



安裕資源有限公司

ANN JOO RESOURCES BERHAD

Company Registration No.: 199501041948 (371152-U)

ANN JOO GROUP OF COMPANIES

**PERSONAL DATA PROTECTION POLICY
("PDPP")**

VERSION 1/2024

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A. PREAMBLE

On 15 November 2013, the **Personal Data Protection Act 2010 [Act 709]** (“**PDPA**”) came into force in Malaysia with the objective of protecting the personal data of individuals with respect to commercial transactions.

This PDPA applies to any person who collects and processes personal data in regard to commercial transactions. The seven (7) principles of the PDPA are as follows;

- i. General
- ii. Notice and Choice
- iii. Disclosure
- iv. Retention
- v. Security
- vi. Access
- vii. Data Integrity Principle

B. INTRODUCTION TO THE POLICY

Ann Joo wishes to inform the Data Subject that their Personal Data (as defined) is being or will be processed by Ann Joo. Committed to adhering to the PDPA, this Ann Joo Group of Companies Personal Data Protection Policy (“**PDPP**” or “**Policy**”) details Ann Joo’s practices and procedures for handling Personal Data. It explains the types of data collected, its uses, and purposes, emphasizing Ann Joo’s commitment to privacy and compliance with applicable data protection laws.

The Policy is formulated in accordance with the PDPA and aligned with the General Data Protection Regulation (“**GDPR**”) and other relevant international laws, this Policy outlines how Ann Joo handles Personal Data collected through application forms, interactions on our platforms, or our website (collectively, “**Services**”). This includes administrative functions and any related physical or digital interactions through the Platform.

Ann Joo processes Personal Data for specific purposes based on consent from the Data Subject. Where GDPR applies, processing may also be based on legitimate interests such as legal compliance, managing employment relationships, and facilitating internal operations. In some cases, processing is necessary to meet statutory or contractual obligations.

Additionally, if Personal Data is collected, used, or disclosed in jurisdictions with specific requirements, including for Sensitive Personal Data, Ann Joo will comply with those regulations.

Furthermore, this Policy supplements but does not replace any other consents provided by the Data Subject regarding their Personal Data and does not alter any legal rights of Ann Joo members concerning data collection, use, or disclosure.

**C. DEFINITION**

The definition of the terms and words used in this Policy aligns with those set forth in the PDPA unless otherwise specified herein.

Words	Meaning
Ann Joo	Ann Joo Resources Berhad (Registration No. 199501041948 (371152-U)), a company incorporated in Malaysia and registered under the Companies Act 2016 [Act 777], and having its registered office at Wisma Ann Joo, Lot 19391, Batu 8½, Jalan Klang Lama, 46000 Petaling Jaya, Selangor Darul Ehsan. P.O. Box 8189, Pejabat Pos Kelana Jaya, 47301 Petaling Jaya, Selangor Darul Ehsan.
Ann Joo Group	Refers to, Ann Joo and its subsidiaries, collectively.
Collect	In relation to personal data, means an act by which such personal data enters into or comes under the control of a data user.
Correction	In relation to personal data, includes amendment, variation modification or deletion.
Data Processor	In relation to personal data, means any person, other than an employee of the data user, who processes the personal data solely on behalf of the data user, and does not process the personal data for any of his own purposes;
Data Subject	Means an individual who is the subject of the personal data.
Data User	Means a person who either alone or jointly or in common with other persons processes any personal data or has control over or authorizes the processing of personal data but does not include a data processor.
Direct Marketing	Means the communication by whatever means of any advertising or marketing material which is directed to individuals.
Disclose	In relation to personal data, means an act by which such personal data is made available by a data user
Personal Data	<p>Refers to any information that relates to Data Subject such as:</p> <ul style="list-style-type: none"> (a) Name, NRIC/Passport No, age & date of birth (b) Nationality, race & gender (c) Contact details including address(es), telephone/fax/handphone numbers & email address(es) (d) Marital status, details of spouse/ family members (e) Job/profession particulars including name <p>Means any information in respect of commercial transactions, which:-</p> <ul style="list-style-type: none"> (f) is being processed wholly or partly by means of equipment operating automatically in response to instructions given for that purpose: (g) is recorded with the intention that it should wholly or partly be processed by means of such equipment; or



