

Privacy Policy

1. Introduction

- 1.1. In line with its aim to comply with the legislative requirements on the protection of personal data and to maintain the highest standards of confidentiality with respect to the personal data of our guests, visitors, members, customers or affiliates, this document sets out the Privacy Policy of Malayan Racing Association (“**MRA**”) and its associated clubs, namely Penang Turf Club, Selangor Turf Club, Perak Turf Club and Singapore Turf Club (“**Associated Clubs**”). For the purposes of this Privacy Policy and matters pertaining to data protection, unless expressly mentioned otherwise, the reference to MRA shall mean MRA and its Associated Clubs. MRA’s Privacy Policy may be accessed in <https://www.malayan-racing.com/Private-Policy> and <https://racing.turfclub.com.sg/en/privacystatement>.
- 1.2. The purpose of the personal data legislation (“**PDPA**”) is to govern the collection, use and disclosure of personal data by organisations in a manner that recognises both the right of individuals to protect their personal data and the need for organisations to collect, use or disclose personal data for purposes that a reasonable person would consider appropriate in the circumstances.
- 1.3. This Privacy Policy applies to all information collected by MRA from our guests, visitors, members, customers or affiliates.
- 1.4. Nothing in this Privacy Policy is intended to derogate from any contract that you have entered with MRA.
- 1.5. For the purpose of this policy, the terms “we”, “us” or “our” shall, unless otherwise indicated, refer to MRA.

2. What is personal data?

- 2.1. Personal data is personal information, whether true or not and whether in electronic or other form, about an individual who can be identified:-
 - 2.1.1. from the types of data we collect may include, but is not limited to:-
 - a. full name;
 - b. identity document number e.g., NRIC, passport number;
 - c. photographs or video images from which an individual can be clearly identified;
 - d. mobile or residential telephone number;
 - e. personal email address;
 - f. residential address;

- g. nationality;
- h. date of birth; and
- i. financial information.

2.1.2. from that data and other information to which we have access to or are likely to have access to.

2.2. We will do our best to ensure that your personal data that we collect is accurate. However, we do encourage you to provide us with an update of any change in your personal particulars as soon as possible.

3. When is personal data collected from you?

- 3.1. When you apply to MRA to become a licensee, member, or Racing Gold Card account holder (where applicable) or when you update your personal particulars.
- 3.2. When your image is captured by our photographers or videographers on our premise or at our events.
- 3.3. When your image is captured on our CCTV system.
- 3.4. When you visit MRA or attend our events or respond to our marketing campaigns.
- 3.5. When you enquire or rent MRA's corporate boxes, function rooms, or venue spaces.
- 3.6. When you provide feedback or interact with MRA's customer service officers e.g., via meetings, enquiry forms, emails, or telephone calls (the telephone calls may be recorded for training and quality control purposes).
- 3.7. When you agree that we contact you.
- 3.8. When you agree to be included in a mailing list.
- 3.9. When you take part in any of MRA's contests, surveys, or promotions.
- 3.10. When you agree for us to carry out credit reference checks or for us to obtain information from the authorities or regulatory bodies.
- 3.11. In certain situations, we may obtain your personal data from regulatory bodies, authorities or third parties.
- 3.12. When you access our website, e-ordering system and WIFI.
- 3.13. When you provide the personal data of your family members, friends or any other third parties for purposes connected with your custom of, visit to or involvement with MRA and the racing industry.

4. What is the information collected or used for?

- 4.1. To maintain a register of our members.
- 4.2. The general administration of membership applications.
- 4.3. To facilitate the use of our facilities and services and participation in our activities.
- 4.4. To respond to your requests and queries.
- 4.5. To communicate with you.
- 4.6. To enforce our rules and regulations, contractual and legal rights, and obligations.
- 4.7. To send you information, promotions, updates and marketing and advertising material in relation to the facilities, services and activities offered by MRA and our affiliates.
- 4.8. To publicise events and activities of MRA in our publications.
- 4.9. From time to time, to conduct contests, surveys, or promotions.
- 4.10. To maintain an appropriate level of security in MRA and its premises.
- 4.11. To carry out assessment and analysis, background or credit checks with regulatory bodies, authorities, credit reporting agencies or third party agencies including but not limited to CTOS Data Systems Sdn Bhd.
- 4.12. To comply with the law, any requests from law enforcement and regulatory officials, or orders of court.
- 4.13. For purposes consistent with MRA Constitution, Regulations and Rules of Racing.
- 4.14. Towards any other purpose of use for which we have obtained your consent, express or implied.

5. To whom your personal data may be disclosed to?

- 5.1. We may disclose your information to our service providers, agents and the parties identified below for the above referenced purposes:-
 - (i) any related entities of MRA, including its affiliates, associated clubs, agents, representatives, service providers and business partners within and outside Singapore and Malaysia, including those established in the future including but not limited to professional consultants, legal advisors and auditors;
 - (ii) any person to whom MRA is compelled or required to do so under law, by court order or in response to a competent regulatory, law enforcement or government agency;

- (iii) any person where public interest or our interests require disclosure;
 - (iv) any agent or third party service provider who provides administrative, commercial, professional, telecommunications or other services to MRA;
 - (v) government agencies, regulatory bodies, law enforcement bodies, Federal or State Government;
 - (vi) financial institutions, credit check agencies or credit reporting agencies and fraud prevention agencies; and
 - (vii) such sub-contractors or third party service or product providers as MRA may determine to be necessary or appropriate for purposes of data storage or processing or human resource management or otherwise.
- 5.2. If at any time you provide us with personal information about another person, you shall ensure that you are authorised to do so.

