering products and services to meet those needs;
 - for the research and development of products and services for customers' use;
 - to allow HLAM, HLAM's related and/or affiliated companies, service providers and business partners to promote their products and services;
 - for debt collection purposes;
 - for enforcement of our rights and obligations of other parties to us and/or our affiliates;

- to enable a party to evaluate any actual or proposed assignment, participation, sub-participation and/or novation of our rights and/or obligations;
- to meet legal and regulatory requirements, which may include disclosure, notification and record retention requirements;
- to maintain and protect our offices;
- for audit and risk management;
- for any transfer or proposed transfer of any part of HLAM's interests, obligations, business and/or operations;
- for such other purposes as permitted by applicable law or with your consent; and
- for all other purposes incidental and associated with any of the above

5. Disclosure of Personal Data

- 5.1 For the purposes above, your personal data may be provided by HLAM to:-
- any person under a duty of confidentiality to HLAM or to companies related to or affiliated to HLAM;
 - companies related to or affiliated to HLAM (whether such company operates in Malaysia or elsewhere);
 - Bank Negara Malaysia, Securities Commission Malaysia, any other relevant authority as may be authorized by law to obtain information about you, authorities/agencies established by Bank Negara Malaysia and/or any other person as may be authorised by law or any governmental authority and/or regulatory authority and/or any industry related association;
 - any relevant agent, contractor or third party service provider who provides administrative, telecommunications, computer, payment, securities clearing, management, audit or other services to HLAM;
 - any banking, financial or other institution with which you have or propose to have dealings with;
 - lawyers, auditors, tax advisors, investment banks and other professional advisors which is restricted to the nature of the business relationship in which you are involved in with HLAM;
 - any person or corporation to whom HLAM transfers or proposes to transfer any part of its interests, obligations, business and/or operations;
 - any nominee, trustee, co-trustee, centralised securities depository or registrar, custodian, estate agent, solicitor or other person who is involved with the provision of services or products by HLAM to you;
 - any person by whom HLAM is required by applicable legal, governmental or regulatory requirements to make disclosure; or
 - to HLAM's business partners or any other person reasonably requiring the same in order for HLAM to carry out the activities set out in the above purposes.
 - to HLAM's insurance service providers and their authorised agents, related companies, affiliates, other insurance or takaful companies, operators, brokers, distribution partners (such as banks, Islamic banks, brokers), industry trade associations, merchants, strategic partners, enforcement regulatory and governmental agencies. Please take note of any relevant insurance providers whose products are offered with or linked to your relevant HLAM product or service. Please read our insurance providers' privacy notices (posted on their respective websites) before you sign up for any product or service. You may seek further information about the relevant insurance providers and their website addresses using the contact details set out in Clause 7.2 below. By signing up for any product or service with us, you shall be deemed to have read and accepted the privacy notices of the insurance providers.
- HLAM may disclose data to any or all of the parties stated above and may if necessary, do so notwithstanding the recipient's place of business is outside Malaysia, or that such information following disclosure will be collected, held, processed or used by such recipient in whole or in part outside Malaysia.

6. Data Subject's Obligations

- 6.1 You are responsible for providing accurate and complete information to HLAM about yourself and any other person whose personal information you provide us and for updating this personal information as and when it becomes incorrect or out of date by contacting the Personal Data Protection Officer via the contact details provided below.
- 6.2 In the event you may need to provide HLAM with personal information relating to third parties (for example about your spouse or children or the authorised persons or directors from an organisation or company) in connection with the financial services or products requested by you, you confirm that you have (i) obtained such individuals' consent or are otherwise entitled to provide the individuals' personal information to HLAM for HLAM to process and use personally, and (ii) informed the relevant individuals of HLAM's policy on personal data and referred them to HLAM's Privacy Policy at HLAM's website (<http://www.hlam.com.my>).

7. Right to Access and Correct Personal Data

- 7.1 You are entitled to ask whether HLAM holds data on you and to request access to and the correction of any such data held. You will be required to fill up a form and a reasonable administrative fee may be charged for processing each data access request.
- 7.2 If you wish to request for access to, or to correct data held by HLAM, or to seek further information about any relevant insurance provider and its website address, please forward your request to the Personal Data Protection Officer at:-
- (i) the telephone number currently stated at HLAM's website (<http://www.hlam.com.my>);
 - (ii) +603 2081 8500 (facsimile);
 - (iii) inquiry@hlam.hongleong.com.my (email),
- and we will facilitate the fulfilment of your request as soon as possible.

8. Amendments to this Privacy Policy

- 8.1 This Policy may be reviewed and amended from time to time. We will communicate such changes along with the updated Policy on HLAM's website (<http://www.hlam.com.my>) and/or other appropriate communication means as may be determined by HLAM.