



Personal Data Protection Policy

1. Introduction

Ahmad Zaki Resources Berhad ("AZRB") is committed to safeguarding personal data in accordance with Malaysia's Personal Data Protection Act 2010 ("PDPA").

This policy defines AZRB's approach to personal data management in accordance with its diversified business operations, which include engineering and construction, property development, oil and gas supply base, hospitality services (hotels), highway construction, and concessionary services.

2. Scope

This policy applies to all employees, contractors, and third-party service providers engaged by AZRB in all divisions. It includes any personal data processed by AZRB, including information on workers, customers, suppliers, and other stakeholders.

3. Principles of Personal Data Protection

AZRB adopts to the following PDPA principles in handling personal data.

- 3.1 **General Principle:** Personal data shall be processed only with the data subject's consent, for authorised reasons, and shall not be excessive.
- 3.2 **Notice and Choice Principle:** Data subjects shall be notified of the reason of the data collection and given the option to share their information.
- 3.3 **Disclosure Principle:** Personal data shall not be released without consent, except for purposes associated to or mandated by law.
- 3.4 **Security Principle:** Personal data must be protected against misuse, loss, unauthorised access, or disclosure.
- 3.5 **Retention Principle:** Personal data shall not be kept longer than necessary for the fulfilment of its purpose.
- 3.6 **Data Integrity Principle:** Personal data shall be accurate, complete, and kept up-to-date.
- 3.7 **Access Principle:** Data subjects shall be given access to their personal data and the right to correct it if it is incorrect.

4. Oversight and Accountability

4.1 PDPA Oversight Structure

- **Head of Division and Head of Department:** Responsible for ensuring compliance in their respective areas. They must put in place and maintain adequate data protection procedures, as well as disclose any concerns to the Group Corporate Assurance Division.
- **Audit and Risk Committee:** The committee ensures that the PDPA governance and policies are carried out efficiently. They undertake regular audits and reviews to verify compliance and oversee any concerns that arise.

4.2 Responsibilities

- **Employees:** Are required to comply this policy and attend data protection training courses.
- **Contractors and Third-Party Service Providers:** Must comply with this policy and any contractual obligations regarding data protection.
- **Data Protection Officer (DPO) (if applicable):** Oversees the implementation of this policy, gives advise on data protection issues, and serves as the point of contact for data subjects and regulatory bodies.

5. Data Collection and Processing

5.1 Data Collection

- Personal data is obtained via a variety of methods, including but not limited to employment forms, consumer transactions, service contracts, and online interactions.
- Only relevant and required data will be collected for defined, implied, and lawful objectives.

5.2 Data Processing

- Data processing activities include collection, recording, storage, modification, retrieval, and destruction.
- Data processing must be done in a secure and confidential manner.

6. Data Subject Rights

The data subjects have the following rights:

- **Right to Access:** Request access to their personal data.
- **Right to Correction:** Request a correction for inaccurate or incomplete data.
- **Right to Erasure:** Request deletion of data under specific situations.
- **Right to Restriction:** Request a restriction on data processing under specified situations.
- **Right to Data Portability:** Request to transfer data to another organisation.
- **Right to Object:** Object to data processing on the basis of legitimate interests.

7. Data Security

- To secure personal data, AZRB must put in place adequate technological and organisational measures.
- Regular data security assessments and audits will be carried out to identify and mitigate risks and issues.

8. Data Retention

- Personal data shall only be kept for as long as required to fulfil its objective.
- Retention periods will be determined depending on legal, regulatory, and commercial considerations.

9. Data Breach Management

- In the event of a data breach, AZRB must take immediate steps to contain it, analyse the damage, and notify impacted data subjects and regulatory authorities as needed.
- A Data Breach Response Plan shall be established, maintained and regularly updated.

10. Training and Awareness

- Regular training and awareness programs on the AZRB personal data protection policy shall be conducted for all employees.
- Employees who manage sensitive data or participate in data protection operations must receive specialised training.

11. Policy Review and Updates

This policy will be reviewed annually or as needed to ensure that it remains relevant and effective. Updates to the policy must be notified to all employees and stakeholders.

AZRB is committed to safeguarding personal data and maintaining compliance with the PDPA. This policy provides as a guideline for AZRB to achieve its data protection requirements while preserving the confidence of its stakeholders.



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