

EONMETALL GROUP BERHAD

**PERSONAL DATA PROTECTION ACT (“PDPA”)
POLICY**

1.0 Purpose

- 1.1 The Personal Data Protection Act 2010 of Malaysia ("the Act") govern the processing of personal data in business transactions. In compliance with the Act, the Group is required to inform data subjects about the personal data it collects and processes.
- 1.2 The policy served as a guideline for the processing of personal data in business transactions, as well as for employment, charity, any other related purposes, in compliance with the Act.

2.0 Scope

2.1 Definition

- 2.1.1 The terms "personal data", "processing", "business transactions", "data subject" and "relevant person" used in this Policy shall have the meaning prescribed in the Act.
- 2.1.2 The expression "the Group", "we", "us" or "our" shall refer to Eonmetall Group Berhad including its subsidiaries, related or associated companies.
- 2.1.3 The expression "you" or "your" refer to and include employees, potential employees, former employees, interns, clients, customers, potential customers, vendors, suppliers, contractors, sub-contractors, service providers, distributors, and/or relevant persons such as family members, guardians, parental authorities, dependents, referees of employees (including potential or former employees), as well as authorized representatives who receive or obtain goods/services from or providing goods/services to the Group.

2.2 Types of Personal Data and Sources of Personal Data

- 2.2.1 The personal data about you may be voluntarily provided by you, your family members, guardians, parental authorities, referees, recruitment agents, current or former employees, or your company during your dealing with us in any form or manner.

This includes, but is not limited, data shared in connection with business transactions or communications with us, participation in events organized or attended by the Group, or data obtained independently from lawful sources (if any such as from public depositories, trade or online directories, credit reporting agencies, the public domain, or other authorized third parties) in our forms, agreements, website, online forms and/or other similar documents.

2.2 Types of Personal Data and Sources of Personal Data (cont'd)

2.2.2 The personal data collected and processed by us may include:

- information such as name, date of birth, marital and family status, identification documents, race or ethnicity, education background, resume, employment history, referees, and results of background checks (credit and reference checks);
- contact details including address, phone number(s) and email address;
- salary and compensation details, financial and social security information (EPF, SOCSO), emergency contacts, family members' personal, financial details and health or medical information;
- details of any criminal records or legal proceedings, information from security systems (CCTV, voice or video recordings);
- information about your directorships or shareholdings; or
- any other personal data necessary for the purpose outlined in clause 2.3.

2.2.3 By voluntarily providing your personal data to us, you consent to its collection, use and processing by the Group.

2.2.4 By voluntarily providing your Sensitive Personal Data, you give us your explicit consent to collect, use and process such data. You also acknowledge that the collection of this data may be necessary to protect your vital interest or the vital interest of others.

2.2.5 You hereby confirm that the Personal Data provided by you, or obtained from your family members, guardians, parental authorities, referees, recruitment agents, current or former employers, or your company, is sufficient, accurate, complete and not misleading. You also acknowledge that such Personal Data is necessary for us to carry out business or employment related transactions.

2.2.6 If the Personal Data provided by you, or obtained from your family members, guardians, parental authorities, referees, recruitment agents, current or former employers, or your company is inaccurate or outdated, you shall promptly notify the Group.

2.2.7 If you choose not to provide the required Personal Data, or if the data is insufficient, inaccurate, incomplete, or misleading, the Company may be unable to:

- provide you with the requested goods or services or deliver them at the expected level of quality;
- offer you the full benefits associated with your employment (if you are an employee);
- purchase goods or services from you (if you are a supplier, vendor, contractor or subcontractor); or
- supply goods or services to you (if you are a distributor or customer).

2.3 Purposes of Collecting Your Personal Data

We will process Personal Data in connection with employment or business transactions for the following purposes.

