



PRIVACY POLICY

1. **THE ROYAL INVESTMENT BANK OF KELANTAN INC.** (Company No: LL17680), a company incorporated in Labuan, Malaysia and having its registered address at Unit Level 11(A), Main Office Tower, Financial Park Labuan, Jalan Merdeka, 87000 Federal Territory of Labuan (hereinafter referred to as the "**Company**")

1. INTRODUCTION

When processing personal data, the Company is governed by the Personal Data Protection Act 2010 ("Act").

By signing the Investment agreement with the Company (hereinafter referred to as the "Agreement"), you allow the Company to use your personal data to the extent specified in the Agreement.

This policy sets out the basic principles by which the Company processes your personal data and sets out its responsibilities in processing personal data. This policy fulfils the Company's information obligations to data subjects Act.

2. INFORMATION ON THE PROCESSING OF PERSONAL DATA

The Company hereby provides you with information about your rights related to the processing of your personal data by the Company in connection with the conclusion of the Agreement and the performance of the obligations contained therein, including the possibility of using the Company's or its service provider's software platforms ("Processing Ground").

The Company is the data controller, i.e. the person who determines the purposes and means and decides on the processing of your personal data.

The processing of your personal data is carried out by the company on the basis of your consent to the processing of your personal data by the company for one or more processing reasons as appropriate. You have the right to withdraw your consent to the processing of your personal data at any time. However, this may result in a narrowing of your ability to use the Company's services or may be deemed by the Company as a termination of the Agreement by you. The processing of your personal data is carried out by the company in connection with the specific reason for the processing. The processing of your personal data is carried out so that the company can provide you with services related to the specific reason for processing in the highest possible quality. Your personal data is processed by the company from the time you give your consent to the processing until the time that consent



is withdrawn. Thereafter, the company only retains your data for the time necessary to technically ensure its removal from the company's databases. In addition, the Company only retains those of your personal data that are necessary for the exercise of the Company's rights and performance of the Company's obligations or where required by law. The processing of your personal data does not involve automated decision-making or profiling that would have legal consequences for you or affect you in a similarly significant way.

The company only processes personal data within the scope specified in the Agreement.

The company includes your personal data in the database related to the reason for processing, furthermore, the company records them in the database and uses them only for the purpose related to the reason for processing in order to provide services of the highest possible quality.

The company handles your personal data with due care and in accordance with applicable law. The company protects your personal data to the maximum extent possible, which corresponds to the technical level of the available means. The Company has strict rules specifying which specific person or department may have access to your personal data and what personal data they may process. In the event of your personal data being transferred outside the company to external processors, the company has ensured an adequate level of security protection in accordance with the relevant legislation.

The Company may transfer your personal data to anyone outside the Company and/or outside Malaysia where:

- it is necessary for the performance of the contract, in particular to ensure the full functionality of THE ROYAL MARKET software platform,
- the company has your express consent,
- the company is required or authorised to do so by law (for example, by law enforcement authorities),
- the Company's service provider is an external processor.

You have the rights in relation to your personal data specified in Article 6 below. You also have the right to withdraw your consent to the processing of your personal data at any time, including separately for any of the processing reasons. You can withdraw your consent by sending an email to The Company at Info@ribk.com.my. However, this may result in a narrowing of your ability to use the Company's services or may be deemed by the Company as a termination of the Agreement by you.

Your data protection rights are fully respected by the company. If you wish to exercise them, or if you have any questions regarding the processing of your personal data by the



Company, please contact the Company directly through the following communication channels:

Email: Info@ribk.com.my

Address: Unit Level 11(A), Main Office Tower, Financial Park Labuan, Jalan Merdeka, 87000 Federal Territory of Labuan

3. PURPOSES OF THE PROCESSING OF PERSONAL DATA

Personal data is processed for the following purposes:

- 1) Contract performance - if you are a client of the Company (Client), the Company needs to keep certain information for the purpose of Agreement performance.
- 2) Own marketing - own marketing means that the data is used for the company's promotional activities towards existing customers, in search of potential customers and other target groups.
- 3) Compliance with legal obligations - the company keeps certain data and documents because it is required to do so by specific legal regulations (tax laws, accounting laws, etc.).
- 4) Protection of legitimate interests - the Company also retains certain data and documents for the purposes of potential litigation, for the purpose of defending and proving itself in such litigation or for the purpose of pursuing and enforcing its own claims.

The above purposes entitle the company to process your personal data for a limited period of time without your consent if you are a customer (Client) or business partner.

4. GENERAL PRINCIPLES OF PERSONAL DATA PROCESSING

1. Legality, fairness and transparency

The company processes personal data lawfully, fairly and transparently in relation to the data subject.



