### **Privacy Notice**

We value your privacy and are committed to the protection of your personal data. This Privacy Notice therefore describes how we process your personal data in line with the Personal Data Protection Act 2010 ("PDPA").

By providing your personal data to us, you are agreeing to the provisions of this Privacy Notice and the processing of your personal data as described in this Privacy Notice.

For the purposes of this Privacy Notice, the expressions:

- "TIM" refers to, collectively, Taurus Investment Management Berhad (formerly known as Libra Invest Berhad) (Registration No.: 199501032001 (361207-D)) and all its related corporations, as defined in section 7 of the Companies Act 2016 and jointly controlled companies;
- (ii) "personal data" and "processing" have the meaning ascribed to them in the PDPA (and the expression "process" shall therefore be construed accordingly);
- (iii) "we", "us" and "our" refers to Libra.

### What Kind of Personal Data We Collect

In order to enable us to deal with your inquiries (or inquiries from your organisation or company), open and operate an account for you (or your organisation or company), evaluating your investment needs and/or to generally provide you (or your organisation or company) with our products and services, we may need to process personal data about you.

Personal data refers to any information that relates directly or indirectly to you, from which you may be identified, and includes sensitive personal data and expressions of opinion about you.

Personal data which we may collect includes (without limitation) name, address, copies and details of identification documents, contact details, employment history, marital status, credit and references check, financing activity as well as personal, financial and social security details, commission or alleged commission of offence, personal information to establish suitability for any of our products/services applied for (if required).

# When and How We Collect Your Personal Data

We may collect your personal data from yourself and from a variety of sources, including without limitation:

- (a) through your (or your organisation's or company's) relationship with us, such as when you access and/or use our online services or other products or services, information provided via application forms, when using our products or services, taking part in surveys, promotions and reviews and enquiries about our products and/or services;
- (b) through your verbal and written communications with us and/or our authorised agents;

- (c) from any information that is supplied and/or collected when you visit our websites, such as your mobile device, computer's IP address or from any information that is collected via cookies in some of our websites;
- (d) call our helpdesk or representatives;
- third party background checks, any registered credit reporting agency, any financial institution, any regulatory authorities, any authority, central depository or depository agent from a counterparty to whom you are providing (or involved, in any capacity, in providing) goods or services;
- (f) from a counterparty to whom you are providing (or involved, in any capacity, in providing) goods or services; and
- (g) from such other sources where you have given your consent for the disclosure of personal data relating to you, and/or where otherwise lawfully permitted.

### What We May Use Your Personal Data For

We may process your personal data for the following purposes:

- (a) to assess your eligibility or suitability for our products or services applied for and verify your financial standing through credit reference/reporting checks;
- (b) in connection with an enquiry or application for our products and services;
- (c) in connection with any contract or arrangement entered or to be entered into between you (or your organisation or company) and us;
- (d) to manage and maintain your (or your organisation or company's) account(s) and investment(s) with us;
- (e) to execute or facilitate the execution or performance of any arrangement or transaction;
- (f) to better understand the current and future investment needs as well as financial situation of an applicant which you represent;
- (g) to notify and/or update on new features or development of our products and services which may be of interest to you;
- (h) to administer offers, competitions and promotions;
- (i) to support our business, financial and risk monitoring, planning and decision-making;
- (j) to respond to your enquiries and complaints and to generally resolve disputes;

- (k) in connection with the agreements, terms of services and/or our rules and policies with respect to our products or service (including, but not limited to, monitoring compliance and enforcement of rights);
- (I) to update, consolidate and improve the accuracy of our records;
- (m) to produce data, reports and statistics which have been anonymised or aggregated in a manner that does not identify you as an individual;
- (n) to conduct research for analytical purposes including, without limitation, knowledge discovery in data and analysis of transactions with us;
- (o) the compliance and disclosure requirements of any governmental and/or quasigovernmental departments, agencies or regulatory and/or statutory bodies;
- (p) for the purpose of record-keeping in the ordinary course of our business;
- (q) complying with any legal obligation binding on us under any law, rule, regulation, by-law, order, guideline, directive, policy and such other requirements in force and as amended from time to time;
- (r) for audit, compliance and risk management purposes;
- (s) to assess financial and insurance risks;
- (t) to transfer or assign any of our rights vis-à-vis you (or your organisation or company);
- (u) to conduct anti-money laundering checks;
- (v) for crime detection, investigation, prevention and prosecution; to comply with any sanction requirements;
- (w) to enforce and/or defend any of our rights;
- (x) for any other purpose that is required or permitted by any law, regulations, guidelines and/or relevant regulatory authorities; and
- (y) for such other purposes that is incidental or ancillary or in furtherance to the above purposes.

