



Data Protection Policy



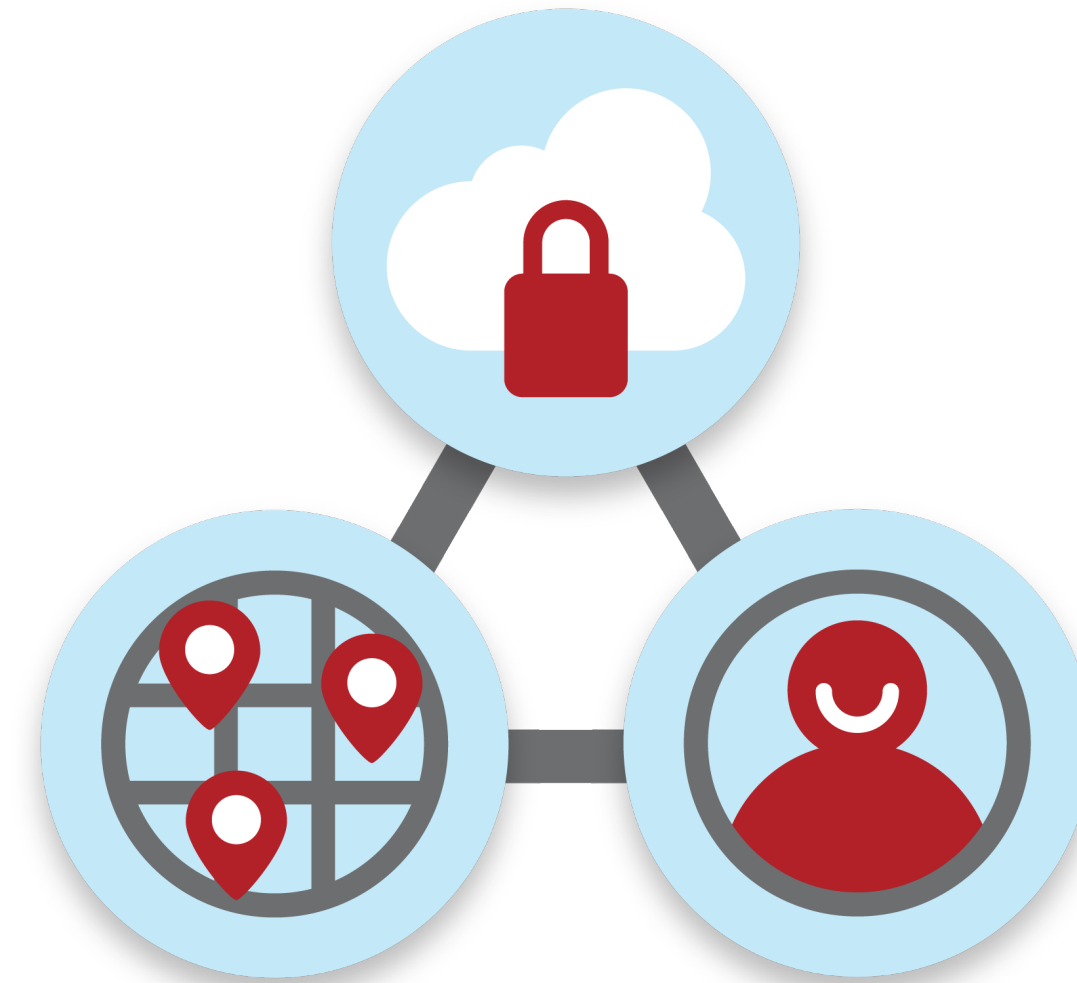
Data Protection Policy

Introduction

This policy applies to all personal data collected by Karex and all its related companies (also collectively referred to as “we”, “our” and “us”). “Personal Data” is defined under the PDPA to mean data relating to an individual who can be identified from that data and other information in the possession of an individual and includes any sensitive personal data and expression of an individual. Common examples of Personal Data include;

- Name
- User name
- Social Security number
- ID Number
- Postal address (including billing and shipping addresses)
- Telephone number (including home and mobile phone numbers)
- Email address
- Credit and debit card number
- Profile picture
- Social media account ID
- Country of residence
- Health information (including medical records)
- Photographs and Video Images
- Religious beliefs
- Expression of opinion

The purpose of this Policy is to inform you of how Karex manages Personal Data which is subject to the personal data protection principles under the Malaysian Personal Data Protection Act 2010 (Act 709) (“the Act”) or similar personal data protection principles applicable to companies which provide company formation and administration services.



We will collect, use and process your Personal Data in accordance with the PDPA. We will notify you of the purposes for which your Personal Data may be collected, used, disclosed and/or processed, as well as obtain your consent for the collection, use, disclosure and/or processing of your Personal Data for the intended purposes, unless an exception under the law permits us to collect and process your Personal Data without your consent.

In some cases, we may use a third-party payment service to process purchases and/or collect donations made through the Sites. In these cases, your Personal Information may be collected by this third party and not by us, and will be subject to the third party's privacy policy, rather than this Privacy Policy. We have no control over, and are not responsible for, this third party's use or disclosure of your Personal Information.

