

Privacy Policy

IMT Tech Sdn Bhd (Company No.: 201701035589 (1249760-V)), (collectively and individually referred to as “IMT Tech”, “we”, “us” or “our”) operate its websites (collectively or individually referred to as the “Site”) and distributes a community mobile platform (collectively or individually referred to as the “App”), and/or other services which may be offered from time to time. This Privacy Policy explains how we handle Personal Data and comply with the requirements of Malaysia’s Personal Data Protection Act 2010 (“PDPA”).

We are a real estate communications and marketing platform offering a set of communication, security, management, accountancy system, marketplace and convenience products known as iResidential, iCommercial, iMixed, iDefects, iLoyalty, iMaintain, iSchool etc. (“IMT Tech Product”) that enable end users to receive customised services in connection with real estate properties and developments with the goal of delivering world-class services. One of the ways to enable us to do is by using data to personalise your experience and improve our services. This Privacy Policy will assist you in understanding how we collect, use, disclose and/or process Personal Data you have provided to us or that we possess about you, as well as to assist you in making an informed decision before providing us with any of your Personal Data. We want you to be able to use our Site, App, IMT Tech Product and other services with full confidence that your privacy rights are protected.

The term “Personal Data” means data, whether true or not, about an individual who can be identified from that data, or from that data and other information to which an organisation has or is likely to have access. This may include your name, address, telephone number, email address, date of birth, gender, credit card details, photographs, personal images, device ID, operating system or version, information about your purchases or preferences, and any other information collected by us where you are identified or identifiable.

By using the App, Site and/or IMT Tech Product, registering for an account with us, visiting our Site, you acknowledge and agree that you accept the practices, requirements, and/or policies outlined in this Privacy Policy, and you hereby consent to us collecting, using, disclosing and/or processing your Personal Data as described herein. IF YOU DO NOT CONSENT TO THE PROCESSING OF YOUR PERSONAL DATA AS DESCRIBED IN THIS PRIVACY POLICY, PLEASE DO NOT USE OUR SERVICES OR ACCESS OUR APP OR SITE. If we change our Privacy Policy, we will post those changes or the amended Privacy Policy on our App and Site. We reserve the right to amend this Privacy Policy at any time.

This Privacy Policy is subject to Malaysian laws.

1. COLLECTION OF PERSONAL DATA

1.1 We may collect Personal Data from you through various means, including but not limited to instances when you:

- (a) provide your Personal Data through our App or Site for the purpose of registering for and creating an account;
- (b) submit any form, including, but not limited to, application forms or other forms relating to any of our products and services, whether online or by way of a physical form;

- (c) download or access the App;
- (d) agree for the App to access your location;
- (e) scanning the Quick Response code (“QR code”);
- (f) participate in a promotion or other website features;
- (g) request for a product or services information or to receive any marketing, promotional or other types of communications;
- (h) provide your ratings and review of products and/or services;
- (i) carry out transactions through our App or Site;
- (j) make enquiries or comments;
- (k) interact with your property managers or with us; or
- (l) submit your Personal Data to us for any reason.

The above does not purport to be exhaustive and sets out some common instances of when Personal Data about you may be collected.

1.2 In addition to the above, we may use variety of technologies, as the case may be, to automatically collect information about your activities on the App or Site, such as cookies; web beacons, clear pixels or pixel tags; analytical tags; web server logs; geo-location technologies; and QR code (each a “Mobile Technology”).

1.3 You have no obligation to provide any of the Personal Data requested by us. However, depending on circumstances, it may be the case that if you do not provide the requested Personal Data, we may not be able to provide you with certain products and services, that depend on the collection, use or disclosure of your Personal Data.

2. MINOR’S PRIVACY

We do not and do not intend to, transact through the App or Site directly with anyone we know to be under the age of 18. If you are under the age of 18, you should use the App or Site only with the involvement of a parent or guardian and should not submit any Personal Data to us. By providing any Personal Data to us, you declare that you are over the age of 18.

3. SETTING UP AN ACCOUNT

In order to use certain functionalities of the IMT Tech Product, you will have to create a user account which requires you to submit certain Personal Data. When you register and create an account, we require you to provide us with your name, contact number and/or email address as well as your unit number. We also ask for certain information about yourself such as your contact number, email address, shipping address, photo identification, bank account details, age, date of birth, gender and interests. Upon activating an account, you will select a user name and password. Your user name and password will be used so you can securely access and maintain your account.

