

## THIS POLICY APPLIES TO:

- MST Golf Group Berhad  
(Registration No.: 199301009307 (264044-M))
- MST Golf Sdn Bhd  
(Registration No.: 198901011987 (189294-P))
- MST Golf Management Sdn Bhd  
(Registration No.: 200101013452 (549209-A))
- MST Golf Arena Sdn Bhd  
(Registration No.: 199801015399 (471528-D))
- MST Golf (Singapore) Pte Ltd  
(Registration No.: 200002124N)

# Personal Data Protection Policy

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## ADOPTION & REVISION HISTORY:

Rev.	Effective Date	Description	Approved by
0	1 Feb 2023	Formal Adoption	Board of Directors

(SEE NEXT PAGE FOR POLICY)

# Personal Data Protection Policy

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## 1. INTRODUCTION AND APPLICATION

- 1.1 MST Golf Group Berhad ("Company") and its subsidiaries (collectively including the Company, "Group") listed in the first page of this Personal Data Protection policy ("Policy") are committed to the protection of the personal data of its stakeholders and to conducting their business in accordance with the relevant personal data protection laws. The Group comprises the companies listed the first page of this policy and any companies that subsequently become members of the Group. The reference herein to the "Group Company" refers to each company in the Group, where applicable.
- 1.2 This Policy is legally binding and enforceable on each Group Company, including their employees ("Employees"). Each Group Company shall execute the Acceptance Form in Appendix 1 and shall be responsible for the implementation of and to give effect to the Policy. Non-compliance of Employees to this Policy may result in disciplinary action against the Employee in accordance with the relevant Group Company's policies and local laws, up to and including termination of employment or contract.
- 1.3 Any amendments to this Policy and any guidelines and audit programmes which supplement and complement it shall be communicated to the Group Companies.
- 1.4 Where the local laws require a higher level of protection for personal data than that set out in this Policy, the local laws will take precedence over the Policy and the Group Company shall comply with such local laws.

## 2. OBJECTIVE

- 2.1. This Policy aims to protect the privacy of the Group's stakeholders in accordance with relevant laws for the protection of personal data where applicable ("Relevant Laws"), including but not limited to Personal Data Protection Act 2010 of Malaysia ("PDPA Malaysia") and the Personal Data Protection Act 2012 of Singapore ("PDPA Singapore"). Without limiting the generality of the foregoing, an objective of the Policy is to provide adequate protection for the transfers and processing of personal data by the Group Companies and their employees.
- 2.2. The Group's stakeholders include, but are not limited to:
  - 2.2.1. Shareholders and investors;
  - 2.2.2. Employees and job applicants;
  - 2.2.3. Clients;
  - 2.2.4. Members of any membership scheme of the Group, including ilovegolf;
  - 2.2.5. Suppliers and contractors;
  - 2.2.6. Consultants and professional service providers;
  - 2.2.7. Government and regulatory bodies; and
  - 2.2.8. Members of the public.

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### **3. STRATEGIES OF THE GROUP**

- 3.1. Each Group Company shall achieve the abovementioned purpose by ensuring that its stakeholders are clearly informed of the following:
  - 3.1.1. The type of personal data that the Group Company may collect;
  - 3.1.2. Why the personal data is collected;
  - 3.1.3. How the personal data is collected;
  - 3.1.4. The parties with whom the Group Company shares or discloses the personal data;
  - 3.1.5. Transfer of personal data outside of Malaysia or Singapore (as the case may be);
  - 3.1.6. The choices the Group Company offers its stakeholders with regards to personal data;
  - 3.1.7. Responsibilities regarding personal data; and
  - 3.1.8. Retention period of personal data.

### **4. PERSONAL DATA THE GROUP COMPANY MAY COLLECT**

- 4.1. Personal data that the Group Company may collect includes, but is not limited to, personal and contact information such as full names, contact numbers (mobile phone and fixed line), fax numbers, identity card numbers, designations, employer's names and addresses, official mailing addresses, official email addresses, personal email addresses, bank account information, EPF, SOCSO and personal tax file number information.
- 4.2. In addition, in respect of the members of any membership schemes of the Group (including ilovegolf), the Group Company may collect, through its membership application form, the following type of personal data including but not limited to an individual's name, gender, date of birth, race, nationality, partial identity card number / passport number, contact information including mailing address, telephone number and email address and marital status, and other related information such as home club, handicap level, purchase details and history.
- 4.3. The Group Company shall ensure that the necessary consents are sought or have been obtained for the collection of personal data.

