

# PERSONAL DATA PROTECTION POLICY

*(In compliance with the Personal Data Protection Act 2010 – Malaysia)*

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## PART A: ENGLISH VERSION

### 1. Introduction

This Personal Data Protection Policy (“Policy”) sets out the principles and practices adopted by H&A Group and its subsidiaries in relation to the collection, use, disclosure, retention, and protection of personal data in accordance with the Personal Data Protection Act 2010 (“PDPA”).

This Policy applies to all employees, directors, officers, contractors, consultants, business partners, customers and other relevant parties who handle personal data on behalf of the Group.

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### 2. Definition of Personal Data

“Personal Data” refers to any information in respect of commercial transactions that relates directly or indirectly to an individual who is identified or identifiable from that information, including but not limited to name, identification number, contact details, employment information, and financial data.

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### 3. General Principle

The Group shall not process personal data unless:

- The data subject has given consent to the processing; and
- The processing is for a lawful purpose directly related to the Group’s activities; and
- The data collected is adequate, relevant, and not excessive for the purpose for which it is processed.

Personal data may be collected and processed in the course of the Group’s business activities, including but not limited to the following situations:

- Booking forms and documentation for the purchase of property;
- Appointment of sales agents for marketing and promotional purposes;

- Human resource management records, including recruitment, employment administration, payroll, performance management and statutory contributions;
- Supplier and contractor onboarding, due diligence, contract administration and payment records;
- Visitor management systems, Wi-Fi usage analytics, and CCTV surveillance within office premises for security and operational purposes;
- Customer relationship management and after-sales service administration.

The processing of personal data in these situations shall be carried out in compliance with the PDPA and this Policy.

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#### 4. Notice and Choice Principle

The Group shall inform data subjects, through a written notice, of:

- The purpose for which personal data is collected and processed;
- The right of the data subject to access and correct their personal data;
- The class of third parties to whom the data may be disclosed; and
- Whether the supply of personal data is obligatory or voluntary.

Data subjects shall be given the choice to consent to or limit the processing of their personal data, subject to legal and contractual obligations.

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#### 5. Disclosure Principle

Personal data shall not be disclosed for any purpose other than:

- The purpose for which the data was collected; or
- A purpose directly related to the original purpose; or
- With the consent of the data subject; or
- Where disclosure is required or permitted by law.

The Group shall take reasonable steps to ensure that third parties receiving personal data protect it adequately.

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#### 6. Security Principle

The Group shall take practical and reasonable measures to protect personal data from:

- Loss or misuse;
- Unauthorised access or disclosure;
- Alteration or destruction.

Security measures include physical, administrative, and technical safeguards such as access controls, password protection, data encryption, secure servers, restricted access to filing systems, and CCTV monitoring where appropriate.

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## 7. Retention Principle

Personal data shall not be retained longer than is necessary to fulfil the purpose for which it was collected or as required by law.

The Group's record retention practices include the following general guidelines:

- Human resource and payroll records: retained for a minimum of seven (7) years or in accordance with statutory requirements;
- Financial, accounting and tax-related records: retained for at least seven (7) years pursuant to applicable laws;
- Property transaction records: retained for the duration of the contractual relationship and thereafter in accordance with legal limitation periods;
- CCTV recordings: retained for a limited period (e.g., 30 to 90 days) unless required for investigation or legal proceedings;
- Supplier and contractor records: retained for the duration of the business relationship and thereafter in accordance with statutory requirements.

When personal data is no longer required, it shall be securely destroyed or permanently deleted in accordance with the Group's record retention practices.

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## 8. Data Integrity Principle

The Group shall take reasonable steps to ensure that personal data is accurate, complete, up-to-date, and not misleading, having regard to the purpose for which it is processed.

Data subjects are encouraged to notify the Group of any changes to their personal data.

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## 9. Access Principle

Data subjects have the right to:

- Access their personal data held by the Group; and
- Request correction of inaccurate, incomplete, or outdated personal data.

