

Personal Data Protection Notice

1.Introduction

Bukit Jalil Golf & Country Resort ("BJGCR") is owned and operated by *Berjaya Hartanah Berhad (Registration No. 199101012980 (223292-U))* ("Company", "we", "our", or "us"). We are committed to protecting your personal data and respecting your privacy in accordance with the Personal Data Protection Act 2010 ("PDPA"), the Personal Data Protection Standards 2015, and any amendments thereto.

Your privacy is important to us. This Personal Data Protection Notice ("Notice") explains how Berjaya Hartanah Berhad, the owner and operator of Bukit Jalil Golf & Country Resort ("BJGCR"), collects, uses, processes, stores, discloses, transfers, and protects your personal data.

Where necessary for business, operational, administrative, human resource management, customer service, legal, compliance, or marketing purposes, your personal data may be disclosed or transferred to companies within the Berjaya Group, which comprises Berjaya Corporation Berhad and its subsidiaries, related corporations, and associated companies, in accordance with this Notice and applicable laws.

This Notice applies to all individuals who interact with BJGCR, including but not limited to members, guests, customers, visitors, event participants, tenants, vendors, suppliers, contractors, service providers, website users, and other external parties.

Any personal data provided by you to us, whether now, from time to time, or previously, will be collected, used, processed, stored, disclosed, and otherwise handled in accordance with this Notice. We reserve the right to amend, vary, or update this Notice from time to time. Any changes to this Notice will be published on our website and shall take effect upon publication.

In this Notice:

"**BJGCR**" means Bukit Jalil Golf & Country Resort, which is owned and operated by *Berjaya Hartanah Berhad (Registration No. 199101012980 (223292-U))*.

"**Company**" means *Berjaya Hartanah Berhad (Registration No. 199101012980 (223292-U))*.

"**Berjaya Group**" means Berjaya Corporation Berhad and its subsidiaries, related corporations, and associated companies.

"**Biometric Data**" means any personal data resulting from specific technical processing relating to the physical, physiological, or behavioural characteristics of an individual that enables or confirms the unique identification of that individual.

"**Data Controller**" means a person who, either alone or jointly with others, processes personal data or has control over, or authorises the processing of, personal data.

"**Data Processor**" means any person, other than an employee of the Data Controller, who processes personal data solely on behalf of the Data Controller and does not process the personal data for its own purposes. All Data Processors engaged by the Company are required

to operate under appropriate contractual arrangements and comply with applicable data protection obligations.

"Data Subject" means an individual who is the subject of personal data.

"Personal Data" means any information that relates directly or indirectly to a Data Subject who is identified or identifiable from that information, or from that and other information in the possession or control of a Data Controller, including any Sensitive Personal Data.

"Sensitive Personal Data" means any personal data consisting of information relating to an individual's physical or mental health or condition, political opinions, religious beliefs or other beliefs of a similar nature, the commission or alleged commission of an offence, biometric data, or any other category of personal data prescribed by applicable law as sensitive personal data.

2. COLLECTION OF PERSONAL DATA

2.1 What we collect from you

Depending on your relationship and interactions with BJGCR, we may collect and process the following categories of Personal Data:

- Name, NRIC/passport number, date of birth, gender, nationality and photographs;
- Contact information including residential address, mailing address, email address and telephone/mobile number;
- Employment and business information such as company name, company registration number, job title, department and business contact details;
- Membership information including membership number, membership category, nomination records, transfer records, verification records, golf bag tag records, membership card records and related membership administration information;
- Golf and club-related information including tee-time bookings, tournament participation, golf handicap information, visitor and guest registration records, access card records and facility usage information;
- Event, function and banquet information including event details, reservation records, banquet bookings, attendee information, quotations, invoices, billing information and payment records;
- Banking and financial information including bank account details, payment information, billing address, invoice records and transaction history;
- Employment and human resource information including recruitment records, employment history, performance appraisals, leave records, overtime records, disciplinary records, training records, insurance claims, medical claims and exit management records;
- Sensitive Personal Data, including information relating to your health, medical condition, dietary requirements, disabilities, or accessibility needs, which is voluntarily provided by you where necessary for employment, insurance, event participation, safety, or service-related arrangements.
- CCTV recordings, visitor registration records, access control records and security logs maintained within BJGCR premises; and

- Any other Personal Data provided by you, your authorised representative or obtained lawfully from third parties.

