



THE ELS CLUB

Privacy Policy

Privacy Statement

Last Updated 29 May 2019

This Privacy Statement sets out how Desaru South Course Sdn Bhd, Desaru North Course Berhad and TDR Golf Resorts Bhd (collectively referred to as "The Els Club Malaysia", "us" or "we") collect, store and handle personal information) of individuals using our website <http://www.elsclubmalaysia.com> or otherwise in their dealings with us, in accordance with the Personal Data Protection Act 2010 ("PDPA"). Please read this Privacy Statement to understand how we use the personal information we may collect from you. By providing your Personal Information to us, you are consenting to this Privacy Statement and the collection, use, access, transfer, storage and processing of your personal information as described in this Privacy Statement.

This Privacy Statement explains:

- What kind of personal information we collect
- How we collect your personal information
- How we use your personal information
- When we disclose your personal information
- When we transfer your personal information abroad
- Your right to access and correct your personal information

Our Commitment To You

We value your trust and are committed to protecting your personal information. To ensure that you can make informed decisions and feel confident about supplying your personal information to us when using any of our websites, products and/or services offered by <http://www.elsclubmalaysia.com> ("Products and/or Services"), We provide you with this Privacy Statement outlining our practices and the choices you have concerning how your personal information is being collected and used by us.

Defining Personal Information

Personal information refers to any information which relates directly or indirectly to you. This includes any information that can be used to distinguish, identify or contact you. For the purposes of this Privacy Statement, personal information encompasses sensitive personal information which relates to information relating to your health, political opinions, religious beliefs, etc. For the avoidance of doubt, please note that this Privacy Statement is applicable only if you are a natural person / an individual.

What Kind of Personal Information We Collect?

In order for us to provide you with our Products and/or Services, we need to collect relevant personal information from you. The personal information collected by us may include (but is not limited to) the following:-

- contact information such as your name, date of birth, identification supporting documents (including NRIC or passport number), gender, nationality and race, preferred language, current private and/or business address, installation address, telephone or mobile phone number, fax number, email address
- your credit card information and bank account details
- the description of the Products and/or Services you have acquired from us or subscribed to
- how you use the Products and/or Service (for example traffic data such as numbers and addresses of calls, SMS, MMS, emails and other communications made and received by you and the date, duration, time and cost of such communications)
- the amount of data that has been received and/or sent by you
- the equipment you use when accessing our Products and/or Services (such as your mobile handset, your computer system and platform) to customize the service for you
- your personal interests and preferences to help us tailor offerings of our Products and/or Services which would suit you best
- clickstream data when you visit any of our websites (for example the pages you access and the Services and/or Products you browsed)
- recording of calls placed by you to our help desk for our service enhancement and improvement



THE ELS CLUB

When and How We Collect Your Personal Information?

We may collect personal information directly from you when you:-

- communicate with us (for example when you submit an application form to become our customer, or when you contact us for any enquiries including by calling our customer service)
- register or subscribe for a specific Product and/or Service or our publications (for example, newsletters)
- use our Products and/or Services
- participate in our surveys
- enter into or participate in any competitions, contests or loyalty programmes run/organised by us
- register interest and/or request for information of (through our online portals or other available channels) or subscribe to our Products and/or Services
- respond to marketing promotions
- commence a business relationship with us (for example, as a service provider/business partner)
- visit or browse our websites
- lodge a complaint with us
- provide feedback to us (for example via our websites or in hard copy)

Other than personal information obtained from you directly (as detailed above), we may also obtain your personal information from third parties we deal with or are connected with you (credit reference agencies or financial institutions), and from such other sources where you have given your consent for the disclosure of information relating to you, and/or where otherwise lawfully permitted.

How We Use Your Personal Information

We may collect and use personal information received from you or from third parties identified in this Privacy Statement, for one or more of the following purposes: -

- to verify your identity
- to assess and process your application(s) /request(s) for our Products and/or Services
- to provide you with the Products and/or Services you have requested
- to administer and manage the Products and/or Services we provide you (including charging, billing, facilitating payments and collecting debts)
- to investigate and resolve any service issues, billing queries, complaints or other enquiries that you submit to us regarding our Products and Services with our customer relations teams
- to assess and/or verify credit worthiness if required
- to detect and prevent fraudulent activity
- to manage our service to you
- to keep in contact with you and provide you with any information you have requested
- to engage in business transactions in respect of Products and/or Services to be offered and provided to you
- to establish and better manage any business relationship we may have with you
- to process your queries, complaints or feedback
- to help us monitor and improve the performance of our Products and Services, our customer relations teams and service providers and the to maintain and develop our business systems and infrastructure, including testing and upgrading of these systems
- to manage staff training and quality assurance
- to notify you about benefits and changes to the features of our Products and/or Services
- to determine how can we improve services to you
- to produce data, reports and statistics which shall be anonymized or aggregated in a manner that does not identify you as an individual
- to investigate, respond to, or defend claims made against, or involving The Els Club Malaysia
- to conduct marketing activities (for example, market research)
- to maintain records required for security, claims or other legal purposes
- to comply with legal and regulatory requirements
- for any other purposes that is required or permitted by any law, regulations, guidelines and/or relevant regulatory authorities



