



ISKANDAR INVESTMENT BERHAD

PRIVACY NOTICE ON PERSONAL DATA PROTECTION

AMENDMENT INFORMATION

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Privacy Notice

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Iskandar Investment Berhad (Company No. 200601032342 (752101-D)), and our Group of Companies, which includes our subsidiaries, related and/or associated companies (collectively "IIB", "we", "us", or "our") values your privacy and is committed to protecting personal data in accordance with the Personal Data Protection Act 2010 ("PDPA") and the personal data protection principles which are set out in the Act.

This Privacy Notice ("Notice") explains the following:

- The definitions used and the scope of this Notice
- Types of your personal data we collect
- Sources from which we collect personal data
- Choice to supply your personal data
- Purposes for collecting your personal data
- Disclosure of your personal data
- Transfer of your personal data outside Malaysia (if required)
- Security of your personal data
- Retention of your personal data
- Use of your personal data in direct marketing
- Your rights to the personal data collected by us
- Updates to the Notice
- How to contact us

1. DEFINITIONS AND SCOPE

The terms used in this Notice are as defined in the PDPA and shall have the meanings given to them under the PDPA:

- 1.1. **"Personal Data"** means any information in respect of commercial transactions, which:
- a. is being processed wholly or partly by means of equipment operating automatically in response to instructions given for that purpose;
 - b. is recorded with the intention that it should wholly or partly be processed by means of such equipment; or
 - c. is recorded as part of a relevant filing system or with the intention that it should form part of a relevant filing system,

that relates directly or indirectly to a data subject, who is identified or identifiable from that information or from that and other information in the possession of a data user, including any sensitive personal data and expression of opinion about the data subject; but does not include any information that is processed for the purpose of a credit reporting business carried on by a credit reporting agency under the Credit Reporting Agencies Act 2010;

(i.e., information about you that helps us directly or indirectly identify you, whether on its own or when combined with other data that we collect or have access to. This includes data such as your name, IC number, email address as well as less obvious personal data like device related data, call records, online identifiers, and location data.)

- 1.2. **"Sensitive Personal Data"** means any personal data consisting of information as to the physical or mental health or condition of a data subject, his political opinions, his religious beliefs or other beliefs of a similar nature, the commission or alleged commission by him of

any offence, biometric data or any other personal data as the Minister may determine by order published in the Gazette;

(i.e., information such as your physical or mental medical records, religious affiliation, criminal records, fingerprints, voice recordings, etc.)

1.3 **“Processing”** in relation to personal data, means collecting, recording, holding or storing the personal data or carrying out any operation or set of operations on the personal data, including:

- a. the organization, adaptation or alteration of personal data;
- b. the retrieval, consultation or use of personal data;
- c. the disclosure of personal data by transmission, transfer, dissemination or otherwise making available; or
- d. the alignment, combination, correction, erasure or destruction of personal data;

(i.e., using your personal data in any way, including collecting, storing, combining, sharing, erasing, or destroying your personal data.)

1.4. **“Data subject”** means an individual who is the subject of the personal data and shall not include a deceased individual. (hereafter referred to as “you” or “your”).

1.5. Other terms used in this Notice shall have the meanings given to them in the PDPA (where the context so permits).

1.6. This Notice applies to the collection and use of all personal data in our possession or under our control. This also includes personal data in the possession of organisations which we have engaged to collect, use, disclose or process personal data for our purposes as listed in Section 5 below.

1.7. This Notice covers both our online and offline data collection activities, including personal data that we collect through our various channels as listed in Section 3 below.

2. TYPES OF PERSONAL DATA WE COLLECT

2.1. The personal data we may collect from you includes, but are not limited to, the following categories:

- **Identification Information:** This includes any information that would allow us to identify you such as: first and last name, identity card number or passport number, driving licenses, date of birth, age, signatures, gender, etc.
- **Contact Information:** Any information that would allow us to contact you such as residential or business address, service address, e-mail address, mobile or landline number, social media profile name, etc.
- **Personal Relationship Data:** This includes your marital status, details of your spouse, children and other immediate family members, as well as authorised signatories and guarantors that can determine your identity.
- **Professional and Education Data:** This includes any data with regards to your academic and professional standing, such as level of education, academic qualifications, professional credentials, employment history, occupation, and employer details, and relationships with other business entities or individuals, including ownership interests.

