

Personal Data Protection Notice

General Information

ViTrox Corporation Berhad and all of its subsidiaries ("ViTrox") respect and are committed to the protection of your personal data and your privacy. This Personal Data Protection Notice ("Notice") explains how your personal data are collected and handled following the Personal Data Protection Act 2010 ("Act").

1. Personal Data

Personal data means any information which relates to you and which was collected from or provided voluntarily by you to ViTrox for the purposes stated in Section 2. Your personal data may include, but is not limited to the following:

- personal details – photograph or photographic image, video, audio recordings or any form of appearances, name, contact details, email, address, identification card number, gender, marital status, date of birth, age, nationality, passport details, emergency contact, previous criminal offence;
- family as defined under 'immediate family', family details, disclosure of family member(s) working together in ViTrox, and nomination of the beneficiary;
- academic qualification supported with certificates and transcripts, language proficiency, and professional membership;
- employment history with supporting payslips (if applicable), personal skills and competencies, referees, reason(s) for leaving;
- medical record;
- involvement in extra-curricular activities such as sports, clubs, community service, part-time employment, consultancy work, and other independent means of income;
- payroll details – job grade, salary, income tax details, statutory contribution details, banking account details;
- employment in ViTrox – employment status, job description, key performance indicators (KPI), performance record, training record, employment record, achievements, disciplinary record;
- academic achievements in ViTrox – journals, publications, research, project, presentations, consultation work;
- any other personal data provided in the course of your employment in ViTrox;
- any information you provide directly to ViTrox as part of your employment relationship with ViTrox, including any information/data you may have submitted at the time of applying for a position with ViTrox, at the time of joining the employment of ViTrox, or subsequently during your employment with ViTrox, including any Sensitive Personal Data as described in the Act;
- information that is collected when you fill in or update your information with ViTrox, whether in writing or through email or on the intranet of the company;
- website or at the thumbprint machine, which may include personal data such as your photograph, name, thumbprint, and contact details;

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- the contents of all documents submitted to ViTrox, such as employment applications, forms, and any supporting documents;
- any messages or comments you submit to us in whatever manner, which may include personal data such as name, email address, and telephone number; and
- in some circumstances, you may have provided Personal Data relating to other individuals (such as your spouse or other family members) and in such circumstances, you represent and warrant that you are authorized to provide their personal data to ViTrox and you have obtained their consent for their personal data to be processed and used in the manner as outlined in this Notice.

2. The Purpose of Collecting and Processing Your Personal Data

Personal data that you provide to ViTrox voluntarily will be processed as required or permitted by law for the following purposes related to:

- your employment contract (new contract and contract renewal);
- monthly payroll and related activities;
- insurance coverage and insurance claim;
- staff benefits and related staff claims;
- training, workshops, seminars, briefing, and conferences both locally and internationally; visa application;
- business trips;
- work permit;
- teaching permit;
- accreditation of your academic qualification;
- external assessment of your academic achievements for promotion;
- performing statistical analysis for various objectives;
- reference check from your referee(s), job recruiter(s), and previous employer(s);
- responding or verifying to third party's inquiries of your application(s) - bank account opening, bank loan, financial aid, further studies, scholarship, or bursary application;
- responding or attending to reference check from your job recruiter(s) and potential future employer(s);
- the survey, research, or project sanctioned by ViTrox;
- editorial, advertising, art, promotion, marketing, in or through the use of copyright, use, publish and distribute on all media formats;
- contact purpose;
- ViTrox systems or website requirements or digital marketing channels;
- internal investigations, audit or security purposes;
- in compliance with ViTrox's legal and regulatory obligations in the conduct of its business;
- where required by law, where ViTrox considers that such use or disclosure is necessary to respond to any claims or legal process, or where ViTrox suspects that fraud or unlawful activity has been, is being, or may be engaged in;
- where a third party requires the Data for the such third party to perform functions or services as required by ViTrox (for example, hospital & surgical policy and to

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banks who are arranging for salary remittances & claim reimbursements (for employees) and to the bank for internship disbursements);

- where a third party requires such third party to perform functions or obligations as required under the laws, rules, regulations, by-laws, and/ or guidelines (whether or not having the force of law) or as required by any governmental and/or nongovernmental authorities, agencies or departments (for example, to external auditors who are auditing ViTrox's human resource and learning centre processes); and
- any other purposes not specifically mentioned herein-above but that are required to be carried out in connection with the day-to-day business of ViTrox.

