

**SARAWAK PLANTATION BERHAD**  
**REGISTRATION NO. 199701035877 (451377-P)**  
**PERSONAL DATA PROTECTION NOTICE**

As our commitment to the protection of your personal data, this Notice serves as a guide for you to understand how Sarawak Plantation Berhad and its subsidiaries (collectively referred to as “the Group”) will collect, process, use, disclose, transfer and store personal data.

**PERSONAL DATA**

A. Personal data means any information, whether recorded from any material information from which the identity of an individual is apparent or can be reasonably or directly ascertained by the entity holding the information or when put together with other information would directly and certainly identify an individual. Such information may be collected and processed by the Group and which may include but is not limited to the following:

1. Name, race, ethnic origin, religious belief, occupation, company name, company registration number, signature, contact particulars including telephone numbers, residential address(es), email address(es);
2. Age, gender, date of birth, national registration identity card number, passport number;
3. Marital status, details of children, information and contact details of your family, relatives or related parties;
4. Educational background, income, current and past employers, Employee Provident Fund (EPF) and Social Security Organization (SOCSO) details, tax file details and bank details;
5. Medical information;
6. Image or photo by way of video surveillance installed in some parts of the premises as part of the Group’s security infrastructure;
7. Biometrics data.

The list above is not exhaustive and may include other personal data depending on the nature of the dealing or transaction.

B. By submitting or disclosing your personal data to the Group, you confirm that you agree to our collection, process, use, disclose, transfer and storage of your personal data in accordance with this Notice.

**COLLECTION OF DATA**

A. Your personal data can be collected from various sources, including information provided by yourself or from third parties and information from the public domain.

B. If you provide personal data of other individuals (including minors), you hereby represent to the Group that the other individuals have agreed to appoint you to act on their behalf and you are authorised to:

1. Consent on their behalf to the data processing of their personal data;
2. Receive this personal data protection notice on their behalf;
3. Consent to the transfer of their personal data abroad, if applicable.

C. Provision of personal data to the Group is mandatory unless otherwise specified. Your failure to provide your personal data will result in the Group being unable to process your personal data to carry out the Purposes stated herein.

## **ACCURACY OF DATA**

- A. You remain primarily responsible for the completeness and accuracy of your personal data and you give your assurance that the personal data which you provide is not misleading and is up to date as at the point of provision.
- B. The Group cannot be held liable for its inability to fulfil its obligation if you fail to ensure that your personal data submitted to the Group is complete, accurate and up to date or your failed to notify the Group promptly of any changes to your personal data.

## **APPLICATION OF PERSONAL DATA**

- A. Personal data collected by the Group allows the latter to process transactions for the Group's business, welfare and social activities. It also allows the Group to keep the intended audience up to speed on the latest announcements and events. On the other hand, it can also assist the Group to improve its product and its engagement with target clusters.
- B. Below are some examples of how personal data is used by the Group ("the Purposes"):
  - 1. For corporate governance and compliance;
  - 2. For corporate exercises, dealings or other corporate purposes;
  - 3. For identification, authentication or verification purposes or reference checks;
  - 4. For internal record keeping and the conduct of internal activities;
  - 5. For analysis and marketing purposes;
  - 6. For communication with you but not limited to responding to queries and or requests;
  - 7. For facilitation of business or operations and for processing transactions related thereto;
  - 8. For provision of products or services to you and vice versa;
  - 9. For fulfillment of contractual obligations;
  - 10. For enforcement of legal or contractual rights including seeking legal and financial advice and legal redress;
  - 11. For insurance purposes;
  - 12. For auditing, administrative, billing, accounting and tax purposes;
  - 13. For creation of database or directories.

The Purposes above are not exhaustive and may include other usage depending on the nature of the dealing or transaction.

- C. Your personal data may be disclosed in good faith to:
  - 1. Our parent company, subsidiaries, related or affiliated companies;
  - 2. Our directors, authorized staff, auditors, lawyers, advisers, bankers, professional firms, our third party service providers, sub contractors;
  - 3. Government, Local Authorities, law enforcement agencies or any other authorities including regulatory and securities authorities to whom the Group is subject to or have reporting obligations or to whom the Group is required to provide personal data;;
  - 4. Relevant authorities because it is necessary for the prevention, detection or investigation of an actual or potential crime or suspicious transaction or breach of securities;
  - 5. Such other persons which the Group deems necessary, regardless of whether they are in Malaysia or outside, for any of the Purposes or where such disclosure is required by the law or by the order of a court of competent jurisdiction.

## **PROTECTION OF PERSONAL DATA**

- A. Your personal data collected will be stored in a secure manner in an electronic and or physical form, depending on the requirement and kept in strict confidence. Appropriate security measures and procedures are in place, where applicable and feasible.
- B. Sensitive personal data collected will not be disclosed to third parties without your consent unless the same is required under the Personal Data Protection Act 2010 and the Personal Data Protection (Amendment) Act 2024 (“the Act) or other applicable laws.
- C. The Group will use all reasonable efforts to secure your personal data but you do acknowledge that the use of the Internet is not entirely without risks hence the Group cannot fully guarantee the security and integrity of any personal data that is transferred to you or from you via the Internet.

## **RETENTION OF PERSONAL DATA**

- A. Personal data collected will be retained for the period necessary to fulfil the Purposes stated herein unless a longer period is required under the law or to protect the interests of the Group.
- B. Thereafter reasonable steps will be taken to ensure that the personal data is destroyed or deleted.

## **ACCESS TO PERSONAL DATA**

- A. You have the right to access the personal data the Group holds relating to yourself for correction or updating purposes unless the same is prohibited under the Act.
- B. Within the limits allowed under the Act, you may contact the Company Secretary via the details below to correct or update your personal data:

**DATIN TRINA YL TAN**  
Sarawak Plantation Berhad  
8th Floor Wisma NAIM  
2 ½ Mile Rock Road  
93200 Kuching  
Sarawak  
Email : PDP@spbgroun.com.my

## **WITHDRAWAL OF CONSENT**

- A. Should you wish to withdraw your consent to the process, use or disclosure of your personal data by the Group, please notify the Company Secretary via the details given above.

## **EXCLUSION OF LIABILITY**

- A. You acknowledge and agree that the Group shall not in any way be liable for any claim, loss, damage (financial or otherwise), injuries, embarrassment or liability howsoever arising from any inaccuracies or loss, deletion or modification of your personal data or for any other reasons whatsoever relating to any of your personal data forwarded by the Group to such other parties or in relation to the access or use or the inability to access or use by such other party or the reliance on the information contained therein, whether caused by any technical, hardware or software failure of any kind, interruption, error, omission, delay, virus or otherwise howsoever.

- B. Further, you shall indemnify, and keep indemnified, the Group from any loss, damage, expense, injuries, embarrassment or liability that may be suffered by the Group arising from your provision of false, inaccurate or misleading personal data.

#### **AMENDMENTS TO THIS NOTICE**

- A. The Group retains the right to amend this Personal Data Protection Notice from time to time via posting on our website. Your usage of services and continued business relationship with the Group shall be deemed as acceptance of any update, revision or amendment made to our Personal Data Protection Notice.