- **Financial Data:** Information such as your bank account details, cardholder details and other information about your financial position such as assets and income, source of funds, investment objectives, annual income, tax details, account balances, payment history, account activity and credit rating data.
- **Behavioural Data:** This would include views or opinions voluntarily shared with us via feedback or surveys and observed habits, preferences and interests arising from your use of our services, browsing behaviour on our websites and transactional activities with us.
- **Photos and Videos:** Any photographic and/or video footage captured or recorded by our recording systems such as photos taken for ID/access cards, surveillance camera (CCTV) footage at our premises, photos or videos taken during campaigns and events, etc.

2.2. We may also collect sensitive personal data from you, only when necessary and with your explicit and informed consent. The type of sensitive personal information we may collect are:

- **Racial or ethnic origin:** Information relating to your racial or ethnic origin.
- **Religious beliefs:** information relating to your religious beliefs and other beliefs of a similar nature.
- **Biometric data:** Information which physically identifies you. For example, facial recognition or fingerprints.

2.3. Regarding the collection of personal data of minors under 18 years of age:

- a. We may collect the personal data of minors (below the age of 18 years) from their parent or legal guardian. In such cases, we will verify the identity of the parent or guardian and their authority to consent on behalf of the minor and ask for their explicit consent before any minor's data is collected or processed.
- b. We do not knowingly solicit or collect personal data directly from minors below the age of 18. If we discover or are informed that we have unintentionally collected personal data from a minor without consent from a parent or guardian, we will remove that personal data from our records promptly and stop all related processing activities.

If you believe we might have any personal data from or about a minor under 18 without consent from the parent or guardian, please contact us at the information provided in Section 13 below.

2.4. We generally do not collect your personal data unless:

- a. You have given your explicit or implicit consent and voluntarily provided your personal data.
- b. You have authorised a third party to disclose your personal data to us (your "authorised representative") after:
 - i. you (or your authorised representative) have been notified of the purposes for which the data is collected, and
 - ii. you (or your authorised representative) have provided written consent to the collection and usage of your personal data for those purposes.

2.5. We may collect and use your personal data without your consent where it is permitted or required by the PDPA, such as for compliance with legal and contractual obligations or to protect your vital interests.

- 2.6. We shall seek your consent before collecting any additional personal data and before using your personal data for a purpose which has not been notified to you (except where permitted or authorised by law).

3. SOURCES FROM WHICH WE COLLECT PERSONAL DATA

- 3.1. We collect personal information and sensitive personal information directly from you and may also collect them from other sources, including but not limited to:

- **Collection forms:** Printed or digital registration and similar forms that we collect via postal mail, physical locations, campaigns, contests, and events.
- **Our websites:** This includes sites that we operate under our own domains/URLs and other sites that we run on third-party social networks such as Facebook or Instagram (“Websites”). Some web pages may require you to provide a limited amount of personal data in order to enjoy certain services on our websites (system login credentials, email address and contact, etc). and will only be used for its intended purposes only, i.e. to respond to your message or deliver the requested services.
- **Cookies on our website:** Your personal data may also be collected from cookies through the use of our websites. A cookie is a text file placed into the memory of your computer and/or device by our computers. A copy of this text file is sent by your computer and/or device whenever it communicates with our server. We use cookies to collect the following information during your visit to our website:
 - a. the date and time you accessed each page on our website;
 - b. the URL of any webpage from which you accessed our site (the referrer); and
 - c. the web browser that you are using and the pages you accessed.
- **Our communication channels:** This includes verbal and written communications with us and/or our authorised agents via SMS, phone or mobile device, email, fax, mail, websites, or any other appropriate communication channels.
- **Shared internal database:** This refers to our internal database pursuant to your relationship with any subsidiary, affiliate, or associated company.
- **Indirect sources:** This includes previous employers, appointed solicitors, third party service providers, parents and guardians of minors, etc.
- **Recording Systems:** This includes the surveillance camera (CCTV) system when you are physically present at any of our premises or events, and recordings of customer support calls, online interviews/meetings with you, etc.
- **Publicly Available Resources:** Online registers or directories or online publications, social media posts and other information that is publicly available.