### **5. WHY THE PERSONAL DATA IS COLLECTED**

- 5.1. The Group Company collects shareholders' and investors' personal data in order to perform the following:
  - 5.1.1. Communicate with shareholders and investors as part of the Group Company's or its holding company's (as the case may be) obligation as a company listed in the Stock Exchange of Kuala Lumpur;

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- 5.1.2. Maintenance of share registrar;
  - 5.1.3. Better understand the needs of shareholders;
  - 5.1.4. Enhance security and prevent fraud;
  - 5.1.5. Statistical analysis of data;
  - 5.1.6. Marketing activities; and
  - 5.1.7. Dividend payout to shareholders.
- 5.2. The Group Company collects personal data of employees for the following purposes:
- 5.2.1. Maintaining accurate employee database for efficient and effective management, training and development of the Group Company's human resources;
  - 5.2.2. Internal and external communication as part of day-to-day course of duties;
  - 5.2.3. Contact during emergency;
  - 5.2.4. Purchase of insurances and administration of other staff benefits;
  - 5.2.5. Pay-out of salary and other remuneration, reimbursement and disbursement;
  - 5.2.6. Where required by any act, law, regulation, directives or the order of a government authority or court of competent jurisdiction; and
  - 5.2.7. Such other purposes consented by the employee.
- 5.3. The Group Company collects personal data of job applicants to achieve efficient and effective recruitment processes, including screening, shortlisting, invitation for interview, information of outcomes, job offer, and background checks (as permitted by applicants).
- 5.4. The Group Company collects personal data of clients', suppliers' and contractors' representatives in relation to carrying out day-to-day contractual obligations, such as reporting, coordination, inspections, inquiries, claims, application for variation orders, application for extension of time, value added inputs, and problem solving.
- 5.5. The Group Company collects personal data of vendors for the following purposes:
- 5.5.1. Communicate with vendors' representatives to ensure their work is done correctly and properly as per contractual requirements and specifications; and
  - 5.5.2. Maintaining an accurate database of vendors for efficient and effective vendor selection, monitoring and evaluation.
- 5.6. The Group Company collects personal data of consultants and professional service providers to achieve the intended outcomes of the consultancy and professional service.

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- 5.7. The Group Company collects personal data of representatives from the government and regulatory bodies to keep in contact with them to ensure the Group's business activities adheres to laws and regulations.
- 5.8. The Group Company collects personal data of members of the public to communicate with them for matters such as community service, public feedbacks, resolution of complaints, traffic management, promotion and advertising.
- 5.9. The Group Company collects personal data of members of any membership scheme of the Group for the following purposes:
- 5.9.1. Registration and administration of any membership schemes of the Group (including ilovegolf);
  - 5.9.2. Internal record keeping;
  - 5.9.3. Information of upcoming sales, events and promotions;
  - 5.9.4. Carry out data sorting and analysis to enable the Group Company to better understand a member's characteristics and buying behavior and to provide other products / services better tailored to a member's needs, and to assist the Group Company in identifying products and services that are likely to be of interest to a member;
  - 5.9.5. To offer tailored promotions and marketing communications;
  - 5.9.6. Resolving complaints and handling requests and enquiries; and
  - 5.9.7. Such other purposes as may be related to the foregoing.
- 5.10. In addition, MST Golf (Singapore) Pte Ltd may disclose and transfer the personal data of its members of any membership scheme (including ilovegolf) to other Group Companies in Malaysia for operational, management, administrative, supervisory or evaluative purposes.

## **6. HOW THE PERSONAL DATA IS COLLECTED**

- 6.1. The Group Company only collects personal data directly from the data subject or persons or companies associated with the data subject. The rest of this section describes the processes in which the Group Company may obtain personal data.
- 6.2. The Group Company normally collects shareholders' and investors' personal data during the following processes:
- 6.2.1. Shareholder registration process when the shareholder purchased or subscribed for his/her shares; and
  - 6.2.2. Establishment of investment agreements where investor's personal data forms part of the agreement.

