This Personal Data Processing Policy and Procedures ("PDPPP") is prepared in accordance with the requirements of the Personal Data Protection Act 2010 (the "Act"). This PDPPP sets out the policies and procedures of the Group with regard to personal data, agreement to the usage, processing of personal data and management of personal data gathered.

The custodian of the PDPPP is the Human Resource & Admin Manager and any amendments to the policy must be made in accordance to all governing law.

1. OBJECTIVES

I. Set out the responsibilities of the Group in using, managing and safeguarding the personal data gathered from internal and external parties.

II. Provide information and guidelines to person handling and managing the personal data.

III. Ensure that the Group is in compliance to the Personal Data Protection Act 2010 and all laws governing personal data.

2. DEFINITIONS

- Personal Data is any information which may identify a data subject, in which it may be identifiable by one type of personal data or/and a combination of other personal data.
- Sensitive Personal Data is information relating to the physical health or condition, political opinions, religious belief or other belief of similar nature.
- Processing is the act of carrying out any operation or set of operations on personal data.
- Commercial Transactions are any transactions of a commercial nature which includes the exchange of goods and services, investments, agency, financing, banking and insurance.
- Vital Interest are matters relating to life, death or security of a data subject.
- Third Party is a relevant person in relation to a data subject, a data processor or a person authorized in writing by the data user under the direct control of the data user.

3. DETAIL POLICIES AND PROCEDURES

PART 1: COLLECTION, PROCESSING AND USE OF PERSONAL DATA

I. In general principle, the Group is not allowed to collect and process any personal data without the consent of the data owner.
II. All data owner must be issued with the Group's Personal Data Processing Statement and must sign and consent to the content of the statement before any personal data can be collected and processed.

III. All use of personal data collected must be in line with the consented Personal Data Processing Statement.
IV. All use of personal data gathered must only be done for lawful purposes, meaning that the use is necessary and directly related to the Group's business activities.
V. All type of data gathered must not be excessive and reasonable.

PART 2: PERMITTED DISCLOSURE UNDER THE LAW

The Group is permitted to disclose personal data other than what has been outlined in the Personal Data Processing Statement only under the circumstances outlined below;

I. The data subject has given his/her consent to the disclosure.
II. The disclosure is necessary for the purpose of preventing or detecting a crime, or for the purpose of investigations, or, is required or authorized by or under any law or by the order of a court.
III. The disclosure is justified as being in the public interest in circumstances as determined by the law.

PART 3: STORING AND SECURITY OF PERSONAL DATA COLLECTED

To ensure privacy and security is maintained, all personal data collected must be stored in a secured and accessed controlled manner. All paper copy of documents that contains personal data must be;

I. Kept secured in locked cabinets.
II. Area must be marked restricted/authorised access area and accessible only by authorised personnel.

All digital copy of documents containing personal data must be stored in;

I. When stored in cloud, it must be in a cloud system provided by reputable cloud computing services provider.
II. In an enhanced network security environment.
III. Use of removable media devices is limited on hardware storing personal data.
IV. Hardware is secured and password protected.
V. Password and access to account containing personal data is restricted to authorised personnel.

Authorised personnel to access personal data documents are as below;

I. Managing Director
II. Executive Director
III. Human Resource Manager
IV. Human Resource Executive

PART 4: RETENTION AND DESTRUCTION OF PERSONAL DATA

The retention period, disposal action and disposal authority of all personal data collected by the group are as per table below;

No.	Type of Record	Description	Retention Period	Legal / Administrative Requirements	Disposal Authority
1	Employee Files	• Employee personal record • CV's	• Maximum of 7 years after last day of service • Maximum of 2 years after CV received.	• HR Policy • Employment Act 1955	• Managing Director • Human Resource & Admin Manager
2	Payroll record	• Employee pay history • Salary ledger/ record • Payslip copy	• Maximum of 7 years.	• HR Policy • Income Tax Act	• Managing Director • Human Resource & Admin Manager
3	Attendance Record	• Employee	• Maximum of 2 years	• HR Policy	• Managing Director • Human Resource & Admin Manager
4	Any other documents	• Surveys, questionnaires and any documents containing sensitive personal data	• Maximum of 2 years		• Managing Director • Human Resource & Admin Manager

In the event where there is a need to keep the personal data beyond the retention period, the retention period will be reviewed in blanket or on a case-to-case basis. The approving authority of such case will be the Managing Director and Human Resource & Admin Manager.

The destruction of all documents containing sensitive personal data must be made by the methods below;

- Paper documents containing sensitive personal data must be destructed by method of shredding, pulping or burning.
- Digital or electronic documents containing sensitive personal data must be done by cutting, crushing or completely deleting it from system i.e. delete file and cleared from junk box.

4. REVIEW AND REVISION

The Group is committed to continually enhancing, improving and strengthening the Policy. The implementation of the Policy and its effectiveness shall be reviewed periodically or as at when there are major changes in the Personal Data Protection Act 2010 or any other applicable laws and regulations, with identified improvements to be implemented as soon as possible.