

Employee

Personal Data

Protection

Policy

EMPLOYEE PERSONAL DATA PROTECTION POLICY (PDPA POLICY)

1. Introduction

Kinergy Advancement Berhad and its Group of Companies (“Kinergy” or “the Group”) is committed to protecting the **privacy, confidentiality, and security** of all employees’ personal data in accordance with the **Personal Data Protection Act 2010 (PDPA)**. This Policy outlines Kinergy’s approach to managing and safeguarding the personal data of all its employees, both during active employment and following an employee’s departure from Kinergy, to ensure continued compliance and organisational protection.

2. Personal Data Collected

In carrying out its human resources (“HR”) and business functions, Kinergy collects, stores, discloses and processes various categories of employee data in accordance with the Malaysia Personal Data Protection Act 2010 (PDPA) for all lawful and relevant purposes throughout the employment lifecycle. The categories of data may include identification and contact information, employment and HR records, financial and payroll details, medical or health-related information, technology and security access data, lifestyle or welfare-related information voluntarily provided by employees, and any other information required for employment related purposes. The Group may also collect commute and mobility data to support environmental, social and governance (“ESG”)-related reporting requirements, alongside any other information necessary to fulfil contractual, statutory, operational, safety, or business management obligations.

3. Purpose of Processing Personal Data

All personal data is collected, used, and processed for **lawful and legitimate business purposes**, including but not limited to recruitment, onboarding, payroll administration, statutory submissions, benefits management, performance evaluation, disciplinary matters, workplace security, emergency response, internal reporting, ESG initiatives, and compliance with applicable laws and regulations.

Such data will be processed with appropriate security safeguards and will only be used, stored, retained, or disclosed as permitted under the PDPA. Sensitive personal data, including health information, will be handled with additional care to preserve its integrity, confidentiality, and accuracy. Employees may request to correct or update their personal data in accordance with the provisions of the PDPA.

4. Data Retention, Cooling Period, and Statutory Compliance

Kinergy stores personal data in secure physical and/or electronic systems. Personal data will be retained for as long as required to fulfill the purposes for which it was collected or to meet legal, regulatory, contractual, or operational requirements.

The Group reserves the right to ensure adequate organisational protection, a minimum cooling period of twelve (12) months will apply following the cessation of employment. During this cooling period, the personal data of former employees will be retained to address any outstanding payroll matters, statutory filings, audits, claims, reference checks, or other post-employment obligations. Upon completion of the cooling period, the Group will retain only data to meet statutory and regulatory requirements, typically for up to seven (7) years, including for tax, EPF, SOCSO, and audit purposes. All other data that is no longer required will be securely deleted, destroyed, or anonymised. All personal data retained during and after the cooling period shall continue to be treated with strict confidentiality and managed in full compliance with this Policy and applicable laws.

5. Disclosure of Personal Data

Kinergy may disclose personal data to authorised third parties when necessary. These parties include government authorities, regulatory bodies, insurers, financial institutions, auditors, and service providers engaged to support operational, statutory, or regulatory requirements. Kinergy will take reasonable steps to ensure such third parties maintain proper **confidentiality** and **data protection** standards.

6. Employee Rights

Employees have the right to request correction or updating of their personal data if it is inaccurate, incomplete, or outdated. All such requests must be supported with appropriate justification and will be reviewed and processed by the Group in accordance with established procedures.

7. Employee Responsibilities

Employees are responsible for promptly providing accurate, complete, and up-to-date personal information to the HR department to ensure proper HR administration and compliance with applicable requirements. They must also notify the HR department of any changes to their personal data and ensure that any personal data accessed in the course of their duties is treated with strict confidentiality.

In the event an employee becomes aware, suspects, or has reason to believe that their own personal data or that of a colleague has been compromised—such as through device hacking, unauthorised access, loss of equipment, or accidental disclosure—they must immediately report the incident to HR Department for investigation and mitigation. Unauthorised use or disclosure of personal data is strictly prohibited and may result in disciplinary action, including termination.

8. Other Information Required for Lawful Employment or Business Purposes

Kinergy may collect and use additional personal information as necessary for lawful employment or legitimate business purposes, including compliance with statutory, safety, audit, or reporting requirements.

9. Other Concerns

Kinergy shall address any additional personal data protection matters not explicitly covered in this Policy, including emerging legal requirements, third-party data handling, unforeseen risks, and concerns raised by data subjects. All such matters will be managed in compliance with the Personal Data Protection Act 2010 and the Group's internal procedure

10. Data Security Measures

Kinergy is committed to implementing reasonable **administrative, technical, and physical safeguards** to prevent the loss, misuse, alteration, or unauthorised access of personal data. These measures are regularly reviewed to ensure continued effectiveness and compliance with PDPA requirements.

11. Policy Review and Updates

This Policy is subject to periodic review and refinement to ensure ongoing relevance, effectiveness and alignment with emerging regulatory requirements, industry best practices and stakeholder expectations. This Policy was approved by the Management of Kinergy on 24th November 2025.