

ABSOLUTE THAI'S PRIVACY POLICY

MALAYSIA PRIVACY NOTICE FOR OUR CUSTOMERS AND OTHER BUSINESS RELATED PERSONAL DATA

We value your privacy and strives to protect your personal data in compliance with the laws of Malaysia. This privacy notice explains how we collect, use, disclose, retain and protect your personal data.

We will only collect and use your personal data in accordance with such laws (including the Personal Data Protection Act, 2010 ("PDPA") and this Privacy Notice

This Privacy Notice explains:

1. Who is responsible for processing your data?
2. Categories and Sources of Personal Data and Purposes and Basis for Processing
3. Sharing of Your Information
4. Transfers of Personal Data outside Malaysia
5. Your Rights

Please take the time to read this privacy notice, since it contains important information about the way that we process personal data.

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

1. Absolute Thai refers to the Sea Cuisine Sdn. Bhd. (Company No. 118404-P), Silverwell Sdn. Bhd. (Company No. 540133-K) and Absolute Thai Sdn. Bhd. (Company No. 900750-D) and all their respective affiliated, associated, holding or related corporations ,
2. This Privacy Notice is applicable only if you are an individual. Where you are a corporate entity or organisation, to the extent that you have shared personal data related to employees, directors, authorised signatories, or other individuals, please note that it is your responsibility to obtain their consent for sharing their personal data with us and explain to them that their personal data will be provided and processed in accordance to this Privacy Notice prior to providing their personal information to us.

Section 1. WHO IS RESPONSIBLE FOR PROCESSING YOUR DATA AND HOW TO CONTACT US

For the purpose of the PDPA, Absolute Thai (the "we" or "us" or "our") will be the data controller responsible for any personal data we process.

Any queries and requests regarding this Privacy Notice are welcomed and may be emailed to enquiries@absolutethai.com.my.

Section 2. WHAT PERSONAL DATA WE COLLECT AND WHY?

We may source, use and otherwise process your personal data in different ways listed below.

2.1 INDIVIDUAL CUSTOMERS

2.1.1 We may obtain your personal data from the following sources:

- a) from you directly (over the phone, email, website, social media channels, mobile device applications, interactive features or paper forms or in person);
- b) from Absolute Thai , where we have your permission to access it;
- c) from third parties; and/or
- d) from our systems , if you have used our technologies at our restaurants.

2.1.2 We may collect the following personal data relating to our existing or prospective individual customers [AAC: This is covered in another section] including but not limited to:

- Name,
- email (personal and/or business email address),
- home address,
- home and/or business telephone number,

- date of birth,
- nationality,
- gender,
- race,
- identity card details,
- passport,
- photograph,
- image,
- CCTV recording,
- family members and their dates of birth.
Please note that it is your responsibility to obtain consent from adult family members for sharing their personal data with us prior to providing their personal information to us such as,
- banking and credit card details,
- details of your request, for example, for booking a table in one of our restaurants this will include the date, time, party size, menu selection, table preferences,
- dietary preferences,
- voucher or other discount details, if you provide them to us,
- social occasion information,
- details and records of your request, complaint or query,
- details of orders (amount spent, date, time, table number, vouchers or offers used),
- categorisation of you as a customer based on the information we have about you from various sources (for example, if this is your first experience with us or you are a regular customer),
- any feedback you submitted about your experience with us,
- regions from which users open our marketing emails,
- sensitive information such as physical or mental health conditions,
- religious beliefs,
- criminal records,
- such other information as may be required,
- account information, such as username, password, and other identifiers or credentials used to access our website and mobile device applications

