



## **PRIVACY NOTICE**

### **About this Privacy Notice**

This Privacy Notice informs you about The Fifth Academy PLT's (hereinafter referred to as "TFA" or "the Company") notice and practices on data privacy matters which you may be concerned with, before you provide your personal data to TFA.

In this Privacy Notice, we will tell you:

- the source of your personal data
- what personal data is collected;
- what are the purposes for which TFA uses your personal data;
- whom your personal data may be disclosed to;
- what are your rights over your personal data;
- how long and where does TFA keep your personal data; and
- how to contact TFA.

### **1. Source of your personal data**

We collect most personal data directly from you, for example, when you apply for Lease / Hire Purchase facility from TFA or when you apply for job with TFA, you will fill up an application form with your personal data. Your personal data may also be shared to us by our Group\*\*. We may also verify or source personal information about you from third party sources (both public and private) such as credit reporting agencies, Companies Commission, Insolvency Department. For pictures/photographs, it will be either provided by you or originally taken by TFA. In the event the pictures/photographs are taken by TFA, such pictures/photographs and/or any reproductions of same in any form, are the property of TFA and you do not have any rights of claim on such property.

*\*\*The definition of "Group" means TFA and/or its holding company, subsidiaries, related and associated companies*

### **2. What personal data is collected**

The personal data collected and processed by TFA may include, but are not limited, to the following:

- your name;
- NRIC/Passport No.;
- residential and business addresses;
- contact numbers;
- email address;
- your income, financial/credit information;
- your employment or business or professional practice information;
- your ownership of properties or other assets information;
- pictures/photographs;
- qualifications, employment history, your knowledge, experience & expertise;
- health and medical condition (including the medical histories of your immediate family members) for insurance product offering;
- any other sensitive personal data\*\*; and
- the relevant products and/or services offered to you.

*\*\*Sensitive personal data, as defined by law, is any personal data consisting of information as to the physical or mental health or condition, political opinions, religious beliefs, biometric data or other beliefs of a similar nature, the commission or*



*alleged commission of any offence. If sensitive personal data is collected, the purpose for collecting the data will be explained to you.*

- TFA may also collect personal data of your connected parties such as directors, shareholders, beneficiary owner, manager, authorised person of your company for any purposes suggested above;
- when you participate in any events organized, co-organized, sponsored by or affiliated to TFA, your photograph may be taken during the event. Such pictures/photographs and/or any reproductions of same in any form, are the property of TFA and you do not have any rights of claim on such property;
- Personal data collected by TFA includes those provided by you on our corporate website, i.e. [www.thefifthacademy.com](http://www.thefifthacademy.com);
- TFA may also collect or seek verification of your personal data from third party and public sources. Third party sources from whom TFA may either collect or seek verification of your personal data include the following:
  - your current or previous employer in relation to your income;
  - credit bureaus or agencies which provide credit or other information; and
  - public and government bodies such as the Companies Commission of Malaysia, National Registration Department, Director General of Insolvency, Registrar of Business, land office etc.

### **3. Purposes for which TFA uses your personal data**

TFA collects, processes and retains your personal data for purposes (hereinafter referred to as the “Purposes”) which include:

- processing financing facilities application;
- proposal for guarantor or security for loan;
- disbursing and maintaining the operation of your loan account;
- any insurance services relating to the loan account with the Company and/or its principal;
- complying with any legal or regulatory requirements both within and outside Malaysia;
- processing and assessing your application of job;
- for pictures/photographs and/or any reproductions of same in any form, may be included in the posting of the event on Pac Lease’s official website or social media accounts such as Facebook, LinkedIn, Instagram etc.;
- direct marketing by TFA and/or its agents, distributors and/or other persons related to TFA (if you opt in via consent form);
- appointment of any third-party service providers;
- engagement with vendor, supplier, contractor;
- sponsorship/donation request;
- referral program;
- credit/trade checks;
- resolve complaints/issues;
- ongoing or future review and/or evaluation of your account/case;
- account restructuring;
- recovery of goods;
- litigation proceedings;
- shared with companies or entities within the Group\*\*;
- business affiliates or partners; or
- any other appropriate business dealings or events consequent to the purpose for which your personal data is collected.

*\*\*The definition of “Group” means TFA and/or its holding company, subsidiaries, related and associated companies*



#### **4. Classes of Persons whom your personal data may be disclosed to**

Personal data held by TFA relating to you will be kept confidential but TFA may need to disclose your personal details herein to the following classes of persons:

- regulatory agencies
- licensing authorities
- law enforcement agencies and courts
- companies or entities within the Group\*\*
- auditors
- business partners
- credit reporting agencies
- service providers such as solicitors, couriers
- to any other third party upon your request, if it is technically feasible and data format allows.

for any of the Purposes or any other purpose for which your personal data is to be disclosed at the time of its collection or any purpose directly related to any of the above Purposes.

*\*\*The definition of "Group" means TFA and/or its holding company, subsidiaries, related and associated companies*

For pictures/photographs and/or any reproductions of same in any form, TFA may include the such in Pac Lease's posting on Pac Lease's official website and/or social media accounts such as Facebook, LinkedIn, Instagram etc. If TFA opts to do so, your picture/photo and/or any reproductions of same in any form will be available to the audience who log on to or follow Pac Lease's official website and/or social media accounts.