2. Purpose limitation

Personal data is collected by the company only for specific, explicit and legitimate purposes and is not further processed in a way that is incompatible with those purposes.

3. Data minimisation

The company processes personal data to the extent proportionate, only relevant and limited in relation to the purpose for which it is processed.

4. Accuracy

The company processes personal data accurately within the limits of objective possibilities and updates them where necessary. The Company has internal processes in place to ensure that personal data that is inaccurate in relation to the purposes for which it is processed is corrected or deleted.

5. Limited shelf life

Personal data shall be kept for no longer than is necessary for the purposes for which they are processed. This period must take into account the possibility of ensuring the resolution of the company's legal obligations (e.g. mandatory archiving), legal relationships (e.g. guarantee period) and unlawful situations (e.g. compensation for damages) that may arise in relation to data subjects and the claims related to these obligations.

In general, the company processes personal data for a period of 10 years after the termination of the Agreement for the purpose of settling any claims for damages and claims for defective performance. During this period, the company may also use personal data for direct marketing.

6. Integrity and confidentiality

Taking into account the state of the art and available security measures, the cost of implementation, and the likelihood and severity of privacy risks, the Company uses appropriate technical and organisational measures to ensure adequate security of personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage. These measures include both physical means of protection of personal data processed and electronic security of electronically processed data.



7. Liability

The company as a data controller is responsible for and must be able to demonstrate compliance with the above principles.

8. Risk-based approach

The greater the risk that the type of processing carried out by the company may interfere with the interests or fundamental rights and freedoms of the data subject, the greater the transparency and security measures to be taken for that processing.

5. DATA PROTECTION DURING PROCESSING

In order to demonstrate compliance with these principles, the company should implement data protection in its processes and activities.

The Company collects as little personal data as possible.

The Company maintains the accuracy, integrity, confidentiality and relevance of personal data based on the purpose of processing. Adequate security measures designed to protect personal data are employed to prevent the theft, misuse or abuse of personal data and to prevent data breaches.

Whenever a company uses a third party, supplier or business partner to process personal data on its behalf, it will always ensure that the processor provides sufficient security measures to protect personal data appropriate to the risks involved. A questionnaire on the processor's compliance with the requirements of the Act may be used for this purpose.

The company Agreementually obliges the supplier or business partner to provide the same level of data protection as the company itself provides. The supplier or business partner must only process personal data for the purpose of fulfilling its Agreementual obligations to the Company or on the instructions of the Company and not for any other purpose. If the Company processes personal data jointly with independent third parties, the Company must enter into a data processing agreement or similar Agreement with the supplier or business partner.

6. YOUR RIGHTS TO YOUR DATA



1. Right of access

The Company offers you access to your personal data that it processes. This means that you can contact the Company and the Company will inform you of what personal data it has collected and processed and the purposes for which such data is used.

2. Right of rectification

You have the right to have inaccurate, incomplete, outdated or unnecessary personal data held about you corrected or completed after you contact the Company. In some cases where the Company uses official data, we may ask you to contact the relevant authority directly to request that your data be corrected to ensure that the correction is carried out in the proper official manner necessary for such records.

3. Right to erasure (right to be forgotten)

You can ask the Company to delete your personal data from the Company's systems and records. The Company will comply with this request unless it has a legitimate reason for retaining the data.

4. Right to object

You may object to certain uses of your data where such data has been processed for purposes other than those necessary for the performance of the Company's services or to comply with legal obligations. You may also object to any further processing of your personal data after your prior consent has been given, or you may withdraw your previously given consent at any time. If you object to any further processing of your personal data, this may result in a narrowing of your ability to use the Company's services or may be deemed by the Company as a termination of the Agreement by you.

You have the right to prohibit the company from using your personal data for direct marketing, market research and profiling purposes.

5. Right to restriction of processing

You can ask the company to restrict the processing of certain personal data. However, this may result in limitations on your ability to use the Company's services.

6. Right to data portability

You have the right to receive the personal data you have provided to the company in a structured and commonly used format. The Company notes that this only applies to data



that you have personally provided directly to the Company and that the Company processes it either with your consent or for the purpose of performing a Agreement.

7. How to exercise these rights

These rights may be exercised in person at the company's registered office, by registered letter or by e-mail to Info@ribk.com.my

You have the right to request a copy of the information the company holds about you. If you would like a copy of some or all of your personal information, please send an email or letter to the Company at the following addresses:

Email: Info@ribk.com.my

Address: Unit Level 11(A), Main Office Tower, Financial Park Labuan, Jalan Merdeka, 87000 Federal Territory of Labuan