	<p>(h) is recorded as part of relevant filing system or with the intention that it should form part of a relevant filing system,</p> <p>that relates directly or indirectly to a Data Subject, who is identified or identifiable from that information or from that and other information in the procession of data user, including any sensitive personal data and expression of opinion about the Data Subject, but does not include any information that is processed for the purpose of a credit reporting business carried on by a credit reporting agency under the Credit Reporting Agencies Act 2010.</p>
Processing	<p>In relation to personal data, means collecting, recording, holding or storing the personal data or carrying out any operation or set of operations on the personal data, including</p> <ul style="list-style-type: none"> (a) the organization, adaptation or alteration of personal data; (b) the retrieval, consultation or use of personal data; (c) the disclosure of personal data by transmission, transfer, dissemination or otherwise making available; or (d) the alignment, combination, correction, erasure or destruction of personal data
Relevant Data User	<p>In relation to,</p> <ul style="list-style-type: none"> (a) an inspection, means the data user who uses the personal data system which is the subject of the inspection; (b) a complaint, means the data user specified in the complaint; (c) an investigation — <ul style="list-style-type: none"> (i) in the case of an investigation initiated by a complaint, means the data user specified in the complaint; (ii) in any other case, means the data user who is the subject of the investigation; (d) an enforcement notice, means the data user on whom the enforcement notice is served.
Sensitive Personal Data	<p>Means any personal data consisting of information as to the physical or mental health or condition of a Data Subject, his political affiliation, his religious beliefs or other belief or a similar nature.</p>
Third party	<p>In relation to personal data, means any person other than</p> <ul style="list-style-type: none"> (a) a Data Subject; (b) a relevant person in relation to a Data Subject; (c) a data user; (d) a data processor; or (e) a person authorized in writing by the data user to process the personal data under the direct control of the data use. <p>Refers to :</p> <ul style="list-style-type: none"> (a) any other divisions or entities within Ann Joo Group; (b) Ann Joo Group joint venture/ alliance partners;



	<ul style="list-style-type: none">(c) Ann Joo Group agents, contractors, third party service providers and specialist advisers who have(d) been contracted to provide Ann Joo Group with administrative, financial, research,(e) operational or other services such as telecommunications, information technology, data entry, payment, payroll, training, market research, storage and archival;(f) any third party business partners who offer goods and services or sponsor contests or other promotional programmes, whether in conjunction with Ann Joo Group or not, and where permitted by applicable laws;(g) insurers or insurance investigators and credit providers;(h) the Credit Bureau, or in the event of default or disputes, any debt collection agencies or dispute resolution centres;(i) 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 the Ann Joo Group;(j) Ann Joo Group professional advisors such as auditors and lawyers;(k) relevant government regulators or authority or law enforcement agency to comply with any laws or rules and regulations imposed by any governmental authority;(l) anyone to whom Ann Joo Group transfer or may transfer Ann Joo Group rights and obligations, including, for example, where Ann Joo obtain the services of a third party organisation to handle any aspect of the(m) processing of Data Subject's Personal Data for the purposes notified to Data Subject in accordance with this Policy;(n) banks, credit card companies and their respective service providers; and(o) any other party as may be consented to by Data Subject, as specified by Data Subject or as may be notified to Data Subject by Ann Joo Group in subsequent notices.
Use	In relation to personal data, does not include the act of collecting or disclosing such personal data.