- to communicate with you;
- to facilitate, process, deal with, administer, manage and/or maintain your relationship with us;
- to verify your identity and/or to process your application/transaction with us;
- to respond to your enquiries or complaints and resolve any issues and disputes which may arise in connection with any dealings with us;
- to facilitate / administer your participation in the survey / feedback or any events including meetings, talks, celebrations, road shows, contests, promotion or campaigns;
- to provide you with information and/or updates on our products, services, upcoming promotions or events offered and/or organized by us from time to time by SMS, phone call, email, fax, mail, social media and/or any other appropriate communication channels;
- public disclosure and use of your personal data, images, photographs, voice and video recoding for publicity without payment or compensation;
- to check your credit history and assess your creditworthiness when needed to provide products, services or facilities to you;
- to process any payments related to your business transactions with us;
- to maintain and improve customer relationship;
- for purposes related to your employment, including but not limited to payroll administration, employee entitlement and benefits, performance evaluation training and development, career progression, health and safety management as well as succession and contingency planning;
- to support any special needs related to a disability or medical condition;
- to communicate with family members, guardians and authorized representatives in the event of an emergency or accident;
- for internal administrative purposes;
- for storage, hosting back-up (whether disaster recovery or otherwise) of your Personal Data, whether within and/or outside Malaysia;
- to share any of your Personal Data pursuant to any agreement you have entered with us, for purpose of seeking legal and/or financial advice, and/or for purpose of commencing legal action;
- to conduct due diligence, background checks or other monitoring and screening activities in line with legal or regulatory requirements, or as part of our internal risk management procedures that may be required by law or that may have been put in place by us;
- to detect, investigate and prevent any fraudulent, prohibited or illegal activities or omission or misconduct;
- for audit, risk management, compliance and security purposes;
- to enable us to fulfill our obligations and enforce our rights under any agreements or documents that we are a party to;
- to transfer or assign our rights, interests and responsibilities under any agreements with you;
- to comply with legal or regulatory requirements and make disclosures as required by any applicable law, regulation, court order or by-law, guideline, circular or code applicable to us;
- to comply with requests or directions from government authorities or respond to inquiries from public agencies and similar bodies;
- for other purpose required to operate, manage and improve our business and our relationship with you.

2.4 Disclosure of Personal Data (Within and/or Outside Malaysia)

2.4.1 To provide the services you required, you hereby consent to and authorize us to disclose your Personal Data to the following parties (both within and outside of Malaysia):

- our employees, consultants, accountants, auditors, lawyers, advisers, agents, contractors, vendors, co-marketing partner, vendor, suppliers, contractors, sub-contractors, service providers, insurance companies, merchants, distributors and/or financial institutions to provide support and services;
- the Group of companies including the parent/holding company, subsidiaries, related and associated companies;
- successors in title to us;
- any third party (and its advisers/representatives) in connection with any proposed or actual re-organization, merger, sale, consolidation, acquisition, joint venture, assignment, transfer, funding exercise or asset sale relating to any portion of the Group;
- your immediate family members and/or emergency contact person as may be notified to us from time to time;
- any party in relation to legal proceedings or prospective legal proceedings;
- our auditors, consultants, lawyers, accountants or other financial or professional advisers appointed in connection with our business on a strictly confidential basis, appointed by us to provide services to us;
- professional bodies, accreditation bodies or statutory regulatory bodies;
- foreign embassies and agencies appointed by the foreign embassies;
- Malaysian Immigration Department;
- government agencies, law enforcement agencies, courts, tribunals, regulatory bodies, industry regulators, ministries, and/or statutory agencies or bodies, offices or municipality in any jurisdiction, if required or authorized to do so, to satisfy an applicable law, regulation, order or judgment of a court or tribunal or queries from the relevant authorities such as but not limited to the Inland Revenue Board, the Employees' Provident Fund Board, the Social Security Organisation and Bank Negara Malaysia;
- our business partners, third party product and/or service providers, suppliers, vendors, contractors or agents, on a need-to-know basis, that provide related products and/or services in connection with our business, or discharge or perform one or more of the above purposes and other purposes required to operate and maintain our business;
- payment channels including but not limited to financial institutions for purpose of assessing, verifying, effectuating and facilitating payment of any amount due to us in connection with your purchase of our products and/or services;
- any party nominated or appointed by us either solely or jointly with other service providers, for purpose of establishing and maintaining a common database where we have a legitimate common interest;
- data centres and/or servers for data storage purposes;
- storage facility and records management service providers;