THE ELS CLUB

Disclosure of Your Personal Information

As a part of providing you with our Products and/or Services and the management and/or operation of the same, we may be required or need to disclose information about you to the following third parties:

- law enforcement agencies
- government agencies
- companies and/or organisations that act as our agents, contractors, service providers and/or professional advisers
- companies and/or organisations that assist us in processing and/or otherwise fulfilling transactions and providing you with Products and/or Services that you have requested or subscribed for
- our business associates and other parties for purposes that are related to the purpose of collecting and using your personal information
- other parties in respect of whom you have given your express or implied consent subject at all times to any laws (including regulations, guidelines and/or obligations) applicable to us

Direct Marketing

We may use your personal information to provide you with information about services and/or products provided by us or third parties, which may be of interest to or benefit you, except where otherwise requested or notified by you. In certain instances, we may disclose your personal information to our preferred merchants and strategic partners with whom you have subscribed for particular services or products which require such disclosure, and/or where your consent has been obtained. We take reasonable steps to ensure that our agreements with our merchants and/or strategic partners include appropriate privacy and confidentiality obligations. If you do not wish your personal information to be utilised for the purposes of marketing or should you change your mind in relation to your previous decision, please contact us at our customer support centres via the contact details provided below. Your latest written instructions to us will prevail.

What If Personal Information Provided by You Is Incomplete?

Where indicated (for example in registration/application forms), it is obligatory to provide your personal information to us to enable us to process your application for our Products and/or Services. Should you decline to provide such obligatory personal information, we may not be able to process your application or provide you with our Products and/or Services

Your Rights to Access, to Delete and Correct Your Personal Information

We can assist you to access, to delete and correct your personal information held by us. Where you wish to have access to your personal information in our possession, or where you are of the opinion that such personal information held by us is inaccurate, incomplete, misleading or where relevant, not up-to-date, you may make a request via the contact details provided below. You should quote your name, address and phone/account number and provide brief details of the information you want a copy of in any such request. We shall charge a processing fee for searching for and providing you with access to your personal information to cover administration costs. We will use reasonable efforts to comply with your request to access, to delete or correct your personal information within 21 days of receiving your request and the relevant processing fee. Please note that we may have to withhold access to your personal information 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 for the same information. Nevertheless, we will notify you of the reasons for not being able to accede to your request.

Provision of Personal Information

You are responsible for providing accurate and complete information to us about yourself and any other person whose personal information you provide us and for updating this personal information as and when it becomes incorrect or out of date by contacting us via the contact details provided below. 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 the Products and/or Services. In the event you may need to provide us with personal information relating to third parties (for example about your spouse or children or where you are the designated person in charge (from an organisation or company) for dealing with us, if you are acquiring and are responsible for a service and/or product that they will use), you confirm that you have (i) obtained their consent or otherwise entitled to provide their personal information to us and for us to use accordingly, and (ii) informed



THE ELS CLUB

them to read this Privacy Statement at our website at <http://www.elsclubmalaysia.com> and at any The Els Club Malaysia's information centre.

Online Dealings with The Els Club Malaysia Cookies

We collect information about your use of our websites from cookies. Cookies are packets of information stored in your computer which assist your website navigation by customizing site information tailored to your needs. Cookies in themselves do not identify the individual user, just the computer used. You are not obliged to accept cookies. If you are concerned, you can set your computer either to accept all cookies, to notify you when a cookie is issued, or not to receive cookies at any time. However, rejection of cookies may affect your use of our websites as we will be unable to personalize aspects of your use of the website.

Links to Third Party Websites

Please be informed that this Privacy Statement applies solely <http://www.elsclubmalaysia.com> and does not apply to any third party websites you may access from our websites. To determine how they deal with your Personal Information, you should ensure that you read their respective privacy policies.

Transfer of Your Personal Information Outside Malaysia

It may be necessary for us to transfer your personal information outside Malaysia if any of our service providers or strategic partners ("overseas entities") who are involved in providing Products and/or Services are located in countries outside Malaysia or if you use the Products and/or Services from a country other than Malaysia (for example, bookings via website). You consent to us transferring your personal information outside Malaysia in these instances. We shall take reasonable steps to ensure that any such overseas entities are contractually bound not to use your personal information for any reason other than to provide the Products and/or Services they are contracted by us to provide and to adequately safeguard your personal information.

Updates To Our Privacy Statement

We may amend this Privacy Statement from time to time and the updated version shall apply and supersede any and all previous versions, including but not limited to, leaflets or hard copy versions. Please check our website for information on our most up-to-date practices.

Our Contact Details

Should you have any queries, concerns or complaints in relation to this Privacy Statement, kindly contact us during office hours (between 9:00am to 5:30pm, Monday to Friday) at the following contact points:

The Els Club Desaru Coast – Ocean & Valley Course

No 4 Jalan Danau, Desaru Coast
81930 Desaru
Johor
PHONE: +607 878 0000
FAX: +607 878 0011
EMAIL: membership@elsclubmalaysia.com

The Els Club Teluk Datai – Rainforest Course

Jalan Teluk Datai,
07000 Langkawi, Kedah Darul Aman, Malaysia
PHONE: +604 959 2700
FAX: +604 959 2216
EMAIL: reservations@elsclubmalaysia.com