

SYNERGY TOURS SDN. BHD.
PERSONAL DATA PROTECTION NOTICE

This Personal Data Protection Notice explains the practices of Synergy Tours Sdn. Bhd. [Company No.: 199001002752 (194318-M)] (hereinafter referred to as “we”, “our”, “us” or “ST”) regarding the personal information / personal data in accordance with the relevant data protection laws including but not limited to Malaysian Personal Data Protection Act 2010 that we collect from you and/or about you whether on this site, through written or verbal communications with us, information collected when we appoint you as our travel agent.

Please note that ST may amend this Personal Data Protection Notice at any time and without prior notice and will publish the amended or revised Personal Data Protection Notice on our website or by email or by other means.

By submitting your personal information to us, you will be treated as having given your permission, where necessary and appropriate for disclosures referred to in this Personal Data Protection Notice. Kindly study this Personal Data Protection Notice and understand your rights on the matter.

If you do not consent, or in the event that you decide to withdraw or limit your consent to any of the purposes mentioned herein, kindly inform us in writing. However please take note that we may not be able to provide you with the full range of services that may be of interest to you or to your benefit if you decide to withhold, withdraw or limit your consent.

This Personal Data Protection Notice shall also serve as the Global Data Privacy Policy of ST.

1. Personal Information We Collect

- 1.1 At every contact point or guest or customer interaction, and in conducting every aspect of our business, we may collect personal information.
- 1.2 This personal information may include:
 - a) your contact information, including without limitation your name, address, email address, phone number, internet protocol (IP) address of your computer or mobile device if this IP address can be associated with other personal information;
 - b) information related to your transaction, reservation and so forth,
 - c) participation in a membership or loyalty or other programmes;
 - d) when you fill in any forms, letters, agreements and/or contracts for our services;
 - e) participation in a lucky draw or marketing program or events;
 - f) information related to the purchase and receipt of products or services;
 - g) personal characteristics, nationality, gender, date of birth, currency, language, religious affiliation, racial/ ethnic background, income, national registered identity card /passport number and date and place of issue;
 - h) Travel details including: -
 1. Intended check-in and check-out dates;
 2. Number of rooms/ pax required for packages/ programmes/ reservations/ flights; and
 3. Pick-up and drop-off dates and times.

- i) any other forms, cards and documents through which we collect information from you;
- j) travel history;
- k) medical information relevant to your travel or tour arrangements;
- l) financial, banking, credit card or payment information;
- m) customer preferences;
- n) marketing and communication preferences;
- o) reviews and opinions about ST's portfolio, products or services (if they are identified or associated with you);
- p) frequent flyer or travel partner program affiliation and member number;
- q) hotel, agents, accommodation, tour, education and other packages or programmes booked;
- r) information needed to administer our programs and profiles, including transaction and correspondence details;
- s) information provided on membership and account applications; and other types of information that you choose to provide to us or that we may obtain from third parties;
- t) any third parties (including credit reference bodies, regulatory and law enforcement authorities);
- u) occupation, designation, employment, professional or education related information;
- v) images / information in audio or video or digital format (including voice, video, closed circuit television), location tracking/ GPS information;
- w) dietary requirements; and/or
- x) any other personal data depending on the nature of dealing or transaction with us and/or our travel agents and from all other information that you may provide us and/or our travel agents from time to time.

2. Personal Information We Collect from Third Parties

- 2.1 You need to know that we may also obtain information about you based on physical and/ or online interaction with you through our and/ or third-party websites, the information you provide to us or from other information we receive. We may also collect information about you from third parties, including information from our travel agents, credit card, and other partners and associates, information from social media sites consistent with your settings on such sites, such as social media sign-on programs, and from third-party sources. ST may append this information to the information we have on file for you and share it with others consistent with this Personal Data Protection Notice.
- 2.2 If you inform a third-party travel agent that you would like to receive marketing communications from ST, they will securely transfer your contact details and marketing preferences to us.
- 2.3 If you book one of our travel/holiday packages through a third-party travel agent, certain personal data (as applicable to your booking, such as your name, date of birth or any special requirements you have) will be passed to us to provide the services you have requested/booked.