2.1.3 Why do we collect your personal data?

We may use your personal data to:-

provide you with our products or services (for example, to book a table at our restaurants or fulfill your requests or orders and process payments for our products and services), register to use our websites and mobile device applications, establish and manage our relationship (this includes making your experience with us personalised, adapting our services to your requirements, such as your food preferences, dealing with complaints or maintaining your account with us), learn about how our products and services are or may be used (for example, when we ask you to fill out surveys about the experience you had with us), security (ensuring confidentiality of personal information or preventing unauthorised access and modifications to our systems), let you know about our products, services and events that may be of interest to you by letter, telephone, email or other forms of electronic communication, participate in our marketing and promotional activities, market surveys and analytics, operate, evaluate and improve our business, including the development of new products and services; determination of the effectiveness of our sales, marketing and advertising efforts; and analysis and improvement of our products, offers, promotions, and online services and other technologies, protect against, identify and prevent fraud and other criminal activity, claims and other liabilities, and comply with applicable law, personalize your experience on our online services and in-restaurant technologies, such as providing you with content in which you may be interested, and making navigation to our websites and mobile device applications easier;

subject at all times to any law.

If you object to us using your personal data for these purposes, including direct marketing, please let us know using the email address provided in Section 1.

Where we use your email to communicate marketing information to you we will seek your prior consent where required to do so by law.

2.1.4 How long do we keep your personal data?

We will process your personal data only for as long as is necessary for the purposes for which it was collected in connection with the provision of service to you, unless we have a legal right or obligation to

retain the data for a longer period, or the data is necessary for the establishment, exercise or defence of legal claims.

2.2 **REPRESENTATIVES OF OUR EXISTING OR PROSPECTIVE CORPORATE CUSTOMERS, BUSINESS PARTNERS, AND VENDORS**

2.2.1 We may collect personal data related to employees, directors, authorised signatories, or other individuals associated with Absolute Thai's existing or prospective corporate customers, business partners, and vendors.

2.2.2 We may obtain your personal data from the following sources:

- a) from you directly,
- b) from a company that employs you, if you are an employee of our existing or prospective customer, business partner, or vendor,
- c) from Absolute Thai;
- d) during networking events that we have either hosted, or sponsored, or attended; and/or
- e) from publicly available sources (for example, your company website or social media sites, such as LinkedIn)

2.2.3 We may collect the following categories of personal data relating to our existing or prospective customers', business partners', and vendors' employees, officers, authorised signatories, and other associated individuals:

name;
business address;
business email address;
business telephone number;
job title;
details of booking (venue, date, party size, previous functions); and/or
any feedback you submitted about your experience.

2.2.4 **Why do we collect your personal data?**

We may use your personal data to:

- a) provide you with our products or services or receive products or services from you;
- b) establish and manage our relationship;
- c) learn about how our products and services are or may be used;
- d) let you know about our products, services and events that may be of interest to you by letter, telephone, email or other forms of electronic communication;
- e) Security;

subject at all times to any law.

If you object to us using your personal data for these purposes, including direct marketing, please let us know using the email address provided in Section 1.

2.2.5 Where we use your email to communicate marketing information to you we will seek your prior consent where required to do so by law.

2.2.6 How long do we keep your personal data?

We will process your personal data only for as long as is necessary for the purposes for which it was collected in connection with your business relationship with us, unless we have a legal right or obligation to retain the data for a longer period, or the data is necessary for the establishment, exercise or defence of legal claims.

2.3 **WEBSITE VISITORS**

2.3.1 We may obtain your personal data from the following sources:

- a) from you directly (for example, at the time of subscribing to any services offered on our website, including but not limited to email mailing lists, interactive services or requesting further goods or services); and/or
- b) from your device or browser.

If you contact us, we may keep a record of that correspondence.

2.3.2 Personal data that we collect and process

name;
 title
 date of birth, and post code, if you are signed up to our e-newsletters;
 email address;
 operating system;
 browser type;
 information on the use of our website (for example, pages visited, geographical location, time spent on the website, online transactions);
 cookie data
 preferences regarding online marketing; and/or
 IP address.