4. VIEWING WEBSITE

As with most websites, your computer sends information which may include Personal Data about you that gets logged by a web server when you browse our Site. This typically includes without limitation your computer’s Internet Protocol (“IP”) address, operating system, browser name/version, the referring website, requested page, date/time, and sometimes a cookie which can be disabled using your browser preferences, to help the Site remember your

last visit. If you are logged in, this information is associated with your personal account. The information is also included in anonymous statistics to allow us to understand how visitors use our Site.

5. PURPOSES FOR COLLECTION, USE, DISCLOSURE AND PROCESSING OF PERSONAL DATA

5.1 We will/may collect, use, disclose and/or process your Personal Data for one or more of the following purposes:

- (a) administering, facilitating, processing and/or dealing in any matters relating to your use or access of the App or Site;
- (b) monitoring, processing and/or tracking your use of the App or Site in order to provide you with a seamless experience, facilitating or administering your use of the App or Site, and/or to assist us in improving your experience in using the App or Site;
- (c) scanning or be scanned on a unique QR code made available at the entrance of the premises to facilitate effective registration process and contact-tracing of visitors;
- (d) managing, operating, administering and providing you with as well as to facilitate the provision of our services, including, without limitation, remembering your preferences;
- (e) tailoring your experience by displaying content according to your interests and preferences;
- (f) assessing and processing your request for the purchase of and/or subscription to our products and/or services;
- (g) registering you as a user of IMT Tech Product and/or to deal with, process and/or administer the account that you may open with us, including to facilitate your transactions or activities on the App or Site, or your transactions or activities with us;
- (h) administering, facilitating, processing and/or dealing with your relationship with us, any transactions or activities carried out by you on the App or Site. This includes processing your application, orders and payment transactions; implementing transactions and the supply of products and/or services to you that you have requested. Should you make a purchase to be delivered to a third party recipient, you consent to us disclosing Personal Data that identifies you to the said third party recipient (such as but not limited to your name). Further, you acknowledge and agree that delivery of your purchase could involve disclosure of certain Personal Data about you to bring about delivery of the same such as your name and contact details, which may be disclosed on the cover of the parcel, on an envelope or a delivery related document, as the case may be, which could be seen by third parties who view such parcel, envelope or said document;
- (i) carrying out your instructions or responding to any enquiry given by (or purported to be given by) you or on your behalf including responding to your customer service enquiries and complaints; or responding to or dealing with your interactions with us;

(j) contacting you or communicating with you via phone/voice call, text message and/or fax message, email and/or postal mail for the purposes of administering and/or managing your use of the App or Site, and/or account with us, your relationship with us or any transactions made by you with us. You acknowledge and agree that such communication by us could be by way of the mailing of correspondence, documents or notices to you, which could involve disclosure of certain Personal Data about you to bring about delivery of the same as well as on the external cover of envelopes/mail packages;

(k) to prevent or investigate any fraud, unlawful activity or omission or misconduct, whether or not there is any suspicion of the aforementioned; dealing with and/or investigating complaints;

(l) complying with or as required by any applicable law, governmental or regulatory requirements of any relevant jurisdiction, including, without limitation, meeting the requirements to make disclosure under the requirements of any law binding on IMT Tech or on its related corporations or affiliates;

(m) conducting research including user research, surveys, market surveys, analysis and/or development activities (including but not limited to data analytics, surveys and/or profiling) to improve our services and facilities, or to improve our understanding of your interests, concerns and preferences, in order to enhance any continued interaction between yourself and us connected or in relation to the App or Site, or improve any of our IMT Tech Product or services. Without limiting the generality of the foregoing, we may/will in this regard send you surveys or request a face to face interview survey, by way of email or postal mail;

(n) storing, hosting, backing up (whether for disaster recovery or otherwise) of your Personal Data;

(o) for marketing purpose, we might be providing you with marketing, advertising and promotional information, materials and/or documents relating to products, contests, services and/or events (including those of third party organisations whom we may collaborate with) that we or such third party organisations may be selling, marketing, offering, organizing, involved in or promoting, whether such products, services and/or events exist now or are created in the future by way of electronic transmission to your email address, push notifications, other forms of in-app notifications or harnessing other technologies (such as geo-location technology) for our App on your mobile device or other technologies on your computer, and/or through other modes of communication, in compliance with the PDPA;

(p) to implement and maintain our information technology systems, including to store and process Personal Data in computer databases and servers; and/or

(q) to produce statistics and research for internal and statutory reporting and/or record-keeping requirements

(the purposes set out above shall be collectively referred to as the "Purposes").