4. CHOICE TO SUPPLY YOUR PERSONAL DATA AND ACCURACY OF YOUR DATA

- 4.1. The supply of your personal data to us is voluntary and necessary in connection to the provision of the products and services we offer and the nature of the relationship you have with us. We may not be able to offer you our products or services if you decline to provide or allow us to process the personal information which we consider necessary and/or is required to meet our business needs and legal/regulatory obligations. Choosing not to provide your personal data may:

- Result in us being unable to process your application and/or provide you with our services.
- Result in us preventing your entry to our premises or participating in our events.
- Result in us being unable to respond to your requests on our products/services.
- Limit or prevent access to certain features on our websites.

- Result in us being unable to inform you on latest updates regarding any promotions, our services/products or launches.
 - Result in our inability to enter a contract with you or continuing to contract with you.
 - Negatively impact your chances of being selected for any potential employment, engagement or internship.
- 4.2. We generally rely on personal data provided by you (or your authorised representative) to ensure that your personal data is current, complete, and accurate. Please update us if there are changes to your personal data by informing us in writing using the contact details provided in Section 13 below.

5. PURPOSES FOR COLLECTING YOUR PERSONAL DATA

- 5.1. The purpose of processing your personal data may comprise part or all of the following, but is not limited to:
- Performing obligations in the course of, or in connection with, our provision our products and services to you.
 - Verifying your identity.
 - Complying with the Companies Act 2016.
 - Managing your relationship with us, including responding to, handling, and processing queries, requests, applications, complaints, and feedback from you.
 - Conducting due diligence, assessing credit worthiness and other risks associated with our business operations.
 - Employment-related activities such as processing employment applications, recruitment and background checks.
 - Maintaining and updating internal record keeping, files and contact lists.
 - Storing and carrying out data analytics processes to improve our products and services, our websites, our marketing activities and our profiling of your preferences.
 - Direct marketing purposes via SMS, phone call, email, fax, mail, social media and/or any other appropriate communication channels, including notifying you of events (where you have explicitly consented to such notification).
 - Storing and hosting back-ups (whether for disaster recovery or otherwise) of your personal data, whether within or outside Malaysia.
 - Monitoring entry onto our sites and ensuring effective management of the health and safety of our staff, guests and facilities.
 - Complying with any applicable laws, regulations, codes of practice, guidelines, or rules, or to assist in law enforcement and investigations conducted by any governmental and/or regulatory authority;
 - Transmitting to third parties, including our third-party service providers and agents, and relevant governmental and/or regulatory authorities.
 - Any other incidental business purposes related to or in connection with the above.

6. DISCLOSURE OF YOUR PERSONAL DATA

- 6.1. We will only disclose your personal data where such disclosure is required for the purposes of processing as set out in Section 5 of this Notice or when we are under a legal obligation share your personal data as permitted or required by law.
- 6.2. We will only disclose your personal data to the parties listed below:

- **Business Partners:** Business alliance, co-branding partners or other companies or organisations the IIB cooperates with based on contractual arrangements or other joint ventures to provide our products and services. In the event of a merger, acquisition, or sale of the business, personal data may be transferred to the relevant party.
- **Staff of IIB:** Any employee, agent, director or other representative of IIB who require access to personal data to carry out their duties in the course of their employment with us.
- **Professional advisors:** Our auditors, consultants, lawyers, accountants, asset valuation specialists or other financial or professional advisers appointed in connection with our business under a duty of confidentiality.
- **Credit Rating Agencies:** For risk assessments related to financial transactions.
- **Banks and Financial Institutions:** For purpose of assessing, verifying, and facilitating payment of any amounts due to us in connection with our services.
- **Regulatory Authorities:** This includes government agencies, law enforcement agencies, courts, tribunals, regulatory/professional bodies, industry regulators, ministries, and/or statutory agencies or bodies, offices or municipality in any jurisdiction, if required or authorised to do so, to satisfy any applicable law, regulation, order or judgment of a court or tribunal or queries from the relevant authorities.
- **Authorised Third Party Service Providers:** This includes third parties engaged or partnered with us to analyse and facilitate our internal operations or for the provision of products and services. This includes payroll agencies, insurance agencies, advertising companies, telemarketing and direct sales agents, call centres for customer support and communications, and technology and social media platform providers.

