

LUNAS PERSONAL DATA PRIVACY NOTICE

(Version: August 2025)

This Personal Data Protection Notice ("Notice") is issued by **LUNAS** to inform our valued customers, suppliers, business partners, contractors, job applicants, service providers and employees about the manner in which we collect, use, disclose, and protect your personal data, in accordance with the **Personal Data Protection Act 2010 ("the Act")**.

Terms & Definitions

TERM	DEFINITION
LUNAS	Refers to Lumut Naval Shipyard Sdn. Bhd., LUNAS Ship Repair Sdn. Bhd., LUNAS Langkawi Shipyard Sdn. Bhd. and LUNAS Yachts Sdn. Bhd.
PDPA	Personal Data Protection Act 2010 (Act 709)
Personal Data	Any information that relates directly or indirectly to an identifiable individual and is processed or intended to be processed as part of a commercial transaction. This includes Sensitive Personal Data and any expression of opinion about the individual, but excludes data processed solely for credit reporting purposes under the Credit Reporting Agencies Act 2010.
Processing	Refers to any operation or series of operations performed on Personal Data, whether carried out by automated means or otherwise. This includes, but is not limited to, the collection, recording, organization, structuring, storage, adaptation, alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment, combination, restriction, erasure, or destruction of Personal Data.
Data Controller	A person or an organisation that determines the purposes and means of processing personal data.
Data Subject	An individual to whom personal data relates.
Data Processor	An entity that processes Personal Data on behalf of a data controller, but does not process it for their own purposes
Data Protection Officer	Head of Risk, Integrity & Compliance responsible for PDPA compliance.
Cross-Border Data Transfer	Transfer of Personal Data to any country outside Malaysia.
Sensitive Personal Data	Any personal data that relates to personal information about an individual's physical or mental health, biometric data, political opinions, religious beliefs, criminal records, or other categories as may be prescribed by law.

Collection of Personal Data

In the course of your interactions with LUNAS , we may collect and process personal information about you. This may occur when you contact us, interact with us, engage our services, supply goods or services to us, apply for employment, or carry out work with or for us. We only collect information that is necessary for us to manage our business operations and fulfil our contractual and legal obligations to you.

All Personal Data will be processed in accordance with the principles set out in the Act, including the principles of notice and choice, disclosure, security, retention, access, and data integrity. Further, by accessing or using our websites, digital and social media platforms, engaging our services or entering business or employment relationships with us, you acknowledge and consent to the collection, use, processing, and storage of your Personal Data for the purposes and in the manner described in this Notice.

Personal Data we collect may include (but is not limited to):

- Name, identification number, passport number
- Contact details (address, email, telephone number)
- Race, gender, date of birth, marital status, religious beliefs
- Employment history, education details
- Financial details (banking, EPF, and SOCSO numbers)
- Health, safety, and emergency contact information (where relevant)
- Any other information relevant to your dealings with us

Why We Collect Your Personal Data

We collect and processes your Personal Data for purposes that are directly related to our business operations which include, but are not limited to:

- Administering and managing services, contracts, and commercial transactions;
- Communicating with you regarding our operations, services, employment opportunities or business engagements;
- To process your payment transactions;
- Processing supplier registrations, vendor applications and related documentation;
- Ensuring safety, security, and access control at our premises, facilities and project sites;
- Complying with applicable laws, regulations and statutory requirements;

- Conducting market surveys and trend analysis;
- Conducting audits, investigations, or risk assessments.
- Notifying you of important operational matters, policy changes, compliance requirements, or information relevant to our business relationship.

We will only use your Personal Data for lawful purposes and in accordance with the principles set out in the Act.

How We Collect Your Data

We may collect your Personal Data from through various means, including but not limited to:

- Application forms, contracts, agreements, tenders, and other documentation submitted to us;
- Communications through emails, telephone calls, written correspondence, or any other channels;
- Interactions through our websites, digital or social media platforms, or at any events or activities;
- Business cards or contact details you provide to our employees;
- Closed-circuit television (CCTV) recordings at our premises, facilities and project sites;
- Third-party references or background checks such as credit reporting agencies, subject to your prior consent.

Consequences of Not Providing Your Data

The provision of certain Personal Data is necessary for us to carry out our business operations and comply with legal and regulatory requirements. If you choose not to provide the required Personal Data, it may:

- Prevent us from processing your job application, vendor registration, or other business related requests;
- Affect our ability to fulfil contractual or legal obligations or provide services to you;
- Restrict access to our premises, facilities, project sites or services due to safety, security or and regulatory requirements.

