

## PRIVACY AND PERSONAL DATA PROTECTION POLICY

This Privacy and Personal Data Protection Policy are issued to all our existing and/or prospective customers, individual suppliers and employees pursuant to the Personal Data Protection Act 2010 (Act 709) and Personal Data Protection (Amendment) Act 2024 ("the Act").

### PART A: GENERAL PROVISION

#### Introduction

Tomei Consolidated Berhad and/or any of its subsidiaries ("TOMEI") are Data Controllers under the Act. TOMEI is a Data Controller that processes personal data, has control over or authorises the processing of such data.

This Policy applies to all individuals ("data subject") interacting with TOMEI, including:

- (a) Customers – individuals who purchase or express interest in the TOMEI's products or services.
- (b) Individual suppliers – individuals engaged in a business relationship with TOMEI.
- (c) Employees – all individuals employed by TOMEI.

All parties shall comply with and adhere to this Policy in accordance with applicable personal data protection laws.

#### 1. Collection of Personal Data

In the course of dealings with TOMEI, personal data may be collected from customers, individual suppliers, employees and other data subjects. Such personal data enables TOMEI to enter into transactions, deliver services, manage relationships and comply with legal obligations. Personal data collected by category as follows:

Category	Types of Personal Data Collected
Customers	Name, NRIC number, passport number, date of birth, gender, race, nationality, contact details (address, email, telephone number), payment details, purchase history, tax identification number (TIN) (for e-invoicing), product preferences, membership tier, reward points, loyalty program activity, CCTV footage at branch / HQ premises, biometric data and etc.

Category	Types of Personal Data Collected
Individual suppliers	Contact person name and designation, email address, telephone number, bank account details (for payments), director and shareholder information, tax identification number (TIN) (for e-invoicing), due diligence documentation which includes personal data, biometric data and etc.
Employees	Name, NRIC number, passport number, work permit details, date of birth, gender, race, religion, marital status, emergency contact details, banking details (salary), EPF, SOCSO, EIS, PCB, medical records, disciplinary records, performance reviews, training history, job application data (resume, references), biometric data (where used for time attendance or access control) and etc.

### 1.2 Biometric Data as Sensitive Personal Data

Pursuant to the Personal Data Protection (Amendment) Act 2024, biometric data constitutes sensitive personal data and is subject to stricter processing requirements. Tomei shall only process biometric data for legitimate purposes e.g., time attendance, security access, identity verification and shall obtain your explicit written consent before collection. You may withdraw your consent for biometric data processing at any time, subject to alternative arrangements e.g., card-based access. Biometric data shall be deleted upon termination of employment or withdrawal of consent, unless required for ongoing legal proceedings.

### 1.3 CCTV Surveillance

Tomei operates closed-circuit television (CCTV) systems for security and crime prevention purposes. Signage is prominently displayed at outlets to notify individuals of CCTV recording. CCTV footage constitutes personal data where an individual is identifiable. Access to CCTV footage is restricted to authorised personnel and will not be disclosed to third parties except as permitted under the Act.

## 2. Source of Personal Data

Personal data is collected from legitimate and transparent sources, including:

- (a) Business transactions for the sale and purchase of products or services;
- (b) Registration forms, loyalty programmes (My Jewel Club) or online enquiries via our websites/online platforms.

- (c) Contracts, proposals, employment applications or supplier onboarding documents;
- (d) Emails, correspondence, meetings or interviews;
- (e) Business cards provided to our employees or representatives;
- (f) Referrals from other parties with verifiable consent;
- (g) Credit reporting (e.g., CTOS, CCRIS) where permitted by law;
- (h) Publicly available sources as permitted by law.

### **3. Purpose of Collecting of Personal Data**

#### **3.1 For Customers**

Personal data will be processed for the following purposes:

- (a) Processing product sales, purchases, reservations, repairs and returns;
- (b) Membership registration, verification and entitlement to My Jewel Club privileges;
- (c) Customer account registration and access to TOMEI's businesses / websites / online platforms;
- (d) Marketing communications, promotions, event invitations and newsletters are sent with explicit consent. Opting out and ceasing all marketing communications is possible by replying with "unsubscribe" or by using the opt-out link provided in our messages.
- (e) Participation in contests, lucky draws and customer satisfaction surveys;
- (f) Prevention of crime (including fraud, money laundering and identity theft);
- (g) Compliance with legal or regulatory requirements.