7. TRANSFER OF YOUR PERSONAL DATA OUTSIDE MALAYSIA

- 7.1 Where you have provided your explicit consent or when it is necessary for us to transfer your personal data to countries outside Malaysia for any of the processing activities listed in Section 5 above, we will take reasonable precautions and exercise due diligence to ensure that your personal data is adequately protected and is not processed in a manner which would contradict the PDPA. This includes:

- **Transfer Impact Assessments (TIAs):** We conduct assessments to determine whether the recipient country/countries offer data protection laws substantially similar to the PDPA or ensures an equivalent level of protection as afforded by the PDPA.
- **Standard Contractual Clauses (SCCs):** Where appropriate, we incorporate SCCs into our agreements with foreign data recipients to ensure they are contractually bound to uphold data protection standards consistent with the PDPA.
- **Binding Corporate Rules (BCRs):** For intra-group data transfers, we implement BCRs that provide legally binding commitments within our corporate group to protect personal data in accordance with PDPA requirements.
- **Certification Mechanisms:** Where applicable, we will rely on approved certification mechanisms that demonstrate the foreign recipient's adherence to data protection standards equivalent to those under the PDPA.

8. SECURITY OF YOUR PERSONAL DATA

- 8.1. To safeguard your personal data from unauthorised access, collection, use, disclosure, copying, modification, disposal or similar risks, we have introduced practical organisational, physical and technical measures to secure storage and transmission of personal data, both internally and to authorised external third parties.

8.2. You should be aware, however, that no method of transmission over the Internet or method of electronic storage is completely secure. While security cannot be guaranteed, we strive to protect the security of your personal data and are constantly reviewing and enhancing our information security measures.

8.3. The measures we implement include, but are not limited to the following:

- Ensuring all employees handling your personal data are sufficiently aware and trained on our organisations data privacy and protection policies and procedures.
- Controlling and limiting our employee's access to personal data systems for the purpose of collecting, processing and storing of personal data.
- Terminating access immediately when our employee who has authorised access to personal data is no longer handling the data, whether due to his/her resignation, termination of contract or agreement, or other internal adjustments.
- Conducting due diligence on any third parties authorised to process personal data on our behalf and putting in place data sharing agreements which contractually bind them to adhere to our data privacy and protection standards.
- Prohibiting the transfer of personal data through unauthorised channels and removable media devices unless authorisation has been received from the appropriate authority within IIB.
- Implementation of backup and recovery systems to prevent loss of personal data.
- Appropriate endpoint security and patch management to prevent unauthorised access, modification, alteration, loss, exfiltration, or other misuse of personal data in our care.
- Physical security measures to safeguard personal data, including controlled access to offices and data storage areas, surveillance systems, security personnel and visitor access controls.
- Environmental security measures such as fire safety measures, climate control for data storage facilities, and disaster recovery plans to mitigate risks from environmental hazards such as fire, flooding, or power failures.
- Periodic security assessment and reviews to improve our security measures.

9. RETENTION OF YOUR PERSONAL DATA

9.1. We will retain your personal data for as long as it is necessary to fulfil the purpose for which it was collected, or as required or permitted by applicable laws.

9.2. We will cease to retain your personal data or remove the means by which the data can be associated with you, as soon as it is reasonable to assume that such retention no longer serves the purpose for which the personal data was collected and is no longer necessary for legal or business purposes.

9.3. We implement the following measures to manage the retention and deletion of your personal data:

- Preparing, maintaining, and following our organisational data retention and disposal schedule.
- Disposing of your personal data after expiry of the retention period using secure data disposal procedures.
- Ensuring any secondary storage provider adheres to our retention periods and uses secure methods to dispose of your personal data and provides certificates of destruction.

10. YOUR RIGHTS TO THE PERSONAL DATA COLLECTED BY US

10.1 Right to Access and Correct your personal data:

- If you wish to make an access request for access to a copy of the personal data which we hold about you or information about the ways in which we use or disclose your personal data, or make a correction request to correct or update any of your personal data which we hold about you, you may submit your written request using the contact details provided below in Section 13 below.
- We may reach out to you after receiving your request to verify your identity or to better understand the nature and scope of your request before we proceed.
- Please note that a reasonable fee may be charged for an access request. If so, we will inform you of the fee before processing your request.