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- 6.3. The Group Company normally collects personal data of employees and job applicants during the following processes:
- 6.3.1. Application for employment where applicants submit their resumes to the Group Company;
  - 6.3.2. Background checks performed by the Group Company as permitted by the applicants;
  - 6.3.3. Interview sessions where further personal data may be disclosed by the applicants; and
  - 6.3.4. Employee data update where employees are required to keep the Group Company updated on their personal information.
- 6.4. The Group normally collects personal data of clients', suppliers', contractors', consultants' and professional services providers' representatives during the following processes:
- 6.4.1. Exchange of contact information in the normal day-to-day course of business between clients', consultants' and professional service providers' representative and the Group Company's employees; and
  - 6.4.2. Establishment of contracts where a client's, consultant's and professional service provider's personal data forms part of the contract.
- 6.5. The Group Company normally collects personal data of vendors', suppliers' and contractors' representatives during the following processes:
- 6.5.1. Vendor, supplier or contractor pre-qualification where they fill in the Group Company's pre-qualification forms;
  - 6.5.2. Vendor, supplier or contractor registration into the Group Company's procurement system application;
  - 6.5.3. Exchange of contact information in the normal day-to-day course of business between such representatives and the Group Company's employees; and
  - 6.5.4. Establishment of contracts where a vendor's, supplier's or contractor's personal data forms part of the contract.
- 6.6. The Group Company normally collects personal data of representatives from the government and regulatory bodies via websites, hotlines, and inquiries to personnel within the government and regulatory body.
- 6.7. The Group Company collects personal data of members of the public via inquiries made for community service organising, receipt of public feedbacks or complaints, and events or roadshows.
- 6.8. The Group Company collects personal data of the members of the membership scheme of the Group (including ilovegolf) through its membership application form and process(es).

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- 6.9. The Group Company shall ensure that it and its employees only collect, use and disclose personal data for purposes that a reasonable person would consider appropriate under the given circumstances and for which the stakeholder has given their consent or where there is deemed consent under the applicable laws.

### **7. THE PARTIES WITH WHOM THE GROUP COMPANY SHARES THE PERSONAL DATA**

- 7.1. The Group Company only discloses personal data to a third party for the purposes described in Section 5 (Why the Personal Data Is Collected) or for other purposes for which consent has been sought and obtained.
- 7.2. The Group Company may disclose personal data to the following parties, subject to consent having been obtained where applicable:
- 7.2.1. Other Group Companies for operational, management, administrative, supervisory or evaluative purposes;
  - 7.2.2. Companies or organisations that act as its agents, contractors, service providers or professional consultants;
  - 7.2.3. Companies or organisations that assist it with processing and/or otherwise fulfilling transactions and providing the stakeholders with the relevant services;
  - 7.2.4. Its business associates and other parties for purposes that are related to the purpose of collecting and using the stakeholder's personal data;
  - 7.2.5. Other parties in respect of whom the stakeholder has given their express or implied consent or where permitted under applicable laws; and
  - 7.2.6. Federal or state government, law enforcement agencies, government agencies and regulatory bodies.

### **8. TRANSFER OF PERSONAL DATA OUTSIDE OF MALAYSIA**

- 8.1. It may be necessary for the Group Company to transfer its stakeholders' personal data outside Malaysia if any of the Group Company's service providers or business partners involved in providing whole or part of the Group Company's services are located in countries outside Malaysia. Such Group Company shall ensure that the stakeholder consents to the Group Company transferring his/her personal data outside Malaysia in accordance with the Relevant Laws.
- 8.2. The Group Company shall take reasonable steps to ensure that any such service providers or business partners are contractually bound not to use the personal data for any reason other than to provide the services they are contracted to provide and to adequately safeguard the personal data.



## 9. TRANSFER OF PERSONAL DATA OUTSIDE OF SINGAPORE

9.1. Where personal data is transferred outside of Singapore from MST Golf (Singapore) Pte Ltd to any of the other Group Companies in Malaysia, including but not limited to MST Golf Sdn Bhd, such Group Company undertakes and agrees to ensure that it provides a standard of protection to such personal data so transferred that is at least comparable to the protection under the PDPA Singapore. In relation to this, the recipient Group Company shall comply with the PDPA Singapore principles and obligations, which are briefly set out below:

9.1.1. Accountability Obligation

Undertake measures to ensure that the Group Company meets its obligations under the PDPA Singapore such as developing and implementing policies and practices, making information about its data protection policies, practices and complaints process available upon request, and designating a data protection officer (DPO) and making the business contact information available to the public.

9.1.2. Notification Obligation

Only collect, use or disclose personal data for purposes which an individual has given his/her consent to. In addition, allow the individual to withdraw consent, with reasonable notice, and inform him/her of the likely consequences of withdrawal. Once consent is withdrawn, make sure that it ceases to collect, use or disclose the individual's personal data.

9.1.3. Purpose Limitation Obligation

Only collect, use or disclose personal data for the purposes that a reasonable person would consider appropriate under the given circumstances and for which the individual has given consent. The Group Company may not, as a condition of providing a product or service, require the individual to consent to the collection, use or disclosure of his or her personal data beyond what is reasonable to provide that product or service.