2.2 How your Personal Data is collected

Your Personal Data may be collected directly or indirectly from various sources, including but not limited to:

- Membership application forms, nomination forms, transfer forms, membership renewal forms and other membership administration documents;
- Banquet, event and function booking forms, quotations, invoices, function confirmation agreements and related correspondence;
- Recruitment, employment, payroll and human resource administration forms, including employee personal data forms, performance appraisal forms, leave applications, overtime applications, medical claims, insurance claims and exit clearance documentation;
- Golf, recreational, sporting and club-related registrations, competitions, tournaments, programmes and events organised by BJGCR;
- Visitor registration forms, access card applications, guest registrations and security records;
- Communications with us through email, telephone, WhatsApp, social media platforms, written correspondence or face-to-face interactions;
- Online interactions through our website, online enquiry forms, booking platforms and digital applications;
- CCTV systems, access control systems and security monitoring systems operating within BJGCR premises;
- Business transactions and engagements involving vendors, suppliers, contractors, tenants, consultants and service providers; and
- Third parties, including authorised representatives, business partners, service providers, government authorities, regulatory bodies or publicly available sources were permitted by law.

2.3 Why your Personal Data is collected

2.3.1 Your Personal Data may be collected, used and processed for one or more of the following purposes:

- To verify your identity and process membership applications, renewals, nominations, transfers and related membership administration activities;
- To provide, operate and manage golf, recreational, sports, dining, banquet, event and other club facilities and services;

- To process reservations, bookings, registrations and participation in tournaments, competitions, events, programmes and club activities;
- To administer customer, member, guest, vendor, tenant and business relationships;
- To prepare quotations, invoices, billing statements and process payments, refunds and financial transactions;
- To communicate with you regarding services, memberships, bookings, events, enquiries, complaints, feedback or service-related matters;
- To administer membership benefits, promotions, rewards programmes and marketing activities, subject to applicable legal requirements;
- To manage recruitment, employment, payroll administration, employee benefits, performance management, training, disciplinary processes and human resource functions;
- To maintain the safety, security and integrity of BJGCR premises, facilities, systems, members, guests, visitors and employees;
- To conduct internal audits, investigations, compliance reviews, governance activities and risk management processes;
- To comply with legal, regulatory, contractual and operational requirements; and
- For any other purpose directly related to the above purposes or where otherwise permitted or required by law.

2.3.2 Certain Personal Data requested by BJGCR is mandatory for us to process membership applications, event bookings, facility reservations, employment applications, employment administration, payments, contractual arrangements and compliance with legal and regulatory obligations. Failure to provide such Personal Data may result in our inability to process your application, provide the requested products or services, maintain your membership, facilitate your participation in club activities, fulfil employment-related obligations or otherwise continue our business relationship with you. All other Personal Data is provided voluntarily unless otherwise specified.

3. DISCLOSURE OF PERSONAL DATA

3.1 Your Personal Data may be disclosed or transferred on a need-to-know basis, where necessary and in compliance with applicable laws, to the following classes of third parties, including but not limited to:

- Companies within the Berjaya Group for business, operational, administrative, human resource management, customer service, legal, compliance, audit, risk management, and marketing purposes;
- Service providers, vendors, suppliers, contractors, agents, consultants, and business partners engaged by BJGCR in connection with the provision of golf, recreational, hospitality, restaurant, banquet, event management, membership administration,

maintenance, security, information technology, cloud hosting, telecommunications, customer support, marketing, and other related services;

- Banks, financial institutions, payment gateway providers, payment processors, and other parties involved in processing payments, refunds, billing, or financial transactions;
- Auditors, legal advisers, insurers, insurance brokers, medical practitioners, consultants, and other professional advisers appointed by BJGCR;
- Government authorities, regulatory bodies, statutory agencies, local authorities, law enforcement agencies, courts, tribunals, or other authorities where disclosure is required or permitted by law;
- Event organisers, sponsors, tournament organisers, sports associations, or competition administrators where required for participation in tournaments, events, competitions, or club activities;
- Any person authorised by you, nominated by you, acting on your behalf, or otherwise permitted under applicable laws; and
- Any other party to whom disclosure is necessary for the purposes described in this Notice or as otherwise permitted or required by law.

3.2 All disclosures of Personal Data shall be subject to appropriate confidentiality obligations, contractual safeguards, and reasonable security measures to protect your Personal Data against unauthorised access, use, modification, disclosure, or loss.

