



KJTS GROUP BERHAD

(202201020004) (1465701-T)

(Incorporated in Malaysia)

PRIVACY POLICY

1. Introduction

- 1.1. KJTS Group Berhad (Registration No. 202201020004 (1465701-T)), its direct and indirect subsidiaries, associated, affiliated and related companies (both local and international), whether present or future (collectively, “**KJTS Group**”), prioritise the protection of your personal data and will take the relevant measures to safeguard your personal data in accordance with the Personal Data Protection Act 2010 and Data Protection Regulations 2013.
- 1.2. For the purposes of this Policy, “we”, “our” or “us” shall refer to any company within KJTS Group and “you” shall refer to yourself and such other persons or companies represented by you of which you are providing the personal data. Furthermore, the terms “personal data” and “processing” shall have the same meaning as prescribed in the Personal Data Protection Act 2010.
- 1.3. This Privacy Policy (“**Policy**”) outlines how we collect, process, protect, use, transfer and disclose your personal data, as well as the choices or rights you have regarding your personal data that we have collected.

2. Collection of Personal Data

2.1. We may collect information from you under the following situations:

- (a) when you visit our website <<https://www.kjts.com.my>> (“**Website**”);
- (b) when you provide or update your information with us, which may include personal data you furnished when filling in enquiry forms and other similar online forms, available on or through our Website;
- (c) when you interact with us directly or indirectly through various communication channels, including but not limited to telephone calls, mails, in-person meetings, emails, social medias, or our Website;



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- (d) when you participate in or provide feedback for any of our events, forums, surveys, contests, and/ or any interactive platform(s) whether virtual or physical;
- (e) when you register or sign up for an user account on our Website;
- (f) when you engage or intend to engage with us in any capacity, including but not limited to as an employee, vendor, supplier, contractor, service provider, customer, business partner, public agency and referral intermediaries (collectively referred to as “Engagements”);
- (g) when you submit to us any form, such as applications, registrations, declarations or other relevant forms, whether online or in physical form, for the purposes related to your Engagements with us;
- (h) when you enter into agreements or provide any other documentation or information related to your Engagements with us;
- (i) when you apply for employment with us, or submit documents or information including but not limited to your resume, curriculum vitae (CV), or supporting documentation for consideration for any position in our company;
- (j) when you visit or attempt to access our premises and are recorded by closed-circuit television (CCTV) surveillance;
- (k) when you communicate with our personnel and/ or authorised agents, vendors, suppliers or contractors regarding our products, services or any other matters related to your Engagements with us;
- (l) when we are required to collect your personal data to comply with applicable rules, laws, regulations, or our internal policies in connection with any of your relationship, transactions, or other interactions with us; and/ or
- (m) when we are required to collect your personal data for the Purposes (as defined below) stated below.



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- 2.2. The personal information that we may collect from you, may include but is not limited to the following:
- (a) your profile information such as name, gender, nationality, identification card or passport number, age, date of birth, personal photo, email address, mobile number, residential address and marital status;
 - (b) your financial information such as bank account details;
 - (c) information relating to your Employees Provident Fund (EPF), Social Security Organization (SOCSO) and tax file reference numbers (if required);
 - (d) information relating to your mental or physical health condition (if required);
 - (e) information relating to your religious beliefs or similar beliefs;
 - (f) information relating to your commission or allegations of an offence (if any);
 - (g) your biometric data such as fingerprint identification and facial features (if required);
 - (h) information disclosed in your resume, curriculum vitae or any supporting documents that you have provided to us for your job application;
 - (i) information relating to your username and password of your user account on our Website;
 - (j) any personal information relating to a third party that you may provide to us; and/or
 - (k) any other information that you have provided to us or is necessary and/or relevant for the Purposes (as defined below) stated below.
- 2.3. By submitting your personal information to us including but not limited to the information stated above, you hereby give your **consent** to our collection and processing of your personal data.



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- 2.4. By signifying your consent to us, you also give us your **explicit consent** to process your sensitive personal data such as information relating to your mental or physical health condition, information relating to your religious beliefs or similar beliefs and information relating to your commission or allegations of an offence (if any) for the purposes as described in this Policy or as required by law.
- 2.5. By providing us with any information relating to a third party (if any), you represent to us that you have validly obtained the **consent of the third party** to our collection and processing of his/ her personal data.
- 2.6. When you visit our Website through your computer, mobile device, or any other device with internet connectivity, our servers will automatically record data that your browser sends, for example your IP address and information about your visit (such as time stamp, date and duration etc).