6. Accuracy of Your Personal Data

6.1. MRA will correct any inaccurate data when notified by the authorised party.

7. Is your consent required and can it be withdrawn?

- 7.1. We will endeavour to obtain your consent to collect, use and disclose your personal data prior to or at the time we collect it. However, in certain situations you will be deemed to have consented to the provision of your personal data, e.g., where you provide your personal data voluntarily.
- 7.2. In respect of our CCTV system and the images that are recorded, MRA has placed signs at prominent locations to inform you of the operation of the CCTV system and its purpose which is to ensure and maintain the security in and around our premises.
- 7.3. You may at any time give us reasonable written notice of the withdrawal of your consent to collect, use or disclose your personal data. Within a reasonable time after we receive the notice of withdrawal of your consent, we will inform you of the consequences of your withdrawal of consent and when it will take effect. Failing to provide your consent may:
- result in us being unable to process your application;
 - result in us being unable to able to have a valid agreement with you;
 - result in us being unable to provide you with the services and/or products requested; and/or
 - result in us being unable to update you on the latest product, services and/or launches.
- 7.4. Please note that it may be a legal or regulatory requirement for us to process your personal data under certain circumstances.

7.5. You can withdraw your consent previously given in regard to the processing of your personal data, through the “unsubscribe” or opt-out clause attached to our marketing communications.

8. Can I get access to or correct my personal data?

8.1. You can view your personal data which we have collected and stored at any time. In order to do so, you will need to submit a written request for access to view your personal data. We may request payment of an administrative fee before we process your request.

8.2. Your right to view your personal data is limited to your personal data only. We are not permitted to reveal any personal data about any other individual to you. We reserve the right to refuse access to your personal data if it will reveal or lead to the revelation of another individual’s personal data, cause harm to you or another individual or is contrary to the national interest.

8.3. You can submit a written request to correct your personal data which we have collected and stored. We will make the necessary corrections as soon as reasonably practicable provided we are satisfied that the corrections should be made. In the event that we feel the corrections should not be made, we will inform you.

9. Is my personal data secure?

9.1. MRA will not reveal details of your personal data to any other person unless we have your permission or is required under a legal obligation or any other duty to do so. Access to your personal data is on a need-to-know basis. MRA makes every effort to maintain the highest standards of confidentiality and security of your personal data. To this end, we have internal policies and procedures in place to ensure that your personal data is kept secure. These include the following:-

9.1.1. restricting access to your personal data;

9.1.2. conducting regular briefings and trainings for our staff in relation to our data protection policies;

9.1.3. imposing confidentiality obligations on our staff;

9.1.4. Conducting regular audits of our data protection policies; and

9.1.5. devising procedures that will be implemented in the event of a breach of security.

10. How long do you retain my personal data?

10.1. MRA will retain your personal data for as long as the purpose for which your personal data was collected is still being served and as long as it is necessary for legal, regulatory or commercial purposes.

10.2. MRA will securely dispose of or anonymise personal data which it can reasonably determine is no longer needed.

11. Do you transfer my personal data out of the jurisdiction where it was first received by MRA?

11.1. Your personal data may be transferred to, stored by and / or processed by a party outside of the jurisdiction where it was first received by MRA.

11.2. MRA will ensure that the party receiving, storing and/or processing your personal data outside of the jurisdiction where it was first received by MRA protects your personal data at a standard at least comparable to the protection under the PDPA. MRA will ensure that the party coming into contact with your personal data outside of the jurisdiction where it was first received by MRA:-

11.2.1. complies with the PDPA, all applicable laws and regulations and this Privacy Policy and will not do or permit anything to be done which might cause MRA to breach this Privacy Policy; and

11.2.2. takes appropriate measures to ensure such compliance by implementing the necessary data protection and appropriate technical and organisational measures and providing a standard of protection for your personal data that is comparable to the protection under the PDPA.

12. What to do if I have a complaint?

12.1. If you have any concerns or problems with the way your personal data has been handled, please write in and clearly set out the nature of your concern.

12.2. Upon receiving your complaint, we will confirm that your complaint will be investigated and provide you with an estimate of how long you should expect to wait to receive a full response. While MRA endeavours to respond as promptly as possible, response times will vary depending on the nature of the complaint.

13. Who can I contact about my personal data or this policy?

13.1. If you have any queries or doubts about the policies set out in this statement or about your personal data that we obtain, maintain, process, use and disclose or if you would like to access or correct your personal data, you may contact MRA's Data Protection Officer via the following:-

- a. Customer service line: +603 8941 1716
- b. Written mail: Malayan Racing Association, C/O Selangor Turf Club, Jalan Sungai Besi, 57100 Kuala Lumpur
- c. Email to: contactus@malayanracing.com
- d. Feedback on our website.

13.2. For more information about the PDPA, please visit Personal Data Protection Commission's website at <http://pdpc.gov.sg/> and <http://www.pdp.gov.my>.

14. Update

14.1. MRA reserves the right to amend this Personal Data Protection and Privacy Policy at any time by posting such changes on our Website.

15. Conflict

15.1. This Privacy Notice in both English and Bahasa Malaysia. In the event of discrepancies and inconsistencies between the two versions, the English version shall prevail.

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