

PERSONAL DATA PROTECTION ACT (PDPA) POLICY

1. Introduction

Zerin Group, hereinafter referred to as "the Company," is committed to protecting the personal data of our clients, tenants, employees, and other individuals with whom we interact. This Personal Data Protection Policy (PDPA Policy) is established to ensure compliance with the Personal Data Protection Act 2010 (PDPA) of Malaysia which is practice at a group-wide level.

2. Scope

This PDPA Policy applies to all employees, contractors, and agents of the Company involved in the collection, processing, and handling of personal data.

3. Definitions

- a) **Personal Data:** Any information that relates directly or indirectly to an individual, who is identified or identifiable from that information.
- b) **Data Subject:** The individual to whom the personal data relates.
- c) **Processing:** Any operation or set of operations performed on personal data, including collection, recording, storage, use, disclosure, and disposal.

4. Principles

The Company is committed to the following principles as outlined in the PDPA:

- 4.1. Personal data will only be collected, processed, and disclosed with the consent of the data subject, except where required or permitted by law.
- 4.2. Personal data will only be collected for specific, lawful purposes and will not be processed in a manner incompatible with those purposes.
- 4.3. Reasonable steps will be taken to ensure that personal data is accurate, complete, and up to date.
- 4.4. Personal data will be retained only as long as necessary for the fulfillment of the purposes for which it was collected.
- 4.5. Appropriate security measures will be implemented to protect personal data from unauthorized access, disclosure, alteration, or destruction.
- 4.6. The Company will maintain transparency regarding its data protection practices and make this PDPA Policy readily available to the public.
- 4.7. Data subjects have the right to access and correct their personal data held by the Company, subject to the provisions of the PDPA.

5. Collection of Personal Data

The Company will only collect personal data that is necessary for the purposes it was collected for, and we will inform the data subjects about the purpose of the data collection and obtain their consent when required.

6. Use and Disclosure of Personal Data

Personal data will be used and disclosed only for the purposes for which it was collected or as required or permitted by law. We will not sell personal data to third parties.

7. Data Security

The Company will implement appropriate security measures to protect personal data from unauthorized access, disclosure, alteration, or destruction. This includes physical, technical, and organizational measures.

8. Data Subject Rights

Data subjects have the right to request access to their personal data, request corrections, and lodge complaints regarding the handling of their personal data. The Company will respond to such requests in accordance with the PDPA.

9. Data Breach Notification

In the event of a data breach involving personal data, the Company will promptly notify the affected data subjects and the relevant authorities as required by law.

10. Review and Update

This PDPA Policy will be reviewed periodically and updated as necessary to ensure compliance with the PDPA and best practices in data protection.

11. Conclusion

The Company is committed to protecting the personal data of individuals and ensuring compliance with the PDPA. All employees, clients, contractors, and agents are responsible for adhering to this PDPA Policy.