

## Personal Data Protection Notice (PDPN)

1 June 2026 ("Effective Date")

**Ehsan Bina Group of Companies**, including Ehsan Bina Sdn. Bhd., Foresthill Damansara Land Sdn. Bhd., and its subsidiaries, affiliates, related and associated companies (collectively referred to as "**EB Group**", "**we**", "**us**" or "**our**") are committed to protecting personal data in accordance with the Personal Data Protection Act 2010 ("PDPA") and its amendments.

This Personal Data Protection Notice ("Notice") explains how we collect, use, process, disclose and safeguard personal data in the course of our property development, construction, and related business activities.

By communicating with us, using our services, or engaging with us, you acknowledge that you have read and understood this PDPN and consent to the processing of your personal data in accordance with this Notice.

### (1) PERSONAL DATA

#### 1.1 Types of Personal Data

"Personal Data" means any information that relates to an identifiable individual, whether directly or indirectly. This may include but not limited to information as follows:

- name, NRIC/passport number, nationality, date of birth, and gender;
- contact details (such as address, telephone number, and email address);
- employment, occupation, and income-related information;
- banking and financial details (including loan and payment information);
- property-related information (including booking forms, Sale and Purchase Agreements (SPAs), and transaction records);
- correspondence and communication records;
- images and recordings (including photographs and CCTV footage for security purposes); and
- such other relevant information to enable us to provide you with our services and products.

Sensitive Personal Data (such as information relating to health, religion, or criminal records) will only be processed where necessary and in accordance with the PDPA, including obtaining your consent where required.

#### 1.2 Sources of Personal Data

Personal data may be collected from:

- you directly (e.g., forms, SPA, bookings, registrations, communications);
- job applicants, candidates, referees, and other employment-related sources (including recruitment agencies, background screening providers, and former employers);
- our websites, digital platforms, or customer portals;
- property agents, introducers, or authorised representatives;
- financial institutions (for loan/financing purposes);
- publicly available sources (where permitted by law).

#### 1.3 Obligatory Personal Data and Impact resulting from failure to supply Personal Data

Certain Personal Data is required for us to process transactions, execute agreements, or provide services.

Failure to provide such data may result in our inability to proceed with transactions or provide requested services.

## (2) PURPOSES OF PROCESSING PERSONAL DATA

### 2.1 Property Development and Transaction-Related Purposes

- processing property transactions, including bookings, Sale and Purchase Agreements (SPAs), payments, and ownership records;
- facilitating property-related documentation and legal processes;
- coordinating with financial institutions for loan and financing arrangements;
- managing project development, delivery, and related administrative matters.

### 2.2 Customer Relationship and Service Management

- managing customer relationships and communications;
- responding to enquiries, requests, or complaints;
- facilitating after-sales services, including property handover and customer care.

### 2.3 Marketing and Business Development

- providing information on our projects, products, promotions, and events (subject to your consent);
- conducting customer surveys, market research, and service improvement initiatives;
- managing marketing campaigns, events, and promotional activities.

### 2.4 Business Operations and Administration

- managing business operations, including engagement with contractors, consultants, service providers, and vendors;
- internal administration, record keeping, and reporting;
- supporting IT systems, data hosting, and operational infrastructure.

### 2.5 Recruitment and Employment-Related Purposes

- assessing your application, conducting interviews, and communicating recruitment outcomes;
- verifying your identity, qualifications, employment history, and references;
- evaluating suitability for current and future roles within the EB Group;
- preparing employment documentation and onboarding (if successful);
- administering employment matters such as payroll, benefits, statutory contributions, leave, and performance management;
- ensuring compliance with internal policies, legal obligations, and workplace requirements;
- managing workplace safety, security, and access control;
- handling disciplinary matters, grievances, and investigations, where applicable.

### 2.6 Legal, Regulatory, and Risk Management

- complying with legal and regulatory requirements;
- performing credit checks and financial assessments where necessary;
- preventing fraud, misconduct, and security incidents;
- conducting audits, investigations, and enforcement of legal rights.

Where applicable, the above purposes include both customer-related and employment-related activities.

We will not process your Personal Data for purposes other than those stated above unless required or permitted by law or with your consent.

### (3) DISCLOSURE OF PERSONAL DATA

Your Personal Data may be disclosed, where necessary, to the following parties:

- companies within the EB Group (including holding companies, subsidiaries, and related entities);
- financial institutions, banks, and payment processors;
- professional advisers, including lawyers, auditors, consultants, and insurers;
- contractors, consultants, service providers, and vendors engaged in connection with our business operations (including property development, sales, marketing, and property-related services);
- third-party service providers supporting our systems and operations, including IT systems, data storage, hosting, and customer management platforms;
- recruitment agencies, background screening providers, referees, former employers, educational institutions, and professional bodies for verification and employment-related purposes;
- government authorities, statutory bodies, regulators, or law enforcement agencies, where required by law or in response to lawful requests;
- any person to whom disclosure is required or permitted under applicable laws or regulations.

EB Group will not disclose personal data to third parties without consent, except where legally required, and limited strictly to stated purposes.

We do not sell, rent, or trade your Personal Data to third parties.

