

PERSONAL DATA PROTECTION POLICY

1. Introduction

Lysaght Galvanized Steel Bhd ("Company") is committed to protecting the personal data of employees, customers, vendors, and business associates in compliance with the **Personal Data Protection Act 2010 (PDPA)** and its latest amendments. This policy outlines how the Company collects, processes, stores, discloses, and protects personal data while ensuring compliance with regulatory obligations.

2. Scope

This policy applies to:

- **Employees (current, past, and prospective)**
- **Customers, clients, and business partners**
- **Vendors, suppliers, and contractors**
- **Website visitors and online users**
- **Any other individuals whose personal data is processed by the Company**

This policy applies to all personal data collected, processed, stored, and transmitted, whether electronically, manually, or via third-party platforms.

3. Definition of Personal Data

Personal data refers to **any information that identifies or can be used to identify an individual**, directly or indirectly. This includes, but is not limited to:

- **Basic personal information:** Name, identification card (IC) number, passport number, date of birth, nationality, gender
 - **Contact details:** Address, phone number, email address
 - **Employment information:** Job title, salary, work history, bank account details
 - **Online identifiers:** IP address, device ID, login credentials
 - **Sensitive personal data:** Health information, biometric data, religious beliefs, and criminal records (processed with additional security measures)
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4. Personal Data Collection & Purpose

The Company collects personal data for **legitimate business and operational purposes**, including but not limited to:

1. **Employment & HR Administration** – Payroll processing, benefits management, performance evaluation
2. **Customer & Client Services** – Order processing, customer support, contract fulfilment
3. **Marketing & Promotions** – Sending updates, newsletters, and promotional materials (with consent)
4. **Regulatory & Legal Compliance** – Compliance with tax, labour, and data protection laws
5. **Security & Fraud Prevention** – Preventing unauthorised access, cybersecurity measures

Data Minimisation Principle:

We only collect **necessary and relevant** data to fulfil the intended purpose.

5. Consent & Notification

- **Explicit consent** is obtained before collecting or processing personal data.
 - **Privacy Notices** are provided to individuals when data is collected.
 - Individuals have the **right to withdraw consent** at any time.
 - The Company **does not collect personal data from minors (under 18)** without parental consent.
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6. Rights of Data Subjects

Individuals have the following rights under the PDPA:

1. **Right to Access** – Request a copy of their personal data.
2. **Right to Correction** – Request corrections to inaccurate or outdated information.
3. **Right to Withdraw Consent** – Stop the processing of their data.
4. **Right to Restriction** – Request a limitation on data processing under certain conditions.
5. **Right to Data Portability** – Request transfer of data to another service provider (if applicable).

6. **Right to Object** – Object to direct marketing or automated decision-making.

How to Exercise Rights:

Individuals can submit a request by contacting our **HR Department** at **hr@lysaghtmarketing.com.my**. Requests will be processed within **21 working days**.

7. Data Retention & Disposal

- Personal data will be **retained only as long as necessary** for legal and business purposes.
 - **HR & Employee data** – Retained for **7 years** post-employment.
 - **Customer & client data** – Retained for **5 years** after contract expiration.
 - Data will be **securely disposed of** through **encryption, anonymisation, or physical destruction**.
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8. Data Security Measures

The Company implements **robust security measures** to protect personal data from unauthorised access, disclosure, or loss.

8.1 Technical Security Controls

- **Encryption & Data Masking** – Encrypting sensitive data in transit and at rest.
- **Access Controls & Authentication** – Multi-factor authentication (MFA) for critical systems.
- **Intrusion Detection & Firewall Protection** – Preventing unauthorised access.

8.2 Organisational Security Controls

- **Confidentiality Agreements** – Signed by employees and third-party processors.
 - **Data Breach Response Plan** – A structured approach to responding to data breaches.
 - **Regular Cybersecurity Audits** – Ensuring compliance with security policies.
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9. Data Sharing & Third-Party Processors

We do not sell, rent, or trade personal data to third parties. However, data may be shared with:

- **Regulatory authorities** (Bank Negara Malaysia, LHDN, MCMC)

- **Third-party service providers (Cloud storage, HR systems, payment processors)**
- **Law enforcement (Upon official request)**

Third-party agreements are in place to ensure compliance with PDPA security and confidentiality requirements.

10. Cross-Border Data Transfers

- Personal data may be transferred outside Malaysia **only if the receiving country has adequate data protection laws.**
 - Transfers will be **legally justified** through:
 - **Data Processing Agreements (DPAs)**
 - **Standard Contractual Clauses (SCCs)**
 - **Explicit Consent from the data subject**
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11. Breach Notification & Incident Response

- **Data breaches must be reported within 72 hours to the Human Resource Department (HRD) and affected individuals if there is a risk of harm.**
 - The Company follows a **four-step response plan**:
 1. **Detection & Containment** – Immediate mitigation of the breach.
 2. **Assessment & Reporting** – Internal investigation & HRD notification.
 3. **Remediation** – Implementing corrective actions.
 4. **Communication** – Informing affected individuals & stakeholders.
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12. Employee Responsibilities & Training

All employees must:

- **Comply with this PDPA policy** and attend data protection training (if applicable).
- **Report suspected data breaches** or unauthorised data use to the **HR Department.**
- **Handle personal data securely** as part of their job roles.

Non-compliance may result in **disciplinary action, including termination.**

13. Compliance with Malaysia PDPA 2010 & Amendments

This policy complies with:

1. **Personal Data Protection Act 2010 (PDPA)**
2. **Personal Data Protection (Compounding of Offences) Regulations 2016**
3. **Malaysia Cyber Security Strategy (MCSS) 2020–2024**

The Company actively monitors changes in **PDPA laws and regulations** and will update this policy accordingly.

14. Review & Amendments

- This policy will be reviewed **annually** or when **regulatory changes occur**.
- Updates will be communicated via **internal memos and company training**.

15. Contact Information

For any **inquiries, complaints, or data subject requests**, please contact:

HR Department

Lysaght Galvanized Steel Bhd

Email: hr@lysaghtmarketing.com.my

Phone: 05-5451822 ext. 239