

## **Leong Hup International Berhad and its Subsidiaries**

### **Personal Data Protection Notice (“Notice”)**

**Date of Publication of Notice: 31 December 2025**

*This version supersedes all previous versions and remains in force until replaced or updated.*

For the purpose of this Notice:

- references to “**We**”, “**Us**” and “**Our**” refer to Leong Hup International Berhad and its subsidiaries (“**Leong Hup Group**”); and
- references to “**You**”, “**Your**” and “**Yourself**” refer to any natural person, or any individual acting on behalf of a natural person or an entity, including, without limitation, individual employees, officers, directors, shareholders, beneficial owners (e.g., sole proprietors, partners), guarantors, or obligors of a natural person or an entity that has, had, or will have a commercial relationship with Us.

We value Your privacy and are committed to the protection of Your personal data. This Notice explains how We process Your personal data in accordance with the Personal Data Protection Act 2010 and its subsidiary legislations, code of practices, circulars and guidelines (“**PDPA**”).

We reserve the right to amend this Notice from time to time by updating the contents of this page without prior notice and will publish any updates to Our Notice on Our website(s) or by email. Any amendments will take effect and become binding on You once published on Our website(s) or, where applicable, notified to You by email, whichever earlier. You are encouraged to review this page periodically to remain informed of any changes.

#### **1. Processing of personal data**

We will only process (including collect, record, hold, use, disclose and store, dispose) Your personal information in accordance with the PDPA, this Notice and the privacy terms in any agreement(s) with Us (if any) that You may have contracted with.

We may process Your personal data during Your visit to Our website(s) and/or during the course of or in respect of any prospective, existing, or future dealings or transactions with Us.

We may process personal data of Your spouse, dependants or children (including individuals under the age of 18) where such personal data is provided to Us by You in your capacity as the individual’s spouse, parent, legal guardian or court-appointed representative. Your engagement or communication with us, or provision or submission of such individual’s personal data to Us, shall be deemed as Your confirmation that You are duly authorised to engage, communicate, provide or submit such individual’s personal data to us, and as both the individual’s consent and Your confirmation that the individual has consented to Our processing of such personal data in accordance with this Notice.

Where We process personal data of individuals under the age of 18, You further confirm that You are duly authorised to provide consent on the individual's behalf to processing their personal data in accordance with this Notice.

## **2. Types of Personal Data Processed by Us**

“Personal data” means any data that relates directly or indirectly to You, or from which You are identified or identifiable, whether on its own or in combination with other information in Our possession. Such data is collected or provided to Us for the Purposes stated below, and includes, without limitation:

- personal information, such as Your name, nationality, NRIC or passport number, date of birth, contact details, gender, email address, address, social network details;
- information to establish Your financial standing, such as employment details, creditworthiness, bank statements, income or tax records, and results from searches with governmental entities and credit worthiness agencies;
- financial or payment information required by Us or Our payment processing provider(s) to facilitate transactions or payments to or from You, such as bank account details or statements, debit or credit card details, other payment methods details (if available), transaction or payment records and history;
- information required for legal and regulatory compliance, such as tax identification and registration number, business registration numbers or other identifiers mandated by applicable laws;
- specimen signatures, such as Your handwritten, digital or electronic signatures as defined under the applicable laws and regulations;
- shareholding information, such as shareholding details (e.g.: shares/options held), beneficial ownership details and bank account information;
- professional background, such as education, occupation, qualifications, or training;
- communications with Our customer service personnel. Your communications with Our customer service personnel may be recorded or listened into, in accordance with applicable laws, for operational needs (e.g. for quality or training purposes);
- demographic or behavioural characteristics, such as Your date of birth, age or age range, gender, geographical location, interest or preferences in relation to Your use of Our, or Our partners or vendors' products and services;
- feedback and survey information, such as Your views or opinions made known to Us via feedback or surveys;

- information collected when You access our premises, such as: visitor logs, images and footages from closed-circuit television (“CCTV”) recordings, vehicle number plates or biometric data;
- account login information, including Your login identification, email address, profile or screen name, password in unrecoverable form, and/or security questions and answers;
- electronic data or online identifiers, such as internet protocol (“IP”) addresses, cookies, activity logs, other online identifiers and location data through Your navigation of Our websites, or through usage of Our products or services, or as part of their delivery to You;
- information relating to Your spouse, dependants, or children, such as identification details, contact information, date of birth, and their relationship to You;
- sensitive personal data, such as information about Your physical or mental health or condition, religious beliefs, commission or alleged commission of any offence, biometric data or financial data; and
- other information necessary to provide You with Our products or services, and any personal data voluntarily provided to Us.

