



DATA SECURITY AND PRIVACY POLICY

1.0 Introduction

QL Resources Berhad (“**QL**” or the “**Company**”) and its subsidiaries (the “**Group**”) are committed to upholding the highest standards of personal data protection as provided for in the Malaysian Personal Data Protection Act 2010 (“**PDPA**”).

In compliance with the PDPA and its regulations, including any order, code of practice, policy, standard or guideline related to it, where applicable (collectively referred to as the “**Data Privacy Laws**”), the publications of this Data Security and Privacy Policy (“**Privacy Policy**”) on QL’s website (“**Website**”), applications and other site(s) constitute as notices that are issued to all our valued clients and/or prospective clients. This Privacy Policy will inform you of your rights in regard to your personal data that has been and/or will be collected and processed by us.

2.0 Objective

QL wants to give you the best possible customer experience and we will use and combine the personal data collected by us and/or on your behalf including but not limited to:-

- a. Provide you better products and services;
- b. Subscriptions to news or promotional items;
- c. Internal record and marketing;
- d. Legal compliance; and
- e. Communications.

(collectively, “**Purposes**”).

3.0 Type and Description of Personal Data

This Privacy Policy encompasses all types of data deemed to be confidential and private. Below are examples of the personal data collected:-

- a. Name;
- b. Identity Card Number / Passport Number;
- c. Gender;
- d. Email Address;
- e. Mobile Phone Number;
- f. IP Address;
- g. Images (Still/ Recording);
- h. Sensitive Personal Data;
- i. Personally Identifiable Information (PII) defined by international privacy laws or standards.



4.0 Sources of Personal Data

QL may obtain your personal data in hard copy, digital formats and/or verbal disclosure received or disseminated from any medium including but not limited to face-to-face interactions through our stores or premises, application forms, business cards, emails, over the phone, texts, WhatsApp messages, and through the use of our applications or otherwise by using our Website or interacting with us on social media.

5.0 Disclosure of Personal Data

Your personal data may be disclosed to:

- a. the QL Group, related or affiliated companies;
- b. our directors, authorised employees or representatives, auditors, advisers, consultants, professional firms or entities;
- c. our third party service providers, subcontractors, licensors, business partners, freight forwarders, shipping agencies/ firms/ entities, banks and financial institutions;
- d. relevant regulatory authorities, securities exchange(s), governmental bodies and law enforcement agencies;
- e. such other persons which QL may think fit or necessary,

notwithstanding that any such persons may be outside Malaysia, for any of the Purposes or any other purposes directly related to any of the Purposes for which your personal data was to be disclosed at the time of its collection or where such disclosure is required or authorised by law or by order of a court.

6.0 Security of Personal Data

QL uses strict procedures and security features to prevent unauthorised access wherever possible. Personal data provided to us via our Website, applications or other site(s) are protected during transit using encryption such as Transport Layer Security (TLS).

When personal data is stored by QL, we use computer systems with limited access (access is given to our authorised personnel(s) only) in our facilities with physical security measures and data stored in cloud services are in encrypted form including third-party storage. Personal data is kept in non-electronic environment are also treated with strict procedures and means.

7.0 Use of Cookies

Our Website, applications and other site(s), like many others, employ "cookies," which are stored by our servers to identify you or your computer or your smart device upon each visit to the Website, applications and other site(s). These cookies are solely associated to anonymous users and do not provide personal data of the users.

Some cookies are used by authorised third parties to provide QL with data on the effectiveness of its engagements and promotions. These cookies do not in any way collect personal data to identify a specific user.



These cookies are of a temporary nature, used solely to improve the efficiency of the latest transmission. Users can configure their browser to notify them of the reception of cookies to prevent the installation on their computer or smart device.

8.0 Transfer of Personal Data

We are very serious about providing a comparable level of protection for personal data should the information be processed or used outside Malaysia by our Vendors.

9.0 Data Subject's Obligation

For avoidance of the doubt, “**data subject**” means an individual who is the subject of the personal data that is collected from the sources mentioned in section 4.0 above including but not limited to all our users, valued clients and/or prospective clients.

It is necessary for QL to collect and to retain your personal data. Therefore, it is also obligatory for you to supply your personal data to us genuinely in the most accurate manner.

If you do not provide us with your personal data, QL will not be able to process the personal data on your behalf for the Purposes stated in section 2.0 above or effectively render our services to you; and all relationships created or to be created between us shall then be terminated and ceased to be in effect immediately.

10.0 Rights of Data Subject

The rights of the data subject under the PDPA includes but are not limited to:-

a. To request access to personal data

You have the right to request for access to personal data processed by us with reasonable notice.

b. To request correction of personal data

You have the right to request for correction and/or update of your personal data that is inaccurate, incomplete or outdated.

c. To limit processing of your personal data and to withdraw consent from processing personal data

You have the right to request to limit or to cease us from processing of your personal data.

You have the right to request for limiting the use of your personal data with reasonable notice which include for direct marketing purposes subject to any applicable legal restrictions, contractual conditions and within a reasonable time period.

In addition, you also have the right to withdraw your consent and to cease us from processing your personal data.

If you would like to exercise one of your rights as set out herein, or you have any inquiry or complaint about this Privacy Policy, or the way your personal data is processed, please write in to us for the abovementioned request(s) at the address stated in section 14.0 below.



11.0 Expiry Period of Processing the Personal Data

Whenever we collect or process your personal data for the Purposes, we will only keep it for as long as necessary for the fulfilment of such Purposes for which the personal data was collected (“**Retention Period**”). At the end of that Retention Period, your personal data will either be deleted completely or anonymised, for example by aggregation with other data so that it can be used in a non-identifiable way for statistical analysis and business planning.

12.0 Changes of Privacy Policy

We reserve the right to amend this Privacy Policy from time to time without prior notice. We advise that you check on our Website at www.ql.com.my for any updates to this Privacy Policy on a regular basis.

13.0 Acknowledgement and Consent

By communicating, engaging with us or by using of QL products and services, you acknowledge that you have read and understood this Privacy Policy and agree and consent to the use, processing, disclosure and transfer of your personal data by QL as described in this Privacy Policy.

You may however withdraw your consent in the manner described in section 10.0 above. Any email sent by QL to you will contain an automated unsubscribe link so that you can opt-out of the mailing list.

14.0 Inquiries or Complaints

Should you require further information about the personal data that we hold or the manner in which your information is being collected or used which is not answered under this Privacy Policy, please contact or write to us at:

Person in Charge	:	Data Protection Officer
Contact Number	:	+603-7801 2288
Email	:	privacy@ql.com.my
Post	:	Data Protection Officer QL Resources Berhad 16A, Jalan Astaka U8/83, Bukit Jelutong, 40150 Shah Alam, Selangor Darul Ehsan

15.0 Non-Binding Commitments

This Privacy Policy does not constitute a contract and does not imply any binding commitments between QL and any other parties.



16.0 Policy Review and Revision

This policy is endorsed by the Board of Directors on 29 February 2024. It will undergo periodic reviews and revisions annually as part of our commitment to continuous improvement. The updated policy will be communicated to all relevant stakeholders to ensure its effective implementation by the Sustainability Working Group.