



NWP HOLDINGS BERHAD

(Company No. 495476-M)

Personal Data Protection Policy

(Incorporating amendments

as at 29 October 2019)

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PERSONAL DATA PROTECTION POLICY

1. Introduction

NWP Holdings Berhad and its subsidiaries (“NWP Group”) are committed to protect your privacy in accordance with the Personal Data Protection Act 2010 of Malaysia (“PDPA”). This Policy explains:

- a. The type of personal data we collect and how we collect it;
- b. How we use your personal data;
- c. The parties that we disclose the personal data to;

2. Personal Data We May Collect from You

We may collect the following personal data about you:

- a. Personal information to establish your identity and background such as your full name, passport or identity card number and nationality;
- b. Contact information such as billing address, premises address, telephone number, mobile phone number, fax number and email address;
- c. Payment information such as bank account details;
- d. Sensitive information such as your race, religion, health and records of criminal offence.

3. How We Collect Your Personal Data

We may collect personal data either from you, from your authorised representatives, from third parties, or from publicly available resources which may include (but is not limited to):

- a. When you contact us by a phone call or in person;
- b. When you commence a business relationship with us;
- c. When you attend any of our corporate events;
- d. When you visit or browse our website;
- e. When you apply job with us;
- f. When we collection information about you from third parties we dealt with or are connected with you; and
- g. From such other resources where you have given your consent for the disclosure of personal data relating to you, and/or where otherwise lawfully/permitted.

4. Use of Personal Data Collected

You agree that we may use your personal data where permitted by applicable law and for the following purposes:

- a. To verify your identity
- b. To manage and maintain your account or contract with us
- c. To engage in business transactions in respect of services or goods to be offered and provided to you

- d. To persons who have been identified as you or your authorised representative(s) pursuant, for the purpose of the relevant transaction inquiry
- e. To provide and improve our services to you including fulfilling audit requirements, billing for goods or services and facilitating payments
- f. To protect or enforce our rights to recover any debt owing to us
- g. To comply with any legal or regulatory obligations under the applicable laws, regulations or industry codes that applies to us
- h. For any other purposes that is required or permitted by any law, regulations, guidelines and /or relevant regulatory authorities

5. With Whom We Share Your Personal Data

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

- a. government or regulatory bodies, bureaus, agencies or any person to whom we are required by law to disclose information
- b. companies or organisations that act as our agents, contractors, service providers or professional consultants
- c. our business associates and other parties for purposes that are related to the purpose of collecting and using your personal data
- d. those to whom we outsource certain business operations
- e. any person to whom we may determine to be necessary or appropriate

Where permitted, your Personal Data may be provided to any of the parties above who may be located in or outside of Malaysia. Your Personal Data may be transferred to, stored and processed in a jurisdiction where a service provider or contractor is located. By providing us with your Personal Data, you consent to us disclosing your Personal Data to those third parties and/or the transfer of your information outside your jurisdiction or to those third parties described above.

6. Your Rights

- a. Subject to the exceptions provided under the PDPA, you have the right to request for access to, request for a copy of, a request to update or correct, your Personal Data held by us. We may charge a small fee (such amount as permitted by the PDPA) to cover the administration costs involved in processing your request to access your Personal Data.
- b. You also have the right, by notice of writing, to inform us on your withdrawal (in full or in part) of your consent given previously to us subject to any applicable legal restrictions, contractual conditions and a reasonable duration of time for the withdrawal of consent to be affected. However, your withdrawal of consent could result in certain legal consequences arising from such withdrawal. In this regard, depending on the extent of your withdrawal of consent for us to process your Personal Data, it may mean that we will not be able to continue with your existing relationship with us/or the contract that you have with us will have to be terminated.

7. Administration and Management of Personal Data

- a. We will take reasonable efforts to ensure that your Personal Data is accurate and complete. However, this means that you must also update us of any changes in your Personal Data that you have initially provided us with. We will not be responsible for relying on inaccurate or incomplete Personal Data arising from you not updating us of any changes in your Personal Data that you have initially provided with.
- b. We will put in place reasonable security arrangements to ensure that your Personal Data is adequately protected and secured. Appropriate security arrangements will be taken to prevent unauthorised access, collection, use, disclose, copying, modification, leakage, loss, damage and/alteration of your Personal Data. However, we cannot assume responsibility for any unauthorised use of your Personal Data by third parties which are wholly attributable to factors beyond our control.
- c. Any of your Personal Data provided to us is retained for as long as the purposes for which the Personal Data was collected continues; your Personal Data is then removed from our records and system in the event your Personal Data is no longer required for the said purposes unless its further retention is required to satisfy a longer retention period to meet our operational, legal, regulatory, tax and accounting requirements.

8. Update on Data Protection Policy

- a. We reserve the right, at any time and without notice, to amend or update this Policy. Any amendment to this Policy will be posted on our website. Any such amendment or update will be effective immediately upon posting.
- b. You are encouraged to visit our website from time to time to ensure that you are well informed on our latest policies in relation to personal data protection.