#### <u>Disclosure of Personal Data</u>

We may disclose your personal data to the following parties:

(a) your organisation or company whom you are representing in connection with our products or services;

- (b) your advisers and/or agents (including but not limited to brokers, accountants, auditors, lawyers, financial advisers or other professional advisers) where authorised by you;
- (c) our related corporations;
- (d) companies and/or organisations that act as our agents, affiliates, service providers, business partners, professional advisers, banks and/or financial institution, within or outside Malaysia, where necessary;
- (e) any person to whom we are under an obligation to make disclosure under law, rule, regulation, by-law, order, guideline, directive, policy; any court and/or officer of the court; our auditors:
- (f) any credit bureau, credit reporting agencies, rating agencies and third-party due diligence database service providers;
- (g) companies and/or organisations that assist us in processing and/or otherwise fulfilling transactions or services that you have requested (whether on your own behalf or on behalf or your organisation or company);
- (h) companies and/or organisations that provide services to us in communicating our products and services to you;
- (i) any other person notified by you as authorised to give instructions or to use the account(s)/facility(ies) or products or services on your (or your organisation's or company's) behalf;
- (j) any person intending to settle any moneys outstanding under the facility(ies) granted to you;
- (k) any guarantors or security providers for the facility(ies) granted to you;
- (I) any third party as a result of any restructuring of facilities granted to you, sale of debts, transfer of rights granted by you (or your organisation or company) or the acquisition or sale of any company by us, provided that any recipient uses your information for the same purposes as it was originally supplied to us and/or used by us;
- (m) any rating agency, insurer or insurance broker or direct or indirect provider of credit protection;
- (n) government bodies and agencies, to meet our legal and regulatory obligations;
- (o) law enforcement agencies, for the purpose of preventing and/or detecting crime, investigations and/or the apprehension or prosecution of offenders and/or protection of national security and/or any purpose that is required or authorized by or under any law, order or judgment of a court; and

(p) any person connected to the enforcement or preservation of any of rights under an arrangement or our rights under your agreement(s) with us,

subject at all times to any laws (including regulations, guidelines and/or obligations) which apply to us (whether in or outside Malaysia). The aforementioned third parties may be located outside of Malaysia.

### Accuracy of your Personal Data

You are responsible for ensuring that the personal data about yourself and any other person that you provide to us is accurate, complete and not misleading and that such personal data is kept up-to-date. This obligation is a condition to the provision of our products and/or services to you and/or any other person authorised or permitted by you or your organisation/company to use such products and/or services. You shall promptly keep us informed in the event that such personal data is inaccurate, incomplete, misleading or not up-to-date and you shall provide us the true, accurate, complete and updated data. If you give us personal data about another person (for example where you are the designated person in charge (from an organisation or company), you confirm that you: (i) have notified the relevant individual of the purposes for which data will be collected, processed, used or disclosed; (ii) informed them to read this Privacy Notice; (iii) have obtained such individual's consent for, and hereby consents on behalf of such individual to, the collection, processing, use and disclosure of his/her personal data; (iv) have been authorised by such individual to provide such consent on his/her behalf; and (v) will immediately notify us upon becoming aware of the withdrawal by the relevant individual of his/her consent to such collection, processing, use and/or disclosure.

## What If You Do Not Provide Us with Your Personal Data?

Where indicated (for example in registration/application forms), it is obligatory to provide your personal data to us to enable us to process your application for our products and/or services. Should you decline to provide such personal data, we may not be able to process such applications, or provide and/or continue to provide our products and/or services.

### Retention of Personal Data

We will retain any personal data supplied by you for as long as necessary for the duration of your (or your organisation's or company's) relationship with us, for such period as may be necessary to protect our interests as may be deemed necessary, where otherwise required by the law, regulatory requirement or demand and/or where required by our policies.

# Transfer of Your Personal Data to Places Outside Malaysia

We may transfer your personal data to places outside Malaysia (including, without limitation, where: (i) any of our service providers or partners who are involved in providing part of our product and/or service; or (ii) outsourced data storage or data processing services for and on behalf of us is located outside Malaysia or has servers and/or related equipment outside Malaysia). You consent to us transferring your personal data to places outside Malaysia in these instances. We may also transfer your personal data to places outside Malaysia where permitted by law.

## Your Rights

You may request access to and correction of your personal data and/or limit the processing of your personal data (including personal data relating to other persons who may be identified from that personal data), or make any enquiries or complaints in respect of your personal data, by contacting us at our office address at Unit 13A02, Level 13A, Tropicana Gardens Office Tower, No. 2A, Persiaran Surian, Tropicana Indah, 47810 Petaling Jaya, Selangor Darul Ehsan or by emailing us at enquiry@taurus-im.com. In relation to either a data access request or a data correction request, you should quote your name, address and phone/account number and provide brief details of the information you want a copy of or, as the case may be, you want to have corrected, in any such request. Please note that we may decline to comply with your data access request in certain situations, for example when we are unable to confirm your identity or where information requested for is of a confidential commercial nature or in the event we receive repeated requests from you for access to the same information which burden or expense of providing access is disproportionate to the risks to your privacy. We may also decline to comply with your data correction request in certain situations, for example when you have not supplied us with such information as we may reasonably require to ascertain in what way the personal data to which the data correction request relates is inaccurate, incomplete, misleading or not up-to-date. Nevertheless, we will notify you of the reasons for not being able to accede to your data access and/or data correction requests. We shall be entitled to charge a fee (where permitted under the applicable law) for any data access request.

### Changes to the Privacy Notice

We reserve the right to modify, update or amend this Privacy Notice at any time and the updated version shall apply and supersede any and all previous versions, including, leaflets and hard copy versions. You are encouraged to check our website and re-visit this Privacy Notice periodically for our most up-to-date Privacy Notice.