5.2 The Purposes for which we will/may collect, use, disclose or process your Personal Data depend on the circumstances. In the event such purpose does not appear above, we will notify you of such other purpose at the time of obtaining your consent, unless processing of the applicable data without your consent is permitted by the PDPA.

6. SHARING AND DISCLOSURE OF PERSONAL INFORMATION

6.1 In conducting our business, we may/will need to disclose your Personal Data to third parties, whether located within or outside Malaysia, for one or more of the above Purposes. In this regard, you hereby acknowledge, agree and consent that we are permitted to disclose your Personal Data to such third parties for one or more of the above Purposes and for the said third parties to subsequently collect, use, disclose and/or process your Personal Data. Without limiting the generality of the foregoing, such third parties include:

- (a) our related corporations and affiliates either in Malaysia or overseas;
- (b) any of our agents, contractors or third party service providers, including but not limited to those which provide administrative or other services to us such as mailing houses, telecommunication companies, logistics companies, information technology companies and data centres;
- (c) our business partners;
- (d) any other person to whom such disclosure is required by law or regulatory requirement or pursuant to a court order.

6.2 In the event we need to provide our service providers with the information they need to perform their services and work with them, we shall require our service providers to adhere to strict privacy guidelines and not to use your Personal Data for unauthorised purposes.

6.3 For the avoidance of doubt, in the event that PDPA or other applicable laws permit an organisation such as us to collect, use or disclose your Personal Data without your consent, such permission granted by the laws shall continue to apply.

6.4 Third parties may unlawfully intercept or access Personal Data transmitted to or contained on the App or Site, technologies may malfunction, or might be accessed, abused or misused information through no fault of ours. We will nevertheless deploy reasonable security arrangements to protect Personal Data as required by the PDPA.

7. PROVISION OF THIRD PARTY PERSONAL DATA BY YOU

Should you provide us with Personal Data of individual other than yourself, you represent, warrant and hereby confirm that:

- (a) prior to disclosing such Personal Data to us, you would have and had obtained consent from the individual whose Personal Data are being disclosed to us, to permit you to disclose the individual's Personal Data for the Purposes; and permit us to collect, use, disclose and/or process the individual's Personal Data;

(b) any Personal Data of individual that you disclose to us is accurate; and

(c) you are validly acting on behalf of such individual and that you have the authority to provide their Personal Data to us.

8. HOW WE PROTECT AND MANAGE PERSONAL DATA

8.1 We endeavour to take all reasonable steps to ensure your Personal Data is kept confidential and secure, and to take appropriate technical and organizational measures to prevent unlawful or accidental destruction, accidental loss, unauthorized disclosure or access or other unlawful forms of processing. We will not rent, trade, distribute or sell any Personal Data that you give us to any third party unless we receive your prior consent or applicable law permits the same. However, your Personal Data is accessible by a limited number of employees who have special access rights to such systems.

8.2 Your Personal Data is contained behind secured networks and appropriate security arrangements will be taken to prevent any unauthorized access, collection, use, disclosure, copying, modification, leakage, loss, damage and/or alteration of your Personal Data. However, we cannot assume responsibility for any unauthorized use of your Personal Data by third parties which are wholly attributable to factors beyond our control.

8.3 For your convenience, the App includes functionality allowing you to remain logged in to the App so that you do not have to re-enter your password each time you access the App. If you choose to remain logged in, you should be aware that anyone with access to your mobile device will be able to access and make changes to your account. You agree that we will not be responsible for any unauthorized transactions or activities with us using your App account as we logically are only in a position to assume that any user of your App account is you.

8.4 We will retain Personal Data in accordance with the PDPA and/or other applicable laws. We will destroy or anonymize Personal Data as soon as it is reasonable to assume that (i) the purpose for which that Personal Data was collected is no longer being served by the retention of such Personal Data; and (ii) retention is no longer necessary for any legal or business purposes. If you cease using the App or Site, or your permission to use the App, Site and/or the services is terminated or withdrawn, we may continue storing, using and/or disclosing your Personal Data in accordance with this Privacy Policy and our obligations under the PDPA. Subject to applicable law, we may securely dispose of your Personal Data without prior notice to you.

