

Swift Group of Companies (“the Company”) as a data user is committed to protecting the personal information provided by you in accordance with the Personal Data Protection Act 2010 (“PDPA”). Personal Data will be collected only for lawful and relevant purposes and all practicable steps will be taken to ensure that Personal Data held by us is accurate. The Company will take all practicable steps to ensure security of the Personal Data and to avoid unauthorized or accidental access, erasure or other use. If you have any queries please consult Human Resource Department.

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1. Processing of Your Personal Data

1.1 This Notice serves to inform you that we may process your Personal Data.

2. Collection Of Your Personal Data

2.1 The Personal Data collected by us may include your name, NRIC number or passport number, date of birth, address, telephone number, email address, and other contact details, race, nationality, marital status, details of your dependents, family background, creditworthiness, physical or mental health or medical condition, educational background, employment history, areas of expertise, bank details, records relating to annual leave, sick leave and categories of other leave, commission or alleged commission of any offence or proceedings for any offence committed or alleged to have been committed including past misconduct, the disposal of such proceedings or the sentence of any court in such proceedings and information captured on security systems. Where you have provided us details of your next of kin, referees and/or any other relevant person(s), and where applicable to you, you will have to ensure you have the permission and authority to provide us such details of your next of kin, referees and/or any other relevant party, in relation to collection of your Personal Data.

2.2 Your Personal Data may have been collected directly from you, and/or third parties and/or from any other sources publicly available and over time through your course of employment with the Company.

2.3 The Company may receive and/or retain your Personal Data in various forms (including in writing, electronically or verbally).

3. Processing of Your Personal Data/Sensitive Personal Data

3.1 The Company collects and uses your Personal Data for a variety of personnel/employee administration, work and general business management purposes including but not limited to:

3.1.1 processing employment applications including pre-employment checks;

3.1.2 for internal record keeping as may be required by law;

- 3.1.3 to contact or communicate with you or send general or specific notices relating to or connected to your employment with the Company;
 - 3.1.4 human resources management purposes, such as: onboarding, the planning and implementation of staffing and training, performance assessments, promotions, transfers, secondments and other career-related matters; the review, implementation and administration of the Company's staff benefits, payroll administration and termination;
 - 3.1.5 to maintain medical leave and other absence records (including any medical reports which are provided to the Company);
 - 3.1.6 for work related injury and illness reporting;
 - 3.1.7 the provision of employee references;
 - 3.1.8 intra-group communications, and strategic, financial and business planning and operations within the group;
 - 3.1.9 for monitoring compliance with legal requirements or internal rules of the Company;
 - 3.1.10 internal and external investigations including disciplinary, grievance, and regulatory issues;
 - 3.1.11 to comply with compliance and disclosure requirements of any and all governmental and/or quasi-governmental departments and/or agencies, regulatory and/or statutory bodies;
 - 3.1.12 to enforce the Company's rights under employment law or any other applicable laws and to defend the Company's rights under the law including but not limited to any disciplinary action or actions relating to the termination of employment;
 - 3.1.13 for any financial background or credit checking;
 - 3.1.14 criminal record checking; and
 - 3.1.15 other purposes directly relating to any of the above.
- 3.2 Employees and potential employees ought to be aware that the failure to supply such data which will result in the Company being unable to process employment applications, or affect the Company's ability to perform the Company's obligations under any potential or existing employment contract and/or your ability to enjoy the benefits of your employment with the Company.
- 3.3 If an application for employment is successful, data about employees (including Sensitive Personal Data) may also be collected from employees during the period of their employment with the Company and from other sources such as third party background checks, any registered credit reporting agencies, any regulatory authorities and any authorities, central depository or depository agent in relation to the securities industry.

3.4 Notwithstanding the above, the Company may process your Personal Data without your consent if it is permitted under the PDPA or any other relevant legislation.

3.5 The Company does not process or disclose your Sensitive Personal Data, such as your physical or mental health or medical condition, your political opinions, religious beliefs or other beliefs or of a similar nature, the commission or alleged commission of any offence without your explicit consent and/or unless otherwise provided under Section 40 of the PDPA.

4. Disclosure to Third Parties

Data held by the Company relating to employees and potential employees will be kept confidential but the Company may provide such information to the following parties, whether locally or overseas, for the purposes as set out in paragraph 3 above (which parties may also subsequently process, transfer and disclose such data for the purposes set out in paragraph 4):

4.1 To appropriate persons in the Company's parent and affiliated companies both locally and overseas.

4.2 Any agent, contractor, service provider, any professional adviser or third party who provides administrative, telecommunications, human resources management or administrative services (including but not limited to performance of pre-employment checks, payroll administration, safety and provision of administration of benefits entitled to employees) or any other service to the Company and its subsidiary;

4.3 Any other person under a duty of confidentiality to the Company which has undertaken to keep such information confidential.

4.4 Persons seeking employee reference in respect of employees.

4.5 Any person to whom the Company is under an obligation to make disclosure under the requirements of any law binding on the Company or under and the purposes of any guidelines or regulations issued by regulatory or other authorities with which the Company is expected to comply.

4.6 Any actual or proposed purchase of all or part of the business of the Company or, in the case of any merger, acquisition or other public offering, the purchaser or subscriber for shares in the Company or any affiliated company and their advisors.

5. Transfers of Your Personal Data outside of Malaysia

5.1 The Company's information technology storage facilities and servers may be located in other jurisdictions outside of Malaysia. This may include, but not limited to, instances where your Personal Data may be stored on servers located outside Malaysia. In addition, your Personal Data may be disclosed or transferred to entities located outside Malaysia. Please note that these foreign entities may be established in countries that might not offer a level of data protection that is equivalent to that offered in Malaysia under the laws of Malaysia. You hereby expressly consent to us transferring your Personal Data outside of Malaysia for such purposes. We shall endeavour to ensure that reasonable steps are taken to procure that all

such third parties outside of Malaysia shall not use your Personal Data other than for that part of the purposes and to adequately protect the confidentiality and privacy of your Personal Data.

6. Choices and Means Available for Limiting the Processing of Your Personal Data

6.1 Your continued employment with the Company is deemed consent for the Company to collect, process and store the data in accordance with the above. Failure to consent to the above may result in your inability to enjoy the benefits of your employment with the Company.

7. Security of your Personal Data

7.1 The Company shall take all reasonable action to prevent unauthorized use, access or disclosure and to protect the confidentiality of your Personal Data in connection with the purposes for which the Personal Data, has been disclosed to, or has been collected by us.

7.2 The company cannot and do not accept responsibility for any unauthorised access or interception or loss of Personal Data that is beyond the Company's reasonable control.

8. Retention of data

8.1 The Company retains Personal Data only until it is no longer required. For employees this is generally seven years after the end of employment. It is the Company's policy to retain Personal Data of unsuccessful applicants for a period of one year.

9. Access and correction of Personal Data

9.1 From time to time, the Company may request for you to review and update your Personal Data to ensure that your Personal Data is complete, accurate and not misleading.

9.2 You may access and request for correction of your Personal Data and/ or to limit the processing of your Personal Data or make any enquiries or complaints in respect of your Personal Data, by contacting the Company. A reasonable fee may be charged to offset the Company's administrative and actual costs in complying with your access requests.

10. Update to this PDPA Notice

10.1 The Company may amend this PDPA Notice from time to time and will ensure that a notice of such amendments will be made available to you.

10.2 Nothing in this notice shall limit the rights of employees and potential employees under the PDPA.