

# SCC Group

## Personal Data Protection Act Policy

DATE: 31.10.2023

REV: 0

## **PRIVACY NOTICE**

### **1. Collection of Personal Data**

This notice is issued in accordance with the Personal Data Protection Act 2010. The main purpose of this notice is to provide you with a better understanding of the reasons and objectives behind the collection of Personal Data by Swang Chai Chuan Limited and/or SCC Group (hereafter referred to as "SCC") and to emphasize SCC's commitment to securely processing and preserving your data. We believe that our customers have an expectation to understand how their Personal Data is managed. It is an integral part of SCC's values to treat all Personal Data and customer privacy with care and respect. The security of your Personal Data is important to us. As our valued customer, we would like you to recognize that, in the course of your commercial transactions with SCC, it is essential for SCC to gather and process data related to you and/or your business entity. Please take some time to review this notice.

### **2. Nature of Personal Data**

Personal Data related to you may include copies and other details of identity documents, proof of address and other contact information. It may also include information about your age, address, telephone number, contact person, position, types of goods/service requested, business registration number, authorized capital, paid up capital, name, identification details and address, average monthly purchases, average payment days, period of dealing, credit terms and credit limit. The above description of Personal Data provides a general overview of the various types of Personal Data collected from our various customers. The nature of Personal Data varies from one customer to another. Depending on the nature of their business and circumstances, we may only need to collect and process a more limited set of Personal Data. However, in other situations, there may be a requirement to collect additional Personal Data based on the nature of transaction and business or as required by law.

### **3. Source of Personal Data**

In general, the Personal Data we collect originates from you and/or your business. When you use the SCC website, interact with the SCC sales team, or complete any enquiry, application or registration forms/documents referencing this notice, you are considered to have agreed to this notice and the use of your Personal Data as described herein. In addition to the information provided by you, SCC may acquire Personal Data about you and your business entity through various reference checks, background checks, various governmental authorities and cookies on SCC websites as permitted by law. If you provide us with any personal data pertaining to a third party (e.g., information about your spouse, children, parents, and/or employers), by submitting such personal data to us, you affirm that you have obtained the third party's consent to provide us with their personal data for the purposes described in this notice.

### **4. Providing Personal Data**

It is important that you provide the required Personal Data to us in order to facilitate transactions and business arrangements between you and SCC. All requested information must be provided by you unless

stated otherwise. If you fail to provide the mandatory information, we may be unable to process your request or provide you with relevant services or products.

#### **5. Purpose of Personal Data**

Personal Data you provide will be collected, used and otherwise processed by SCC, its related companies and/or related third-party providers for the following purposes:

- a) Evaluating your credit account application and creditworthiness
  - b) Facilitating the payment and refund process, which may involve an authorized third-party data processing company
  - c) Providing consumer and customer relationship management services, including, but not limited to communication, creation, development, operation, delivery and improvement of our products, services, content and advertising
  - d) Serving the specific purposes provided for any particular service or product offered by us
  - e) Conducting marketing activities related to our services and associated products
  - f) Enhancing SCC's loss prevention and anti-fraud security measures;
  - g) Maintaining our internal records
  - h) Collecting outstanding payments
  - i) Administering your participation in contest or campaign organized by us
  - j) Meeting legal or regulatory requirements related to the provision of our services and products and making disclosures as required by applicable law, regulation, direction, court order, bylaw, guideline, circular, code applicable to SCC
  - k) Conducting research, benchmarking and statistical analysis
  - l) Pursuing other purposes permitted under the Personal Data Protection Act 2010 or applicable laws.
- The purposes listed above collectively referred to as "Purposes" in this Privacy Notice.

#### **6. Confidentiality and secure disclosure**

We take the confidentiality of your Personal Data very seriously. Personal Data provided to SCC by you or on behalf of you will be kept confidential. However, in certain circumstances, it may be necessary for us to provide or disclose your Personal Data for the purposes stated above to:

- a) SCC's subsidiaries and affiliated companies, as required to fulfil the above Purposes;
- b) any third-party to whom SCC is compelled or required to do so by law or in response to a competent government agency with purposes related to national security, law enforcement, or other matters of public importance;
- c) sub-contractors or third-party service or product providers who perform services on our behalf related to the Purposes;
- d) SCC's suppliers and product principals (solely for the purpose of market analysis and benchmarking to better understand our customers' needs).

In addition, where we deem it necessary or appropriate for conducting business, data storage or processing or customer / human resource management, we may transfer your Personal Data to another

member of the Group or third-party service providers either within or outside the country, under strict confidentiality conditions and similar levels of security safeguards.

We may also disclose information about you if we determine that disclosure is reasonably necessary to enforce our terms and conditions or protect our operations, users or customers. Additionally, in the event of a reorganization, merger, or sale we may transfer all personal information we have collected to the relevant third party.

#### **7. Data security and safeguards**

Efforts will be made to ensure that any Personal Data held by SCC is kept up-to-date and protected against any loss, misuse, unauthorized or accidental access or disclosure, alteration or destruction.

SCC may regularly review the security measures for safeguarding your Personal Data and only authorized SCC staff who have received appropriate training are permitted to handle the Personal Data.

#### **8. Retention of data**

Any Personal Data provided by you will be retained by SCC for a period SCC deemed suitable and necessary by SCC to fulfill the stated Purposes or as required to meet legal, regulatory, accounting obligations, or to safeguard SCC's interests (referred to as "the Retention Period").

Once the Retention Period expired and/or when SCC ceases to process your Personal Data, SCC will undertake all necessary measures to permanently delete and destroy your Personal Data.

#### **9. Your rights of access and correction**

You have the right to request notifications about the Personal Data we hold related to you and to request correction or deletion of your Personal Data held by us or by a third party. In addition, if the processing of your Personal Data is based on your consent, you have the right to withdraw your consent in writing at any time.

The contact for written requests regarding access to Personal Data, correction and/or deletion of Personal Data or for information about SCC's policies, procedures and types of Personal Data handled is: [pdpa@sccsb.com.my](mailto:pdpa@sccsb.com.my) or you can reach us at:

SCC Group of Companies,  
Lot 147-A, Kawasan Perindustrian Semambu,  
25350 Kuantan, Pahang