



Personal Data Protection Notice

1. INTRODUCTION

Kelab Darul Ehsan ("KDE") is owned and operated *KDE Recreation Berhad* (Registration No. 198401008705 (121237-P)) ("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 we collect, use, process, store, disclose, transfer, and protect your personal data when you interact with KDE or the Company.

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

This Notice applies to all individuals whose personal data is processed by the Company, including but not limited to members, guests, customers, visitors, event participants, vendors, suppliers, contractors, service providers, job applicants, employees, website users, and other stakeholders who interact with KDE.

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

In this Notice:

"KDE" means Kelab Darul Ehsan.

"Company" means *KDE Recreation Berhad* (Registration No. 198401008705 (121237-P)), the owner and operator of KDE, including its successors-in-title, assigns and authorised representatives.

"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 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 Personal Data We Collect

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

- Personal details including your name, NRIC number, passport number, date of birth, age, gender, nationality, race, marital status, photograph and other identification information;
- Contact information including residential address, mailing address, correspondence address, telephone number, mobile number and email address;
- Membership information including membership number, membership category, membership status, nominee information, membership card details and other membership administration records;
- Information relating to your family members, dependants, nominees, supplementary members, authorised representatives, tenants and guests nominated by you for Club-related purposes;

- Visitor and guest information including visitor registration details, guest pass records, visitor contact information and facility access records;
- Golf, sports, recreational and Club-related information including bookings, participation records, event registrations, facility usage information and programme participation records;
- Financial and billing information including bank account details, direct debit authorisations, credit card information, security deposit information, refund records, invoicing information, payment records and transaction history;
- Supplier, vendor and contractor information including company name, company registration number, SST registration number, tax identification number, business address, business contact information, authorised representative details and banking information;
- Employment-related information relating to employees and job applicants, including recruitment records, employment records, payroll information, emergency contact information and employment administration records;
- CCTV recordings, visitor logs, security records, access monitoring records and incident reports maintained within Club premises;
- Technical information collected through our website, online platforms and applications, including IP address, browser type, device information, cookies, usage information and website analytics data; and
- Any other Personal Data voluntarily submitted by you or lawfully obtained from third parties in connection with the products, services, facilities, programmes and activities offered by KDE.

2.2 How Your Personal Data Is Collected

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

- Membership applications, registrations, bookings, transactions and other Club-related forms and documents;
- Payments, billing records, direct debit arrangements, refunds and other financial transactions with KDE;
- Visitor registrations, guest registrations, event registrations and participation in Club activities, programmes and services;
- Communications and correspondence with us through telephone calls, emails, WhatsApp messages, written correspondence, online forms or face-to-face interactions;
- Our website, social media platforms, online services, mobile applications and other digital channels;

- CCTV systems, visitor management systems and other security monitoring systems operating within KDE premises;
- Third parties including authorised representatives, nominees, family members, suppliers, service providers, business partners, regulatory authorities and other lawful sources; and
- Companies within the Berjaya Group where such disclosure is necessary for the purposes described in this Notice.

2.3 Purposes of Collecting and Processing Your Personal Data

KDE may collect, use, process, disclose and otherwise handle your Personal Data for one or more of the following purposes:

- To verify your identity and maintain accurate records;
- To administer memberships, applications, registrations, bookings, reservations and related services;
- To provide, operate and improve KDE's facilities, programmes, activities and services;
- To manage payments, billing, refunds and other financial transactions;
- To communicate with you regarding memberships, services, enquiries, requests, feedback, complaints and other related matters;
- To provide customer service and support;
- To send notices, updates, newsletters, event invitations, promotional materials and other communications where permitted by applicable law;
- To manage employment, recruitment and other human resource-related matters;
- To maintain the safety, security and integrity of KDE's premises, facilities and operations;
- To conduct audits, investigations, compliance reviews and risk management activities;
- To comply with applicable legal, regulatory and contractual requirements; and
- For any other purpose directly related to the above purposes or otherwise permitted by applicable law.

2.3.1 Mandatory Personal Data

Certain Personal Data requested by KDE is mandatory to enable us to process membership applications, membership transfers, nominations, licence applications, facility bookings, employment applications, employment administration, payments, direct debit arrangements, contractual arrangements, and to comply with applicable legal and regulatory requirements. Failure to provide such Personal Data may result in KDE being unable to process your application, provide the requested products or services, maintain your membership, administer your account, facilitate your participation in club activities, fulfil employment-related obligations, process payments, or otherwise continue its business relationship with you.

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 KDE in connection with membership administration, golf and recreational activities, accommodation and resort services, maintenance, security, information technology, cloud hosting, telecommunications, customer support, marketing, and other related services;
- Banks, financial institutions, payment gateway providers, payment processors, credit reporting agencies, and other parties involved in processing payments, refunds, billing, direct debit arrangements, or financial transactions;
- Auditors, legal advisers, insurers, insurance brokers, medical practitioners, consultants, and other professional advisers appointed by KDE;
- Government authorities, regulatory bodies, statutory agencies, local authorities, law enforcement agencies, courts, tribunals, or other authorities where disclosure is required or permitted by law;
- 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, loss, misuse, or destruction.

4. TRANSFER OF PERSONAL DATA OUTSIDE MALAYSIA

Based on KDE's current operations, Personal Data is generally stored and processed within Malaysia. Where it becomes necessary to transfer, store, access or process Personal Data outside Malaysia, KDE will take reasonable steps to ensure that such transfer complies with the requirements of the Personal Data Protection Act 2010 and that appropriate safeguards are implemented to protect the Personal Data.

5. YOUR RIGHTS AS A DATA SUBJECT

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

- To request access to the Personal Data that the Company holds about you;
- To request correction of any Personal Data that is inaccurate, incomplete, misleading, or not up to date;
- To withdraw your consent to the processing of your Personal Data, subject to any applicable contractual, legal, or regulatory restrictions and a reasonable notice period;
- To request that the Company cease or limit the processing of your Personal Data for direct marketing purposes;
- To opt out of receiving marketing, promotional, or commercial communications from the Company; and
- To 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 the expiry of the applicable retention period, or when the Personal Data is no longer required for the purposes for which it was collected and processed, the Company will take reasonable steps to ensure that such Personal Data is securely destroyed, permanently deleted, anonymised, or otherwise 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, stored by, 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 the Company cease or limit the processing of certain Personal Data, the Company may be unable to provide certain products, services, membership benefits, 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, incident investigation, protection of persons and property, and operational management, KDE may utilise Closed-Circuit Television ("CCTV") systems within its premises.

CCTV recordings may capture your image, likeness, and movements while you are within KDE premises. Such recordings may be collected, 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:

Kelab Darul Ehsan

KDE Recreation Berhad (Registration No. 198401008705 (121237-P))

Data Protection Officer

Taman Tun Abdul Razak,

Jalan Kerja Air Lama,

Ampang Jaya, 68000,

Ampang, Selangor Darul Ehsan

Email: dpo.kde@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

Attention: Sitee Noorlia Binti Md Sharif/ Membership Department

Tel: 018-222 0123

Email: sitee.noorlia@berjayaclubs.com/ kde@berjayaclubs.com

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.