

PERSONAL DATA PROTECTION NOTICE

This website is owned and operated by, MSM Malaysia Holdings Berhad or known as 'MSM' from its offices in Malaysia. All reference to 'we', 'us' and 'our' in this Personal Data Protection Notice (the "PDP Notice") are deemed to refer to MSM and its group of companies.

The Personal Data Protection Act 2010 ("PDPA") is an act to regulate the processing of personal data in a commercial transaction. In compliance with the regulations of PDPA for MSM to manage the personal data collected from the users through the usage of MSM's website, this PDP Notice is hereby issued to all user of this website to inform you of what to expect us to do with your personal information.

DEFINING PERSONAL DATA

1. **Personal Data** refers to any information that directly identifies you as an individual, or that can identify you when combined with other data. This includes, but is not limited to:
 - 1.1. **Contact and Demographic Information:** Name, gender, race, ethnic origin, marital status, residential status, contact details (phone, address, email), age, date of birth, national identity, identification and passport numbers.
 - 1.2. **Professional and Financial Information:** Job title, company/business name, industry, professional qualification, education background, financial background, and bank details.
 - 1.3. **Relational Information:** Details of your family, relatives, or related parties.
 - 1.4. **Transaction and Usage Data:** Information on products/services purchased or inquired about, visual data from surveillance systems, and network usage data (IP address, links visited, online activities).
 - 1.5. **Sensitive Personal Data:** Biometric data, religious beliefs, health conditions, dietary requirements, details of offenses, and other sensitive information as required by law for specific purposes (e.g., employment, vital interests, law enforcement, medical).
 - 1.6. **Other Data:** Any additional personal data necessary for the purposes outlined in Paragraph 4 of this PDP Notice.

2. **Personal Data about Third Parties:** If you provide us with personal data concerning another individual or a minor, you confirm that you have their explicit authorisation to:
 - 2.1. Give consent on their behalf to the processing of their personal data.
 - 2.2. Receive any data protection notices on their behalf.
 - 2.3. Consent to the cross-border transfer of their personal data on their behalf.

WHAT PERSONAL DATA WE COLLECT, USE AND WHY

3. We collect your personal data through various channels, including but not limited to:
 - 3.1. **Direct Interactions:** When you register interest in our products/services (via phone, email, or in-person), submit job applications, respond to communications via correspondences or attend meetings activities or events, or update your contact information with us.
 - 3.2. **MSM Group:** From any company within the MSM Berhad group.
 - 3.3. **Physical Presence:** CCTV footage or other recordings, visual data like your images when you visit MSM premises or participate in MSM-organized activities/events.
 - 3.4. **Third-Party Sources:** Information from third parties (for e.g.: headhunters), publicly available information from social networking websites and public domains as well as credit reporting agencies (e.g., CTOS or equivalent).
4. MSM may collect and use your personal data including for the following purposes:
 - 4.1. **Communication & Account Management:** To provide requested information, create and manage user accounts to access restricted sections of our website or our system.
 - 4.2. **Service Delivery & Contractual Obligations:** To fulfill, deliver and receive contractual commitments, products and services to/from vendors/suppliers.
 - 4.3. **Marketing & Engagement:** To share updates, event details, programs, activities, and information about our products and services with interested individuals, and for promotional and publicity activities, including recording or photographing participants at events.
 - 4.4. **Employment Recruiting & Management:** To evaluate job applications, and for staff training, quality assurance, performance evaluation, staff benefit, management and record-keeping related to employment.
 - 4.5. **Research & Development:** To research, develop, and enhance our events, programs, activities, products, and services.

- 4.6. **Compliance & Security:** To comply with legal and regulatory requirements, verify identity, monitor activities (including video surveillance), prevent and investigate fraud, misconduct, and unlawful actions, and for overall health, safety, and security.
- 4.7. **Health Check:** To evaluate health fitness for employment and managing public health during an outbreak to ensure the safety and well-being of MSM's workforce and community.
- 4.8. **Credit Checks:** For conducting credit reference/reporting checks.
- 4.9. **Data Processing & Transfer:** For transfer to third-party data intermediaries to facilitate any of the above purposes.
- 4.10. **Ancillary Purposes:** For any other purpose incidental, ancillary, or in furtherance of the stated objectives (collectively, the "Purpose(s)").

WHO WE SHARE PERSONAL DATA WITH

- 5. Your personal data may be disclosed to:
 - 5.1. **Internal and Affiliated Entities:** Our parent company, subsidiaries, related, or affiliated companies, as well as our directors, authorized employees, representatives, and internal auditors.
 - 5.2. **External Party:** Our data processors, insurance companies, healthcare providers, professional or legal advisors, organisations we need to share information with for safety reasons, relevant regulatory authorities, external auditors or inspectors, professional consultants, financial institutions, credit reporting agencies and emergency services.
 - 5.3. **Other Necessary Parties:** Other persons whom MSM deems appropriate or necessary, even if located outside Malaysia, for any of the above purposes, or any other purposes for which your personal data was to be disclosed at the time of its collection, or any other purpose directly related to the above Purposes, or where such disclosure is required or authorized by law or court order.

