

PRIVACY POLICY FOR JOHOR GOLF & COUNTRY CLUB (JGCC)

We, **Johor Golf & Country Club (“JGCC”)**, take the privacy and protection of your personal data seriously. Our privacy policy sets out the below information about our processing of your personal data, what rights you have and how you can get in touch if you want to know more.

The term Johor Golf & Country Club or “JGCC” or “we” or “our” or “us” in this privacy policy refers to Johor Golf & Country Club having an address at 3211 Jalan Tun Abd Razak, 80200 Johor Bahru, Johor, Malaysia

With the implementation and coming into force of the Personal Data Protection Act 2010 (“**PDPA**”), all rules and regulations, standards, codes and all other subsidiary legislation enacted pursuant to PDPA, **JGCC** is required to comply with the PDPA which regulates the processing of personal data and we shall ensure that the personal data collected and processed is obtained voluntarily and with your consent.

We may change this privacy policy from time to time by updating our privacy policy page on our website. We encourage you to check our privacy policy from time to time on our website, as the version of our privacy policy which is currently displayed on our website takes precedence over all previous versions of our privacy policy.

This privacy policy sets out how the acknowledgment of this notice, your consent to us to process the following personal data as provided by you and/or a service provider engaged by JGCC and/or obtained from public domain which may include, but is not limited to personal data that relates to:

- Personal details (including your name and NRIC number/passport number, vehicle registration number, photos, membership of other clubs and travel document information);
- Your date of birth, gender and/or age;
- Your nationality, details and copies of identity documents (if relevant to the product and service);
- Your employment details (including your occupation, industry, position/ designation, name of employer/ business address of employer / business);
- Your contact details and contact details history (including your residential / mailing address, mobile phone number, house phone number, office phone number, fax number and e-mail address);
- Particulars of your family members (including information about your spouse and children);
- Financial details (including your salary, details of other income, details of your savings, details of your expenditures, payment method(s), credit card details and signature);

- Criminal records information, including alleged offence;
- Fraud, debt and theft information, including the details of money you owe, suspected instances or fraud or theft, and details of any devices used for fraud;
- Personal data which we obtain from Credit Reference Agencies and Fraud Prevention Agencies, including public (for example, defaults) and shared credit history, financial situation and financial history;
- Information we buy or rent from third parties, including demographic information, details of outstanding finance, marketing lists, publicly available information, and information to help improve the relevance of our products and services;
- Third party transactions, such as where a person other than you uses the service, information about that person and the transaction;
- Analysis of data relating to marketing made to you, including history of communications and whether you open them or click on links provided by us;

We will process your personal data for the following purposes:

- In order for you to enter into the necessary agreement and/or contract to purchase the products and/or services from us;
- Conducting marketing and profiling activities in connection with our services and related products;
- Credit assessments and other background checks as we may determine to be necessary or appropriate
- Internal record keeping;
- Billing and collection of outstanding payments
- Prevention of crime (including cases of fraud, money-laundering, bribery);
- Meeting any legal or regulatory requirements relating to our provision of products and services and to make disclosure under the requirements of any applicable law, regulation, direction, court order, by-law, guideline, circular, code applicable to us;
- Purposes relating to any of the above (including but not limited to research, benchmarking and statistical analysis);
- Where you have given us your consent:
 1. To deliver notices, information, services or products and marketing of such services or products whether present or future to you;
 2. To send you information by e-mail, tele-communications means (telephone calls or text messages) or social media about products and services offered by selected third parties that we think may interest you;
- Investigating complaint, insurance claim and suspected suspicious transactions.

FAILURE TO PROVIDE PERSONAL DATA

The information is necessary to us. If you do not provide all the information as requested, we will not be able to keep your complete record of information, thus affecting our ability to accomplish the above stated purposes.

DISCLOSURE TO THIRD PARTIES

We may disclose your personal data to the following third parties (who may be located within or outside Malaysia):-

- Our agents for purposes relating to the provision of our products/services;
- Our related, associated or affiliated companies;
- Any third party, service provider, agent or contractor who have been appointed by us to provide services to us subject to sufficient controls over the information to enable us to operate our business;
- Any credit reference / reporting agencies including any debt collection agencies in the event of default;
- Our auditors, lawyers, consultants and other advisors;
- Any regulators, government agencies, law enforcement agencies and the courts of Malaysia in order to comply with statutory and governmental requirements.
- Any other parties authorised by you.

We may also use your personal information to send you promotional information about third parties which we think may be interesting or useful to you.

COOKIE POLICY

Our website uses cookies to distinguish you from other users of our website and/or mobile app. This helps us to provide you with a good experience when you use our website and/or mobile app and also allows us to improve our website and/or mobile app. A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer. Cookies contain information that is stored on your computer's hard drive. You have the ability to accept or decline cookies by modifying the setting in your browser. If you would like to do this, please see the help menu of your browser.

By continuing to use our website, you accept to the use of cookies as outlined above.

When you engage with us through social media sites, you have allowed us to access to certain information from your social media account (e.g., name, e-mail address, photo, gender, birthday, city, the posts or the trade you make).

A SET AMOUNT OF TIME

Your personal data will be stored either for as long as you are our member and/or customer and for a period of seven years after the termination of your membership and/or end of the customer relationship, or longer if required by law. There may be specific circumstances where it is necessary for us to retain your personal data for longer (such as when a dispute arises).

YOUR RIGHTS

When it comes to how we use your personal data, you have the rights to:

- request a copy of your personal data (we have the right to charge a reasonable fee to complete this request);
- request that we correct anything that is incorrect or outdated, or complete any incomplete personal data;
- limit or withdraw any part of your consent you have previously given for the processing of your personal data, however such action may prevent us from performing our obligations to you;
- Limit or withdraw your consent to us using your personal data for direct marketing or other processing for the purposes set out in our privacy policy.

Please note that you are obliged to provide us with the necessary information as soon as practicable to enable us to promptly correct ~~and~~ any information found to be incorrect.

- We may refuse to comply with your request for access or correction for reasons permitted under the PDPA, all rules and regulations, standards, codes and all other subsidiary legislation enacted pursuant to the PDPA, in which event we will notify you in writing of the refusal and the reasons for the refusal.
- In the event of any conflict between the English version and the Bahasa Malaysia translation version of this privacy policy (if any), the English version shall prevail.

Should you have any inquiries or complaints in respect of your Personal Data, you may also contact us at (+60)7 2233322 or write to us at the JGCC address or e-mail address as stated below.

CONTACT US

If you want to exercise Your Rights stated above or if you require any other information about any other part of this privacy policy, you can contact us via our contact details below:-

JOHOR GOLF & COUNTRY CLUB

Jalan Tun Abd Razak
80200 Johor Bahru, Johor, Malaysia

E-Mail Address: enquiry@johorgolfandcountryclub.com

Tel No: (+60)7 2233322, 011 27563848