### **3. Sources of Personal Data**

We may collect Your personal data from You and from a variety of sources in any format, including but not limited to from:

- forms submitted physically or digitally via Our website(s), mobile site(s) or application(s) operated by or for Us;
- verbal and written communications or interactions with Us and/or Our authorised agents by email, telephone, social media or other channels. Please note that any communication or engagement with Us on external social media platforms is subject to the terms, conditions, and privacy policies of those platforms. We advise You to use such platforms with due care regarding Your privacy. Leong Hup Group will never ask for personal data or sensitive information (such as passwords, financial or transactional details, or NRIC numbers) through social media platforms. For matters involving personal data or sensitive information, please contact Us at the contact details provided in section 15;
- interactions with You in the course of or in contemplation of Your dealings or transactions with Us;
- Your registrations or interactions with Us for events, programs, or contests;

- other third parties, including but not limited to third parties connected with You; governmental or statutory authorities and/or law enforcement agencies; credit reporting/referencing agencies, bureaus or agencies; banking or financial institutions; third party service providers; insurers and healthcare providers; professional advisors and corporate service providers;
- information that is supplied and/or collected when You visit Our website(s), mobile site(s) or application(s) which may include Your device's IP address or from data that is collected via cookies. Our website(s), mobile site(s) and application(s) may include social sharing buttons that enable You to share content to third-party social media platforms. By choosing to use these features, You acknowledge and agree that the relevant social media platforms may track, collect and store or carry out other processing of Your personal data or activity, and that Leong Hup Group has no control over, and shall not be responsible or liable for such processing by these third-party social media platforms;
- recordings of CCTV installed at Our premises;
- through cookies or other tracking technologies used on Our website(s), mobile site(s) or application(s); and
- any publicly available sources or databases.

#### **4. Purposes of Processing Personal Data (“Purposes”)**

We may process Your personal data for the following Purposes, including to:

- respond to Your queries;
- provide products or services and post-sales support, perform commercial transactions;
- fulfil Our contractual obligations;
- facilitate and process payments to or from You;
- process Your credit account applications and assess Your creditworthiness;
- support and conduct Our general business functions, such as creating and maintaining email and user accounts necessary to facilitate system access for Our business, financial, sales, administrative, and operational purposes;
- operate Our premises safely and securely in compliance with health and safety and security requirements;

- conduct and support internal marketing analysis, customer patterns, and engagement studies;
- customise and tailor content in Our website(s), mobile site(s) or application(s) so that it is effectively presented for You and Your device(s);
- accurately maintain Our internal records management;
- manage customer relations and to improve Our products and services;
- inform You about Our products, services, events, promotions, advertising, marketing, and materials of interest, and to collaborate with third parties to advertise and market products/services;
- conduct profiling of Your preferences and statistical analysis;
- comply with Our legal and regulatory obligations, such as company, tax, anti-money laundering, financial, occupational safety and health, data protection, and other laws;
- conduct internal investigations, audits, risk management or security checks;
- conducting due diligence and related activities in connection with mergers and acquisitions, joint ventures, partnerships, financing, reorganising, restructuring, divestments, public offerings, or other corporate exercises such as share transfers, reorganisations, or capital market transactions;
- process Your personal data for purpose of or in connection with any legal proceedings or for the purpose of obtaining legal advice, or to establish, exercise and defend Our legal rights and interests, or for the administration of justice;
- protect Your vital interest;
- assist You, upon Your request, in issuing or preparing confirmation letters, reference letters, supporting documentation, or other information for any applications or matters relating to You or Your spouse, dependants or children (e.g. visa, financial, insurance, educational, housing, or other administrative purposes);
- disclose Your personal data to third parties (i) where We are required to do so by applicable law; (ii) in response to legal proceedings; (iii) in response to a request from a competent law enforcement agency; (iv) to protect Our rights, privacy, safety or property, or the public; (v) for detection and prevention of crime (including fraud).

We may also disclose Your personal data for other purposes that are directly related to the purposes for which the personal data was originally collected.

(collectively, the “**Purposes**”)

## **5. Failure to Provide Personal Data**

Save for provision of personal data for direct marketing and promotional activities, which are voluntary in nature, the provision of Your personal data to Us is necessary for Us to perform the Purposes stated in this Notice. If You choose not to provide Your personal data, or if You later withdraw Your consent to its processing, We may be unable to carry out the Purposes stated in this Notice or fulfil Our obligations in relation to You and/or for any related purposes.