4. TRANSFER OF PERSONAL DATA OUTSIDE MALAYSIA

Your Personal Data may be transferred to, stored, processed, or accessed in countries outside Malaysia where it is necessary for operational, administrative, human resource management, customer service, information technology, cloud hosting, data storage, system maintenance, backup, disaster recovery, or other legitimate business purposes. Where such cross-border transfers occur, BJGCR and the Company will take reasonable steps to ensure that the recipient is subject to appropriate data protection obligations and that your Personal Data is afforded a level of protection comparable to that required under the Personal Data Protection Act 2010 ("PDPA") and any applicable laws. By providing your Personal Data to us, you acknowledge and consent to such transfers where necessary for the purposes described in this Notice and as permitted by applicable laws.

5. YOUR RIGHTS AS A DATA SUBJECT

As a Data Subject, you have the right, subject to the provisions of the PDPA and applicable laws, to:

- Request access to the Personal Data that the Company holds about you;
- Request correction of any Personal Data that is inaccurate, incomplete, misleading, or not up to date;

- Withdraw your consent to the processing of your Personal Data, subject to any applicable contractual, legal, or regulatory restrictions and a reasonable notice period;
- Request that the Company cease or limit the processing of your Personal Data for direct marketing purposes;
- Opt out of receiving marketing, promotional, or commercial communications from the Company; and
- Make enquiries, raise concerns, or lodge complaints regarding the processing of your Personal Data.

Requests may be submitted in writing by completing the online [Data Subject Rights Request Form](#), or by downloading and submitting the completed form to the Data Protection Officer via the contact details provided below.

6. PERSONAL DATA RETENTION

The Company will retain your Personal Data only for as long as necessary to fulfil the purposes for which it was collected and processed, or as otherwise required or permitted under applicable laws, regulations, contractual obligations, and legitimate business requirements. Upon expiry of the applicable retention period, or when the Personal Data is no longer required for the purposes for which it was collected, the Company will take reasonable steps to ensure that such Personal Data is securely destroyed, permanently deleted, anonymised, or disposed of in accordance with applicable laws and the Company's data retention policies.

7. SECURITY MEASURES

7.1 The Company implements reasonable and appropriate administrative, technical, organisational, and physical security measures to protect your Personal Data against accidental or unlawful destruction, loss, alteration, unauthorised access, disclosure, misuse, or other unlawful forms of processing. Such measures may include access controls, secure information technology systems, cybersecurity safeguards, encryption technologies where appropriate, confidentiality obligations, and physical and electronic security controls.

7.2 The Company requires its employees, contractors, service providers, vendors, consultants, and other third parties engaged to process Personal Data on its behalf to implement appropriate security measures and comply with applicable data protection and confidentiality obligations.

7.3 While the Company takes reasonable steps to protect your Personal Data, no method of electronic transmission, storage, or processing can be guaranteed to be completely secure. Accordingly, the Company cannot guarantee the absolute security of any Personal Data transmitted to or received from us.

8. LIMITING THE PROCESSING OF YOUR PERSONAL DATA

You may, at any time, request that the Company cease or limit the processing of your Personal Data for direct marketing purposes by notifying us in writing using the contact details provided in Section 10 of this Notice.

Please note that if you withdraw your consent or request that we cease or limit the processing of certain Personal Data, the Company may be unable to provide certain products, services, membership benefits, event registrations, bookings, communications, or other services that depend on the processing of such Personal Data.

Unless otherwise notified by you in writing, the Company may continue to process your Personal Data for the purposes described in this Notice and as permitted under applicable laws.

9. CCTV MONITORING

For the purposes of safety, security, crime prevention, investigation of incidents, protection of property, and operational management, BJGCR may utilise Closed-Circuit Television (CCTV) systems within its premises.

CCTV recordings may capture your image and movements while you are within BJGCR premises. Such recordings may be used, disclosed, retained, and processed in accordance with applicable laws and for the purposes stated above.

10. Contact Us

Personal Data Protection Matters

If you have any questions, complaints, concerns, requests or feedback regarding this Notice or the processing of your Personal Data, please contact our Data Protection Officer:

Bukit Jalil Golf & Country Resort

Berjaya Hartanah Berhad (Registration No. 199101012980 (223292-U))

Data Protection Officer

Jalan Jalil Perkasa 3

Bukit Jalil

57000 Kuala Lumpur

Email: dpo.bukitjalil@berjayaclubs.com

Telephone: 03-21491436

General Enquiries

For membership, club services, bookings, events, facilities, billing, or other non-personal data protection matters, please contact the relevant department below:

Email: jalil@berjayaclubs.com or jalil.pr@berjayaclubs.com

Telephone: 03-89941600

NOTE: In the event of discrepancies or inconsistencies between the English language version and Bahasa Malaysia version of this Notice, the English language version shall prevail.