



# **UNITED PLANTATIONS BERHAD**

(Company no. 191701000045 (240-A))

Jendarata Estate • 36009 Teluk Intan • Perak Darul Ridzuan • Malaysia

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PERSONAL DATA PROTECTION POLICY

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## Personal Data Protection Policy

At United Plantations Berhad (Company No 191701000045 (240-A)), and our subsidiaries we are committed to protecting your privacy in accordance with the Personal Data Protection Act 2010 of Malaysia

### 1. Policy Statement

- 1.1 It is essential for United Plantations Berhad and its subsidiaries (hereinafter referred as "the Group") to collect, process and use certain types of information about individuals (hereinafter referred to as "personal information" or "personal data") who come into contact with the Group in order for or on behalf of the Group.
- 1.2
- 1.3 Personal information must be collected and dealt with appropriately whether such information is collected on paper, stored in a computer data base system or recorded on other material, and adequate security measures should be accorded to such personal information under the provisions of the Personal Data Protection Act 2010(hereafter referred to as "the Act").

### 2. Data User

- 2.1 The Group is the sole "data user" within the meaning of the Act, which means that is determines what purposes personal information of individuals held would be used for in the course of its business and activities.
- 2.2
- 2.3 It shall also be the responsibility of the Group to provide the necessary statutory notifications under the Act to the "data subject" and "data processor" and where necessary to the PDP of the data it holds or is likely to hold, and the general purpose that this data will be used for by the Group.

### 3. Disclosure

- 3.1 During the course of its business and operational activities, the Group may or shall be required to share personal information of individuals held by the Group with other parties such as the Federal and State Governments, Statutory Bodies, Public Corporations and other Government Agencies and private corporations.
- 3.2 Where there is a requirement on the part of the Group to disclose or share personal information of individuals to third parties, the individual concerned will be made aware in the most circumstances of how and with whom their personal information will be disclosed or shared.
- 3.3 Nonetheless, there are or could be circumstances where the law permits or requires the Group to disclose personal information without the consent of the data subject.

#### 4. Personal Data Protection Principles

- 4.1 The Group regards the lawful and correct treatment and handling of personal information as very important to successful business practices and to maintaining the confidence of those with whom the Group or its agents deal.
- 4.2 It is the Group's policy that all personal information held by the Group be treated and dealt with respectfully, correctly and lawfully at all times in accordance with the provisions of the Act.
- 4.3 To this end, the Group will, at all times, adhere to the Principles of Data Protection as enshrined in the Personal data Protection Act 2010.

More specifically, the afore-mentioned Principles require that personal information held:

- (a) shall be processed by the Group or its agents fairly and lawfully and, in particular, shall not be processed unless specific conditions are complied with;
- (b) shall be obtained by the Group only for one or more of the purposes specified in the Act, and shall not be processed in any manner incompatible with that purpose or those purposes for which such information was meant for;
- (c) shall be adequate, relevant and not excessive in relation to the purpose or purposes for which it was sought by the Group;
- (d) shall be accurate and, where necessary, kept updated from time to time;
- (e) shall, subject to any other law on retention of data or records of individuals, not be kept or retained by the Group for longer than is necessary;
- (f) shall be processed in accordance with the rights of data subjects under the Act;
- (g) be at all times kept secured by the Data User, and in addition the Data User shall take appropriate technical and other measures to prevent unauthorised or unlawful processing or accidental loss or destruction of, or damage to, the personal information of individuals;
- (h) unless otherwise permitted by law, shall not be transferred to any other third party wherever located without the express written consent of the data subject.