#### **3.2 For Individual Suppliers**

Personal data will be processed for the following purposes:

- (a) Supplier registration, evaluation, onboarding and due diligence;
- (b) Processing purchase orders, invoices, payments and e-invoicing (LHDN);
- (c) Conducting credit assessments, financial and background checks;
- (d) Managing contracts, negotiations, tenders and dispute resolution;
- (e) Compliance with legal or regulatory requirements.

#### **3.3 For Employees**

Personal data will be processed for the following purposes:

- (a) Recruitment, interview, background checks and reference verification;
- (b) Payroll processing, EPF, SOCSO, EIS, PCB and income tax reporting;
- (c) Performance appraisal, promotion, career development and training;
- (d) Disciplinary proceedings, grievance handling and dispute resolution;
- (e) Medical benefits, health screenings, insurance coverage and workplace safety;
- (f) Time attendance and access control (including biometric data, where implemented);
- (g) Compliance with labour laws, company policies and statutory contributions.

#### **4. Disclosure of Personal Data**

Personal data will be kept confidential. However, TOMEI may disclose personal data to the following as necessary:

- (a) Related companies, subsidiaries or holding companies within Tomei;
- (b) Auditors, legal advisers, consultants or other professional advisers;
- (c) Government agencies, statutory authorities or regulators where required by law including LHDN, EPF, SOCSO, SSM, MCMC, Bank Negara Malaysia, etc;
- (d) Third-party service providers (e.g., payment processors, IT cloud service providers, delivery partners);
- (e) Individual suppliers where necessary to fulfil contractual obligations.

All parties are required to process personal data in accordance with TOMEI's instructions and applicable data protection laws and to maintain appropriate security measures. Non-disclosure Agreement (NDA) are executed in protecting the interest of TOMEI, when necessary.

#### **5. Protection of Personal Data**

TOMEI implements appropriate administrative, technical, physical and organisational safeguards to protect personal data against unauthorised access, unlawful processing, accidental loss, destruction or damage. TOMEI is committed to protecting all personal data in its custody. We implement:

- (a) Technical measures – secure networks, encryption, firewalls, access controls, intrusion detection system.
- (b) Physical measures – secure premises, restricted access, CCTV surveillance.
- (c) Organisational measures – policies, training, confidentiality obligations, breach reporting procedures.

Access to personal data is limited to authorised personnel with a legitimate business need and as stated in Privacy and Personal Data Protection Policy (Employee).

#### **6. Retention of Personal Data**

We will retain your personal data in compliance with this Privacy and Personal Data Protection Policy and/or the terms and conditions of your agreement(s) with us for the duration of your relationship with us, for such period as long as necessary for the aforementioned purposes, unless required by the law and/or where required by our internal policies.

Upon expiry of the applicable retention period, personal data shall be securely deleted or anonymised. If you are no longer our employee, customer or individual suppliers, we will permanently delete your personal data.

## **7. Rights of Data Subjects**

Data subjects, i.e. customers, individual suppliers, employees have the right to:

- (a) Request access to their personal data held by TOMEI.
- (b) Request correction of inaccurate, misleading, out-of-date or incomplete personal data.
- (c) Withdraw in full or in part, previously given consent, subject to legal and contractual limitations.
- (d) Object to the use of their personal data for certain purposes (e.g., marketing).
- (e) Request transfer of their personal data directly to another data controller subject to technical feasibility.

We will respond to access or correction requests within 21 days.

## **8. Reporting Breaches**

Any suspected or actual data breach, unauthorised access or security incident involving personal data must be reported immediately to TOMEI's related HOD and the designated Data Protection Officer.

## **9. Changes to this Policy**

TOMEI reserves the right to amend this Policy from time to time. Updates will be published on TOMEI's official website or communicated through appropriate channels.

## **10. Languages**

Where required by applicable law, this Policy may be issued in Malay language (dual languages). In the event of any inconsistency, the English language version shall prevail.

## **PART B : CONTACT US**

You can contact us or submit your inquiry in regards to the process of your personal data at:

Designation : Data Protection Officer (DPO)

Address : No.8, Jalan 2/131A, Batu 6, Jalan Kelang Lama, 58200 Kuala Lumpur.

Contact : Email: DPO\_PDPA@tomei.com.my