3. Purpose of Collection of Personal Data

- 3.1. Any information we collect from you may be utilised and processed for the following purposes, including but not limited to ("**Purposes**"):
 - (a) verifying your identity, conducting due diligence check and reference check (if applicable);
 - (b) providing you with our products, services, facilities or benefits offered by us;
 - (c) facilitating your Engagements or any other transactions with us, as well as any other corporate matters or transactions related to our business activities;
 - (d) facilitating any business asset transactions conducted by us;
 - (e) processing any necessary payment transactions in connection with your Engagements with us;
 - (f) communicating with you, regarding your Engagements with us;
 - (g) addressing any queries, feedback, complaints, or requests you may have;



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- (h) keeping you informed about our latest products and service announcements, special offers, upcoming events and promotions including information on product updates and related offerings;
- (i) conducting research, survey and trend analysis on various matters such as planning, products, services, security and marketing for the purposes of product development, market research and strategy;
- (j) performing statistical analysis for various objectives and sharing such information within our company;
- (k) if you have applied for employment with us, processing your resume or curriculum vitae and assessing your suitability for available position;
- (l) ensuring compliance with our contractual obligations or business arrangements with third parties;
- (m) preventing, detecting, and investigating fraud, security breaches, unauthorised transactions, unlawful activities and other actual or potential crimes, as well as managing and minimising commercial risks;
- (n) ensuring security of and controlling access to our company or premises;
- (o) managing financial matters, including accounting, taxation and financial reporting;
- (p) complying with all applicable legislative, statutory and regulatory requirements;
- (q) protecting and enforcing our legal rights including but not limited to recovering any debt due and owing to us;
- (r) supporting our corporate governance purposes, including but not limited to auditing, internal investigations, compliance, risk management, conflict of interest reporting and security measures;



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- (s) implementing and maintaining our information technology systems, including the storage and processing of data in databases and servers located within and outside Malaysia;
 - (t) for purposes connected with the operation, administration, development, support, assistance or enhancement of any of our businesses; and/ or
 - (u) for all other purposes in relation or incidental to the above.
- 3.2. Where indicated, it is obligatory to provide your personal information to us to enable us to process your request or fulfill your Engagements with us. You should also ensure that the personal information provided is accurate and up to date, allowing us to proceed with the intended purposes. Should you choose not to provide such obligatory personal information or if the information is inaccurate or outdated, we may not be able to offer you with our products or services, proceed with the Engagements or address any queries you may have.

4. Disclosure of Your Personal Data

- 4.1. We may disclose your personal data that we have collected to the following third parties (including those outside Malaysia, to the extent permitted by law):
- (a) any company within KJTS Group;
 - (b) the Securities Commission, Companies Commission of Malaysia, Malaysia Institute of Chartered Secretaries and Administrators (MAICSA) or the Malaysia Institute of Directors (MID) and other relevant supervisory authorities;
 - (c) any stock or derivatives exchange, clearing house, securities depository authorised by the relevant laws;
 - (d) any actual or prospective business partner, investor, assignee, transferee or acquirer to facilitate business asset transactions, which may include any merger, acquisition or asset sale;
 - (e) any third party service providers who assist us in our operational administration and business development, and providing services to us such as auditing, professional



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advisory, insurance, banking, marketing, advertising, technology, utility, security and courier services. Such service providers will only have access to your personal data to the extent necessary to perform their functions;

- (f) any person, who is under a duty of confidentiality who has undertaken the responsibility to keep such information confidential;
- (g) governmental and other regulatory authorities or the courts in any jurisdiction; or any third-party claimants or potential third-party claimants; and
- (h) any other party in respect of the Purposes.

4.2. We may disclose your personal data if required to do so by law or if we believe that such action is necessary to prevent fraud or crime or to protect our company or the rights, property or personal safety of any person.

5. Safety of Personal Data

- 5.1. You acknowledge that unless you request in writing or otherwise, we, in our sole discretion, to keep or retain your personal data so long as necessary to fulfil the Purposes, after which we will take reasonable steps to ensure that your personal data is destroyed or deleted if it is no longer necessary, unless its retention is required to satisfy legal, regulatory or accounting requirements or to protect our interests.
- 5.2. The processing of your personal data will be done in accordance with all applicable laws. In processing your personal data, we shall take practical and reasonable steps to protect the personal data from any loss, misuse, modification, unauthorised or accidental disclosure, alteration or destruction.
- 5.3. Nevertheless, no data transmission over the internet can be guaranteed as completely secure. Therefore, while we strive to protect such personal data, we cannot ensure or warrant the security of any personal data transmitted to us and individuals do so at their own risk.
- 5.4. We do not sell, rent or lease the personal data and/or information collected to third parties.



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6. Access and Update of Your Personal Data

6.1. If you would like to access, update, correct, delete your personal information or withdraw your consent for the processing of your personal data, you may contact our Data Protection Officer at the following details and provide your name, contact information and brief details of your request:

Data Protection Officer

Name : Haneyda Binti Abdul Hamid
Email address : haneyda@kjts.com.my
Phone No. : 03-2716 6866 (Ext 209)

6.2. We will use reasonable efforts to comply with your request to access, update or correct your personal information within twenty-one (21) days of receiving your request and such request may be subject to a fee pursuant to Personal Data Protection (Fees) Regulations 2013 (P.U.(A) 338/2013) and will be bound by personal data protection laws in Malaysia.

7. Changes to this Policy

We may review and change this Policy from time to time to reflect changes in the law, our organisation practices, processes or structure. While it is not generally feasible to notify you of the changes to this Policy, the latest version of this Policy will be available on our Website. This Policy is not a contract, nor does it suggest any obligation on our part with another party.

8. Conflict

In the event of any conflict between this English language Policy and its corresponding Bahasa Malaysia Policy, the terms in this English language Policy shall prevail.