2.3.3 We may collect information from your computer system or mobile device through automated technologies when you visit our restaurants or use our websites or mobile applications or in-restaurant technologies. These automated technologies may include cookies, local shared objects, and web beacons. The information we collect may include your Internet Protocol (IP) address; computer/mobile device operating system and browser type; type of mobile device; mobile device settings; the unique device identifier (UDID) or mobile equipment identifier (MEID) for your mobile device; device and component serial numbers; advertising identifier (e.g., IDFA and IFAs) or similar identifier; the referring website or application; the linked sites, third-party websites, applications or social media where you share online services content; and activity related to your use of our online services such as the pages you visit on our websites or in our mobile device applications.

The providers of third-party apps, tools, widgets and plug-ins on our websites and mobile device applications, such as Facebook "Like" buttons, also may use automated means to collect information regarding your interactions with these features. This information is subject to the privacy policies or notices of these providers.

2.3.4 Our websites and mobile device applications and in-restaurant technologies may collect precise information about the location of your mobile device or computer using geolocation and location presence awareness technologies such as GPS, Wi-Fi, Bluetooth, or cell tower proximity. For most mobile devices and computer systems, you are able to withdraw your permission for us to acquire this information on your location through the device or Web browser settings. If you have questions about how to disable collection of precise location information, we recommend you contact your mobile device service provider, the device manufacturer, or your Web browser provider. Please note that certain website or mobile device applications and in-restaurant technologies may not function properly without precise location information. If you would like us to delete location information we have collected that is identifiable to you, please contact us at the email using the email address provided in Section 1.

2.3.5 Why do we collect your personal data?

We may use your personal data to:

- provide our website services to you
- establish and manage our relationship
- learn about our websites(s) users' browsing patterns and the performance of our website(s)
- security
- let you know about our products, services and events that may be of interest to you by letter, telephone, email or other forms of electronic communication
- learn about how our products or services may be used

If you object to us using your personal data for the above purposes, including direct marketing, please send us an email using the email address in Section 1.

Where we use your email to communicate marketing information to you we will seek your prior consent where required to do so by law.

2.3.6 How long do we keep your personal data?

We will keep your personal data only for as long as is necessary for the purposes for which it was collected in connection with your requests via our website or your use of our website.

2.4 JOB APPLICANTS

We may collect personal data related to job applicants for positions advertised on our website.

2.4.1 We may obtain your personal data from the following sources:

from you directly;

from a third party, for example, individual referrals or a recruitment agency;

from Absolute Thai ;

via web-based application forms;

during networking events that we have either hosted, or sponsored, or attended; and/or

from publicly available sources (for example, professional networks, such as LinkedIn).

2.4.3 We may collect the following categories of personal data, which may differ, depending on the content of your CV or baseline documents you submit to us:

name;

residence address;

personal email address;

telephone number;

date of birth;

career and education history;

skills, experience, and qualifications;

personal interests, languages spoken, questionnaire results;

gender;

names and contact details for references. Please note that it is your responsibility to obtain consent from your references prior to providing us personal information about them;

current and historic salary details together with salary expectations;

details of your current income and/or benefit entitlements; and/or

information about your entitlement to work.

details about employment record and references,

tax details,

EPF & SOCSO details,

2.4.4 Why do we collect your personal data?

We may use your personal data to:

check your eligibility to work in the country

facilitate the selection process

assess and confirm your suitability for employment

communicate with you

execute business process and internal management

safeguard the security of our infrastructure, premises, assets and office equipment, including prevention of criminal activity, defending legal claims

2.4.5 How long do we keep your personal data?

We will keep and process your Personal Data only for as long as is necessary for the purposes for which it was collected. If you are successful and we hire you, we will keep your CV as part of your employee

record for the duration of your employment with us. We will keep CVs and documents submitted by unsuccessful candidates for no longer than [six] months, unless we obtained their consent to keep it for longer.

2.5 VISITORS TO OUR PREMISES

2.5.1 We may obtain your personal data from you directly and from our systems' records.

2.5.2 Personal data that we collect and process

name;
business or personal contact details;
organisation;
role;
time and date of your visit; and/or
image (for example, from CCTV cameras at our premises).