**1. PRIMARY DATA PROTECTION RULES**

- 1.1. Ann Joo **MUST** adhere to the following rules when **collecting, using or disclosing** Personal Data of any Data Subject:
- (a) Obtain the consent of the Data Subject or, if consent is not obtained, ensure that the collection, use or disclosure is permitted under the PDPA;
 - (b) Ensure that the Data Subject is informed of the purpose of such collection, use or disclosure;
 - (c) Ensure that the Personal Data is only collected, used or disclosed for such purpose, and no other purpose; and
 - (d) Ensure that the Personal Data is properly retained, protected and disposed of in accordance with the PDPA and/or as otherwise stipulated in this Policy.

2. WITHDRAWAL OF CONSENT OR CORRECTION TO PERSONAL DATA

- 2.1 The Data Subject is entitled under the PDPA to withdraw consent, request corrections and access to their Personal Data. In such cases, Ann Joo **MUST** comply with the following:

Circumstances	Descriptions
Withdrawal of Consent	The Data Subject has the right to withdraw the earlier given consent for the continued collection, use and disclosure of their Personal Data, at any given time. Such withdrawal shall be submitted formally in writing to the address and/or email address as specified in paragraph 12 of this Policy. Ann Joo is not entitled to prevent a Data Subject from withdrawing their consent.
Correction of Personal Data	Upon request by the Data Subject, Ann Joo must, in accordance with the PDPA, correct and/or complete any Personal Data found to be inaccurate or incomplete as soon as it is reasonably practicable unless Ann Joo has reasonable grounds that the correction should not be made.
Access to Personal Data	Upon request by the Data Subject, Ann Joo is required under the PDPA to provide the Data Subject, the followings: <ul style="list-style-type: none">(a) their Personal Data that is in the possession or under the control of Ann Joo; and(b) information on how their Personal Data was utilized or disclosed during the past year. Such a request shall be made in



	<p>accordance with the PDPA and/or as otherwise stipulated in this Policy.</p> <p>Note that there are some exceptions to the obligation mentioned above.</p> <p>For further details, kindly refer to PDPA (para 10.2.4).</p>
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3. PURPOSE OF PERSONAL DATA COLLECTED

- 3.1 The purposes for which the Personal Data may be used, include as follows, but is not limited to, those outlined in this Policy. By consenting, the Data Subject agrees to allow Ann Joo to use and process the Personal Data on the manner described herein: -

No.	Person	Personal Data Collected	Purpose
1)	Job applicants	Information in job applicant's curriculum vitae or the job application forms (e.g. personal email, telephone number, address, educational history and background, salary at current/previous place of employment).	To evaluate the applicant and to attend to all administrative works for job application processing.
2)	Employees	Personal Data of its employees (e.g., bank account details, information relating to their salary, bonus, allowances, benefits, tax etc.). Personal Data of employees within Ann Joo, Ann Joo Group and/or its related corporations.	For legal, audit, and compliance purposes, managing employment relationships, including necessary filings or disclosures to authorities and banks. Additionally, for HR service delivery, payroll processing, and managing compensation and benefits.
3)	Directors and other officers	Personal Data of its directors and other officers (e.g. bank account details, information relating to their fee, tax etc.). Personal Data of directors and other officers within Ann Joo, Ann Joo Group and/or its related corporations.	For legal, audit and other compliance purposes, administrative, business, operational and/or management purposes, including filings with or disclosure to authorities and bankers.
4)	Shareholders and investors	Personal Data of shareholders/investors of Ann Joo when they write to Ann Joo to raise queries or when they submit forms	To implement or undertake corporate actions such as dividend payments,



		to Ann Joo (e.g. relating to proxy forms/ dividends/ general meetings).	general meetings (e.g. processing of proxy forms).
		Personal Data of shareholders/investors of Ann Joo with their shareholding interests (e.g. CDS account holders in dealings with Bursa Depository for Malaysian.	To respond and deal with enquiries/ feedback and for other shareholders or investors.

