



PERSONAL DATA PROTECTION POLICY



**INSIGHTS ANALYTICS BERHAD
(202401035770 (1581617-V))**

PERSONAL DATA PROTECTION POLICY

Effective Date: 15th January 2025

1.0	Type Of Personal Data Collected.....	2
2.0	Consent.....	2
3.0	Purposes Of Collection, Use And / Or Disclosure Of Personal Data	3
4.0	Disclosure Of Personal Data.....	4
5.0	Withdrawal Of Consent / Correction And Access To Personal Data.....	5
6.0	Retention Protection And Disposal Of Personal Data	5
7.0	Transaction Security Policy	5
8.0	Links To Other Websites	6
9.0	Changes To This Privacy Policy.....	6
	Appendix I: Personal Data Protection Declaration Form	7
	Appendix II: Personal Data Request Form	9

1.0 Type of Personal Data Collected

- 1.1 It might be required to collect personal data from you during your dealings with the Group or for the purpose of related business activities.
- 1.2 Such personal data may include but is not limited to:
- (a) name, job title and company name;
 - (b) age, gender, date of birth, identity card number, passport number, photograph, signature;
 - (c) race, ethnic origin, nationality, physical and mental health;
 - (d) contact information including address, email address and phone number;
 - (e) marital status, details of children, occupation, work history, performance reviews, income, employer, references and any other details of past employers;
 - (f) type of loans applied for in relation to purchase of property;
 - (g) financial and credit card details, bank name and other pertinent banking information, tax file identification number, EPF number, SOCSO number, criminal history; and
 - (h) such other data necessary for the purpose which the personal data is collected
- 1.3 We recognise that you may provide us with your Personal Data by completing our forms or by communicating with us in person or by phone, e-mail, fax, short message service, instant messages, written form or otherwise.

2.0 Consent

- 2.1 By providing your Personal Data to us, you have read and accepted the Notice, and you have consented to the processing of the Personal Data by us in the manner set out herein. Further, if you have provided the Personal Data of third parties to us, you warrant and represent to us that you have obtained the required consent of the third parties for the processing of the relevant Personal Data by us in the manner set out herein.
- 2.2 The Company may collect, use or disclose an individual's Personal Data without his / her consent in the following circumstances:
- (a) the collection, use or disclosure is necessary to respond to an emergency that threatens the life, health or safety of the individual or another individual;
 - (b) the Personal Data is publicly available;
 - (c) the collection, use or disclosure is necessary for any purpose which is clearly in the interests of the individual, if consent for its collection, use or disclosure cannot be obtained in a timely way;

- (d) the collection, use or disclosure is necessary for any investigation or proceedings;
- (e) the collection, use or disclosure is necessary for evaluative purposes; and / or
- (f) in any other circumstances set out in the PDPA.

3.0 Purposes of Collection, Use and / or Disclosure of Personal Data

3.1 Examples of some situations where the Company collects, uses and / or discloses Personal Data, and the purposes of such are set out below.

No.	Person	Personal Data Collected	Purpose(s)
(a)	Job applicants	<ul style="list-style-type: none"> Information in job applicant's curriculum vitae or the job application forms (e.g. personal email, telephone number, address, educational history and background, salary at current / previous place of employment) 	<ul style="list-style-type: none"> To evaluate the applicant and to attend to all administrative work to process the job application
(b)	Employees	<ul style="list-style-type: none"> Personal Data of its employees (e.g. information in (a) above, bank account details, information relating to their salary, tax etc.) Personal Data of employees within the Group and related corporations of the Group 	<ul style="list-style-type: none"> For legal, audit and other compliance purposes, managing the employment relationship, including filings with or disclosure to authorities and bankers
(c)	Directors and other officers	<ul style="list-style-type: none"> Personal Data of its directors and other officers (e.g. information in (a) above, bank account details, information relating to their fee, tax etc.) Personal Data of directors and other officers within the Group and related corporations of the Group 	<ul style="list-style-type: none"> For legal, audit and other compliance purposes, administrative, business, operational and / or management purposes, including filings with or disclosure to authorities and bankers
(d)	Shareholders and investors	<ul style="list-style-type: none"> Personal Data of shareholders / investors when they write to the Group to raise queries or when they submit forms to the Group (e.g. relating to proxy forms / dividends / general meetings) Personal Data of shareholders / investors of the Group with their shareholding interests (e.g.: CDS account holders in dealings with Bursa Depository for Malaysian securities (e.g.: stock listed on Bursa Malaysia) and other regulatory bodies) 	<ul style="list-style-type: none"> To implement or undertake corporate actions such as dividend payments, general meetings (e.g. processing of proxy forms) To respond and deal with enquiries / feedback and for other shareholder or investor related activities, including delivery of documents to shareholders / investors