10.2 Right to Withdraw consent:

- Where we rely on your consent to use your personal data, you have the right to withdraw your consent at any time by sending your request in writing using the contact details provided in Section 13 below.
- Depending on the nature and scope of your request, we will notify you in writing of the consequences of withdrawing your consent, including any legal consequences which may affect your rights and liabilities to us, and any other consequences as listed in Section 4 above. We will notify you before beginning the processing of your request and proceed only upon your confirmation. Should you decide to cancel your withdrawal of consent, please inform us in writing using the same manner as stated above.
- Upon confirmation of your request to withdraw your consent, we will endeavour to process your request within the timeline stated in Section 13 below.
- Please note that withdrawing consent does not affect our right to continue to collect, use, disclose and retain personal data where such collection, use, disclosure and retention without consent is permitted or required under applicable laws.

10.3 Right to Prevent Processing for Purposes of Direct Marketing:

- We may with your explicit consent, use your contact details to send you relevant marketing communications via email, SMS, telephone, social media, or by post for direct marketing purposes.
- You may withdraw your consent or opt-out from receiving such direct marketing communications at any time in accordance with your rights by using the unsubscribe link in the marketing communications where available or contacting us using the contact details provided below in Section 13 below.
- We will stop all direct marketing communications with you immediately or as soon as reasonably practicable.

10.4 Right to Prevent Processing likely to cause Damage or Distress

- If you wish to prevent, cease, or restrict the processing of your personal data because you have reason(s) to believe it may cause unwarranted and substantial damage or distress to you or another individual(s), you may submit your written request using the contact details provided below in Section 13 below.

- We may reach out to you after receiving your request to verify your identity, to better understand the nature, scope, and reasoning behind your request or to request further evidence to support your reasoning.
- Your right may not be honoured where exceptions apply under the PDPA and in such circumstances we will inform you of this in writing. Otherwise, we will respond to your request within the timeline stated in Section 13 below.

10.5 Right to Data Portability:

- If you wish to make a request to receive a copy of your personal data or to request that we transmit such data to another entity, you may submit your written request using the contact details provided in Section 13 below.
- We may reach out to you after receiving your request to verify your identity or to better understand the nature and scope of your request before we proceed.
Please note that your request for data portability is subject to the technical feasibility and compatibility of the data format for transfer to another entity. If we are unable to process your request due to technical limitations or data format incompatibility, we will notify you as per the timeline stated in Section 13 below.

11. UPDATES TO THE NOTICE

- 11.1. This Notice applies in conjunction with any other notices, contractual clauses and consent clauses that apply in relation to the collection, use and disclosure of your personal data by us.
- 11.2. We may revise this Notice from time to time without any prior notice. You may determine if any such revision has taken place by referring to the date on which this Notice was last updated. Your continued use of our services constitutes your acknowledgement and acceptance of such changes.

12. CONFLICT

- 12.1. In accordance with requirements of Malaysian data protection and privacy laws, this Notice is issued in both English and Bahasa Malaysia. In the event of any inconsistencies or discrepancies between the English version and the Bahasa Malaysia version, the English version shall prevail.

13. HOW TO CONTACT US

- 13.1. If you have any questions or enquiries about this notice, our privacy and information handling practices, or would like to exercise your rights as data subjects, kindly reach out to:

Data Privacy

Phone: 07-5353000

Email: iibgovernance@iskandarinvestment.com

Address: A18 & A19 Menara IIB, Persiaran Medini Sentral 1, Bandar Medini Iskandar, 79250 Iskandar Puteri, Johor.

Link to web form: www.iskandarinvestment.com

- 13.2. Response timeline to requests:

- We will endeavour to respond to any requests made by you as soon as reasonably possible. In general, our response will be within twenty-one (21) days of receiving your request in writing.

- Should we not be able to comply with your request within the twenty-one (21) days after receiving your request, we will inform you of the delay in writing and respond to you within the next fourteen (14) days.
- If we are unable to comply with your request, we shall inform you in writing and provide the reason(s) as to why we are unable to do so within twenty-one (21) days of receiving the request, except where we are not required to do so under the PDPA.