

# VERTICAL ADVENTURE AND EQUIPMENTS SDN. BHD. (969834-T)

(hereinafter referred to as "VERTICAL ADVENTURE AND EQUIPMENTS") is committed to prevent personal data of individuals being used in an inappropriate manner, and ensure compliance with legal, and regulatory requirements for data protection, and privacy.

## 1.0 General

- Personal data means information in respect of commercial transactions that relates to directly or indirectly to a Data Subject, who is identified or identifiable from that information or from that and other information in the possession of a data user, including any sensitive personal data, and expression of opinion about the Data Subject. Such personal information about or which identifies individual(s) who is the Data Subject, includes but not limited to individual(s)' names, addresses, identity card numbers (MyKad), passport numbers, telephone and/or facsimile numbers, photographs, finger prints, and email and/or social media addresses.
- Processing in relation to personal data means collecting, recording, holding or storing the personal data or carrying out any operation or set of operations on the personal data.
- 3. Sensitive personal data means any personal information consisting information including but not limited to the physical or mental health or condition of a Data Subject, his political opinions, his religious beliefs or other beliefs of a similar nature, the commission or alleged commission by him of any offence or any other personal data.
- 4. Data Subject refers to individual who is the subject of the personal data.

#### 2.0 Notice and Choice

- 1. VERTICAL ADVENTURE AND EQUIPMENTS collects personal data directly from the Data Subject, and in this context, from you through online application, registration or feedback form.
- 2. VERTICAL ADVENTURE AND EQUIPMENTS processes various types of personal data including but not limited to individual's names, addresses, identity card (MyKad) numbers, passport numbers, telephone numbers and/or facsimile numbers, photographs, finger prints and e-mail addresses and/or social media addresses.
- 3. VERTICAL ADVENTURE AND EQUIPMENTS shall process the personal data for the following purposes (which may also include purposes directly related to the said purposes):
  - providing you with services under VERTICAL ADVENTURE AND EQUIPMENTS's business which includes any matters relating to the supply or exchange of goods or services;
  - processing your application or registration under any VERTICAL ADVENTURE AND EQUIPMENTS's program; and
  - for the purposes of exercising or performing any right or obligation which is conferred or imposed by law on VERTICAL ADVENTURE AND EQUIPMENTS in connection with candidates for employment including personal data relating to other individuals who may be identified from that personal data.

- 4. VERTICAL ADVENTURE AND EQUIPMENTS may disclose personal data to third parties for legitimate business purposes, including for the following purposes or in the following circumstances:
  - background verification checks on candidates for employment;
  - in anticipation of, and in the course of an actual or potential sale, reorganization, consolidation, merger, or amalgamation of all or part of our business or operations;
  - for the purposes of exercising or performing any right or obligation which is conferred or imposed by law on VERTICAL ADVENTURE AND EQUIPMENTS in connection with candidates for employment including any referee whose personal data are provided by you; and
  - making such disclosures as may be required by law or by order of a court of competent jurisdiction or by any rule, direction or regulation of any regulatory or governmental authority or any other relevant authority to be disclosed.
- 5. VERTICAL ADVENTURE AND EQUIPMENTS would like to notify that it is obligatory for you to supply the personal data in order for us to provide you with services under VERTICAL ADVENTURE AND EQUIPMENTS's business which includes any matters relating to the supply or exchange of goods or services, to process your application or registration under any VERTICAL ADVENTURE AND EQUIPMENTS's program, and to process your application in relation to employment application under VERTICAL ADVENTURE AND EQUIPMENTS. VERTICAL ADVENTURE AND EQUIPMENTS will not be able to provide you with adequate services if you fail to supply the personal data.
- 6. Where sensitive personal data is provided, and disclosed by you to VERTICAL ADVENTURE AND EQUIPMENTS, by such disclosure, you have consented to its collection, and processing by VERTICAL ADVENTURE AND EQUIPMENTS.
- 7. You hereby represent that if at any time you have provided, and disclosed to VERTICAL ADVENTURE AND EQUIPMENTS personal data about other individuals, you are authorized to do so, and are aware that VERTICAL ADVENTURE AND EQUIPMENTS may use, and/or process such personal data for the relevant purposes as set out in "Item 3" above.
- 8. You may by notice in writing to VERTICAL ADVENTURE AND EQUIPMENTS withdraw your consent to or limit the processing of personal data in respect of which you are the Data Subject. VERTICAL ADVENTURE AND EQUIPMENTS shall upon receiving the written notice cease or limit the processing of the personal data accordingly. Please refer to the "Access" section below for the communication methods available.

#### 3.0 Disclosure

1. Personal data shall not without your consent be disclosed for any purpose other than the purpose for which the personal data was to be disclosed at the time of collection of the personal data or a purpose directly related to it, or be disclosed to a third party other than that specified in the "Notice and Choice" section above.

#### 4.0 Security

1. VERTICAL ADVENTURE AND EQUIPMENTS shall take appropriate measures to protect the personal data from any loss, misuse, modification, unauthorized or accidental access or disclosure, alteration or destruction when processing personal data.

#### 5.0 Retention

1. VERTICAL ADVENTURE AND EQUIPMENTS retains personal data for as long as necessary for its legitimate business purposes, and as otherwise permitted by applicable law.

## 6.0 Data Integrity

- 1. Personal data supplied by you to VERTICAL ADVENTURE AND EQUIPMENTS shall be accurate, complete, and not misleading.
- You shall by notice in writing to VERTICAL ADVENTURE AND EQUIPMENTS inform VERTICAL ADVENTURE AND EQUIPMENTS of any changes to the personal data supplied by you to VERTICAL ADVENTURE AND EQUIPMENTS to ensure the personal data is kept up-to-date. Please refer to the "Access" section below for the communication methods available.

#### 7.0 Access

 You have the right to request access to your personal data processed by VERTICAL ADVENTURE AND EQUIPMENTS, and be able to correct that personal data. You may send your request in writing to VERTICAL ADVENTURE AND EQUIPMENTS at the following address or e-mail:

Attention : Risk Prevention Division

- Address : VERTICAL ADVENTURE AND EQUIPMENTS SDN. BHD. (969834-T) 2-105, Jalan Prima SG 3/2, Taman Sri Gombak, 68100 Batu Caves, Selangor Darul Ehsan, Malaysia
- E-mail : <u>pdpa@verticale.my</u>

#### 8.0 Inquiries

1. Any inquiries to the processing