- 3.2 The above purposes are not exhaustive and depending on the nature of Data Subject's relationship with Ann Joo. Ann Joo may collect, use, and disclose the Data Subject's Personal Data for additional purposes, by which the Data Subject will be notified and/or informed of in accordance with the applicable terms and conditions set forth herein.
- 3.3 While the Data Subject's Personal Data will be protected and kept confidential, it may be disclosed to third party for specific purposes as outline herein subject to the applicable laws. Such third party may perform functions on Ann Joo's behalf. Such disclosure may be subjected to additional legal requirements depending on the nature of the transfer to third party. Personal Data will, in each case, only be disclosed to the extent necessary and proportionate.
- 3.4 In the event that, the Personal Data is shared with a third party that acts with a member of Ann Joo Group as joint controllers under GDPR, Ann Joo, to the extent required by law, provide the Data Subject with additional information on the responsibilities of each joint controller, any particular means by which the Data Subject can enforce its rights, and the primary contact person for such requests in relation to the Data Subject's rights.
- 3.5 Ann Joo requires that organisations outside Ann Joo Group which handle or obtain Personal Data as service providers to acknowledge the confidentiality of this data, undertake to respect any individual's right to privacy and comply with the PDPA, the GDPR and any other applicable data protection laws. As a requirement under these laws, Ann Joo may be required to have specific agreements in place with such third party to regulate and safeguard the Data Subject's rights. Ann Joo also requires that these organisations use this information only for Ann Joo's purposes and follow the directions with respect to this information.
- 3.6 Any avoidance of doubt, Ann Joo and/ or the Group and/ or its employees or authorized officers or agents will not be responsible for any Personal Data submitted by the Data Subject to Ann Joo, that is inaccurate, misleading, incomplete and not updated.

**4. TRANSFER OF PERSONAL DATA**

- 4.1 Personal Data may be stored in external servers located overseas or in countries outside of the country of Data Subject's residence. In addition, as described above; in conducting the business, it may be necessary to share information about Data Subject with between the related corporations and affiliates and third-party service providers, some of which may be in countries outside of the Data Subject's country of residence.

5. MANAGEMENT AND SECURITY

- 5.1 This document outlines the measures implemented by Ann Joo and/or Ann Joo Group to manage and secure personal data in accordance with relevant data protection law. These measures include the appointment of Data Protection Officers (DPO) or other employees within the Group to act on behalf of the DPO, the training of employees, and strict adherence to confidentiality standards.
- (a) Comprehensive measures and actionable protocols are implemented to ensure that all Personal Data maintained is consistently updated and securely protected against loss, misuse, alteration, unauthorized access, disclosure, modification, or destruction;
 - (b) Ann Joo Group is tasked with supervising the management of Personal Data in compliance with this Policy and relevant data protection law; and
 - (c) Personnel entrusted with managing personal data undergo training to uphold the confidentiality of this information.

6. DATA BREACHES

- 6.1 Data breaches can arise due to multiple factors, including internal staff actions, external threats, or system malfunctions. There are several potential causes of data breaches as detailed below. It must be noted that the list below is not exhaustive; -

Malicious Activities	<ul style="list-style-type: none">• Hacking incidents/ illegal access to databases containing Personal Data• Theft of computer notebooks, data storage devices or paper records containing Personal Data• Scams that trick organisations into releasing Personal Data of individuals.
Human Error	<ul style="list-style-type: none">• Loss of computer notebooks, data storage devices or paper records containing Personal Data• Sending Personal Data to a wrong e-mail or physical address, or disclosing data to a wrong recipient• Unauthorised access or disclosure of Personal Data by employee



	<ul style="list-style-type: none">• Mistakes in the printing process which may lead to the exposure of Personal Data• Improper disposal of Personal Data (e.g. hard disk, storage media or paper documents sold or discarded before Personal Data is properly deleted)
Computer System Error	<ul style="list-style-type: none">• Errors or bugs in the programming code of websites, databases and other software which may be exploited to gain access to Personal Data stored on computer systems

