

Personal Data Protection Notice

1. PERSONAL DATA COLLECTED

1. Personal data refers to any information in respect of commercial transactions which:-

- is being processed wholly or partly by means of equipment operating automatically in response to instructions given for that purpose;
- is recorded with the intention that it should wholly or partly be processed by means of such equipment; or
- is recorded as part of a relevant filing system or with the intention that it should form part of a relevant filing system,

that relates directly or indirectly to an individual, who is identified or identifiable from that information alone or with other information including any sensitive personal data and expression of opinion about the individual (“**Personal Data**”).

2. Personal Data which **SOTHYS Group** of companies in Malaysia (“**SOTHYS Malaysia Group**”) collects includes*:-

1. any information collected or obtained such as your name, gender, identity card numbers, email address, phone number(s), home address, date-of-birth, and such personal information provided to **SOTHYS Malaysia Group**;
2. medical conditions and medication taken by you (where applicable) (“**Sensitive Personal Data**”);
3. any information collected or obtained such as when you register as a customer via forms, contest, forums, surveys, registration, online via website, etc which may include personal data such as the above;
4. Personal Data collected when you submit your resume or application to us for consideration of employment(where applicable);
5. the content of electronic forms you submit via email requesting us to provide services or information, or to take any actions; and
6. any messages or comments you submit via our website, which may include personal data such as, but not limited to, name, email address and telephone number;

*This list is not exhaustive

3. Where you have provided Personal Data of another individual (“**Third Party**”), you must ensure that you have informed the Third Party that you are providing the Third Party’s Personal Data to us, and have obtained the Third Party’s consent to do so.

2. CONSENT AND PURPOSE OF COLLECTION

1. By providing any of your Personal Data to **SOTHYS Malaysia Group** whether online or otherwise, you acknowledge that you have read, understood and agree to our personal data protection notice and you consent to the collection, retention and use of your Personal Data by us for any of the following purposes*:-

1. fulfilling your instructions and providing you with services under any of **SOTHYS Malaysia Group's** business
2. processing your application to purchase our product(s) or service(s) under any of **SOTHYS Malaysia Group's** business;
3. marketing of product(s) or service(s) and sending any advertising and/or promotional material to you via telephone calls, emails or short message services if you have checked the consent box in the Client's Profile Form, Business Account Application Form and Application for Employment Form and Employee Personal Status Update Form;
4. conducting customer service feedback for any **SOTHYS Malaysia Group**;
5. notifying you of special offers, promotions, current and future product launches, special invitations that we consider might be of interest to you and for similar updates and promotion reasons via our Newsletter, Electronic Direct Mailers, Direct Mailers, etc;
6. monitoring your skin condition;
7. performing statistical and analysis of your behaviour and characteristics for customer relationship management purposes, such as providing a suitable range of products for your skin care needs;
8. purposes connected with the operation, administration, development or enhancement of **SOTHYS Malaysia Group's** business;
9. where required by law, where we consider that such use or disclosure is necessary to respond to any claims or legal process, or where **SOTHYS Malaysia Group** suspects that fraud or unlawful activity has been, is being or may be engaged in;
10. making such disclosures as may be required for any of the above purposes or by law;
11. where you have provided your resume, considering you for any jobs that may arise in **SOTHYS Malaysia Group**, and if applicable your terms and conditions of employment;
12. carrying out studies to monitor **SOTHYS Malaysia Group's** recruitment initiatives: and
13. as reasonably contemplate by the nature of any transaction

*This list is not exhaustive

2. Please note that in the event that insufficient Personal Data is supplied, or is not satisfactory to **SOTHYS Malaysia Group** then your application or request to **SOTHYS Malaysia Group** for any of the above purposes under paragraph 2.1 (whichever is applicable) may not be accepted or acted upon.

3. DISCLOSURE

1. You further consent that Personal Data may be disclosed and transferred within **SOTHYS Malaysia Group** which may include transfer to other entities within the **SOTHYS Group** of companies in different jurisdictions.
2. The personal data provided by you may be disclosed by **SOTHYS Malaysia Group** to:-
 - **SOTHYS Malaysia Group's** agents and contractors acting on our behalf.
 - Any referee whose details are provided by you, to verify or obtain additional information including financial institutions, education institutions, current/previous employers.
 - Credit reference agencies or third party service providers (including third parties managing our software and website), for **SOTHYS Malaysia Group's** operational, administration and development requirements.
 - Our professional advisers to use, disclose, hold, process, retain or transfer such personal data for the purposes of (2.1) above for and on behalf of **SOTHYS Malaysia Group**.
2. Each of the above parties, other than government authorities and your referees, are similarly bound by a duty of confidentiality to **SOTHYS Malaysia Group** in respect of all information disclosed to them.
3. **SOTHYS Malaysia Group** uses and discloses aggregated non-personally identifying information collected through paragraph 2.1 above and our websites part of **SOTHYS Malaysia Group's** process of constantly improving its website and/or **SOTHYS Malaysia Group's** business.

3. SECURITY

1. We have put in place appropriate physical, electronic, and administrative procedures to safeguard and help prevent unauthorised access, disclosure, loss, misuse and to maintain data integrity.

4. STORAGE AND RETENTION OF THE PERSONAL DATA

1. Your Personal Data will be stored either in hard copies in **SOTHYS Malaysia Group's** offices or stored in servers located in Malaysia and operated by **SOTHYS Malaysia Group** or any of its service providers.
2. Any Personal Data supplied by you will be retained by **SOTHYS Malaysia Group** as long as necessary for the fulfilment of the purposes stated in paragraph 2.1 above or is required to satisfy any statutory requirements. As a general rule the maximum retention period of the Personal Data of **SOTHYS Malaysia Group's** customers is eight (8) years. **SOTHYS Malaysia Group** retains the Personal Data of its employees for as long as that individual remains as an employee of **SOTHYS Malaysia Group**.

5. CONFIDENTIALITY

1. Personal Data held by **SOTHYS Malaysia Group** will be kept confidential in accordance with this privacy notice pursuant to the Personal Data Protection Act 2010 (“Act”).

6. RIGHT OF ACCESS TO PERSONAL DATA

1. Under the Act, you have the right to request correction of the Personal Data held by **SOTHYS Malaysia Group** that is inaccurate, incomplete, misleading or not up-to-date.
2. If you have any questions regarding this personal data protection notice or if you wish to correct your Personal Data or if you wish to withdraw your consent to the **SOTHYS Malaysia Group** for the processing of your Personal Data for the purposes as set out in paragraph 2.1 above or for the transfer of your Personal Data to the parties stated in paragraph 3.2 above, you may send your request in writing to pdpa.flagship@sothys.com.my or send your letter to the following address:-

The Operations Department
Faubourg One Sdn Bhd
D4-06-10, Solaris Dutamas,
No. 1, Jalan Dutamas 1,
50480 Kuala Lumpur, Malaysia.

3. By providing your Personal Data, you acknowledge that you have read, understood and agree to our personal data protection notice and have consented for us to collect, process and keep your Personal Data.

Thank you.