Your personal data may be transferred to, stored in, and/or processed in a jurisdiction outside Malaysia, provided that such jurisdiction carries laws and regulations which are substantially similar to that of Malaysia and there is an adequate level of protection in relation to the processing of personal data which is at least equivalent to the level of protection afforded by Malaysia laws.

#### **5. Your rights over your Personal Data**

The provision of your personal data for Purposes listed in item 3 above is voluntary and optional. However, failure to provide your personal data in part or whole and any limitation placed on the Company to process your personal data may result in the Company being unable to process, fulfil or complete your application or request for whatsoever purpose which requires the personal data.

TFA would like to make sure you are fully aware of all of your data protection rights. You are entitled to the following:

The right to access – You have the right to request for copies of your personal data. We may charge you a small fee for this service.

The right to rectification – You have the right to request to correct any information you believe is inaccurate. You also have the right to request to complete the information you believe is incomplete.

The right to erasure – You have the right to request to erase your personal data, under certain conditions.

The right to restrict processing – You have the right to request to restrict the processing of your personal data, under certain conditions.

The right to object to processing – You have the right to object to the processing of your personal data, under certain conditions.



The right to data portability – You have the right to request to transfer the data that we have collected directly to you, under certain conditions or to any other party, if it is technically feasible and compatible in the data format.

If you would like to exercise any of these rights, you are required to write in to us and we will respond to you as soon as possible.

**6. How long and where does TFA keep your personal data**

TFA will keep your personal data for a period of seven (7) years after the cessation of purpose(s) for which it was collected for the purposes or other legitimate business purposes pertaining to the purpose for which my personal data is collected, as stated in the Privacy Policy, including to handle enquiries, audit, complaints or legal proceedings and introduce products or services sold or distributed by the Company. We will also abide by legal, tax and other regulatory and industry requirements/guidelines for keeping records including our retention of record notice.

Your data may be stored in the form of email, report and/or other form of document/format. TFA may store your personal data whether in hard copies form or in soft copies form on our server or on cloud.

**7. Security Measures**

- Secure transfer (SFTP, VPN, encrypted email)
- Data retention policy
- Data deletion policy / secure data destruction method
- Backup security
- Data encryption
- Regular system patching
- Endpoint security
- Multi-factor authentication (MFA) for key system
- Role-based access
- Logging & monitoring
- Vulnerability & penetration testing on systems that process data
- Web application firewall for Cloud only
- Real-time alerting & incident response workflows
- Data classification & handling policies
- Data residency (for Cloud hosting)

**8. How to contact us**

You may have the right to withdraw or restrict consent or to request access to your personal data by applying and giving to the Company at least twenty-one (21) days’ prior written notice by submitting the Correction/Deletion/Access/Portability/Consent Restriction Request Form below to:

Mailing address:	The Fifth Academy PLT G-1-1, Kuchai Business Park Jalan 1/127, Off Kuchai Lama 58200 Kuala Lumpur  Attention to: Data Protection Officer (Policy, Compliance & Operation Risk Department)
Telephone No.:	03-79718032
Fax No.:	NA
E-mail address:	<a href="mailto:kiensoon@thefifthacademy.com">kiensoon@thefifthacademy.com</a>



**CORRECTION/DELETION/ACCESS/PORTABILITY/CONSENT  
RESTRICTION REQUEST FORM (PDPA)**

<b>1. Requestor Details</b>	
Full Name:	
NRIC/ Passport No.:	
Contact Number:	
Email Address:	
Mailing Address:	
Nature of Request:	<input type="checkbox"/> Deletion <input type="checkbox"/> Access <input type="checkbox"/> Correction <input type="checkbox"/> Transfer <input type="checkbox"/> Restrict Consent
<b>2. Description of Incorrect Information</b>	
<i>Please specify the personal data you wish to correct/access/delete/transfer or the consent you would like to restrict.</i>	
<b>3. For Correction of Personal Data ONLY - Corrected Information</b>	
<i>Please provide the correct version of the personal data.</i>	
<b>4. Supporting Documents</b>	
<i>List and attach relevant documents to support your request.</i>	
<b>5. Preferred Method of Receiving Data</b>	
<input type="checkbox"/> Secure Email (encrypted) <input type="checkbox"/> Registered Mail (postal address required)	
<input type="checkbox"/> In-Person Collection (by appointment only)	
<b>6. Declaration</b>	
I certify that the information provided is accurate and understand that the company may contact me for verification.	
Signature:	
Date:	

*For Office Use Only*

Date Received:	
Verified By (Name & Dept.):	
Verification Complete:	<input type="checkbox"/> Yes <input type="checkbox"/> No
Request Accepted:	<input type="checkbox"/> Yes <input type="checkbox"/> No
Reason if Rejected:	
Date of Correction/Action Taken:	



- i. TFA reserves the right to reject the application if the application is incomplete as the Company may not be able to process your data for the Purposes.
- ii. In the event the Company rejects such request(s), it will inform you, by notice in writing of the refusal and the reasons for the refusal.

**9. Changes to this Privacy Notice**

Changes may from time to time be made to this Privacy Notice. We will always post the latest Privacy Notice on our website. Please re-visit this Privacy Notice from time to time for the latest version.