No.	Person	Personal Data Collected	Purpose(s)
(e)	Third parties including contracting parties	<ul style="list-style-type: none"> When an individual interacts with the employees and officers of the Company, for example, via telephone calls, correspondence and face-to-face meetings (including at shareholder meetings) When an individual visits the Company's premises where CCTV may be deployed for security purposes When a party transacts or contracts with the Company, it may provide Personal Data of its directors and employees When an individual approach, sign, subscribe, engage, transact and / or dealing with the Company. 	<ul style="list-style-type: none"> To respond, deal with, manage and / or for other legitimate purposes for the business and operations of the Group

3.2 The Group collects Personal Data primarily from the persons identified in the table set out above.

3.3 Unless permitted by laws, the collection, use and / or disclosure of Personal Data should be limited to that which is necessary for the identified purposes in the table above.

4.0 Disclosure of Personal Data

You hereby consent and authorize the Group to provide or disclose or share or reveal the Personal Data to the following classes of users:-

- (a) Related subsidiaries or associates or holdings companies, including future entities;
- (b) Government agencies, local authorities, utilities service providers, statutory authorities, enforcement agencies under the law and industry regulatory or other authorities if required or authorized to do so to discharge any regulatory function under any law or in relation to any order or judgment of court;
- (c) The Group's employees, auditors, consultants, accountants, lawyers, real estate agents, vendors, co-marketing partner, insurance company, property development and management manager and professional advisers;
- (d) The Group's contractors, subcontractors or third parties service or product providers as may be determined;
- (e) Financial institutions for purposes of facilitating payments and / or maintaining financial records in connection with the business or contract relationship between the Group and you and / or your company; and
- (f) Any other third parties the Group may deem necessary and expedient.

5.0 Withdrawal of Consent / Correction and Access to Personal Data

- 5.1 As an individual, you may exercise your right to access the data held about you by this company by submitting your request in writing to the data controller.
- 5.2 Although all reasonable efforts will be made to keep your information updated, you are kindly requested to inform us of any change referring to the personal data held by the association.
- 5.3 In any case, if you consider that certain information about you is inaccurate, you may request rectification of such data.
- 5.4 You also have the right to request the blocking or erasure of data that has been processed unlawfully.

6.0 Retention Protection and Disposal of Personal Data

The PDPA regulates how Personal Data in the Company's possession is to be protected or dealt with. Some of the basic obligations and the corresponding required practices and policies of the Company are set out below and must be complied with at all times:

Action	Policies / Practices
Protection of Personal Data	The Company shall protect Personal Data in its possession or under its control against risk of unauthorised access, collection, use, disclosure, copying, modification or disposal through reasonable security measures.
Retention and Disposal of Personal Data	The Company must cease to retain documents containing Personal Data or remove the means by which the Personal Data can be associated with particular individuals as soon as it is reasonable to assume that: (i) the purpose for which the Personal Data was collected is no longer being served by the retention of such Personal Data; and (ii) retention is no longer necessary for legal or business purposes. In such event, the Company must ensure that the Personal Data is properly disposed of.
Transfer of Personal Data	The Company shall not transfer any Personal Data of an individual to a recipient outside Malaysia unless the standard of protection to Personal Data in the foreign country is comparable to the protection under the PDPA.

7.0 Transaction Security Policy

This site uses Secure Sockets Layer (SSL) which encrypts the data you send or get through the site to ensure it is private and protected. To confirm the secure nature of your connection, you may view the site information on the top left corner of the browser window which indicates the security status symbol, and the URL address will commence with "https://" signifying a secure webpage.

8.0 Links to Other Websites

- 8.1 To give you a better service, our site can connect you with several links to other local and international organizations and agencies.
- 8.2 When connecting to such other websites you will no longer be subject to this policy but to the privacy policy of the new site.

9.0 Changes to this Privacy Policy

We shall have the right to modify, update or amend the terms of this Policy at any time by placing the updated Policy on this website. Further information on the PDPA can be found at <https://www.pdp.gov.my/>

This policy was adopted by the Board on 15th January 2025.