If you submit any Personal Information relating to other people to us or to our service providers in connection with the Sites, you represent that you have the authority to do so and to permit us to use the information in accordance with this Privacy Policy.

Collection of Personal Data

Generally, our collection of Personal Data includes, but is not limited, to the following ways: Customer / Client / Visitor:

- when you submit any forms relating to any of our products and services;
- when you enter into any agreement or provide other documentation or information in respect of your interactions with us, or when you use our services;
- when you interact with our staff, for example, via telephone calls, letters, face-to-face meetings, social media platforms and emails;
- when you interact with us via any of our websites or use services on any of our websites;
- when you request that we contact you or request that you be included in an email or other mailing list;
- when you respond to our promotions, initiatives or to any request for additional Personal Data;
- when your images are captured by us via CCTV cameras while you are within our premises, or via photographs or videos taken by us or our representatives when you attend events at our premises;
- when you are contacted by, and respond to, our marketing representatives;
- when we receive references from business partners and third parties, for example, when you were referred by them;
- when you engage us through any social media on the Internet and on the social media itself;
- when we seek information from third parties about you in connection with the products and services you have applied for;
- when you submit, divulge or disclose your Personal Data to us for any other reason.

Employment Process:

- when you submit forms or applications to us;
- when you submit requests to us;
- when you submit your personal and dependent's health information to us;
- when you respond to our requests for additional Personal Data;
- when you ask to be included in an email or other mailing list;
- when you respond to our initiatives;
- when you submit your Personal Data to us for any other reason.



Purposes for Collection, Use and Disclosure of Your Personal Data

Your Personal Data will be collected, used and otherwise processed by us or our authorized parties for the following purposes:

- responding to your queries, feedback and requests;
- verifying your identity and processing payments;
- managing the administrative and business operations of Karex and complying with internal policies and procedures;
- providing updates and other communications on developments relating to Karex;
- facilitating business asset transactions (which may extend to any mergers, acquisitions or asset sales) involving Karex;
- matching any Personal Data held which relates to you for any of the purposes listed herein;
- preventing, detecting and investigating (possible) criminal activity, suspicious transactions and/or analyzing and managing commercial risks;
- facilities management (including but not limited to maintaining the security of our premises);
- managing the safety and security of our premises and services (including but not limited to carrying out CCTV surveillance);
- in connection with any claims, actions or proceedings (including but not limited to drafting and reviewing documents, transaction documentation, obtaining legal advice, and facilitating dispute resolution), and/or protecting and enforcing our contractual and legal rights and obligations;
- conducting investigations relating to disputes, billing or fraud (transactional or otherwise);
- managing and preparing reports on incidents and accidents;
- meeting or complying with any applicable rules, laws, regulations, codes of practice or guidelines issued by any legal or regulatory bodies which have jurisdiction over Karex (including but not limited to responding to regulatory complaints, disclosing to regulatory bodies and conducting audit checks, due diligence and investigations);



- financial reporting, regulatory reporting, management reporting, risk management, audit and record keeping purposes;
- project management;
- assessing and processing any applications or requests made by you for products and services offered by Karex;
- requesting feedback or participation in surveys, as well as conducting market research and/or analysis for statistical, profiling or other purposes for us to review, develop and improve the quality of our products and services;
- facilitating the continuation or termination of the relationship and the provision of services to you in accordance with the mandate that you have agreed with us;
- client marketing and/or client relationship management, including sending information relating to our services and business, services offered by third parties, event invitations, newsletters or publications;
- archival management (including but not limited to warehouse storage and retrievals);
- providing media announcements and responses;
- providing remuneration, reviewing salaries and bonuses, conducting salary benchmarking reviews, appraisals and evaluation;

- staff orientation and entry processing;
- administrative and support processes relating to your employment, including its management and termination, as well as staff benefits, including manpower, business continuity and logistics management or support, processing expense claims, medical insurance applications, medical services, leave administration, training, learning and talent development, and planning and organizing corporate events;
- providing you with tools and/or facilities to enable or facilitate the proper and effective performance of your duties;
- compiling and publishing internal directories and emergency contact lists for business continuity;
- conducting analytics and research for human resource planning and management, and for us to review, develop, optimize and improve work related practices, environment and productivity
- administering cessation or termination processes and/or any other purpose reasonably related to the aforesaid.

If you submit an application to us as a candidate for an employment position:

- managing, checking and verifying your application;
- performing background (employment, solvency and/or good standing) checks, and verifying all your employment details and qualifications;
- providing or obtaining employee references and for background screening;
- assessing your suitability for the position applied for; and/or any other purposes relating to any of the above.

If you do not interact with us in the manners specified above, we may collect, use and/or disclose your Personal Data for the following purposes, in accordance with the Act:

- the purposes for which we have specifically obtained your consent;
- and/or the purposes for which you have provided your Personal Data to us.