3. Disclosure of personal data

Personal data provided to ViTrox will generally be kept confidential but may be disclosed to the following classes of third parties (in or outside of Malaysia) as required under the law or according to relevant contractual relationships (for example, appointed third-party service providers) or for the purposes related to Section 2 above:

- entities within ViTrox (including related companies, subsidiaries, holding companies, and associated companies);
- outsourced systems partners related to Human Resource Information System, Information Technology System, and Corporate Communications;
- third party service providers such as insurance companies, banks and financial institutions, auditors, lawyers, company secretaries, consultants, printing companies, marketing agencies, telecommunications companies, contractors, events and training organizers, and other professional advisors;
- health or medical providers such as medical practitioners and hospitals;
- academic-related individuals, bodies, institutions, or organizations;
- your previous and/or future potential employer(s) including job recruiter or recruitment agencies;
- embassies, government ministries, departments or agencies, statutory authorities, law enforcement agencies, and industry regulators; and
- any person or body to whom ViTrox is compelled or required to do so under law, court order, legal proceeding, or in response to a competent or government agency.

4. Impact of Non-Provision of Personal Data

Please note that if the provision of your Personal Data is mandatory and that if sufficient Personal Data is not supplied, or is not satisfactory to ViTrox then your application or request to Company for any of the above purposes as set out in Section 2 above may not be accepted or acted upon or ViTrox will not be able to provide the full range of benefits and/or services.



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5. Data Security

Your personal data will be stored and processed in a secured manner in compliance with the Act. ViTrox endeavors to prevent any accidental loss or damage to your personal data at all times.

6. Transfer of Personal Data

Due to the global nature of ViTrox's business, ViTrox may transfer your Personal Data to the other companies within the ViTrox (which may be located in other countries) or to any parties located in other countries (including countries that have different data protection regimes than is found in the country where you are based). Where your Personal Data is transferred to other countries, Personal data protection laws in those countries may apply. Any Personal Data transferred shall be used for the purposes as set out in Section 2 above and disclosed to parties stated in Section 3 above.

7. Updates to personal data

ViTrox shall ensure that personal data processed is accurate and up-to-date. ViTrox shall be kept informed of any changes to be made to personal data or if the personal data is not accurate.

8. Right to access and correct personal data

You have the right to access and correct your personal data. You are responsible for informing ViTrox about changes to your personal data and for ensuring that such data are accurate and correct.

9. Storage and retention of personal data

Your personal data shall be stored either in hard copies or in servers and will either be operated by ViTrox or its designated service providers. Personal data provided by you will be stored for as long as deemed necessary for the purposes described under Section 2 above or as required to satisfy regulatory requirements or to protect ViTrox's interests.

10. Change To Notice

ViTrox reserves the right to amend this Notice from time to time without prior notice.

11. Consent

ViTrox seeks to use your personal data only for legitimate purposes and with your consent. All information requested from you is obligatory to be provided by you unless stated otherwise. If you do not provide the obligatory information required, ViTrox would not be able to keep complete information about you, thus hampering its ability to accomplish the purposes stated in Section 2.



**VITROX CORPORATION BERHAD &
ITS SUBSIDIARIES**

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If you elect to limit ViTrox's right to process your personal data, object to the use of your personal data or wish to make any complaints in general, you may contact us in writing.

We can be contacted at:

People Management
ViTrox Corporation Berhad
746, Persiaran Cassia Selatan 3, Batu Kawan Industrial Park,
14110 Bandar Cassia, Penang, Malaysia.
Email : hr@vitrox.com

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