9. REQUEST FOR ACCESS AND/OR CORRECTION OF PERSONAL DATA

9.1 If you have an account with us, you may personally access and/or correct your Personal Data currently in our possession or control through the Account Settings page on the App or Site. If you do not have an account with us, you may request to access and/or correct your Personal Data currently in our possession or control by submitting a written request to us. We will need enough information from you in order to ascertain your identity as well as the nature of your request to enable us to deal with your request. Please submit your written request to admin@imttech.co.

9.2 For a request to access Personal Data, once we have sufficient information from you to deal with the request, we will seek to provide you with the relevant Personal Data within 14 days. Where we are unable to respond to you within the said 14 days, we will notify you of the soonest possible time within which we can provide you with the information requested. The PDPA exempts certain types of Personal Data from being subject to your access request.

9.3 For a request to correct Personal Data, once we have sufficient information from you to deal with the request, we will deal with your request in compliance with the PDPA, including correcting your Personal Data within 14 days. Where we are unable to do so within the said 14 days, we will notify you of the soonest practicable time within which we can make the correction.

9.4 We reserve the right to decline the request to correct Personal Data as PDPA exempts certain types of Personal Data from being subject to your correction request and situations when correction need not be made by us despite your request.

10. REQUEST TO WITHDRAW CONSENT

10.1 You may withdraw your consent for the collection, use and/or disclosure of your Personal Data in our possession or under our control by submitting your request to admin@imttech.co and we will process in accordance with the PDPA and other applicable laws.

10.2 We will process your request within a reasonable time once we have verified your identity and received your clear withdrawal instructions. Your withdrawal of consent could result in certain legal consequences arising from such withdrawal. In this regard, depending on the extent of your withdrawal of consent for us to process your Personal Data, it may mean that we may not be able to fulfil the transaction you have entered into with us or continue with your relationship with us, or send you information that you have requested, as examples depending on the circumstances.

11. COOKIES AND MOBILE TECHNOLOGY

11.1 Cookies. For users of the Site, please note that we may deposit cookies in your computer or your mobile device in order to identify you. Cookies are small data text files that are sent from a server computer during a browsing session. Cookies are typically stored on the computer's hard drive and are used by websites to simulate a continuous connection to the Site. Security measures have been employed to prevent unauthorized access to visitor data. However, visitors acknowledge that we do not control the transfer of data over telecommunication facilities including the Internet. Therefore, to the extent permitted by law, we will not be responsible for any breach of security or the unauthorized disclosure or use of any such data on the Internet, through no fault of us. Not all cookies collect Personal Data and you may configure your browser to reject cookies. However, this may mean you may not be able to take full advantage of the services or features on the Site. Where the data collected by such cookies constitute your Personal Data, such Personal Data is being collected, used or disclosed for one or more of the Purposes. By continuing to use the Site, you are agreeing to the use of cookies on the Site.

11.2 Web Beacons. Web beacons are small graphic images on a website or in an email that can be used for such things as recording the pages and advertisements clicked on by users, or tracking the performance of email marketing campaigns.

11.3 Analytics Tags. We use analytical tags to analyse what you like to do and the effectiveness of our features. They can also help us customize your browsing experience. We may use information collected through analytical tags or tracked links in combination with your Personal Data. We may also combine Personal Data you provide to us with other Personal Data such as purchase history and demographic information.

11.4 Web Server Logs. Web server logs are records of activity created by the mobile device or computer that delivers the webpages you request to your browser. The Web server log also may record information about your browser, such as your IP address and the cookies set on your browser by the server.

11.5 QR code. QR code consists of black squares arranged in a square grid on a white background which can be read by an imaging device such as a camera. QR code is a machine-readable optical label that contains information about the item to which it is attached. QR codes often contain data for a locator, identifier, or tracker that points to a website or application. Application include product tracking, item identification, time tracking, document management, and general marketing.

12. REGISTRATION INFORMATION

Our App and Site contain areas where you can submit information to us such as our registration service; and also features such as cookies and performance tracking technology that automatically collect information from the visitors to our App or Site. During the registration process, you must provide us with a password, your name, address and a valid email address, etc. It is your responsibility to keep your password strictly confidential.

13. AMENDMENT TO PRIVACY POLICY

Our privacy practices will be continuously assessed against new technologies, business practices and our users' needs. As we update and diversify our services, our Privacy Policy may evolve. We reserve the right to change its Privacy Policy at any time and notify you by posting an updated version of the policy on the App and Site.