

APPENDIX 1**LIANSON FLEET GROUP BERHAD****PRIVACY POLICY****1. Introduction**

1.1 At Lianson Fleet Group Bhd ("we," "our," "LFG Bhd" or "the Company") we are committed to protecting the privacy and confidentiality of personal data entrusted to us. This Privacy Policy outlines how we collect, use, store, and protect personal data in compliance with the **Personal Data Protection Act 2010 (PDPA)** as amended by the **Personal Data Protection (Amendment) Act 2024** in Malaysia, as well as other applicable data protection laws and regulations.

1.2 This policy applies to all employees, contractors, vendors, and third parties who interact with LFG Bhd and whose personal data is processed by the Company. It also applies to all data that is collected, stored, or processed by the Company, whether electronically or in physical form.

2. Types of Personal Data We Collect

2.1 We may collect and process various types of personal data in the course of our business operations, including but not limited to:

- a) **Employee Data:** Including name, contact information, identification numbers, employment history, salary information, compensation, and performance-related data.
- b) **Vendor Data:** Including business contact details, payment information, and contractual data.
- c) **Customer Data:** Including contact information, project details, payment history, and communication records.
- d) **Website and IT Data:** Including information collected from website visitors, IP addresses, cookies, and usage analytics.

3. Purpose of Collecting Personal Data

3.1 We collect personal data for the following purposes:

- a) To fulfill contractual obligations with employees, customers, and vendors.
- b) To manage employment and labor relations, including HR and payroll functions.
- c) To conduct customer relationship management, including the provision of services and communication.
- d) To comply with legal and regulatory requirements, including data protection laws and safety regulations in the marine, offshore oil and gas industry.
- e) For administrative purposes, such as internal audits, legal compliance, and risk management activities.

4. Legal Basis for Processing Personal Data

4.1 In compliance with the PDPA, we process personal data based on the following legal grounds:

- a) **Consent:** Where required, we obtain explicit consent from data subjects for processing their personal data.
- b) **Contractual Necessity:** Personal data is processed when necessary for the performance of a contract (e.g., employment contracts, vendor agreements.)
- c) **Legal Obligation:** Personal data may be processed to comply with legal obligations or regulatory requirements.
- d) **Legitimate Interests:** In some cases, we may process personal data based on our legitimate interests, such as fraud prevention, IT security, and administrative purposes.

5. Data Sharing and Disclosure

5.1 We do not sell, trade, or rent personal data to third parties. However, we may share personal data with the following categories of recipients:

- a) **Service Providers:** Third-party vendors who provide services such as IT support, payroll processing, legal advisory, and project management services.
- b) **Regulatory Authorities:** Government bodies, law enforcement agencies, or other regulatory bodies as required by law or in response to legal requests.
- c) **Affiliates:** With entities within LFG Group for business operations, compliance, and risk management purposes.

5.2 All third-party recipients of personal data are required to comply with strict data protection standards and ensure that personal data is handled in accordance with applicable laws and this policy.

6. Data Security Measures

6.1 We are committed to ensuring the security of personal data and have implemented appropriate technical and organizational measures to protect it from unauthorized access, disclosure, alteration, or destruction. These measures include:

- a) Use of encryption and secure data storage solutions.
- b) Regular security assessments and audits.
- c) Restricted access to personal data based on job responsibilities.
- d) Regular staff training on data protection and security protocols.

7. Data Retention

7.1 We will retain personal data only for as long as necessary to fulfil the purposes for which it was collected, or as required by applicable laws, regulations, or contractual obligations. Once the data is no longer needed, we will securely dispose of or anonymize it to prevent unauthorized access.

8. Data Subject Rights

8.1 Under the PDPA, data subjects have certain rights regarding their personal data. These rights include:

- a) **Right to Access:** Data subjects have the right to request access to the personal data we hold about them.
- b) **Right to Rectification:** Data subjects have the right to request the correction of any inaccurate or incomplete personal data.
- c) **Right to Object:** Data subjects have the right to object to the processing of their personal data in certain circumstances.
- d) **Right to Data Portability:** Data subjects have the right to request a copy of their personal data in a structured, commonly used, and machine-readable format.

9. Data Protection Impact Assessments

9.1 In line with the requirements of the amended PDPA, we will carry out **Data Protection Impact Assessments (DPIAs)** when initiating new data processing activities or when introducing new technologies that may impact the privacy of data subjects. DPIAs will help assess and mitigate risks related to personal data processing activities. The DPO shall be responsible for the performance of the DPIA and to make the decision on whether DPIA is required.

10. Data Breach Management

10.1 We have established a robust **Data Breach Management Plan** to respond effectively to any incidents involving unauthorized access, loss, or disclosure of personal data. The key elements of our data breach management approach include:

- a) **Detection and Reporting:** Employees and third parties are required to promptly report any suspected or actual data breaches to the **Data Protection Officer (DPO.)**
- b) **Investigation and Containment:** Upon notification, our incident response team will investigate the breach, determine its scope and impact, and implement immediate measures to contain it.
- c) **Notification:** Where applicable, affected data subjects and the **Personal Data Protection Commissioner (PDP Commissioner)** will be notified within **72 hours** of discovering a significant breach, as required by the PDPA.
- d) **Remediation:** Corrective actions, including system updates, process changes, and additional safeguards, will be implemented to prevent future breaches.

11. Transfers of Personal Data Outside of Malaysia

11.1 We may transfer personal data to countries outside of Malaysia where we have business operations or use service providers. We ensure that any such transfers comply with the requirements of the PDPA and applicable international data protection standards. We will ensure that appropriate safeguards are in place, to protect personal data during international transfers.

12. Training on Privacy and Data Protection

12.1 LFG Bhd recognizes the importance of ongoing privacy and data protection training to foster a culture of compliance. Such training may include:

- a) **Mandatory Training:** All employees, especially those handling personal data, are required to undergo regular training on privacy laws, data handling best practices, and security measures.
- b) **Role-Specific Training:** Tailored training sessions are conducted for employees in roles that involve high-risk data processing activities, such as HR, IT, and compliance teams.
- c) **Awareness Campaigns:** We run periodic awareness campaigns to educate employees and contractors about their responsibilities under the PDPA and this Privacy Policy.

13. Changes to this Privacy Policy

13.1 We may update this Privacy Policy from time to time to reflect changes in legal requirements, our business practices, or the way we handle personal data. Any changes will be communicated to relevant stakeholders, and the updated policy will be posted internally to all employees. We encourage you to review this policy periodically to stay informed about how we are protecting your personal data.

14. Contact Us

If you have any questions or concerns about this Privacy Policy, or if you wish to exercise any of your rights, please contact us at:

Data Protection Officer

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