2.5.3 Why do we collect your personal data?

We may use your personal data to:

security

maintain records of visitors to our premises

If you object to us using your personal data for the above purposes, please let us know using the email address provided in section 1.

2.5.4 How long do we keep your personal data?

We keep your personal data for as long as necessary to ensure security of visitors to our premises and as soon as it is no longer necessary, usually after 90 days for CCTV, we delete it.

3. WHO DO WE SHARE YOUR PERSONAL DATA WITH

3.1 We do not sell your personal data to third parties or otherwise share personal information about you, except as described in this Privacy Policy.

3.2 We may share your personal data within Absolute Thai because we share the same guest management and IT systems. Transfers of personal data within Absolute Thai in the Malaysia only.

3.3 We may disclose information about you to organisations that provide a service to us, ensuring that they are contractually obligated to keep your personal data confidential and will comply with the PDPA and other relevant data protection laws.

3.4 We may share your information with the following types of service providers:

technical support providers who assist with our website and IT infrastructure,
third party software providers, including 'software as a service' solution providers, where the provider hosts the relevant personal data on our behalf;
professional advisers such as solicitors, accountants, tax advisors, auditors and insurance brokers;
providers that help us generate and collate reviews in relation to our goods and services;
our advertising and promotional agencies and consultants and those organisations or online platforms selected by us to carry out marketing campaigns on our behalf (for example, Facebook, Google, Instagram); and/or
service providers that assist us in providing our services.

3.5 Law enforcement or government bodies

We may disclose your personal data as permitted by law in order to investigate, prevent or take action regarding illegal activities, suspected fraud, violation of our intellectual property rights, situations involving potential threats to the physical safety of any person, violation of our Terms and Conditions of Use or other agreements, or as required by law.

3.6 Company Mergers and Takeovers

We may transfer your personal data to potential purchasers and their advisors, subject to appropriate confidentiality obligations, in the event we decide to dispose of all or parts of our business.

4. Transfers of personal data outside Malaysia

We share personal data with external vendors or service providers or suppliers that we engage to perform services or functions on our behalf and under our instructions. Where these vendors are located within Malaysia, we ensure that they are contractually obligated to comply with the data protection law.

We may also disclose personal data to our advisers, consultants, law enforcement and other public authorities (such as tax and social security bodies), the police, prosecutors, courts and tribunals. All these recipients are themselves responsible to comply with the Malaysian data protection rules.

5. Your Rights

Absolute Thai provides you with certain rights in relation to the processing of your personal data, including to:

Request access to personal data about you (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you, and to check that we are lawfully processing it.

Request rectification, correction, or updating to any of the personal data that we hold about you. This enables you to have any inaccurate information we hold about you corrected.

Request personal data provided by you to be transferred in machine-readable format (“data portability”).

Request erasure of personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove personal data where you have exercised your right to object to processing (see below).

Request the restriction of processing of your personal data. This enables you to ask us to suspend the processing of personal data about you (e.g. if you want us to establish its accuracy or the reason for processing it).

Object to the processing of your personal data in certain circumstances. This right may apply where the processing of your personal data is based on the legitimate interests of Company, as explained above.

Withdrawal of consent. If we rely on your consent (for example, when setting cookies on your device or for direct marketing), you may withdraw your consent at any time.

These rights listed may be subject to various conditions under applicable data protection and privacy legislation.

If you would like to exercise any of your rights set out above, you can contact us by emailing using the email address in section 1.

6. Revisions to Privacy Notice

We may change this Privacy Notice from time to time. If we change the Privacy Notice, we will post the revised version here. We encourage you to check our official website periodically for the most up-to-date version of our Privacy Notice.

Should you have any query in relation to this Privacy Notice or how we handle your personal data, kindly contact us at the email using the email address provided in Section 1.