

Re: Personal Information – Notice and Consent

Dear Valued Members,

The Club Asia International (“CAI”), (operated by Sara Worldwide Vacations Berhad) places great importance in keeping up with legal and regulatory changes. In view that the Personal Data Protection Act 2010 (“PDPA”) has now come into force, we are taking steps to ensure that we are in compliance with the new Act. As part of Club Asia International’s day to day business, Club Asia International collects your Personal Information when you apply to be our members or to subscribe to any of our services or communicate with us. In return, we may use this information to provide you with our services, maintain our records, send you relevant information, promotions and product updates.

Under the Personal Data Protection Act 2010 (“PDPA”), we are required to inform you:

- I. of the type of Personal Information we collect and how we collect it;
- II. how we use your Personal Information
- III. the parties that we disclose the Personal Information to;
- IV. the choices you have with regards to the extent of Personal Information you provide;
- V. the difference between information that is considered mandatory, or optional; and
- VI. how you access and update your Personal Information

Your privacy is therefore important to us and we are committed to protecting your Personal Information by collecting and using your Personal Information in accordance with the PDPA.

For the purposes of this Privacy Notice, please note that:

- “Personal Information” refers to any information which relates directly or indirectly to you and/ or your transactions with us. This information may include but not limited to your name, NRIC/ Passport number, race, religion, address, occupation, contact details, financial details, the type of packages and/or products and/or services subscribed to and such other necessary information regarding yourself and your transaction(s) including Sensitive Personal Information.
- “Sensitive Personal Information” refers to information relating to your physical or mental health or condition, political opinions, religious belief or other beliefs, the commission or alleged commission of an offence, or any other personal data as may be determined by the Minister.

1. The Type of Personal Information We Collect and How We Collect It

In order to enable us to deal with your inquiries or to provide you with our services, we may be required to collect, use, disclose and store (i.e. “process”) your personal and financial information. Such personal and financial information is required amongst others to:

- a. establish your personal identification and background
- b. supply you with any of our services applied for

We may also obtain the above information about you from the following sources:-

- a. Your relationship with us, for example information provided by you when using our services, when taking part in customer surveys and feedback etc;
- b. Your verbal, written and/or electronic communications with us;
- c. Third parties connected with you, such as secondary member
- d. Any other sources which you have given your consent to disclose information relating to you and/or where not otherwise restricted.

The Personal Information we collect can be either mandatory or optional. Mandatory Personal Information is your information that we require so that we can provide you with the required services. If you do not provide us with the mandatory Personal Information, we will not be able to provide you with those services. Optional Personal Information is your information that is not obligatory to be provided to us. If you do not wish to provide your optional Personal Information, you may still apply for our services.

You may have provided personal data and information relating to others (such as the names and details relating to your immediate family for the purposes. In such cases, you represent and warrant that you have their consent or are otherwise entitled to provide their personal information to us. You warrant and undertake that your personal information is accurate, complete, not misleading and up-to-date. The onus is on you to update us if your personal information has changed.

2. How We Use Your Personal Information

Other than as stated above, we may use your Personal Information for one or more of the following purposes:

- a. Manage and maintain your information through regular updates, consolidation and improving the accuracy of our records. In this manner we can communicate with you, provide services to you, process payment related to your membership, provide you with information on new products and services, respond to your enquiries or complaints and to generally resolve disputes quickly so that we can improve our business and your relationship with us;
- b. Conduct research, market survey and trend analysis to better understand your future needs. We will also produce data, reports and statistic from time to time, however such information will be aggregated so that your identity will remain confidential.
- c. Comply with the requirements of any law binding on us such as completing and filing of statutory forms, for example with Suruhanjaya Syarikat Malaysia.
- d. Outsourcing of business with other related affiliated partners such as tour and travel agencies, vacation exchange companies, outlets participated from time to time that provides value added service to you.
- e. Sharing of your personal data with other entities within the SEDC Group for sending of promotional or marketing material that may be of interest to you.
- f. Other legitimate business activities; and/ or
- g. Any other purpose(s) that is required or permitted by any law, regulations, guidelines and/or relevant regulatory authorities.

Further, please note that if, required for any of the above purposes, your Personal Information may be transferred to locations outside Malaysia or disclosed to our related corporations, business partners and/ or service providers who may be located within or outside Malaysia. Save as specified above, your Personal Information will not be knowingly transferred to any place outside Malaysia or knowingly disclosed to any third party except in accordance with PDPA.

