

## **PERSONAL DATA PRIVACY NOTICE**

This Notice is issued by Mycron Steel Bhd for itself and on behalf of its subsidiaries (collectively referred to as “the Group”, “us” or “we”) to individuals on the Group’s Personal Data Privacy, in compliance with Malaysia’s Personal Data Protection Act 2010 (the “Act”). In this regard, key contextual terms such as “personal data” and “processing” in this Notice shall have the meaning prescribed under the Act. We reserve the right to amend and update this Notice at any time.

### **Why we may collect Personal Data**

Although the Group’s business model centers on brick & mortar business-to-business dealings, it has business conduct with individuals under circumstances relating to employment, contracted services, sole proprietorship, guarantor arrangements, equity investment, and due-diligence on key office-bearers. In the facilitation of dealings with these individuals, their personal data may have to be collected and processed. Recurrence of dealings necessitates the retention of such personal data collected.

### **Types of Personal Data that we may Collect & When**

Under such circumstances, we may collect and process personal data (such as but not limited to: personal and tax identification numbers, e-mail addresses, bank account details, mobile numbers, private references, family & next-of-kind particulars) from such individuals from time-to-time or at the point-of-dealing when the need to do so arises.

Under present operations, we do not collect personal data relating to on-line charging (i.e. credit or debit-card details); and personal user’s ID or password on website or applications operated by 3<sup>rd</sup> parties.

### **How we collect Personal Data & your Rights**

We collect personal data through direct engagement with the individual mostly via standard prescribed forms. Such forms may not include explicit statement seeking the consent of the individual for us to collect, use, store, and retain such personal data. The voluntary act of that individual in providing such personal data sought serves as implied consent for our collection, storage, usage, and retention of such personal data provided. The Group’s policy prohibits any form of coercion against any individuals on their provision of personal data. Disapproving individuals, are reminded of his/her rights to decline from dealing with the Group.

Individuals may request for access to his/her personal data collected, and request for correction. However, such request may incur a fee or be rejected in accordance with the provision of the Act.

We may also collect data on individuals from 3<sup>rd</sup> party agencies and publicly available sources. However, such public domain data may not be deemed as Personal Data under the Act.

## **Usage of Personal Data Collected**

Personal data collected are solely for legitimate business use, such as but not limited to one or a combination of the following purposes:

- Contract administration
- Providing goods and services
- Invoicing, compensation and payment
- Granting credit-terms
- Legal & statutory requirements
- Audit purposes
- Insurance purposes
- Evaluation or assessment

## **Privacy & Confidentiality**

Personal data collected are never disclosed or accessible to any 3<sup>rd</sup> parties, except under permitted circumstances such as statutory audits, outsourced specialist processing services, and legal compulsion.

Personal data collected are administered and accessible by the functional-unit of the particular entity which process that data. The Group does not cross share personal data amongst subsidiaries or related companies, except for centralized processing, and group-level administration.

The Group maintains commensurable standard of security and controls over personal data storage and handling to ensure data privacy and confidentiality is preserved at all times.

## **Contact**

Individuals with personal data with the Group may reach out to us at particulars listed below for legitimate request, enquiries, or complaints in respect of your personal data.

Contact designation	Personal Data Manager
E-mail address	<a href="mailto:personaldata@mycronsteel.com">personaldata@mycronsteel.com</a>
Mailing address	Lot 717, Jalan Sungai Rasau, Seksyen 16 40200 Shah Alam