### (4) ACCESS AND CORRECTION

You have the right to:

- request access to your Personal Data held by us;
- request correction of any Personal Data that is inaccurate, incomplete, or outdated.

Requests must be submitted in writing using the contact details provided in this Notice. We may require verification of your identity before processing your request.

We will respond within a reasonable timeframe in accordance with the PDPA.

Please note that we may refuse your request to access or correct your Personal Data in accordance with the PDPA, including where such access is restricted by law or where the data contains confidential information relating to other parties.

You are encouraged to keep your Personal Data accurate and up to date by notifying us of any changes.

### (5) RETENTION AND INTEGRITY OF PERSONAL DATA

We take reasonable steps to ensure that the Personal Data we collect, use, disclose, and process is accurate, complete, not misleading, and kept up to date for the purposes for which it is processed. Where appropriate, we may periodically verify and update Personal Data with employees, customers, purchasers, contractors, suppliers, and other data subjects to ensure the accuracy and integrity of our records.

You are responsible for informing us promptly of any changes to your Personal Data to enable us to maintain accurate and current records.

Your Personal Data will be retained only for as long as necessary to fulfil the purposes for which it was collected or as required to comply with applicable legal, regulatory, contractual, tax, accounting, audit, operational, or business requirements.

The retention period may vary depending on the nature of the Personal Data and applicable legal obligations, including but not limited to:

- Employment records may be retained for the period required under applicable employment, tax, and statutory requirements;
- Financial, accounting, and taxation records may generally be retained for at least seven (7) years in accordance with applicable tax and accounting laws;
- Sale and purchase agreements (SPAs), property transaction records, financing documents, and related supporting documents may generally be retained for a minimum period of seven (7) years or such longer period as may be required under applicable laws, contractual obligations, audit requirements, or legal proceedings; and
- Records relating to ongoing disputes, investigations, litigation, or regulatory matters may be retained until such matters are fully resolved and any applicable retention period has expired.

For job applicants who are not successful, Personal Data may be retained for a reasonable period, typically not exceeding two (2) years, for consideration in future employment opportunities unless you request otherwise.

When Personal Data is no longer required for the purposes for which it was collected or retained, we will take reasonable steps to ensure that such Personal Data is securely deleted, destroyed, anonymised, or otherwise disposed of in accordance with our data retention policies and applicable laws.

## **(6) SECURITY OF YOUR PERSONAL DATA**

We are committed to ensuring that your Personal Data is kept secure. We implement appropriate technical, organisational, and physical measures to protect Personal Data against unauthorised or unlawful processing, loss, misuse, modification, or disclosure, in accordance with applicable laws and industry standards.

Such measures include:

- restricting access to Personal Data to authorised personnel on a need-to-know basis;
- maintaining secure IT systems and controls to safeguard electronic data;
- conducting periodic security assessments, audits, and reviews to evaluate the effectiveness of data protection and information security controls;
- ensuring secure storage and handling of physical records; and
- implementing secure methods for the disposal or destruction of Personal Data.

We also require our employees, contractors, and third-party service providers to adhere to appropriate confidentiality and data protection obligations.

In the event that the data controller (the company) has reason to believe that a personal data breach has occurred, the company shall notify the Commissioner.

## (7) YOUR RIGHTS AND CHOICES

You have the right, subject to the provisions of the PDPA, to:

- withdraw your consent to the processing of your Personal Data at any time (subject to legal or contractual restrictions);
- request to limit or object to the processing of your Personal Data;
- opt out of the use of your Personal Data for direct marketing purposes at any time;
- opt out of receiving marketing communications from us;
- request the transfer of your Personal Data to another organisation, where applicable and technically feasible;
- make enquiries or lodge complaints regarding the processing of your Personal Data.

Please note that withdrawal of consent or limitation of processing may affect our ability to provide you with certain services or to complete transactions.

All requests or enquiries should be submitted in writing to our Data Protection Officer using the contact details provided in this Notice. We may require verification of your identity before processing such requests.

## (8) CONTACT INFORMATION

If you have any enquiries, requests, or complaints regarding your Personal Data, or if you wish to exercise your rights under this Notice, please contact our Data Protection Officer at:

**Data Protection Officer (DPO)**  
**Ehsan Bina Group of Companies**

GF Wisma Ehsan Bina,  
No. 3, Jalan Kuchai Maju 12,  
Kuchai Entrepreneurs' Park,  
58200 Kuala Lumpur.

Tel: **+603-7980 2111**

Email: [dpo@ehsanbina.com](mailto:dpo@ehsanbina.com)

Please include your full name, contact details, and a clear description of your request or concern to enable us to process your request efficiently.

We will respond to your request within a reasonable timeframe in accordance with the PDPA.

## (9) LANGUAGE AND CHANGES TO THIS NOTICE

In accordance to Section 7(3) Personal Data Protection Act 2010, this Notice is issued in both English and Bahasa Malaysia. In the event of any inconsistency between the two versions, the **English version** shall prevail.

We may revise or update this Notice from time to time to reflect changes in legal, regulatory, or business requirements.

Any updates will be published on our website or communicated through appropriate channels. Your continued engagement with us shall constitute your acknowledgement and acceptance of such revisions.