



PERSONAL DATA PROTECTION POLICY

The Personal Data Protection Act 2010 (“the Act”) was passed by the Parliament of Malaysia for the purpose of regulating the processing of personal data in commercial transactions. The Act came into force on 15 November 2013. At Davis Neptune Sdn Bhd (“DNSB”), we are committed to protecting your privacy in accordance with the Act. This Policy explains:

- the type of personal data we collect and how we collect it;
- how we use your personal data;
- the parties that we disclose the personal data to; and
- the choices we offer, including how to access and update your personal data.

Personal Data We May Collect from You

We may collect the following personal data about you:

- personal information to establish your identity and background such as your full name, passport or identity card number, nationality and religion;
- contact information such as billing address, premises address for electricity supply, telephone number, mobile phone number, fax number and email address;
- credit and bank account information for payment and/or credit evaluation purposes;
- sensitive information such as your racial or ethnic origin, political opinions, religion or other beliefs, health, criminal background or trade union membership;
- recording of your image via CCTV cameras installed at our depots or premises;
- recording of your photograph during any of our corporate events or third party open day;
- function or post when you commence a business relationship with us;
- resume or CVs when you apply job with us.

For general web browsing, although no personal data is revealed to us, certain technical and statistical information is available to us via our internet service provider such as cookies, your IP address, the time, date and duration of your visit. If you provide us with any personal data relating to a third party (e.g. information of your spouse, children, parents, and/or employees), by submitting such personal data to us, you represent to us that you have obtained the consent of the third party to provide us with their personal data for the purposes as listed below.

How Your Data May Be Used

You agree that we may use your personal data where permitted by applicable law and for the following purposes:

- to verify your identity;
- to manage and maintain your account or contract with us;
- to notify you about benefits and changes to our services;
- to provide and improve our services to you including fulfilling audit requirements, billing for services, and facilitating payments;
- to carry out your instructions or to respond to any enquiries, complaints, comments or feedbacks that you have submit to us;
- to protect or enforce our rights to recover any debt owing to us;
- to compile information for analysis and in reports for relevant regulatory authorities;
- to update, consolidate and improve the accuracy of our records;
- to administer competitions, contests, offers, or promotions;



You agree that we may use your personal data where permitted by applicable law and for the following purposes: *(cont.)*

- to produce data, reports and statistics which have been anonymised or aggregated in a manner that does not identify you as an individual;
- to conduct research for analytical purposes including but not limited to data mining and analysis of your transactions with us;
- to assess financial and insurance risk;
- to enable you to provide goods or services to us;
- to assess your job application;
- to conduct internal activities;
- to send you festive and/or promotional messages;
- to better understand your needs as our customer;
- for security and fraud prevention purposes;
- for the purposes of statistical analysis of data;
- for finance and marketing activities;
- for the purposes of our corporate governance;
- to send you event invitations based on selective events;
- for the purposes of complying with various relevant regulations in Malaysia;
- for the purposes of inclusion in media engagements and related events; and
- for the purposes of printed and on-line publications (collectively, “the Purposes”).

Your personal data will be collected from various on-line forms available during your visits to our website, existing guest lists, business cards, guest books and/or any events organised by our Company. You may be required to supply us with your name, company’s name, address, country, telephone numbers, fax numbers and email address. If you fail to supply us with such personal data, we may not be able to process and/or disclose your personal data for any of the above Purposes.

Privacy Policy of Our Website

The Privacy Policy governing the use of our website is set out in the following page:

<https://neptune-orbit.com/privacy-policy/>

Your Consent

By submitting your personal data, you consent to the use of that personal data as set out in this Policy. If we change our Policy, we will publish the amended version on this page. But you can email or write to us to ask for a copy. Continued use of the service will signify that you agree to any such changes.

Please be informed that your personal data may be disclosed, disseminated and/or transferred to any third party organizations or persons for the purpose of fulfilling our obligations to you in respect of the Purposes and all such other purposes that are related to the Purposes and also in providing integrated services, maintaining and storing records.

To this end, we are committed in ensuring the confidentiality, protection, security and accuracy of your personal data made available to us. It is your obligation to ensure that all personal data submitted to us and retained by us are accurate, not misleading, updated and complete in all aspects. For the avoidance of doubt, our Company and/or our employees will not be responsible for any personal data submitted by you to us that is inaccurate, misleading, incomplete and not



updated. Further, we may request your assistance to procure the consent of third parties whose personal data is made available by you to us and you hereby agree to use your best endeavours to do so.

You may at any time after the submission of your personal data to us, submit your request for access to your personal data by submitting such request to us at the address stated below in the event:

- you require access to and/or wish to make corrections to your personal data subject to compliance of such request for access or correction not being refused under the provisions of the Act and/or existing laws;
- you wish to enquire about your personal data; and
- you are no longer agreeable to us retaining, holding or storing your personal data. However, please note that this may result in us not being able to properly perform or discharge our obligations to you.

Any personal data retained by us shall be destroyed and/or deleted from our records and system in accordance with our retention policy in the event such data is no longer required for the said Purposes. We trust that you will consent to the processing of your personal data and that you declare that you have read, understood and accepted the statements and terms herein.