3. Use of Personal Information Collected About You

We use your personal information to provide the services you request from ST, or which are part of a package you have joined or a purchase you have made. We also use your personal information to provide you with information about meeting and event planning and access to specific account information for administrative purposes, processing master merchant/merchants' application, to conduct an investigation of violations of any governing terms and conditions and so forth. In addition, we may use your information to: improve ST's products or services, customer experience, sales and after sales service such as maintenance and support, provide you with the expected level of hospitality and services; ensure our site, products and services are of interest to you; process enrolments and applications; and facilitate collections, administration, planning, development, operations and quality enhancement of products and services, notification of information on new products or services, product surveys, marketing research, marketing and promotion, notification and inquiry to customers in the case of occurrence of recall etc, responding to customer's queries and any other measures to satisfy customer's request or needs. We also use the information to provide or offer you newsletters, promotions and featured specials, other marketing communications, product or service awareness marketing, and to conduct surveys, lucky draws, prize draws, and other contests. We may provide these communications online, via email, telephone, mobile/text messaging (including SMS, MMS, WhatsApp, WeChat and suchlike) and postal mail.

4. How We Share Personal Information

- 4.1 As a Group of Companies comprises operating subsidiaries and associates service business and consumer market in a variety of industries, we are committed to provide you with the same level of service that you have come to expect at ST. In this context, we may share your personal information among companies associated with ST, including the licensed/managed only entities, or service providers that may be located in countries outside your own. Although the data protection laws of these various countries may not be as comprehensive as those in your own country, ST will take appropriate measures to ensure that your personal data is handled as described in this Personal Data Protection Notice.
- 4.2 Your personal data may be disclosed to the classes of third parties as follow:
- a) ST's advertiser;
 - b) Third party travel agent;
 - c) Third parties a contracted by ST to assist ST in delivering all or part of the ST's products and/or services to you, including without limitation, to the following: -
 - i. Payment gateway services for optional services;
 - ii. Profiling/assessment services;
 - iii. Online advertising services;
 - iv. Mapping services;
 - v. Maintenance and repair services; and
 - vi. Market research and website usage analysis services.
 - d) Strategic partners that work with ST to provide the ST's services or that help market and promote ST's services;
 - e) Service Providers: We rely on service providers to provide certain products and services, such as to facilitate administrative functions and information technology operations, credit card billing, reservations services, providing services in connection with our websites, including travel agents and travel packages; communicating news

and delivering promotional and transactional materials via email, direct mail, and online and mobile advertising; processing credit card transactions; professional services such as accounting, auditing and legal advice; investigating accident reports; processing insurance claims; and administering lucky draws , prize draws, competitions and customer surveys. ST will disclose personal information to service providers as appropriate. Third party service /product providers that are deemed necessary or appropriate for the purposes stated above (including those located out of Malaysia, under conditions of confidentiality and similar levels of security);

- f) Others: In addition, ST may disclose personal information in order to:
 - i. comply with applicable laws, rules and regulations and/ or requirements of any governmental or regulatory authorities, bodies or agencies in any applicable jurisdiction;
 - ii. respond to governmental inquiries or requests from public or regulatory authorities;
 - iii. comply with valid legal or judicial process;
 - iv. ST's related and subsidiary companies;
 - v. Auditors, accountants, lawyers, consultants or advisers of ST;
 - vi. Contractors, sub-contractors, suppliers, business partners, service providers and / or affiliates of ST;
 - vii. permit us to pursue available remedies or limit the damages that we may sustain; and
 - viii. respond to an emergency.
- g) Any person, entity, governmental or regulatory agency, body or authority to whom ST is under an obligation to make a disclosure to meet the disclosure requirements or other compliance requirements of any law, regulation or other code which ST is required or expected to observe;
- h) Any actual or proposed purchaser of all or part of the business or assets or shares of ST, in the case of any merger, acquisition or other public offerings, the purchaser or subscriber for shares in ST;
- i) Otherwise permitted under any data protection legislation; and
- j) Other than set out above, you will receive notice when personal information about you might go to third parties, and you will have an opportunity to choose not to share the information.

5. Pertinent Information

- 5.1 When you log onto and interact with ST's website, ST and third parties with whom ST has contracted to provide services to ST, may collect Pertinent Information (for example, a catalogue of the site pages you visit, and the number of visits to our sites). We use cookies and other technologies to collect this information.
- 5.2 We may also aggregate or anonymise personal information (for example, we may aggregate personal information to calculate the percentage of our users who have a particular telephone area code) or collect demographic data such as date of birth, gender and marital status.
- 5.3 As Pertinent Information does not and may not personally identify you, such information may be disclosed for any purpose. In some instances, we may combine Pertinent Information with personal information. If we do combine any Pertinent Information with

personal information, the combined information will be treated by us as personal information in accordance with this Personal Data Protection Notice.