YOUR CONSENT & ACCURACY

6. By providing personal data, including sensitive information, browsing/using our website and/or services, you consent to its collection, transfer, storage, disclosure, and use as outlined in both the PDPA and this PDP Notice. MSM commits to not collecting, using, disclosing, or sharing your personal data beyond what is stated here. When collecting data, MSM will take reasonable steps to clearly inform you about the Purpose(s) of its collection and/or disclosure and the extent to which it may be shared with third parties.
7. Unless otherwise specified, providing the requested personal data is obligatory. Failure to do so may prevent us from processing your personal data and fulfilling the stated Purpose(s) in this PDP Notice.
8. To withdraw your consent for MSM's use or disclosure of your personal data as outlined in this PDP Notice, please submit a written request to the address provided in this PDP Notice.
9. While MSM takes reasonable steps to verify the accuracy of personal data upon collection, you are primarily responsible for ensuring the completeness, accuracy, and up-to-datedness of all submitted information. Data provided will be considered prima facie complete and accurate. MSM will not be liable for service disruptions caused by incomplete or inaccurate personal data, or your failure to notify us of any changes.

SECURITY OF YOUR PERSONAL DATA

10. All such third parties are prohibited from disclosing your personal data except to provide services to us where they are required to maintain the confidentiality of your personal data and we will not disclose your sensitive personal data individually to third parties without your explicit consent, unless legally required.
11. While we strive to secure your data on MSM's website and systems, you acknowledge that digital transmissions cannot be entirely guaranteed as secure. Thus, we cannot fully guarantee the security or integrity of any data that are transferred from or to you digitally. However, rest assured that we are committed to keeping your personal data secure and confidential by implementing appropriate security measures and procedures in line with the PDPA and relevant regulations.

HOW LONG WE KEEP YOUR PERSONAL DATA

12. Any personal data you have disclosed and/or provided to us will be retained for the period necessary for the stated Purposes and as required by law. If such information retained by us is no longer required, we will take reasonable steps to ensure it is deleted and/or destroyed and cannot be recoverable.

SHARING & STORAGE OF PERSONAL DATA OUTSIDE MALAYSIA

13. Your personal data may be transferred and stored both within and outside Malaysia. When doing so, we comply with the PDPA, making sure appropriate safeguards are in place. By providing your personal data, you consent to its transfer and storage outside Malaysia, including to the third parties mentioned in this PDP Notice. If you reside outside Malaysia, you understand and agree that you are bound by Malaysian jurisdiction under this PDP Notice and we may transfer your personal data to and across Malaysia.

ACCESSING, CORRECTING AND PROCESSING OF PERSONAL DATA

14. You have the right to access and request corrections to your personal data. For personal data access, correction, or processing requests or any inquiries or complaints regarding your personal data, please contact us at:

MSM Malaysia Holdings Berhad
Corporate Communications Department
Level 44, Menara Felda, Platinum Park,
No.11, Persiaran KLCC, 50088 Kuala Lumpur.
Email: corpcomms@msmsugar.com

15. Regarding your right to access and/or correcting your personal data, we reserve the right to refuse your request(s) for reasons permitted under the PDPA, or where we reasonably believe that:
- 15.1. The effort or cost of providing access is disproportionate to your privacy risks.
 - 15.2. It poses a serious threat to an individual's life, health, or safety.
 - 15.3. It would unreasonably impact another individual's privacy.
 - 15.4. Your request is considered frivolous or vexatious.
16. MSM reserves the right to charge a reasonable fee for handling and processing your personal data access requests.

17. Unless you notify us in writing to cease processing your data for a specific purpose or in a particular manner, we will assume your consent to MSM's data processing, usage, and disclosure as outlined in this PDP Notice.
18. From time to time, we may offer additional unsubscribe (opt-out) methods for direct marketing, such as buttons or web links. Please note that a short delay may occur before marketing communications cease while your request is processed.

EXCLUSION OF LIABILITY

19. You acknowledge and agree that MSM shall not be liable for any claim, loss, damage (financial or otherwise), injuries, embarrassments, or liability, regardless of the cause (contract, tort, negligence, strict liability, etc.) arising from data inaccuracies, loss, deletion, modification, or any issues relating to any information forwarded by MSM to such other party, as the case may be, or in relation to any access or use, or the inability to access or use by such other party or reliance on the information contained therein, whether caused by any technical, hardware, or software failure of any kind, interruption, error, omission, delay, viruses, or otherwise. Further, you shall indemnify and hold MSM harmless from any loss, damage, expense, injuries, embarrassments, or liability that MSM may suffer arising from your provision of false or inaccurate personal data.

PREVAILING LANGUAGE

20. This PDP Notice is issued in both English language and Bahasa Melayu. In the event of any inconsistency between the English language version and its corresponding Bahasa Melayu version, the English language version of this PDP Notice shall prevail.

CHANGES TO THIS PDP NOTICE

21. MSM reserves the right to amend or update this PDP Notice periodically to reflect business developments or changes in applicable laws and regulations. All revisions will be published on our website at <https://www.msmsugar.com/>. Your continued engagement with MSM after any amendments is published on our website signifies your acceptance of the revised PDP Notice.

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