Requests for access or correction shall be made in writing and may be subject to reasonable administrative fees, where permitted by law.

Data subjects may submit their requests through the following channels:

- By email to: [general@hna Holdings.com.my](mailto:general@hna Holdings.com.my)
- By post to: No 8, Jalan Setia Dagang AJ U13/AJ, Sek U13, Setia Alam, 40170 Shah Alam, Selangor
- By hand delivery to the Group's business office: No 8, Jalan Setia Dagang AJ U13/AJ, Sek U13, Setia Alam, 40170 Shah Alam, Selangor

The Group will respond to such requests within the timeframe prescribed under the PDPA.

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## 10. Policy Review

This Policy may be reviewed and updated from time to time to ensure compliance with applicable laws and regulatory requirements.

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## PART B: VERSI BAHASA MALAYSIA

### 1. Pengenalan

Dasar Perlindungan Data Peribadi (“Dasar”) ini menetapkan prinsip dan amalan yang diguna pakai oleh Kumpulan Syarikat H&A (“Kumpulan”) berhubung dengan pengumpulan, penggunaan, pendedahan, penyimpanan dan perlindungan data peribadi selaras dengan Akta Perlindungan Data Peribadi 2010 (“PDPA”).

Dasar ini terpakai kepada semua pekerja, pengarah, pegawai, kontraktor, perunding, rakan niaga, pelanggan dan pihak-pihak berkaitan lain yang mengendalikan data peribadi bagi pihak Kumpulan.

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### 2. Takrif Data Peribadi

“Data Peribadi” merujuk kepada sebarang maklumat berkaitan transaksi komersial yang secara langsung atau tidak langsung mengenal pasti seseorang individu, termasuk tetapi tidak terhad kepada nama, nombor pengenalan, maklumat perhubungan, maklumat pekerjaan, dan data kewangan.

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### 3. Prinsip Am

Kumpulan tidak akan memproses data peribadi melainkan:

- Subjek data telah memberikan persetujuan; dan
- Pemrosesan adalah bagi tujuan yang sah dan berkaitan secara langsung dengan aktiviti Kumpulan; dan
- Data yang dikumpul adalah mencukupi, relevan, dan tidak berlebihan bagi tujuan pemrosesan tersebut.

Data peribadi boleh dikumpul dan diproses dalam perjalanan aktiviti perniagaan Kumpulan, termasuk tetapi tidak terhad kepada:

- Borang tempahan dan dokumentasi bagi pembelian hartanah;
  - Pelantikan ejen jualan bagi tujuan pemasaran dan promosi;
  - Rekod pengurusan sumber manusia termasuk pengambilan pekerja, pentadbiran pekerjaan, penggajian dan caruman berkanun;
  - Proses pendaftaran pembekal dan kontraktor, usaha wajar serta rekod pembayaran;
  - Sistem pengurusan pelawat, analitik penggunaan Wi-Fi dan rakaman CCTV di premis pejabat;
  - Pengurusan hubungan pelanggan serta perkhidmatan selepas jualan.
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## 4. Prinsip Notis dan Pilihan

Kumpulan akan memaklumkan subjek data melalui notis bertulis mengenai:

- Tujuan data peribadi dikumpul dan diproses;
- Hak subjek data untuk mengakses dan membetulkan data peribadi;
- Kelas pihak ketiga yang mungkin menerima data tersebut;
- Sama ada pemberian data adalah wajib atau sukarela; dan
- Kesan sekiranya data peribadi tidak dibekalkan.

Subjek data diberi pilihan untuk memberikan atau menarik balik persetujuan tertakluk kepada undang-undang dan obligasi kontrak.

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## 5. Prinsip Pendedahan

Data peribadi tidak akan didedahkan selain bagi:

- Tujuan data tersebut dikumpul; atau
- Tujuan yang berkaitan secara langsung; atau
- Dengan persetujuan subjek data; atau
- Jika dikehendaki atau dibenarkan oleh undang-undang.