## 5. Management Control

The Group being the Data User shall, through effective and appropriate management control systems:

- (a) observe fully the conditions regarding fair collection and use of personal information of individuals;
- (b) strictly comply with provisions of the Act to meet its legal obligation to specify the purpose for which personal information is collected and used in the Group;
- (c) collect and process appropriate personal information of individual only, and only to the extent that it is needed to fulfil and comply with its business, operational and statutory requirements;
- (d) ensure that the quality and type of personal information collected and used is that information which is necessary only;
- (e) ensure that the rights of individuals about whom information is held, can be fully exercised under the provisions of the Act, which include:
  - (i) the right to be informed that processing is being undertaken;
  - (ii) the right of access to one's personal information held by the Group;
  - (iii) the right to prevent processing in certain circumstances and;
  - (iv) the right to correct, rectify, block or erase information is regarded as wrong or incorrect information.
- (f) take appropriate technical and organisational security measures to safeguard personal information;
- (g) treat individuals justly and fairly whatever their age, religion, disability, gender, sexual orientation or ethnicity when dealing with requests for information;
- (h) set out clear procedures for responding to requests for information regarding this Policy or any matters pertaining to the Act.

## 6. Data Collection

- 6.1 The Group shall ensure that personal information, in whatever manner, is collected within the limitation and boundaries set forth in this policy.
- 6.2 Where informed consent is required from the data subject, the Group shall obtain the required consent in an appropriate manner from the data subject in writing before collecting and processing the personal information. The Group shall ensure that the data subject agreeing or refusing to provide such consent.

- 6.3 When collecting data, the Group shall ensure that the data subject:
- (a) clearly understand why the information is required by the Group;
  - (b) understands what it will be used for and what the consequences are should the data subject decide not to give consent to the collection or processing of the information;
  - (c) as far as reasonably possible, grants explicit consent either in writing or orally for data to be processed by the Group;
  - (d) is, as far as reasonably practicable, competent enough to give consent and has given so voluntarily without any duress, coercion or compulsion on the part of the Group.
  - (e) has received sufficient information on why their data is needed and how it will be used.

## **7. Data Retention and Storage**

- 7.1 It is the policy of the Group that information and records relating to data subjects shall be stored securely and be accessible only to authorised staff for legitimate purposes.
- 7.2 It is also the policy of the Group that personal information shall be stored for only as long as it is required by law and shall be disposed off appropriately thereafter.
- 7.3 It is the responsibility of the Group to ensure that all personal data is non-recoverable from any computer system previously used within the Group, which has been passed on or sold to any third party.

## **8. Data Access and Accuracy**

- 8.1 All individuals have the right to access the information the Group holds about them. The Group shall also take reasonable measures to ensure that information of data subjects is kept up to date by confirming with the data subjects from time to time, on whether there have been any changes on their personal information.
- 8.2 In addition to the above, the Group shall ensure that:
- (a) it has an appropriate and responsible designated officer in the Group for ensuring compliance with this policy and the provisions of the Act;
  - (b) everyone processing personal information understands that they are contractually and legally responsible for following ethical data protection practise;

- (c) everyone processing personal information is appropriately trained to do so;
- (d) everyone processing personal information executes a pledge of confidentiality in accordance with the provision of the Act;
- (e) everyone processing personal information is appropriately monitored and supervised by a senior officer;
- (f) anybody wanting to make enquiries about handling personal information knows the procedure for the same;
- (g) it handles promptly and courteously with any enquiries relating to personal information;
- (h) it describes clearly and succinctly on how personal information is processed and handled in the Group;
- (i) it shall regularly review and audit the manner personal information is held, managed and used in the Group;
- (j) it shall regularly assess and evaluate its methods and performance in relation to the handling of personal information; and
- (k) all employees are aware that any breach or violation of the rules and procedures identified in this policy may lead to disciplinary action being taken against them.

## 9. Update and Revision

This policy shall be updated and revised as and when it is necessary to reflect best practice in management, security and control of personal data and to ensure compliance with any changes or amendments made to Personal Data Protection Act 2010.

In case of any questions in relation to this policy please contact the Company Secretary, Mr. Ng Eng Ho, Registered Office, United Plantations Berhad, Jendarata Estate, 36009 Teluk Intan, Perak, Malaysia