Appendix I: Personal Data Protection Declaration Form

In line with the Personal Data Protection Act 2010 (PDPA), we seek your consent to be given to us to use, process and / or retain your personal data. In short, PDPA protects your personal data. We would like to seek your full co-operation to grant us your consent by completing this Personal Data Protection Declaration Form. To facilitate your understanding of our use, disclosure and retention of your personal data, kindly refer to our Privacy Notice, which is made available at our website.

PART A: PERSONAL PARTICULARS

Full name (as per NRIC)	:	
NRIC / Passport No.	:	
Correspondence Address	:	
	:	
*House / Office Phone No.	:	
Mobile No.	:	
Email	:	

**Non-mandatory information*

PART B: PRIVACY CONSENT

I agree that Insights Analytics Berhad shall have the right to use my personal data for the purpose of operational process(es) which might include transfer of data and personal information to its related companies, subsidiaries and / or its holding company, outsourcing partners and authorities but not limited to affiliate companies including their outsourcing partners.

I further agree that Insights Analytics Berhad and its related companies, subsidiaries and / or its holding company can share and use my data and personal information for the purpose of promoting the Company's and its related companies', subsidiaries' and / or its holding company's products, new services and support requirement, and marketing campaigns and activities and commercial transactions.

☐ Yes ☐ No

I further agree to be bound by the terms and conditions of the Privacy Notice of Insights Analytics Berhad, which is made available at our website.

[The remainder of this page is intentionally left blank]

PART C: DECLARATION

I, _____ (NRIC / Passport No.: _____),
hereby certify that the information given in this form is true and accurate.

(Signature)

Date / Time:

Contact No.:

Appendix II: Personal Data Request Form

For the purpose of this form, Data Subject / Relevant Person (as defined under the Personal Data Protection Act 2010) must provide a copy of identification card (NRIC) or passport, authorization letter by the Data Subject and other relevant supporting document as required by us. Please note that, we may not be able to process your request in the event of the personal data provided is inaccurate, incomplete, misleading or not up to date in the first place. A request to correct personal data is subject to the requirements under Personal Data Protection Act 2010.

PART 1: TO BE FILLED IN BY DATA SUBJECT

Full name (as per NRIC)	:	
NRIC / Passport No.	:	
Correspondence Address	:	
*House / Office Phone No.	:	
Mobile No.	:	
Email	:	

**Non-mandatory information*

PART 2: TO BE FILLED IN BY RELEVANT PERSON

(i) Particulars of Data Subject

Full name (as per NRIC)	:	
NRIC / Passport No.	:	

(ii) Particulars of Relevant Person

Full name (as per NRIC)	:	
NRIC / Passport No.	:	
Correspondence Address	:	
*House / Office Phone No.	:	
Mobile No.	:	
Email	:	

**Non-mandatory information*

Type of Request: Please tick where applicable.

- ☐ Access to Personal Data (you will not need to fill in Sections B and C)
- ☐ Correction of personal data (you will not need to fill in Section A and C)
- ☐ Withdrawal of consent to use and disclose of Personal Data (you will not need to fill in Section A and B)

Section A: Request for Access

Please indicate the Personal Data you have provided and the reason for access to such information.

Date :		
Personal Data :	<input type="checkbox"/> Full name (as per NRIC) <input type="checkbox"/> NRIC / Passport No. <input type="checkbox"/> Correspondence Address	<input type="checkbox"/> *House / Office Phone No. <input type="checkbox"/> Mobile No. <input type="checkbox"/> Email
Reason to access :		

**Non-mandatory information*

Section B: Request for Correction

Please complete this section if you are requesting corrections of your personal data.
(Please tick (✓) and fill in at all relevant Section(s))

Date :	
<input type="checkbox"/> Full name (as per NRIC) :	
<input type="checkbox"/> NRIC / Passport No. :	
<input type="checkbox"/> Correspondence Address :	
<input type="checkbox"/> *House / Office Phone No. :	
<input type="checkbox"/> Mobile No. :	
<input type="checkbox"/> Email :	

**Non-mandatory information*

[The remainder of this page is intentionally left blank]

Section C: Withdrawal of Consent

Date	:	
Declaration	:	I hereby withdraw my consent to the collection, use and disclosure of my personal data that is held by Insights Analytics Berhad.
Reason (optional)	:	
<i>If you are or were an employee of Insight Analytics Berhad</i>		
Employee No.	:	
Division/Department	:	

Requestor's signature

Date: