

**Personal Data Protection Policy**  
**of**  
**Manitou Malaysia MH Sdn. Bhd.**  
**(Company No. 1157034-A)**  
(hereinafter called the “Company”)

**Our Privacy Commitment**

In the course of the provision of our Services and in order to operate effectively, the Company needs to collect, use and disclose your Personal Data.

We respect your right to privacy and we respect all Personal Data you provide us with.

We are committed to protect all the Personal Data kept by the Company. The Company is bound by the Personal Data Protection Act 2010 (hereinafter called the “**PDPA**”) and all other applicable laws in Malaysia in respect of privacy protection which set out a number of principles regarding the Personal Data and consumer protection in Malaysia.

For the purpose of this privacy notice (hereinafter called the “**Privacy Notice**”):-

“**Authorized Third Parties**” means Manitou’s group of companies, its holding company and its existing or future subsidiaries, associated and related companies, its bankers, professional advisors, consultants, contractors, agents or third party suppliers or service providers with whom the Company enters into agreement, within or outside Malaysia;

“**Company**”, “**we**”, “**us**” or “**our**” means collectively Manitou Malaysia MH Sdn. Bhd. (Company No. 1157034-A) a company incorporated in Malaysia and having its business address at No. 15 Jalan TSB 7, Taman Industri Sungai Buloh, 47000 Sungai Buloh, Selangor Darul Ehsan, Malaysia;

“**Personal Data**” means any personal information and/or data relating to you that you have provided to the Company or made available to the Company;

**“Sensitive Personal Data”** means any information as to your physical or mental health or condition, political opinions, religious beliefs or other beliefs of a similar nature, commission or alleged commission of any offence, or any other Personal Data designated as such;

**“Services”** comprises any communications, information or other products or services provided by the Company to you.

## **I. Collection of Personal Data**

### **A. Definition of Personal Data**

We may obtain the following Personal Data about you:-

- a) contact details;
- b) business contact information;
- c) username and password to access our Services;
- d) financial information;
- e) employment information;
- f) social media and electronic identifier;
- g) other information such as behavior, preferences, language preference, age, date of birth, gender and family status).

Such Personal Data may be provided to the Company by yourself, your employees, your agents, your representatives, your service providers or any lawful sources by whatsoever means and/or in whatsoever manner with your consent and will be kept confidential by the Company.

### **B. Purposes of the Personal Data**

We may collect, use and disclose the Personal Data for the purposes of:-

- a) to communicate with you;
- b) to provide Services to you;
- c) to process your payment transactions;
- d) to respond to your requests and inquiries;
- e) to administer your participation in contests;

- f) to conduct internal activities;
- g) technical administration of our website;
- h) to conduct market research/surveys and trend/statistical analysis;
- i) to provide you with information on products and services of the Company;
- j) for other legitimate business activities of the Company;
- k) for such other purposes in relation to your contract with the Company;
- l) for customer redemption, warranty card program, loyalty, privilege, improvement, appreciation, recognition, benefits, rewards, rebates, discounts and other engagements, marketing and promotional activities and such other strategic alliances;
- m) for marketing profiling activities regarding to the Company latest products or services;
- n) to send out invitation of the Company's present and future products launches, events and exhibitions;
- o) for processing of relevant documents for our products and services;
- p) to send the Company's newsletter, information, updates and corporate information by postage, voice/phone call, fax, email, text messages or social media about our products or services that the Company thinks may interest you; and
- q) to maintenance and upkeep of customer's records and data.

(collectively hereinafter referred as the "**Purposes**").

Should Personal Data be required to be used for a new purpose, your approval will be obtained prior to using your Personal Data for the new purpose or you will be notified respectively, provided that no exemption to the consent or notification obligation applies according to the PDPA.

In case you provide us with any Personal Data of third parties, you confirm that you have obtain all their consents for the collection, use and disclosure of their Personal Data for the purposes as set out above.

The Company will keep the Personal Data not longer than it is necessary for the Purposes.

The Company will take all reasonable steps to ensure that all Personal Data is destroyed, permanently deleted or anonymized if it is no longer required for those Purposes.

### **C. How the Company Collects Personal Data**

The Company will collect your Personal Data in accordance with the PDPA for all or any of the Purposes provided herein.

We will notify you for which purposes your Personal Data may be collected, used, disclosed and/or processed, as well as obtain your consent for the collection, use, disclosure and/or processing of your Personal Data for the intended purposes. You will also be informed about the right to request access and correction of your Personal Data that are being processed.

### **II. Personal Data Confidentiality and Sharing of Personal Data**

The Company will ensure the following:-

- a) keep your Personal Data strictly confidential;
- b) use your Personal Data for the Purposes ;
- c) not process your Personal Data without your prior written consent except for the Purposes and where it is required or permitted under the applicable laws;
- d) if you are below the age of 18, you should ensure that you obtain the prior consent of your parents or legal guardian before using the Company's Services.

In any case, we will not retain your Personal Data longer than the period for which it is originally required for, unless we are required by law to do so or you gave us your consent to keep your Personal Data for a longer period.

### **A. Disclosure of Personal Data to Authorized Third Parties**

You hereby consent and authorize the disclosure of your Personal Data by the Company to and between the Authorized Third Parties, within or outside Malaysia, for the Purposes described above or such other purposes incidental thereto.

We will take steps to ensure that your privacy rights are respected in accordance with this Privacy Notice.

## **B. Security of Personal Data**

Appropriate technical, organizational and administrative security measures are in place to protect Personal Data against unauthorized access, collection, use, disclosure, copying, alteration, accidental loss or theft, destruction, damage or similar risks.

We will promptly notify you if we become aware of any unauthorized use, disclosure or processing of your Personal Data.

All employees of the Company are made aware of the importance to maintain confidentiality of the Personal Data collected, used and processed by the Company. The access to the Personal Data by the employees of the Company is on a “need to know basis” only. The employees are instructed not to discuss any cases with third parties unless you gave us your authorization to do so or unless an exemption under the PDPA or any other legislation is applicable.

## **III. Your Rights**

### **A. Consent**

By providing us your Personal Data, you are giving consent for us to collect, use and process your Personal Data.

### **B. Personal Data Accuracy**

You are providing us with your Personal Data. Therefore we are not responsible for the accuracy of the Personal Data we hold.

We will take all practicable and reasonable steps to ensure that your Personal Data is accurate, complete and up-to-date. You can help us to keep accurate and up-to-date records by informing us in writing of any changes so that records on you could be updated promptly.

### **C. Right of Access to your Personal Data**

You have the right to access, update, limit the processing and use or remove the Personal Data collected and stored by the Company.

You may also request the Company to correct the Personal Data where the data is inaccurate or incomplete at the following address: [privacy.my@manitou-group.com](mailto:privacy.my@manitou-group.com).

As provided by the PDPA, your access request may be subject to a reasonable fee payable to the Company.

#### **D. Right to Opt-Out**

You could refuse or withdraw your consent for the collection, use, process and disclosure of your Personal Data.

Upon your written request, we will promptly take the appropriate action in accordance with your request.

In the event that you fail to consent or withdraw your consent to the processing of your Personal Data, we may not be able to:-

- a) provide the Services requested;
- b) respond or handle any of your queries and requests;
- c) send updates, information relating to our Services and business, services offered by the Authorized Third Parties, events invitations, newsletters or publications and marketing material;
- d) (if you are an employee of the Company) comply with our obligations as an employer and therefore, maintain the employment relationship between the Company and you.

#### **IV. Sensitive Personal Data**

Where required under Malaysian law, the Company will obtain consent from you before processing your Sensitive Personal Data.

The Company will process Personal Data or Sensitive Personal Data without your consent only in the limited circumstances permitted by Malaysian law.

## **V. The Company's Website**

The Company provides products and Services via its website. Consultation of the website is possible without having to reveal your identity or any other Personal Data about you. However, the Company collects anonymous information which helps the Company to improve the structure of its website and generate the site performance statistics. From time to time the Company may also use Authorized Third Parties to analyze this anonymous information.

The Company's website may also require standard information such as Login ID, password, Personal Data for verification purposes, contact details and identification numbers. This information is necessary for the Company to provide the Services you applied for.

The Company hereby certifies to maintain the secrecy of your login ID and password. However, the Company will not be able to secure the Personal Data if you reveal your login ID and password to anyone.

Please note that our website may contain hyperlinks to other sites that are not affiliated with us. The hyperlinked to these websites may or may not meet the same privacy standards that we set for ourselves. Consequently, you should ensure that you understand and evaluate their particular privacy standards and procedures. A hyperlink to these websites is not an endorsement of their contents and is not a warranty of the information they contained.

## **VI. Internet Protocol Addresses and Cookies**

The Company also collects Internet Protocol (IP) addresses. IP addresses are assigned to computers on the internet to uniquely identify them within the global network. The Company collects and manages IP addresses as part of the Services of providing internet session management and for security purposes.

The Company may automatically install "cookies" or other similar technologies on its internet browser. A cookie is a package of data that allows the Company's server to identify and interact more effectively with the customer's computer having to spend time on identifying each customer user, thereby also providing additional login convenience. You may configure and personalize its current browser to refuse, reject or delete such cookies.

The Company is likely to use local storage technology. Local storage allows the recording of non-nominative information related to navigation on the website.

Where applicable, cookies are also intended to:-

- a) compile statistics on the number of visits to the website in order to monitor and improve the service quality;
- b) retain information entered into forms to manage requests;
- c) provide content, including advertising, related to your interests and customize the offers addressed to you by the Company.

## **VII. Social Networks**

Our website uses third party computer applications, which allow you to share our website content with Third parties or to let third Parties know about your opinion on the content of our website. This is particularly the case with “Share” buttons from social networks such as Facebook, Twitter, and LinkedIn.

When you visit a page containing such button, your browser establishes a direct connection with the servers of the social networks.

If you are connected to the social networks during navigation, the application buttons are used to link the pages you have visited. If you do not want the social network to link the information collected through our website, you must log out from the social network before visiting our website.

## **VIII. Interest Based Advertising**

Interest based advertising is a way of making advertisements more relevant to you based on your Personal Data. In order to provide you with interest based advertising, we may collect information about your activities and use that information to associate them with one or more pre-defined interest categories. We may periodically provide you with advertisements that are tailored to your interests.



## **IX. Contacting Us**

If you wish to contact the Company's regarding your Personal Data, you may submit your written request between 9:00 am and 5:00 pm, Monday to Friday by post or email as set out below:

Address: Manitou Malaysia MH Sdn Bhd  
No. 15 Jalan TSB 7  
Taman Industri Sungai Buloh  
47000 Sungai Buloh  
Selangor Darul Ehsan  
Malaysia

Email: [privacy.my@manitou-group.com](mailto:privacy.my@manitou-group.com)

In both cases, we thank you in advance to mention at the subject header that it is a PDPA request in order to allow us to pass your request in an effective manner to the relevant person. Please also send us the elements necessary for your identification, such as your last name, first name, email and possible your postal address.

## **X. Amendment of Policy**

We reserve the right to change or amend this Personal Data Protection Policy from time to time at our sole discretion.

The revised Personal Data Protection Policy will be available on our website [manitou-group.com](http://manitou-group.com) and at your request at the post/email address indicated above.

Therefore we recommend that you reread our Personal Data Protection Policy at regular intervals in order to stay notified of any changes.