6.2 When data breach occurs or is likely to occur, employee **MUST** comply with the following:

Containing The Breach	<p>Where applicable,</p> <ul style="list-style-type: none">• Notify IS&T Department immediately• Shut down and isolate the compromised system that led to the data breach• IS&T Department shall establish whether steps can be taken to recover lost data and limit any damage caused by the breach• Reset password• Address lapses in processes that led to the data breach• Stop any practices that led to the data breach
Reporting The Incident	<ul style="list-style-type: none">• Employee and IS&T Department to immediately report matter to the HR Department with details on how and when the data breach occurred, types of Personal Data involved in the data breach• HR Department will report to the management of the Group to consider whether to notify the police if criminal activity is suspected and preserve evidence for investigation• HR Department will notify the affected individuals and/or Personal Data Protection Commission (PDPC) considering the prevailing PDPC's guidelines



7. PERSONAL DATA RETENTION AND DISPOSAL

- 7.1 Ann Joo, at its discretion, may retain the Data Subject's Personal Data for as long as it is necessary for the purposes for which it has been collected, up to seven (7) years, unless otherwise permitted by applicable law or for the purpose of defending against any legal claims.
- 7.2 Documents containing Personal Data should be removed or disposed of once the purposes for which the Personal Data was collected are no longer being served by the retention of the Personal Data and the retention is no longer necessary for legal or business purposes.

8. RIGHTS AND OPTIONS

- 8.1 Data Subject has the following rights, under applicable data protection laws (except where the exercise of these is restricted under applicable laws – for example, due to judicial proceedings or the carrying out of investigations), which can be exercised by contacting us at the contact details provided in paragraph 12 below:
- (a) To obtain from Ann Joo's confirmation as to whether or not the Personal Data is being processed and request a copy of Data Subject's information. Where legally required, Ann Joo will provide the Data Subject's information in an easily accessible format and assist in transferring some of this information to third party.
 - (b) Rectification of the Data Subject's Personal Data. We endeavour to ensure that all Personal Data we have about Data Subject is accurate and up-to-date. We understand that this information changes frequently with changes of address and other personal circumstances. We encourage Data Subject to contact us as soon as possible to enable us to update any Personal Data we have about Data Subject. Incomplete or outdated Personal Data may result in our inability to provide Data Subject with products and services Data Subject have requested.
 - (c) Where the processing of Data Subject's Personal Data is carried out by automated means, Data Subject have the right to receive Data Subject's Personal Data have provided us in a structured, commonly used and machine-readable format or on demand transmission to another controller.
 - (d) In certain circumstances, Data Subject can request to have Data Subject's Personal Data deleted or restrict the processing of it.
 - i. If Ann Joo processes the Data Subject's information based on our legitimate interests explained above, or in the public interest, Data



Subject can object to this processing in certain circumstances. In such cases, Ann Joo will cease processing the Data Subject's information unless Ann Joo has compelling legitimate grounds to continue processing or where it is necessary for legal reasons. Where Ann Joo uses the Data Subject's data for direct marketing purposes, Data Subject can always object in such communications by contacting us at the details provided in paragraph 12 below;

- ii. Prevent any processing of Personal Data that is causing or is likely to cause unwarranted and substantial damage or distress to Data Subject or another individual;
- iii. Be informed about any use of the Data Subject's Personal Data to make automated decisions about Data Subject where such decisions produce legal effects or have similarly significant effects on Data Subject, and to obtain meaningful information about the logic involved, as well as the significance and the envisaged consequences of this processing; and
- iv. To lodge a complaint about the way in which the Data Subject's Personal Data is being used to a supervisory authority, Data Subject can contact the supervisory authority where the relevant member of the Ann Joo Group which has used Data Subject's Personal Data is located.

8.2 Where Ann Joo relies on the Data Subject's consent to use the Data Subject's Personal Data, Data Subject have the right to withdraw that consent at any time. This withdrawal will, however, not affect the lawfulness of processing based on Data Subject's consent before the Data Subject's withdrawal.