6. Personal Information – Minors/Children

We do not knowingly collect personal information from individuals under the age of eighteen (18). As a parent or legal guardian, please do not allow your children to submit personal information without your permission.

7. Links to Third-Party Websites

- 7.1 Our sites and our mobile applications may contain links to third parties' websites. Please note that we are not responsible for the collection, use, maintenance, sharing, or disclosure of data and information by such third parties.
- 7.2 Other third-party websites include the landing page of the high-speed Internet providers as well as social media sites (such as Facebook, Instagram, Twitter and suchlike) on which ST may have accounts pages where you may be able to post information and materials.
- 7.3 If you provide information on third-party sites, the privacy policy and terms of service on those sites are applicable. We encourage you to read the privacy policies of websites that you visit before submitting personal information.

8. Protecting Personal Data

- 8.1 ST will take reasonable precautionary steps to ensure that personal data/information collected are:
 - a) protected from unauthorised access, disclosure, alteration or destruction; and
 - b) accurate and up-to-date.
- 8.2 We also seek to require our travel agents, affiliates and service providers with whom we share personal information to exercise reasonable efforts to maintain the confidentiality of personal information about you. For online transactions, we use reasonable technology to protect the personal information that you transmit to us via our website. Unfortunately, however, no security system or system of transmitting data over the Internet can be guaranteed to be entirely secure.
- 8.3 For your own privacy protection, we encourage you not to include sensitive personal information in any emails you send to us. Please do not send credit card numbers or any sensitive personal information to us via email.
- 8.4 We will not contact you by mobile/text messaging or email to ask for your confidential personal information or credit card details. We will only ask for your confidential personal information or credit card details by telephone when you are booking a reservation or promotional package by telephone. We will not contact you to ask for your account log-in information. If you receive this type of request, you should not respond to it. We also ask that you please notify us at [].

9. Changing and Accessing Your Personal Information

- 9.1 The information you provided to us at the time of registration may be accessed, reviewed, rectified and updated at any time.
- 9.2 We will make all required updates and changes within the time specified by applicable law and, where permitted by law, may charge an appropriate fee to cover the costs of responding to the request. Such requests must be submitted in writing to the following address:

Company Address :

Person in charge :

Email :

Telephone :

- 9.3 In line with our principle to protect your confidentiality, we can only respond to such requests to the email address that you have registered or otherwise provided to us. Please remember that if you make such a request, we may not be able to provide you with the same quality and variety of services to which you are accustomed.
- 9.4 In addition, in some circumstances based on applicable law, you may request that we cease sharing personal information about you with our business partners or erase all collected personal information about you or that ST cease using personal information about you on the grounds that such personal information was acquired by unjust means or used in violation of law by sending your written request to Synergy Tours Sdn. Bhd (Address). We will seek to honour those requests consistently with applicable law.
- 9.5 In certain circumstances you may object to specific processing activities, require us to restrict how we process your personal information and ask us to share your personal information in a usable format with another company. Where you have given your consent to a particular type of processing, you may withdraw that consent at any time. However, withdrawal of consent will not affect the lawfulness of the processing before your consent was withdrawn.

10. Retaining Personal Information

We retain personal information about you for the period necessary to fulfil the purposes outlined in this Personal Data Protection Notice, unless a longer retention period is required or permitted by applicable law.

11. Choices – Marketing Communications

- 11.1 If you have given us your contact information (mail address, fax number, email address or phone number), we may want to inform you about our products and services or invite you to events by email, telephone, mobile/text messaging (including SMS, MMS, WhatsApp, WeChat and suchlike) or post. You may change the communications you receive from us by logging on to your online account and managing your subscriptions, or by writing to us (and including your email address) at Synergy Tours Sdn. Bhd (Address)Malaysia.
- 11.2 Please note, however, that if you change the communications you receive from us as described above, we will not be able to remove your personal information from the databases of affiliates, Licensed or business partners with whom we have already shared your personal information (i.e., to whom we have already provided your personal information as of the date of your opt-out request).
- 11.3 If you prefer not to receive email marketing materials from us, you may opt-out at any time by using the unsubscribe function in the email you receive from us.

12. Contact Us

If you have any questions about this Personal Data Protection Notice or how ST processes your personal information or would like to exercise one of your data protection rights, please contact us by email at malaysia@synergy-tours.com or by postal mail to :-

Synergy Tours Sdn. Bhd

Unit D-11-1A

Menara Suezcap 1

KL Gateway

No.2 Jalan Kerinchi

Gerbang Kerinchi Lestari

59200 Kuala Lumpur

MALAYSIA