## **6. Consent**

By submitting Your personal data to us, communicating with Us, engaging with Us or using Our products and services, You acknowledge that You have read and understood the contents of this Notice and consent to the processing of Your personal data by Us in accordance to the terms in this Notice. Where You provide to Us the personal data of Your spouse, dependants or children, You confirm that You are duly authorised to do so and where applicable, that You have obtained their prior consent to Our processing of their personal data in accordance with this Notice.

Where You provide personal data of third parties to Us, You confirm that You have obtained their consent or are otherwise duly authorised to do so.

If You would like to withdraw Your consent or any consent You have provided on behalf of Your spouse, dependants or children to the extent You are legally permitted to do so to the processing of personal data by Us, please contact Us at the contact details in Section 15 below.

## **7. Disclosure and Transfer of Your personal data**

It may be necessary for Us to disclose and transfer Your personal data in and outside of Malaysia (whether at your request or otherwise) if any of the parties mentioned below are located or have processing facilities in countries outside of Malaysia.

You consent to us transferring Your personal data in and outside Malaysia to such parties and for the Purposes set out in Section 4 (Purposes of Processing Personal Data) above.

We will take reasonable steps to ensure that any such parties, whether within Malaysia or based outside of Malaysia, protect Your personal data in accordance with Our security policies, and that they can only process Your personal data strictly in accordance with our instructions.

### **(a) to Entities within Our group of companies**

Your personal data may be disclosed and transferred to entities (in or outside of Malaysia) within Leong Hup Group for the Purposes stated in Section 4 (Purposes of Processing Personal Data) above.

### **(b) to Third Parties**

Your personal data may be disclosed to relevant third parties (in or outside of Malaysia) as required under law, pursuant to relevant Our contractual or business relationships with relevant third parties, or for the Purposes stated in Section 4 (Purposes of Processing Personal Data). Relevant third parties may include the following:

- (i) third parties connected with You, such as Your employer, joint account holders, security providers, guarantors and indemnitors;
- (ii) governmental or statutory authorities or regulators and/or law enforcement agencies, such as Bank Negara Malaysia, Bursa Malaysia, Ministry of Health, Ministry of Works, Inland Revenue Board, Employees' Social Security Organisation, Employees' Provident Fund Organisation, Personal Data Protection Commissioner, Securities Commission Malaysia, and Department of Occupational Health and Safety Malaysia;
- (iii) credit reporting/referencing agencies, bureaus or agencies and debt collection agencies;
- (iv) banking or financial institutions;
- (v) service providers or business partners that We use to help Us run our businesses, such as: advertising and marketing partners, payment processors, fraud detection and identity verification service providers, website developers, cloud and hosting service providers, customer support and communication service providers, market research service providers, logistic and shipping partners, our business partners and affiliates, analytics and tracking providers, conference/training/event organizers, insurance companies and healthcare providers;
- (vi) professional advisors and corporate service providers, such as auditors, advisors, lawyers, company secretaries, and consultants.

## **8. Security of Personal Data**

We have implemented physical, technical and procedural measures to secure Your personal data from loss, misuse, modifications, unauthorised or accidental access or disclosure, alternation or destruction, use, alteration, and disclosure. Such measures include:

- (i) Registration of all employees involved in the processing of personal data and ensuring said employees protect confidentiality of data subjects' personal data;
- (ii) Access controls to limit employees' access to personal data systems to only authorized personnel;
- (iii) Imposition of user identifications and passwords;
- (iv) Physical security measures to ensure personal data is stored at secure locations;
- (v) System safeguards with anti-virus protection protect systems against malware threats and backup/recovery systems;
- (vi) Data transfer controls to restrict personal data transfers and ensure cloud transfers comply with the applicable laws;
- (vii) Maintenance of records and logs of data access and transfers;
- (viii) Measures to ensure personal data that are no longer used are destroyed

thoroughly and efficiently.

While We will do our best to protect Your personal data, We cannot guarantee the security of personal data during transmission through our website(s), mobile site(s) or application(s). It is important that You also take active measures to safeguard and maintain the security of Your personal data. You bear sole responsibility for maintaining the confidentiality of Your password and for all activities carried out under Your account(s) with Us. You are expected to make appropriate use of all privacy settings and security controls that We make available to You on Our website(s), mobile site(s) or application(s).

