

# **Synergy House Group of Companies Privacy Policy**

## **DATA PROTECTION NOTICE FOR CUSTOMERS (MALAYSIA)**

This Data Protection Notice (“Notice”) sets out the basis on which Synergy House Berhad and its Group of Companies (“we”, “us” or “our”) may collect, use, disclose and otherwise process personal data of our customers in accordance with the Personal Data Protection Act 2010 (“PDPA Malaysia”) and subsidiary regulations. This Notice applies to personal data in our possession or under our control, including personal data held by third-party service providers engaged by us.

### **1.0 PERSONAL DATA**

- 1.1 “Personal data” means any information, whether recorded in material form or otherwise, in respect of commercial transactions that relates directly or indirectly to an identifiable individual. Depending on your interaction with us, the personal data we collect may include but is not limited to your name, identification number, address, email, contact number, payment details, transaction records, browsing and purchasing history and patterns and other information relevant to our dealings with you.

### **2.0 COLLECTION OF PERSONAL DATA**

- 2.1 We may collect your Personal Data from various sources, including but not limited to:
- 2.1.1 when you interact with us directly through our websites, e-commerce accounts, customer service channels, social media pages, or other online and offline platforms or channels;
  - 2.1.2 from e-commerce platforms on which you browse, make purchases, submit enquiries, or interact with platform features that involve our products;
  - 2.1.3 from third-party service providers engaged by us to facilitate payment processing, delivery and fulfilment, marketing activities, customer engagement, or other services related to your transactions with us,
  - 2.1.4 through cookies or similar technologies when you engage with any of our online platform or channels; or

- 2.1.5 where such collection is otherwise permitted or required by the PDPA Malaysia or any other applicable law.
- 2.2 By providing your Personal Data through these channels, you consent to our collection and processing of such data for the purposes stated in this Notice. “Processing” includes any operation performed on Personal Data, such as collecting, recording, holding, storing, using, disclosing, or otherwise handling it in accordance with applicable laws.

### **3.0 PURPOSES OF USE**

- 3.1 We may collect, process and use your personal data for one or more of the following purposes:
- 3.1.1 Performing obligations in connection with our provision of goods and/or services;
  - 3.1.2 Verifying identity, processing payments, and managing billings or other related matters;
  - 3.1.3 Managing customer accounts, orders, customer service and overall customer relationship management;
  - 3.1.4 Communicating with you for marketing purposes, promotions, enquiries, feedback or complaints;
  - 3.1.5 Complying with legal, regulatory and governmental requirements;
  - 3.1.6 Preventing, detecting and investigating fraud or misconduct; and
  - 3.1.7 Any other purpose directly related to the above or to which you have consented.

### **4.0 DISCLOSURE OF PERSONAL DATA**

- 4.1 We may disclose your Personal Data with the following parties, where such disclosure is necessary for the purposes set out in this Notice, or where it is required or authorised by law:
- 4.1.1 our subsidiaries, related companies and affiliates,
  - 4.1.2 business partners, service providers, consultants, vendors, or agents who process Personal Data on our behalf in connection with the legitimate needs of our business;

- 4.1.3 regulatory authorities, enforcement agencies or courts where required by law; and
  - 4.1.4 any other party to whom you have provided consent for disclosure or where such disclosure is otherwise permitted by the PDPA Malaysia or other applicable law.
- 4.2 Where we disclose your Personal Data to third parties (whether located in or outside Malaysia), we take reasonable steps to ensure that such parties provide a level of protection comparable to the requirements of the PDPA Malaysia and handle your Personal Data only for the purposes for which it was disclosed.

## **5.0 RELIANCE ON EXCEPTIONS**

- 5.1 Under the PDPA Malaysia, we may process personal data without consent in certain circumstances, including where necessary for:
  - 5.1.1 the performance of a contract to which you are a party;
  - 5.1.2 compliance with legal obligations; or
  - 5.1.3 protection of your vital interests.

## **6.0 DATA SUBJECT RIGHTS**

- 6.1 You may request access to or correction of personal data we hold about you by writing to our Data Protection Officer (DPO). A reasonable administrative fee may be imposed for access requests, and we will respond within a reasonable period as required under the PDPA Malaysia. You may also contact our DPO in writing in relation to any other rights provided under the PDPA Malaysia. We may require reasonable proof of identity before processing your request.

## **7.0 LIMITING THE PROCESSING OF PERSONAL DATA / WITHDRAWAL OF CONSENT**

- 7.1 You may at any time withdraw consent or request that we cease processing your personal data for specific purposes by contacting our DPO. Please note that withdrawal of consent may affect our ability to continue providing certain products or services to you.

## **8.0 RETENTION OF PERSONAL DATA**

- 8.1 We retain personal data only as long as necessary to fulfil the purpose for which it was collected or as required by applicable laws. When retention is no longer needed, we will take reasonable steps to delete or anonymise the data securely.

## **9.0 SECURITY OF PERSONAL DATA**

- 9.1 We implement appropriate administrative, technical and physical safeguards to protect personal data against loss, misuse, unauthorised access, disclosure, alteration or destruction, including:
- 9.1.1 access control and authentication measures,
  - 9.1.2 encryption and secure storage,
  - 9.1.3 regular system updates and security audits, and
  - 9.1.4 staff awareness training on data handling.
- 9.2 However, no electronic transmission or storage method is completely secure; we commit to continuously review and enhance our security measures. In the event of a personal data breach (unauthorised access, misuse, loss) we will notify the relevant regulatory authority and affected individuals in accordance with the PDPA Malaysia or other relevant law.

## **10.0 TRANSFER OF PERSONAL DATA OUTSIDE MALAYSIA**

- 10.1 Where it is necessary to transfer your personal data outside Malaysia, we will obtain your consent and ensure that the receiving country provides a level of protection comparable to the PDPA Malaysia.

## **11.0 DATA PROTECTION OFFICER (DPO)**

- 11.1 You may contact our DPO for enquiries, feedback, or to exercise any rights under this Notice:

**Name / Designation:** Data Protection Officer

**Contact No.:** 017-5587365

**Email:** [zach.teh@synergy-house.com](mailto:zach.teh@synergy-house.com)

**Postal Address:** Level 18, Top Glove Tower, No.16, Persiaran Setia Dagang, Setia Alam, Seksyen U13, 40170 Shah Alam, Selangor, Malaysia.

## **12.0 EFFECT OF NOTICE AND CHANGES**

- 12.1 This Notice supplements any other agreements or consent clauses relating to your Personal Data. In the event of any inconsistency, this Notice shall prevail to the extent of such inconsistency, unless otherwise specified. We may update this Notice from time to time. And the latest version will be available on our website. By continuing to use our products, services, websites, or by otherwise engaging with us after any such updates, you acknowledge and agree to be bound by the terms of the updated Notice.

## **13.0 Approval**

- 13.1 This policy is approved by the Board of Directors on 12/11/2025.