

## **PRIVACY POLICY**

This website is operated and maintained by ALCHEMIST PARTNERS SDN. BHD. This page informs you of our policies regarding the collection, use, and disclosure of personal data when you use our services.

In accordance with the Personal Data Protection Act 2010 ("Act 709"), which regulates the processing of personal data in commercial transactions we give you notice as follows (for the purpose of this written notice the terms "personal data" and "processing" shall have the meaning prescribed in Act 709).

We are committed to comply with the following Principles:-

### **1. General Principle**

1.1 We shall not process personal data ("PD") unless the Data Subject (individual who is the owner of the personal data) has given consent to the processing.

1.2 However, we shall process PD about a Data Subject if the processing is necessary for (i) the performance of a contract; (ii) taking of steps with a view to entering into a contract; (iii) compliance with any legal obligation; (iv) protecting the vital interests of the Data Subject, (v) administration of justice; or (vi) the exercise of any functions.

1.3 Between us and suppliers, customers, employees and other individuals, the purpose of collecting, processing and storing the PD is to facilitate the identification, authorization, credential and approval of the commercial transaction and services to be undertaken, contemplated or being undertaken between us and the Data Subject or the company that the Data Subject is representing.

1.4 We shall ensure the PD collected is not excessive for the intended purpose.

1.5 We shall not use the PD for any other purpose except as stated above.

### **2. Notice and Choice Principle**

2.1 We shall inform the Data Subject in writing that PD is being processed, the purposes for the collection and whether the PD will be disclosed to third party.

2.2 For Data Subjects that have provided us with PD earlier, we shall deem that the Data Subjects have consented to us processing the PD in accordance with this policy.

2.3 We do not and will not own any of the PD obtained and by forwarding the PD to us, Data Subject does not confer any ownership rights of the PD to us.

2.4 The Data Subject may choose not to consent or withdraw the prior consent given at any time by notice in writing to us. Any refusal or withdrawal of consent may jeopardize the business and services to be undertaken, contemplated or being undertaken between us and the Data Subject or the company or entity that the Data Subject is representing.

### **3. Disclosure Principle**

3.1 We may disclose the PD to our companies within our group of companies, including those to be incorporated in the future and during all company activities and functions.

3.2 We may disclose the PD to third party if required to do so provided that the third party receiving the PD secures the PD with an appropriate level of security.

#### 4. **Security Principle**

4.1 We shall take practical steps to protect the PD from any loss, misuse, modification, unauthorized or accidental access or disclosure, alteration or destruction.

#### 5. **Retention Principle**

5.1 We shall not keep the PD longer than is necessary for the fulfilment of our obligations and business needs.

5.2 We shall destroy or permanently delete all PD if no longer required.

#### 6. **Data Integrity Principle**

6.1 We are required to take reasonable steps to ensure that the PD is accurate, complete, not misleading and kept up-to-date.

6.2 As such, it is important for Data Subject to provide and update us the accurate, complete, not misleading PD if there is any change to the PD.

#### 7. **Access Principle**

7.1 Data Subject may access, update and correct any PD at any time by requesting in email in respect of your PD at:

rachelleong@kwnggroup.com

7.2 We shall comply with the Data Subject's request unless it is expressly prohibited by law.

#### 8. **Change of this Policy**

8.1 We reserve the right to change or update this Privacy Notice to coordinate any changes to our privacy practices. We will display any such amendment in a notice on our website or through any other suitable means. We believe that you agree to the terms above and allow us to process your personal information.