

	Anti-Bribery Management System Personal Data Protection Policy	RML-GM-001.2-F001.4	1 of 7
		Effective Date: 27/02/2023	Rev: 1

RML-GM-001.2-F001.4
RM Leopad Sdn. Bhd.
Anti-Bribery Management System
Personal Data Protection Policy
Rev. 1
Owner: IMS Office

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1. Purpose

The main purpose of this Policy (“Policy”) is to make you better understand the reasons and purposes of the collection of personal data by Leopad Group (“the Company” or “we” or “us” or “our”) as well as the Company’s commitment to ensure that your data is securely processed and kept. The security of your personal data is important to us.

2. Scope

1. This Policy applies to personal information about individuals (customers, vendors, distributors, suppliers, service providers, joint venture/business partners, job applicants, and employees) held by us.
2. We will only process your Personal Data in accordance with the Personal Data Protection Act 2010, the applicable regulations, guidelines, orders made under the Personal Data Protection Act 2010 and any statutory amendments or re-enactments made of the Personal Data Protection Act 2010 from time to time (collectively referred to as the “PDPA”) as well as this Policy.

3. Definition

Term	Definition
IMS	Integrated management system is combining of QMS, EMS & OH&S
PDPA 2010	Personal Data Protection Act 2010

4. Policy

1. The PDPA requires us to inform you of your rights in respect of your Personal Data that is being processed or that is to be collected and further processed by us and the purposes for the data processing. The PDPA also requires us to obtain your consent to the processing of your Personal Data. In light of the PDPA, we are committed to protecting and safeguarding your Personal Data.
2. By providing your Personal Data to us, you declare that you have read and understood this Policy and agree to us processing your Personal Data in accordance with the manner as set out in this Policy.
3. We reserve the right to modify, update and/or amend this Policy from time to time with reasonable prior notice to you. We will notify you of any amendments via announcements on the website (“Site”) or other appropriate means. Please check the Site from time to time to see if there are amendments to this Policy. Any amendments to this Policy will be effective upon notice to you. By continuing to use the services and/or access to the Site after being notified of any amendments to this Policy, you will be treated as having agreed to and accepted those amendments.
4. If you do not agree to this Policy or any amendments to this Policy, we may not be able to render all services to you and you may be required to terminate your relevant agreement with us and/or stop accessing or using the Site.

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4.1 Collection of Personal Information

1. The personal data that we collect in relation to you may include the following: **your name, copies and other details of your identity documents and proof of identification (for instance, NRIC number, passport number, driver's license etc.), proof of address and other contact details (for instance, telephone/facsimile number, email address etc.), information concerning age, race, nationality, date of birth, occupation and position, types of goods/service requested and personal interest** (collectively "your personal data").
2. The above description of personal data is merely a general description of the various types of personal data that we collect. Depending on the nature of business and circumstances, we may only need to collect and process a more limited form of personal data from certain investors/analysts/ shareholders. In other situations, there may be a need to collect more personal data depending upon the nature of transaction, business and so forth.
3. We do not believe in collecting excessive personal data and what we collect are the essentials that are required to ensure the efficacy of business and transactions.
4. You may choose whether or not to provide your personal data to us, including sensitive personal data. Sensitive personal data may include such things as information on physical or mental health or medical condition, political opinions, religious or other similar beliefs, commission or alleged commission of any offence.

4.2 Source of Personal Data

1. Generally, the personal data that we collect comes directly from you. For instance, when you contact or register with us (whether online or otherwise) or enter into any other transactions with us.
2. Apart from information provided by you, we may obtain personal data on you from various reference checks which shall include but not limited to the background checks or from the various governmental authorities.

4.3 Accuracy of Your Personal Data

Please do understand that it is important for you to provide the necessary personal data for the purpose of communication. The failure to supply your personal data as requested, may result us being unable to continue to provide you with the services requested. It is also important that the data you have supplied is kept up-to-date. You should therefore notify us of any changes so that we may update our records accordingly.

4.4 Purpose of Processing Your Personal Data

1. The Personal Data as provided/ furnished by you to us or collected by us from you or through such other sources as may be necessary for the fulfilment of the purposes at the time it was sought or collected, may be processed for the following purposes (collectively referred to as the "Purposes"):
 - i. Our internal record keeping, maintenance and updating of any information database(s), other administrative purposes, including audits, fraud monitoring and prevention;
 - ii. To communicate with you, including responding to your enquiries; meeting or complying with any legal, regulatory or statutory requirements relating to our provision of services and

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products and to make disclosure under the requirements of any applicable law, legislation, rule, ruling, regulation, direction, court order, by-law, guideline, circular, code (collectively “laws”).

- iii. Other reasons that are required or permitted under the Personal Data Protection Act 2010 or other applicable laws.
- 2. Other than the above, we do not collect personal data for any other reasons. Should there be a new purpose for the collection of data, we shall inform you accordingly and obtain your concurrence to the same, where necessary.

4.5 Confidential and Secure Disclosure of Personal Data

- 1. We treat the confidentiality of your personal data very seriously, which is of utmost importance to us. Personal Data provided to us by you will be kept confidential. However, we may disclose your Personal Data to the following third parties, for one or more of the above Purposes:
 - i. Entities within the Leopad Group of Companies including all related companies, subsidiaries, holding companies and associated companies;
 - ii. Anybody or person to whom the Company is compelled or required to do so under any laws or in response to any competent or government, state, provincial, local government, statutory or municipal authority, industry regulators, agency or body;
 - iii. Law enforcement authorities;
 - iv. Sub-contractors or third-party service or product providers (an example would be auditors, lawyers, company secretaries, service providers, events and training organizers, telecommunications companies, cloud computing or data back-up service providers and other advisers).
- 2. In addition, where we consider it necessary or appropriate for the purposes of the conduct of business, data storage or processing or customer management, we may transfer your personal data to another member of the Group or third party service or product providers within or outside the country in which the Company is established, under strict conditions of confidentiality and similar levels of security safeguards.

4.6 Storage of Personal Data

All information you provide to us is stored on our secure servers. We maintain appropriate administrative, technical and physical safeguards to protect against loss, misuse or unauthorized access, disclosure, alteration or destruction of the personal data you provide to us in accordance with applicable laws.

4.7 Period for Which We Store Your Personal Data

We only keep your personal data for as long as we require it in order to fulfil the purpose for which it was collected or provided to us (unless a legal obligation requires us to keep it for longer).

4.8 Your Rights of Access and Corrections

- 1. You may at any time make a written request to the Company to correct any personal data of yours that is inaccurate, incomplete, misleading or out-of-date and the Company shall, upon receipt of your written request for correction(s), take all necessary measures to give effect to such correction(s).

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2. Please direct any requests to withdraw consent or to request access and/or correction to any Personal Data as follows:

Address	:	Wisma Leopad, 2 nd Floor, No. 5, Jalan Tun Sambanthan, 50470 Kuala Lumpur, Malaysia.
Telephone	:	+603 – 2260 0200
Fax	:	+603 – 2272 3191
E-mail	:	support@leopad.com

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5. Revision History

Revision	Changes	Author(s)	Function
0	New issue	Kala Chandran	IMS Office
1	Changes made as follows: 1. Board of Directors (BOD) are added under approval section. (Page 7)	Kala Chandran	IMS Office

6. Reviewers

Title	Name	Date Reviewed
Senior GQSHE Manager	Kala Chandran	08.02.2023

7. Approval

Title	Name	Date Approved
Chief Executive Officer (CEO)	D. K. Guru	13.02.2023
Board of Directors (BOD)	Muniandy Ramamirtham	13.02.2023

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