Disclosure of Your Personal Data

We treat your Personal Data with strict confidentiality and is committed to protecting it in accordance with the Act. Your Personal Data will only be shared on a strict need-to-know basis and only when necessary for lawful purposes, including but not limited to the following parties:

- **Government and Regulatory Authorities** – such as the Inland Revenue Board (LHDN), Social Security Organisation (SOCSO), Employees Provident Fund (EPF), Malaysian Anti-Corruption Commission (MACC), or other enforcement agencies, where disclosure is required by law.
- **Appointed Service Providers and Contractors** – including IT vendors, outsourced HR/payroll providers, insurance companies, panel clinics, training providers, auditors, or consultants who act on our behalf under contractual obligations.
- **Business Partners and Clients** – in relation to joint ventures, collaborative projects, or contractual deliverables (subject to confidentiality or data processing agreements).
- **Legal and Professional Advisers** – including law firms, risk consultants, and external auditors engaged to assist with investigations, dispute resolution, or compliance reviews.
- **Banks and Financial Institutions** – for payroll, claims processing, and payment transactions.
- **Internal Departments or Subsidiaries within LUNAS Group** – solely for operational, administrative and compliance purposes consistent with the original purpose of collection.
- **Emergency Responders or Health Providers** – where necessary to protect life, health, or safety.
- **Third Parties with Your Explicit Consent** – where you have been informed and agreed to the disclosure.

Data Protection & Security

Your Personal Data is secured with appropriate technical, physical, and administrative safeguards to protect against unauthorized access, loss, misuse, alteration or destruction. Access to Personal Data is strictly limited to authorized personnel for legitimate business purposes.

Data Retention

LUNAS will retain your Personal Data for as long as it is necessary to fulfil the purposes for which it was collected or as required or permitted by law. Once your Personal Data is no longer required, it will be securely disposed of, deleted, or anonymized in accordance with our internal data retention and disposal policies.

The retention period may vary depending on the nature of the Personal Data and the purpose for which it was collected, including legal, regulatory, operational, or audit requirements.

Cross-Border Data Transfer

In the course of our operations, it may be necessary for LUNAS to transfer your Personal Data to locations outside Malaysia, including to our subsidiaries, affiliates, suppliers, contractors, service providers, or business partners operating in other jurisdictions. . Such transfers will only be carried out where necessary for the performance of a contract, provision of services, or as required by law.

When your Personal Data is transferred outside Malaysia, LUNAS will ensure that appropriate safeguards are in place to protect your Personal Data in accordance with this Privacy and Personal Data Protection Policy and the Act. This includes ensuring that the receiving party provides a level of Personal Data protection that is at least equivalent to the standards of protection provided under Malaysian law.

Your Rights

As a data subject, you have the following rights under the Act:

- **Right of Access:** You may request access to your Personal Data held by LUNAS to understand how it is being processed and used.
- **Right to Correction:** You may request correction or update of any Personal Data that is inaccurate, outdated, incomplete, or misleading.
- **Right to Withdraw Consent:** You may withdraw your consent to the processing of your Personal Data. However this may affect our ability to continue providing certain services or fulfilling contractual obligations, subject to legal or operational constraints.
- **Right to Limit Processing:** You may request to limit or restrict the way your Personal Data is used, especially for non-essential purposes such as direct marketing.
- **Right to Data Portability:** Where technically feasible and applicable, you may request to receive your Personal Data in a structured, commonly used, and

machine-readable format. You may also request that we transfer your data directly to another data controller, subject to validation and legal requirements.

To exercise any of these rights, please contact:

Data Protection Officer

LUNAS CORPORATE OFFICE

33-1, Level 33, MOF Inc Tower, 9 Persiaran KLCC,

50088 Kuala Lumpur

Email: dpo@mylunas.com.my

Data Breach Notification and Reporting

LUNAS is committed to protecting the confidentiality, integrity, and security of Personal Data. In the event of a Personal Data breach, the **Data Protection Officer** will immediately initiate containment and investigation measures.

Where required by law, LUNAS will notify:

- The relevant regulatory authority, and
- Affected individuals without undue delay.

Such notifications will include:

- The nature and scope of the breach.
- The categories and estimated number of individuals and records affected.
- Remedial steps taken or planned to contain the breach and mitigate risks.
- Recommended actions for affected individuals, where applicable.

All breach incidents are overseen and coordinated by the **Data Protection Officer**, who will ensure timely communication and compliance with reporting obligations.

Update of the Personal Data Protection Notice

We may revise or update this notice from time to time to reflect changes in our practices and policies, legal requirements, or operational needs. The latest version will be available on our website or upon request.

Language

This policy is issued in both English and Bahasa Malaysia. In the event of any inconsistency between the two versions, the English version shall prevail.