



reNIKOLA HOLDINGS SDN BHD
202101014740 (1415040-M)
(Incorporated in Malaysia)

PERSONAL DATA PROTECTION POLICY

INTRODUCTION

reNIKOLA Holdings Sdn Bhd and its subsidiaries (“reNIKOLA” or the “Group”), are committed to protecting your privacy in accordance with the Personal Data Protection Act 2010 of Malaysia (“PDPA”).

This Personal Data Protection Policy (“Policy”) contains the policies and practices of the Group to comply with the PDPA and shall apply to all personal data collected by reNIKOLA. This Policy explains the purpose of collection, use or disclosure of personal data, and shall be governed by the laws of Malaysia.

This Policy applies to all reNIKOLA’s Directors, employees, business associates, shareholders, investors, job applicants, suppliers, contractors, customers, agents, and any other third-party service providers.

PRIMARY DATA PROTECTION RULES

The Group must comply with the following rules when collecting, using or disclosing personal data of any individual:

- obtain the consent of the individual or, if consent is not obtained, ensure that the collection, use or disclosure is permitted under Malaysia law;
- ensure that the individual is informed of the purpose of such collection, use or disclosure;
- ensure that the personal data is only collected, used or disclosed for such purpose, and no other purpose; and
- ensure that the personal data is properly retained, protected and disposed of in accordance with this Policy.

DEFINATION OF PERSONAL DATA

1. Personal data defined under the PDPA to mean data relating to an individual who can be identified:
 - from such data alone; or
 - from other information in possession of the data user, including any sensitive personal data and expression of the individual.
2. Examples of an individual's personal data:
 - personal contact information, including name, personal address, personal email address, telephone number, bank account and tax details;
 - NRIC, passport or other equivalent identification number;
 - personal data relating to a third party (e.g. information of family members); and
 - other information where the individual can be identified from such information.
3. The PDPA applies only to the personal data of individuals and does not extend to data of companies or corporations, including business contact information, such as the individual's position, business address, email, telephone and fax numbers.

PURPOSES OF COLLECTION, USE OR DISCLOSURE OF PERSONAL DATA

Subject to the provisions of any applicable law, the collection, use or disclosure of personal data by reNIKOLA, shall be for the following purposes;

- responding to queries, feedback and requests;
- providing media announcements and responses;
- providing updates and other communications on developments relating to reNIKOLA;
- providing remuneration, reviewing salaries and bonuses, conducting employee's performance evaluation;
- administrative processes relating to human resource planning and management, including employment, termination, staff benefits, expense claims, insurance, medical services, leave administration, and training;
- managing the administrative and business operations of reNIKOLA and complying with internal policies and procedures;
- financial reporting, regulatory reporting, management reporting, risk management, audit and record keeping purposes;
- facilitating business transactions, which may extend to mergers & acquisitions, capital raising or any other corporate exercises involving reNIKOLA;

- preventing, detecting and investigating (possible) criminal activity, suspicious transactions, disputes, fraud, billings and any other business risks;
- managing the safety and security of the business premises, including but not limited to carrying out CCTV surveillance;
- in connection with any claims, actions, proceedings, and/or protecting and enforcing the Group's contractual and legal rights and obligations, including but not limited to drafting and reviewing documents, transaction documentation, obtaining legal advice, and facilitating dispute resolution;
- managing and preparing reports on incidents and accidents; and
- complying with applicable rules, laws, regulations, codes of practice, guidelines issued by legal or regulatory bodies which have jurisdiction over reNIKOLA, including but not limited to disclosing to regulatory bodies, conducting audit checks, due diligence and other regulatory investigations.

ACCURACY OF THE PERSONAL DATA

reNIKOLA aims to keep all personal data as accurate, not misleading, updated and complete as possible for the Group to provide its services and facilities. As such, it is obligatory for the individual to provide accurate and reliable personal data to the Group.

WITHDRAWAL CONSENT, CORRECTION AND ACCESS TO PERSONAL DATA

1. An individual who has provided the Group with personal data is entitled under the PDPA to access, correct or withdraw his/her consent, for the collection, use or disclosure of the personal data in the Group's possession by submitting a written request.
2. Depending on the extent of the withdrawal of consent for the Group to process the personal data, it may result in the discontinuation of existing relationship with the Group.

RETENTION, PROTECTION AND DISPOSAL OF PERSONAL DATA

1. Personal data provided to the Group is retained for as long as the purposes for which the personal data was collected continues.
2. reNIKOLA takes all reasonable security measures to protect and prevent unauthorised access, collection, use, disclosure, copying, modification or disposal.
3. The personal data is destroyed from the Group's records and system in the event the personal data is no longer required for the said purposes, unless its further retention is required to meet operational, legal, regulatory, tax or accounting requirements.

REVISION AND PUBLICATION OF THIS POLICY

The Board of Directors shall review this Policy from time to time for effectiveness and to check whether any changes are required.

reNIKOLA reserves the right, and at its discretion, to amend or update this Policy, and shall be made available to all via reNIKOLA's website.

If there are any questions or feedback relating to this Policy, to withdraw consent, to obtain access or make corrections to the personal data records, please contact compliance officer, human resource representative, via email at enquiry@renikola.com, or in writing via a letter to our registered business address.

This Policy has been approved and adopted by the Group on 20 July 2022.