2.4 Disclosure of Personal Data (Within and/or Outside Malaysia) (cont'd)

2.4.1 To provide the services you required, you hereby consent to and authorize us to disclose your Personal Data to the following parties (both within and outside of Malaysia) (cont'd):

- the public when you become a winner in a contest, participate in our events, conferences, talks and seminars by publishing your name, photographs and other personal data without compensation for advertising and publicity purposes;
- any person under a duty of confidentiality to which has undertaken to keep your Personal Data confidential which we have engaged to discharge our obligations to you; and/or;
- any other person reasonably requires the same for us to operate and maintain or carry out our business activities.

2.4.2 You agree not to hold the Group liable for any loss or damage arising from third-party access, provided that the Company has taken steps to protect the personal data against loss, misuse, modification, unauthorized or accidental access or disclosure, transmission errors, alteration or destruction.

2.5 Right to Access and/or Correct Personal Data

2.5.1 To the extent that the applicable law allows, you have the right to request for access to, request for a copy of, request to update or correct, your Personal Data held by us and to request us to limit the processing and use of your Personal Data (such as to stop sending promotional materials to you).

2.5.2 You also have the right to withdraw, in whole or in part, your previously given consent by providing us with written notice. Such withdrawal is subject to any applicable legal requirements, contractual obligations, and a reasonable period for the withdrawal to take effect. Please note that withdrawing your consent may have legal consequences. Depending on the extent of your withdrawal, we may no longer be able to maintain our existing relationship with you, and it may result in the termination of any contract you have with us.

2.5.3 Notwithstanding the above, we reserve the right to rely on any applicable statutory exemptions and/or exceptions that permit the collection, use, and disclosure of your Personal Data.

2.5.4 If you would like to request access or to correct your Personal Data or limit the processing of your Personal data, make any inquiries or complaints, you may send your request in writing at the following address:

Eonmetall Group Berhad
Lot 1258, Mk.12, Jalan Seruling,
Kawasan Perusahaan Valdor,
14200 Sungai Bakap, Penang.
Tel: 604-582 8323
Fax: 604-582 1525

- 2.5.5 For security and verification purposes, all requests must be submitted in writing.
- 2.5.6 In accordance with the Personal Data Protection Act 2010, the Group may impose a reasonable fee for processing any data access request. This fee will take into the account the time and resources required for verifying, locating, retrieving, reviewing, and copying the requested information, as well as any other associated costs. You will be notified of the estimated fee prior to the retrieval of your Personal Data.
- 2.5.7 In the event we are unable to comply with your request for access to and/or correction of your Personal Data such as when the requested information is of a confidential commercial nature, we will inform you of the reason for our refusal.

2.6 Changes to Personal Data

- 2.6.1 We are committed to ensuring that your Personal Data is accurate, complete, and up to date where necessary. Therefore, we kindly request that you notify us promptly of any changes to your Personal Data using the contact details provided above.

2.7 Retention of Your Personal Data

- 2.7.1 Any Personal Data you provide to us will be retained as long as necessary to fulfill the purposes for which it was collected.
- 2.7.2 Once your Personal Data is no longer required for the purposes it was collected, it will be destroyed or anonymized in accordance with the statutory retention policy, unless further retention is required to meet our operational, legal, regulatory, tax or accounting requirements

2.8 Security of Your Personal Data

- 2.8.1 We are committed to ensuring the secure storage of your Personal Data. To prevent unauthorized access, disclosure or similar risks, we implement appropriate physical, physical, electronic and procedural safeguards, in line with applicable laws, regulations and industry standards.