8.3 Where Ann Joo processes the Data Subject's Personal Data based on the legitimate interests referred to in paragraph 4.1 above, Data Subject can object to this processing in certain circumstances. In such cases, Ann Joo will cease processing Data Subject's information unless Ann Joo has compelling legitimate grounds to continue processing or where it is necessary for legal reasons.

8.4 Where mandated under the applicable data protection laws, the Data Subject may exercise its rights described or referred to above shall be free of charge. In all other situations, Ann Joo may charge a fee to cover the cost of verifying the request and locating, retrieving, and copying any material requested.

8.5 Ann Joo, at its discretion, may refuse to comply with Data Subject's request for access or correction to Data Subject's Personal Data and if such circumstances were to occur, basis of refusal and reasoning will be provided thoroughly to Data Subject.



- 8.6 If Data Subject wishes to exercise any of the Data Subject's rights or if Data Subject wishes to raise a complaint on how Ann Joo Group has handled the Data Subject's Personal Data, Data Subject may contact the relevant.

9. POWERS OF PDPC AND CONSEQUENCES OF NON-COMPLIANCE WITH PDPA

- 9.1 The Personal Data Protection Commission ("PDPC") may, upon receiving a complaint or of its own motion, conduct an investigation to determine whether an organisation is in compliance with the PDPA. For the purposes of an investigation, the PDPC's powers include, amongst others, requiring documents or information which relates to any matter relevant to the investigation to be produced by the organisation.
- 9.2 It is important for the Group to ensure that its employees comply with the requirements of the PDPA as non-compliance can affect the Group. It is to be noted that enforcement decisions of the PDPC are made public, and the PDPC may issue warnings to the organisation. Amongst others, the PDPC may impose the followings;
- (a) if it is satisfied that an organisation is in breach, impose a financial penalty of up to RM 500,000.00 and/or jail imprisonment up to three (3) years;
 - (b) give directions for the destruction of Personal Data collected or for that the organisation ceases to collect or use Personal Data in breach of the PDPA;
 - (c) review any complaint by an individual against an organisation for refusal to provide access to his/her Personal Data; and give such directions as it thinks fit to ensure compliance with the PDPA.

10. GENERAL

- 10.1 Ann Joo and/or Ann Joo Group retains the right to add, change, or alter this policy at any time. Group employees is urged to check from time to time to make sure they are informed of any such changes.
- 10.2 Do get in touch with the dedicated person in charge of Ann Joo and/or Ann Joo Group for help if the Data Subject have any questions or concerns about the procedures or policies outlined in this policy.
- 10.3 Further information on the PDPA can be found at <https://www.pdp.gov.my/>

**11. CONTACT US**

Address	:	Wisma Ann Joo, Lot 19391, Batu 8½, Jalan Klang Lama, 46000 Petaling Jaya, Selangor Darul Ehsan. P.O. Box 8189, Pejabat Pos Kelana Jaya, 47301 Petaling Jaya, Selangor Darul Ehsan.
Tel	:	+603-7877 0028
Fax	:	+603-7875 9354
Website	:	http://www.annjoo.com.my

12. GOVERNING LAW

As Ann Joo is based in Malaysia, the PDPA sets the baseline for data protection compliance across its business operations within the ASEAN region. In instances where there is a conflict between the PDPA and the data protection laws of any other country, Malaysian data protection laws shall take precedence.

This policy has been approved by the Board of Directors and is effective from 29 August 2024

**APPENDIX 1****REQUEST FOR ACCESS AND CORRECTION FORM**

Subject to any exceptions under applicable laws, Data Subject may at any time request for access to and/or correction of the Data Subject's Personal Data kept by Ann Joo and contact us with any inquiry or complaint in respect of their Personal Data as follows:-

<i>Please state the Company Name of Ann Joo Group or its Subsidiaries involved:</i>		
REQUESTOR'S FULL NAME	:	
ADDRESS	:	
TEL	:	
FAX	:	
EMAIL	:	
ATTENTION TO	:	
DETAILS OF REQUEST	:	