

**OLDTOWN Membership Rewards Programme**  
**PERSONAL DATA PROTECTION NOTICE**

This Privacy Notice relates to the personal data that OLDTOWN group of companies (comprising OLDTOWN BERHAD, its subsidiaries and other related or associated companies) ["OLDTOWN"] may collect or have collected about you in relation to the activities, business or otherwise, of OLDTOWN. At OLDTOWN, safeguarding and keeping your personal data confidential is our priority. In compliance with the Personal Data Protection Act 2010 and the rules and regulations prescribed thereunder from time to time (collectively "the Act"), this Privacy Notice is issued to inform you that your Personal Data (as defined below) is being and/or will be processed by or on behalf of OLDTOWN as well as to make you aware of your rights in respect of such data.

**1. Personal Data**

1.1 Personal Data shall have the meaning as prescribed in the Act and it shall include information about you, such as your: -

- (i) name, NRIC/Passport no., age & date of birth;
  - (ii) nationality, race & gender;
  - (iii) contact details including address(es), telephone/fax/handphone number(s) & email address(es);
  - (iv) marital status, particulars of spouse/family members;
  - (v) job/profession particulars including name and address of company, title/position & income range;
  - (vi) financial and legal status (including bank account information and bankruptcy);
  - (vii) educational and past employment information;
  - (viii) health particulars; and
  - (x) any other information which may be pertaining to you, your spouse or family members that have been or may subsequently be collected, stored, used and processed by OLDTOWN from time to time.
- (ix) Transaction information, such as product purchased, price, method of payment and payment details.
- (iix) Account information, such as username, password, and other identifiers or credentials used to access our Online Services or to acquire OLDTOWN products and services.

1.2 In respect of personal data of third parties such as your spouse and family members, you warrant that you have obtained their consent allowing us to process their personal data and you will extend a copy of this Notice to them.

1.3 You are responsible in ensuring that the Personal Data you provided or will provide to us is accurate, complete, not misleading and kept up to date.

## 2. Purposes

2.1 OLDTOWN may use and process your Personal Data for activities of OLDTOWN, business or otherwise, and any matter in connection thereto, which shall include, without limitation, the following:-

- (i) to perform obligations of OLDTOWN in respect of any contract with you;
- (ii) to provide you with any services or products that you have requested;
- (iii) for the purpose of engaging you to provide services or products;
- (iv) for our administrative use including any checks as may be required by OLDTOWN in order to transact with you, auditing, data analysis;
- (v) to process payments relating to any activities of OLDTOWN;
- (vi) to communicate with you;
- (vii) to respond to any queries, comments or feedback from you;
- (viii) to conduct such surveys and analysis to help improve our services ; or
- (ix) to provide information to regulatory and governmental authorities in order to comply with statutory and governmental requirements and with OLDTOWN's obligations under the law (collectively "Purposes").

2.2 OLDTOWN may also use and process your Personal Data for other purposes ("Other Purposes") such as:

- (i) to send you materials such as season greeting cards, promotional materials, newsletters, articles, write-ups, updates, alerts, and information on/invitation to events, conferences, talks or seminars;
- (ii) to process your registration to participate in or attend event, contest, promotion, poll, survey, research study or any other activity and to share your Personal Data with OLDTOWN's partners, advertisers, event companies or sponsors who may communicate with you to market their products, services, events or activities.

perform data analytics, including consumer research, trend analysis, and financial analysis;

- (iii) operate, evaluate, and improve our business, including the development of new products and services; determination of the effectiveness of our sales, marketing and advertising efforts; and analysis and improvement of our products, offers, promotions, and Online Services and other technologies.

- (iv) protect against, identify, and prevent fraud and other criminal activity, claims and other liabilities; and comply with applicable law.

2.3 We use automated information for purposes such as to

- (i) personalize the visitor experience in our restaurants or on our Online Services; and
- (ii) deliver content (including advertising) tailored to our users' interests and the way our users browse our Online Services or in-restaurant technologies.

2.4 We also use this information to help diagnose technical and service problems; administer our Online Services; identify users of our Online Services; identify a device for fraud prevention purposes,

to target advertising or to personalize users' experiences; and gather demographic information about our users. We also use automated information to determine usage patterns and how we may tailor our Online Services to better meet the needs of our users.

2.5 We may use the information we obtain about you in other ways for which we provide specific notice at the time of collection.

2.6 If you do not agree or consent to OLDTOWN processing your Personal Data for the Other Purposes set out in this Section 2.2, please notify OLDTOWN by contacting OLDTOWN via the contact details set out in Section 4.1 below.