Kumpulan akan mengambil langkah munasabah bagi memastikan pihak ketiga melindungi data peribadi dengan sewajarnya.

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## 6. Prinsip Keselamatan

Kumpulan akan mengambil langkah praktikal dan munasabah untuk melindungi data peribadi daripada:

- Kehilangan atau penyalahgunaan;
- Akses atau pendedahan tanpa kebenaran;
- Perubahan atau pemusnahan.

Langkah keselamatan termasuk kawalan fizikal, pentadbiran, dan teknikal.

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## 7. Prinsip Penyimpanan

Data peribadi tidak akan disimpan lebih lama daripada yang diperlukan bagi tujuan ia dikumpulkan atau seperti yang dikehendaki oleh undang-undang.

Amalan penyimpanan rekod Kumpulan termasuk:

- Rekod sumber manusia dan penggajian: sekurang-kurangnya tujuh (7) tahun;
- Rekod kewangan dan percukaian: sekurang-kurangnya tujuh (7) tahun;
- Rekod transaksi hartanah: sepanjang tempoh kontrak dan tempoh had undang-undang;
- Rakaman CCTV: 30 hingga 90 hari kecuali diperlukan untuk siasatan;
- Rekod pembekal dan kontraktor: sepanjang hubungan perniagaan dan tempoh statutori.

Data peribadi yang tidak lagi diperlukan akan dimusnahkan atau dipadamkan secara selamat.

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## 8. Prinsip Integriti Data

Kumpulan akan memastikan data peribadi adalah tepat, lengkap, terkini, dan tidak mengelirukan selaras dengan tujuan pemprosesan.

Subjek data digalakkan untuk memaklumkan sebarang perubahan kepada data peribadi mereka.

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## 9. Prinsip Akses

Subjek data berhak untuk:

- Mengakses data peribadi mereka; dan
- Memohon pembetulan data peribadi yang tidak tepat, tidak lengkap, atau lapuk.

Subjek data boleh mengemukakan permohonan melalui saluran berikut:

- E-mel kepada: [general@hnaholdings.com.my](mailto:general@hnaholdings.com.my)
- Pos kepada: No 8, Jalan Setia Dagang AJ U13/AJ, Sek U13, Setia Alam, 40170 Shah Alam, Selangor
- Serahan tangan di pejabat Kumpulan

Permohonan hendaklah dibuat secara bertulis dan tertakluk kepada bayaran pentadbiran yang munasabah, jika dibenarkan.

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## 10. Semakan Dasar

Dasar ini boleh disemak dan dikemas kini dari semasa ke semasa bagi memastikan pematuhan kepada undang-undang dan keperluan peraturan yang berkuat kuasa.

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*Dasar ini mencerminkan komitmen Kumpulan terhadap perlindungan data pribadi dan pematuhan kepada APDP 2010.*

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## APPENDIX A: WEBSITE PERSONAL DATA PROTECTION NOTICE (SHORT FORM)

### English Version

The Group respects your privacy and is committed to protecting your personal data in accordance with the Personal Data Protection Act 2010. Personal data collected will be used for purposes directly related to our business activities, including property development, construction operations, customer management, and statutory compliance.

By providing your personal data to us, you consent to the processing of such data in accordance with our Personal Data Protection Policy.

### Versi Bahasa Malaysia

Kumpulan menghormati privasi anda dan komited untuk melindungi data peribadi selaras dengan Akta Perlindungan Data Peribadi 2010. Data peribadi yang dikumpul akan digunakan bagi tujuan yang berkaitan secara langsung dengan aktiviti perniagaan kami termasuk pembangunan hartanah, operasi pembinaan, pengurusan pelanggan dan pematuhan undang-undang.

Dengan memberikan data peribadi kepada kami, anda bersetuju dengan pemprosesan data tersebut selaras dengan Dasar Perlindungan Data Peribadi kami.

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