Disclosure of Personal Data

Karex will take reasonable steps to protect your Personal Data against unauthorized disclosure. Subject to the provisions of any applicable law, your Personal Data may be disclosed by Karex, for the purposes listed above (where applicable), to the following entities or parties, whether they are located overseas or in Malaysia:

- our existing or future related companies;
- agents, contractors or third-party service providers who provide operational services to Karex, such as courier services, telecommunications, information technology, payment, printing, technical services, training, market research, call center, security, employee recognition, storage and archival or other services to Karex;



- any business partner, investor, assignee or transferee (actual or prospective) to facilitate business asset transactions (which may extend to any merger, acquisition or asset sale) involving Karex;
- banks, financial institutions, credit card companies and their respective service providers;
- in the event of default or disputes, any debt collection agencies or dispute resolution centers (whether in Malaysia or otherwise);
- any liquidator, receiver, social assignee/trustee, judicial manager or any other person appointed under or pursuant to any applicable law or court order in connection with the bankruptcy, liquidation, winding up, judicial management or any other analogous process in respect of any individual, company or business;
- our professional advisors such as consultants, auditors and lawyers;
- any judicial, administrative or regulatory body, any government or public agency, statutory boards or authorities or law enforcement bodies or any agents thereof, having jurisdiction over Karex; and/or any other person in connection with the purposes set forth above.

Request for Access and/or Correction of Personal Data

You may request to access and/or correct your Personal Data currently in our possession or control by submitting a written request to us.

Request to Withdraw Consent

You may withdraw your consent for the collection, use and/or disclosure of your Personal Data in our possession or under our control by submitting a written request to us. You should note, however, that your withdrawal of consent could result in certain legal consequences arising from such withdrawal. 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.

Administration and Management of Personal Data

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 had 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 had initially provided us with. We will also 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 any unauthorized access, collection, use, disclosure, copying, modification, leakage, loss, damage and/or alteration of your Personal Data. However, we cannot assume responsibility for any unauthorized use of your Personal Data by third parties which are wholly attributable to factors beyond our control. We will also put in place reasonable measures such that your Personal Data in our possession or under our control is destroyed and/or anonymized as soon as it is reasonable to assume that (i) the purpose for which that Personal Data was collected is no longer being served by the retention of such Personal Data; and (ii) retention is no longer necessary for any other legal or business purposes.

Where your Personal Data is to be transferred out of Malaysia, we will comply with the PDPA in doing so. In this regard, this includes us obtaining your consent unless an exception under the PDPA or law applies, and taking appropriate and reasonable steps to ascertain that the foreign recipient organization of the Personal Data is bound by legally enforceable obligations to provide to the transferred Personal Data a standard of protection that is at least comparable to the protection under the PDPA. This may include us entering into an appropriate contract with the foreign recipient organization dealing with the Personal Data transfer or permitting the Personal Data transfer without such a contract if the PDPA or law permits us to.

Accuracy of Your Personal Data

We aim to keep all Personal Data as accurate, complete, not misleading, up-to-date and reliable as possible. Therefore, the accuracy of your Personal Data depends to a large extent on the information you provide. As such, it is a condition of us providing the products, services and/or facilities to you that you:

- warrant and declare that all your Personal Data submitted or to be submitted to us are accurate, not misleading, updated and complete in all respects for purposes of acquiring or using the relevant products, services and/or facilities, and you have not withheld any Personal Data which may be material in any respect and that we are authorized to assume the accuracy and up-to-date of the Personal Data given by you when processing such Personal Data); and
- promptly update us as and when such Personal Data provided earlier to us becomes inaccurate, incomplete, misleading, outdated or changes in any way whatsoever by contacting us at the contact details below.

Retention of Your Personal Data

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 destroyed from our records and system in accordance with our retention policy 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 or accounting requirements.

Use of Cookies

A cookie is a small piece of information that is placed on your computer when you visit certain websites. The cookies placed by the servers hosting our websites are readable only by us, and cookies cannot access, read or modify any other data on an electric device, nor does it capture any data which allows us to identify you individually. The

data collected by the cookies will be used for the purpose of improving your browsing experience on our websites and to enable Karex to serve you better.

Should you wish to disable the cookies associated with these technologies, you may do so by changing the setting on your browser. However, you may then not be able to enter certain part(s) of our websites.

Data Security

Karex will take reasonable efforts to protect Personal Data in our possession or our control by making reasonable security arrangements to prevent unauthorized access, collection, use, disclosure, copying, modification, disposal or similar risks.



Links to Other Websites

Our websites may contain links to other websites operated by third parties. As Karex does not have any control over such third-party websites, we cannot be responsible for the privacy practices of websites operated by third parties that are linked to our websites. Once you have left our websites, you should check the applicable data protection policy of the third party to determine how they will handle any information they collect from you.

Updates on Data Protection Policy

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

Governing Law

This Policy and your use of this website shall be governed in all respects by the laws of Malaysia.

Contacting Us

If you:

- have any questions or feedback relating to your Personal Data or our Policy;
- would like to withdraw your consent to any use of your Personal Data as set out in this Policy;
- would like to obtain access and make corrections to your Personal Data records,

you can contact our Group Senior HR Manager via
yvonne.lim@karex.com.my