We will seek your consent before using your Personal Information for a purpose other than those that are set out in this Privacy Notice and/ or in the terms of any of your agreement(s) with Sara Worldwide Vacations Berhad, unless otherwise exempted under the PDPA.

3. Disclosure of Your Personal Information

As part of providing you with our services, we may be required to disclose certain information about you to the following third parties:

- a. our agents, service providers, business partners or affiliates, vendors and/or professional advisers who assist us in processing, administering, fulfilling transactions or providing value added services that you have requested;
- b. any person authorized or appointed by you to give instruction to us on your behalf
- c. any person(s) connected to the enforcement or preservation of any of our rights or transferring the rights and obligations under your agreement(s) with us;

Otherwise, we will not disclose your information to others, except where:

- a. we are required or permitted to do so by law
- b. required or authorized by any order of court, tribunal or authority, whether governmental or quasi-governmental with jurisdiction over Sara Worldwide Vacations Berhad.
- c. We may transfer rights and obligations under our agreement(s) with you; and/or
- d. We are required to meet our obligations to any relevant regulatory authority

But rest assured, that at all times, we will respect and protect the privacy and confidentiality of your Personal Information.

4. Security of Your Personal Information

We place great importance in ensuring the security and confidentiality of your Personal Information and regularly review and implement up-to-date technical and organizational security measures when processing your Personal Information.

5. Retention of Personal Information

Your Personal Information will be retained in compliance with this Privacy Notice and / or the terms and conditions of your agreement(s) with Sara Worldwide Vacations Berhad for the duration of your relationship or for such period as may be necessary to protect the interest of both Sara Worldwide Vacations Berhad and you. Such retention is also necessary as required by law or in accordance with our internal policies. Your Personal Information will be destroyed or permanently deleted or erased if no longer required.

6. Your Rights To Access And Correct Personal Information

You may at any time hereafter make written enquiries and, upon payment of a prescribed fee, request in writing for access to, or for correction or update of, or to limit the processing of your Personal Information by submitting such request in writing to the address set out in Clause 9, via registered post, email or facsimile transmission. Our respective Data Access Request Form and Data Correction Request Form are available for download at Club Asia International official website, www.clubasia.com.my. We will endeavor to comply with your request to access and/or correct your Personal Information within 21 days of receiving your completed form and the relevant processing fees (if any).

Please note that we may withhold access to your Personal Information in certain situations, for example when we are unable to confirm your identity where the information requested is of a confidential commercial nature or when there are repeated requests for the same information. Nevertheless, we will notify you of the reason(s) for not being able to accede to your request. We may also request for more documentary evidence to avoid incidence of fraud and/or inaccurate information.

In order to enable us to serve you better, we seek your assistance to continuously keep your Personal Information up-to-date.

7. Where The Personal Information Provided By You Is Incomplete

It may be obligatory for you in some instances to provide certain Personal Information to enable us to process your application or subscribe to some of our services. If you are unable to or decline to provide such obligatory Personal Information, we may not be able to process your application or provide you with the said services.

8. Revisions To The Privacy Notice

Our Privacy Notice may be revised from time to time and if there is/ are any revision(s), it will be posted on Club Asia International's website and/ or other means of communication deemed suitable by us. However any revision(s) will be in compliance to PDPA.

9. Enquiries/Complaints

If you have any enquiries or complaints, you may contact our Data Protection Officer at the following telephone number and address:-

Telephone No. : (60) 82 – 238 007 Fax No. : (60) 82 – 248 007
Email : kch_memberservice@saraworldwide.com.my (**Attention: Data Protection Officer**)
Mailing Address : Level 9, Menara SEDC, Jalan Tunku Abdul Rahman, 93100 Kuching, Sarawak

If you do not agree for your Personal Information to be used by us for the purpose of sending marketing materials or you do not agree to be contacted by us for the sale and promotion of any products, please notify us in writing to the address specified above.

10. Conflict

In the event of any conflict between the English language version of this Privacy Notice and the Bahasa Malaysia version, the English language version shall prevail.

11. Legal Effect

This Privacy Notice is not intended to, nor does it create any contractual rights nor contractual obligations on our part in respect of any other party.

We trust that you consent and agree to the terms above with respect to our processing of your personal information. If we do not receive any response from you on the above within fourteen (14) days from the date of receipt of this Notice, you shall be deemed to have given your consent and agreed to the same.

Yours faithfully
Sara Worldwide Vacations Berhad
(Club Asia International)
Date: 26th August 2019