### 3. Sources

3.1 We may obtain your Personal Data directly from you and various other sources including but not limited to the following:

- (i) agreements, forms and other documents that you may have signed and/or provided to us and/or to which we have access;
- (ii) our business partners or affiliates and/or other parties which we have dealings with;
- (iii) at any events, conferences, talks, seminars or contests held by OLDTOWN;
- (iv) other legal means and/or searches from the relevant governing authorities/bodies/agencies and/or credit reporting agencies and/or other bodies/agencies which are legally allowed to collect, use and/or process your Personal Data;
- (v) from OLDTOWN's Facebook pages, if you follow, like or are a fan of such pages;
- (vi) from the cookies used on the website of OLDTOWN ([www.oldtown.com.my](http://www.oldtown.com.my)); and/or
- (vii) online search tools.
- (viii) use our web or mobile device applications ("Mobile Apps"). We refer to our Websites and Apps collectively as "Online Services".

3.2 If you do not wish for your Personal Data to be collected via cookies on the websites, you may deactivate cookies accordingly.

### 4. Right of Access & Correction and Inquiries

4.1 Subject to any exceptions under applicable laws, you may at any time request for access to and for correction of your Personal Data kept by us and contact us with any inquiry or complaint in respect of your Personal Data as follows: -

Address: No.2, Jalan Portland,  
Kawasan Perindustrian Tasek,  
31400 Ipoh, Perak.

Tel: +605-5415511

Fax: +605-5412921

e-mail: [hr@oldtown.com.my](mailto:hr@oldtown.com.my)

Attention: HR department

4.2 In accordance with the Act:

- (i) we may charge a fee for processing your request for access or correction; and
- (ii) we may refuse to comply with your request for access or correction to your Personal Data and if we refuse to comply with such request, we will inform you of our refusal and reason for our refusal.

## 5. Disclosure To Third Parties

While we maintain strict confidentiality policy on your Personal Data, we may engage other service or facilities providers to perform functions on OLDTOWN's behalf and consequently, we are allowed to provide access of or disclose your Personal Data to third parties, within or outside Malaysia, such as the following parties (which are not exhaustive) :-

- (i) information technology (IT) and data entry service providers;
- (ii) storage facility providers;
- (iii) our professional advisors/consultants, external auditors, legal advisors, accountants, banks, financial institutions and insurance providers;
- (iv) our business partners or affiliates and/or other parties which we have dealings with;
- (v) event management companies, sponsors and market research companies;
- (vi) regulatory and/or statutory authorities/bodies/agencies and/or credit reporting agencies and/or other bodies/agencies in order for OLDTOWN to comply with statutory and governmental requirements; and
- (vii) such other party as OLDTOWN deems necessary for the Purposes.

Your Personal Data may also be shared in connection with corporate transaction(s) such as a sale of subsidiary or merger or asset sale.

## 6. Right to Limit Processing of Personal Data

Subject to Section 7 below and subject further to such rights and restrictions as prescribed under the Act, you may at any time limit the processing of your Personal Data including the extent of the Personal Data and/or the purpose for which it is being processed by giving notice in writing to us, delivered by hand or sent by registered post to OLDTOWN at our address stated in Section 4 above.

## 7. Consequences of Failing to Supply Personal Data

All Personal Data supplied by you to us shall be wholly voluntarily on your part and you may at any time withdraw your consent to OLDTOWN processing your Personal Data. However, if you do not provide or do not consent to OLDTOWN processing your Personal Data, OLDTOWN may not be able to:-

- (i) enter or proceed with a transaction with you;
- (ii) communicate with you;
- (iii) prepare the relevant agreements and/or any other documents for you; and/or
- (iv) perform or achieve the Purposes or Other Purposes as set out in Section 2 above.

## 8. Transfer of Personal Data

As OLDTOWN's information technology storage facilities and servers may be located in other jurisdiction, your Personal Data may be transferred to, stored, used and processed in a jurisdiction other than Malaysia. In any event, you understand and hereby consent to the transfer of your Personal Data to any place outside of Malaysia as provided for under the Act.

## 9. Modifications

OLDTOWN may modify and/or amend the terms of this Notice from time to time without prior notice by placing the updated Notice at our website. Your continued business relationship with OLDTOWN or interaction or communication with OLDTOWN following such modifications or amendments to this Notice shall signify your acceptance of such modifications or amendments.

## 10. Third Party

10.1 We may request your assistance to procure the consent of third parties whose personal data is provided by you to us, and you hereby agree to use your best endeavor to do so.

10.2 Our website may contain links to third parties' websites. Please note that OLDTOWN is not responsible for the collection, use, sharing or disclosure of your Personal Data by such third parties. If you provide information directly to such sites, the privacy policy and terms on those sites are applicable and OLDTOWN is not responsible for the information processing or privacy policies of such sites.

## 11. Cookies and Similar Technologies

OLDTOWN uses cookies and other similar technologies to collect information for the purposes described in this Privacy Statement under "How We Use the Information We Collect."