## **9. How we use cookies**

A cookie is a small file which asks Your permission to be placed on Your computer's hard drive. Once You agree, the file is added and the cookie helps analyse web traffic or lets You know when You visit a particular site. Cookies allow web applications to respond to You as an individual. The web application can tailor its operations to Your needs, likes and dislikes by gathering and remembering information about Your preferences.

We use traffic log cookies to identify which pages are being used. This helps Us analyse data about web page traffic and improve Our website in order to tailor it to Your needs. We only use this information for statistical analysis purposes, and then the data is removed from the system.

Overall, cookies help Us provide You with a better website, by enabling us to monitor which pages You find useful and which You do not. A cookie in no way gives Us access to Your computer or any information about You, other than the data You choose to share with Us.

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but You can usually modify Your browser setting to decline cookies if You prefer. This may prevent You from taking full advantage of Our website(s).

## **10. Retention of Personal Data**

We will use Your Personal Data for as long as necessary to satisfy the Purposes for which Your Personal Data was collected (as described in Section 4 above) or to comply with applicable legal requirements.

Your personal data will be stored only for the period necessary to fulfil the Purposes stated above, after which, if it is no longer necessary to store Your personal data, we will take reasonable steps to delete it.

## **11. Right to Request Access to and for Correction and/or Update of Personal Data**

We will take all reasonable steps to ensure that such data remains accurate, completed and updated. You are responsible for ensuring that all personal data you provide to us is accurate, complete, not misleading, and kept up to date. You should notify us promptly if any of your personal data requires correction or updating.

You have the right to request access to Your personal data processed by us, and for correction and/or update of Your personal data processed by us that is inaccurate, incomplete or outdated.

Should You wish to exercise these rights, You may do so by completing the relevant forms below and submitting the completed form to the contact details provided in Section 15:

- [Data Access Request Form](#)
- [Data Correction and Update Request Form](#)

Upon receipt of a valid request, We will revert within twenty-one (21) days from the day of Our receipt of the request. Where We are unable to comply in full within this period, We shall, before its expiry, notify the requestor in writing of the reasons for any non-compliance and comply with the request to the extent possible. In any event, We shall endeavour to comply in full with the request no later than fourteen (14) days after the expiration of the initial twenty-one (21) day period.

## **12. Right to Withdraw Consent and Limit Processing of Personal Data**

Save for direct marketing and promotional activities, which are voluntary in nature, the provision of Your personal data is necessary for the performance of the Purposes set out in this Notice. You have the right, at any time, to withdraw Your consent to the processing of Your personal data or to request that We limit the manner in which such data is processed, subject always to any applicable legal restrictions and Our contractual rights.

Your withdrawal of consent or request to limit processing may affect Our ability to provide You with certain products or services.

## **13. Right to Data Portability**

Subject to the technical feasibility and compatibility of the relevant data format, You have the right to request that We transmit Your personal data to another data controller of Your choice. Such request must be made in writing, including by way of electronic means, and submitted to Us at the contact details provided in Section 15 below. Upon receiving a valid request, We will endeavour to complete the transmission of Your Personal Data to the designated data controller in accordance with the applicable laws.

#### **14. Accessing and controlling processing of Your personal data**

You retain control over how Your personal data is processed by Us, both electronically and non-electronically.

We may, from time to time, use Your personal data to send You direct marketing or promotional information about third parties which We think You may find interesting, unless You opt out of marketing and promotional updates from us by sending us a notice in writing. Please note that even if You opt out of marketing or promotional updates from us, You will still receive important administrative communications such as order confirmations, account updates, and other essential non-marketing notices.

You may choose to restrict the collection or use of Your personal data in the following ways:

- Whenever You are asked to fill in a form on Our website(s), mobile site(s) or application(s), look for the box that You can click to indicate that Your information is not to be used for direct marketing or promotional purposes (if applicable).
- If You have previously agreed to us using Your personal data for direct marketing or promotional purposes, You may change Your mind at any time by writing to or emailing us at [dpo@lhbb.com](mailto:dpo@lhbb.com).

We will not sell, distribute or lease Your personal data to third parties unless We have Your permission or are required by law.

#### **15. Requests, Queries and Complaints**

For any requests, queries or complaints regarding processing of Your Personal Data, please contact us in writing at the following:

**Leong Hup Group Data Protection Officer**

**Leong Hup International Bhd**

3rd Floor, Wisma Westcourt,

No. 126, Jalan Klang Lama,

58000 Kuala Lumpur.

03-7980 8086

[dpo@lhbb.com](mailto:dpo@lhbb.com)