We also ensure that our employees adhere to these measures to protect your Personal Data against unlawful processing, accident loss, destruction, damage, alteration or unauthorized access or disclosure.

- 2.8.2 Our security measures are as set out below:

- ensuring that all employees involved in the processing of Personal Data are registered or identifiable by their respective departments;
- ensuring that only authorized employees and third parties with a legitimate “need-to-know” are granted access to Personal Data;

2.8.2 Our security measures are as set out below (cont'd):

- implementing a “Clean Desk Policy”, where all documents at employees’ workspace are secured at the end of the working or during absence by storing them in locked drawers or cabinets;
- ensuring that all desks and cabinets used for storing are securely locked before the end of the workday;
- ensuring all used papers, printed documents or other documents exhibiting personal data are destroyed by using shredding machines or other appropriate methods;
- ensuring the filing cabinets and filing cabinet rooms are locked, unless an employee is present within the filing cabinet room;
- ensuring continuous 24-hour CCTV surveillance of filing cabinet rooms and server rooms to enhance security;
- using updated encryption and cyber-security software to protect data and strict security standards on company devices and IT infrastructure;
- prohibiting the use of removable media devices and cloud computing services for transferring Personal Data except with prior authorization from the Company’s top management;
- ensuring all company data is backed up to the company servers with recovery systems in place.

2.8.3 We will periodically update our security measures as necessary and ensure that authorized third parties use your Personal Data solely for the purpose outlined in this Policy.

2.8.3.1 Internet Related

- We implement security procedures to protect your electronic communications with us. All employees and data processors who have access to or are involved in the processing of your Personal Data are required to maintain its confidentiality;
- Third-party websites and any links to such sites accessible from our website are not under the control of the Company and do not operate under this Policy. We do not accept any responsibility or liability for those websites. Similarly, if you subscribe to an application, content, or product from one of our strategic partners and you subsequently provide your Personal Data directly to them, that data will be governed by the third party's privacy or data protection policy (if applicable), not this Policy;
- Please note that internet communications, such as emails, are not secure unless properly encrypted. We cannot and do not accept responsibility for any unauthorized access, interception, or loss of Personal Data that occurs beyond our reasonable control;

2.8.3.1 Internet Related

- The Company collects information about your use of our website through cookies. Cookies are small data files stored on your device that help enhance your browsing experience by customizing content to suit your preferences. Cookies do not identify you personally, only the device you are using. You are not obligated to accept cookies. If you prefer, you can configure your browser to accept all cookies, notify you when a cookie is issued, or reject all cookies. However, please note that rejecting cookies may impact on the functionality and user experience of our website.

2.9 Personal Data from Minors and Other Individuals

2.9.1 To the extent that you have provided, or will provide, Personal Data concerning your family members, spouse, and/or other dependents, you confirm that you have informed them that their Personal Data will be disclosed to and processed by us. You further represent and warrant that you have obtained their consent for such processing, including any disclosure and transfer of their Personal Data, in accordance with this Policy. In the case of minors (i.e., individuals under 18 years of age) or individuals who are not legally competent to give consent, you confirm that they have appointed you to act on their behalf and to provide consent for the processing, disclosure, and transfer of their Personal Data in accordance with this Policy

3.0 Others

We reserve the right to revise or withdraw this Policy at any time, as deemed necessary. This Policy may be reviewed and updated periodically to reflect changes in applicable laws, including the Act. Any revisions, updates or changes will be communicated via an announcement on our website at <https://eonmetall.com>.

By continuing to:

- receive or obtain goods and/or services from us; or
- provide goods/services to us; or
- remain in our employment; or
- enter or maintain a commercial relationship(s) with us.

following the modifications or changes to this Policy, you are deemed to have accepted and agreed to the revised terms.