## 12. Cookies

A "cookie" is a text file that websites send to a visitor's computer or other Internet-connected device to uniquely identify the visitor's browser or to store information or settings in the browser. Like most websites, OLDTOWN uses cookies for a variety of purposes to improve your online experience. For example, we track the total number of visitors to our Sites on an anonymous aggregate basis. We may

also employ cookies so that we remember you when you return to the Site, to keep track of the items in your shopping cart if you purchase merchandise online, to administer certain contests and to help customize your web experience. We may associate personal data with a cookie file in those instances. Both we and others (such as our advertising networks) may collect personal data about our visitors' online activities, on-site and across third-party websites, when using our Online services.

Use the options in your web browser if you do not wish to receive a cookie or if you wish to set your browser to notify you when you receive a cookie. Click on the "Help" section of your browser to learn how to change your cookie preferences. If you disable all cookies, you may not be able to take advantage of all the features of this Site.

### 13. Other Technologies

We may use other technologies, including web beacons and JavaScript, which sometimes work together with cookies and other means with our Sites and Mobile Apps to uniquely identify your device. These other technologies help enable features on our Sites and within our Mobile Apps. We may also use certain technologies to determine whether you have opened an e-mail or clicked on a link contained in an e-mail.

Please note the following:

(i) We offer certain features that are available only with cookies and other similar technologies. We use both session and persistent cookies and other tracking technologies. Tracking technologies (e.g., cookies) can either be persistent (i.e., they remain on your computer until you delete them) or session-based (i.e., they last only until you close your browser). You are always free to decline tracking technologies if your browser permits, although doing so may interfere with your use of Online Services. We may encode and protect the tracking cookies and other tracking technologies that OLDTOWN sets, so that only we can interpret the information stored in them. Where video is available on our Online Services, we may target and track the videos you view. You consent to our tracking of your video viewing through Online Services or third-party social media for up to two years, or as permitted by applicable law, or until consent is withdrawn.

### 14. Targeted Advertising

On our Online Services, we may collect information about your online activities for use in providing you with advertising tailored to your individual interests. This section of our Privacy Statement provides details and explains how to exercise your choices.

You may see certain ads on other websites because we participate in advertising networks. Ad networks allow us to target our messaging to users through demographic, interest-based and

contextual means. These networks track your online activities over time by collecting information through automated means, including through the use of cookies, web server logs, web beacons and other technologies. The networks use this information to show you advertisements that may be tailored to your individual interests. The information our ad networks may collect includes information about your visits to websites that participate in the relevant advertising networks, such as the pages or advertisements you view and the actions you take on the websites. This data collection takes place both on our Online Services and on third-party websites that participate in the ad networks. This process also helps us evaluate our marketing efforts.

#### 15. Links to Other Websites and Social Media

Our Online Services may offer links to third-party websites that are not operated by OLDTOWN. If you visit one of these linked websites, you should review the website's privacy policy, terms and conditions, and other policies. We are not responsible for the policies and practices of third parties. Any information you submit to those third parties is subject to their privacy policy, terms and conditions, and other policies.

#### 16. Information Security

We will otherwise treat your personal data as private and confidential and will not disclose your information to anyone outside OLDTOWN except where:

- (i) where you have given permission, where we are required or permitted to do so by law.
- (ii) where required or authorized by any order of court, tribunal or authority, whether governmental or quasi-governmental with jurisdiction over OLDTOWN;
- (iii) where we may transfer rights and obligations pursuant to our agreement(s) with you; and/or
- (iv) where we are required to meet our obligations to any relevant regulatory authority (whether in or outside Malaysia).

OLDTOWN is committed to taking appropriate measures designed to keep personal data secure. We have in place technical, administrative, and physical procedures designed to protect personal data from accidental, unlawful or unauthorized loss, access, disclosure, use, alteration, or destruction. While we take efforts to safeguard our information systems, no website, mobile application, computer system, or transmission of data over the Internet or any other public network can be guaranteed to be 100% secure.

#### 17. Retention of Personal data

We retain personal data for the period necessary to fulfil the purposes outlined in this Privacy Statement and per OLDTOWN records retention policies unless a longer retention period is required or permitted by law.

#### 18. Your Consent

By: -

(i) engaging OLDTOWN to provide products or services;

(ii) entering into any transaction with OLDTOWN;

(iii) communicating or interacting with us; or

(iv) accessing or browsing the website of OLDTOWN;

you acknowledge that you have read and understood this Notice and you consent to the processing of your Personal Data by or on behalf of OLDTOWN as described in this Notice.

Yours faithfully,

OLDTOWN BERHAD

[This Notice is computer generated and no signature is required.] Dated: 1 November 2014