9.1.4. Accuracy Obligation

Make reasonable effort to ensure that the personal data collected is accurate, complete and up-to-date, especially if it is likely to be used to make a decision that affects the individual or to be disclosed to another organisation.

9.1.5. Protection Obligation

Reasonable security arrangements and safeguards have to be made to protect the personal data its possession to prevent loss, theft, unauthorised access, collection, use, disclosure or similar risks.

9.1.6. Retention Limitation Obligation

Cease retention of personal data and dispose of it in a proper manner when it is no longer needed for any business or legal purpose.

### 9.1.7. Transfer Limitation Obligation

Transfer personal data to another country only in accordance with the requirements prescribed under the PDPA Singapore regulations, to ensure that the standard of protection is at least comparable to the protection under the PDPA Singapore.

### 9.1.8. Access and Correction Obligation

Upon request, to provide individuals with access to their personal data as well as information about how the data was used or disclosed within a year before the request.

The Group Company is also required to correct any error or omission in an individual's personal data as soon as practicable and send the corrected data to other organisations to which the personal data was disclosed (or to selected organisations that the individual has consented to), within a year before the correction is made.

### 9.1.9. Data Breach Notification Obligation

In the event of a data breach, the Group Company must take steps to assess if it is notifiable. If the data breach likely results in significant harm to individuals and/or is of significant scale, it is required to notify the Personal Data Protection Commission of Singapore and the affected individuals as soon as practicable.

## **10. THE CHOICES THE GROUP COMPANY OFFERS ITS STAKEHOLDERS**

10.1. There are situations in the Group Company's course of businesses where a stakeholder may or may not be obliged to supply the Group Company with his/her personal data. In both cases, a stakeholder has a choice to either supply or not supply his/her personal data to the Group Company. If the stakeholder chooses to not supply his/her personal data, he/she understands that such refusal may result in the Group Company not being able to properly perform or discharge the Group Company's obligations to the said stakeholder.

10.2. Any of our stakeholders whose personal data has been collected by the Group Company may at any time submit the following to the Group Company:

10.2.1. Request for access to his/her personal data;

10.2.2. Inquiry about his/her personal data;

10.2.3. Request to make corrections to his/her personal data subject to compliance of such request not being refused under the provisions of Relevant Laws; and

10.2.4. Request to withdraw or limit the Group Company's rights to retain and/or use his/her personal data, and by doing so, understand that such withdrawal or limitation may result in the Group Company not being able to properly perform or discharge the Group Company's obligations to the stakeholder making such

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request. The Group Company shall inform them of the likely consequences of such withdrawal of limitation.

- 10.3. The Group Company shall respond to any request or inquiry by the stakeholder as soon as practicable.

### **11. RESPONSIBILITIES REGARDING PERSONAL DATA**

- 11.1. The Group Company is committed to ensuring the confidentiality, protection, security and accuracy of its stakeholders' personal data, and endeavours to take all reasonable steps to protect and secure its stakeholders' personal data.
- 11.2. The Group Company shall put in place adequate measures to ensure that the stakeholder's personal data in its possession or control remains or is otherwise accurate, not misleading, updated and complete in all aspects. Notwithstanding the adequate measures put in place by the Group Company, it is the stakeholder's obligation to submit to the Group Company personal data that are accurate, not misleading, updated and complete in all aspects.
- 11.3. Further, the Group Company shall ensure that where the stakeholder is providing the personal data of a third party, they have obtained the requisite consent from such third party to provide the personal data to the Group Company. It is the stakeholder's obligation to obtain the consent of third parties whose personal data is made available by the said stakeholder to the Group Company.
- 11.4. In any case, the Group Company shall take steps to correct any errors in such personal data as soon as practicable upon the stakeholder's written request.
- 11.5. The Group Company and its employees shall protect the personal data in its control or possession by making sufficient and reasonable security arrangements (including, where appropriate, physical, administrative, procedural and information & communications technology measures) to prevent (a) any unauthorised or accidental access, collection, use, disclosure, copying, modification, disposal or destruction of personal data, or other similar risks; and (b) the loss of any storage medium or device on which personal data is stored.
- 11.6. For the purposes of this Policy, "reasonable security arrangements" include arrangements set out below:
- 11.6.1. Ensure that the Group Company's employees are bound by and comply with confidentiality obligations and have access to personal data only on a need-to-know basis and to the extent necessary to carry out the applicable purpose and perform their tasks;
  - 11.6.2. The Group Company shall conduct regular training sessions for its employees to impart good practices in handling personal data and to inform them of their obligations;
  - 11.6.3. Ensure that personal data is stored in locked file cabinet systems and privacy filters are used to prevent unauthorised personnel from viewing personal data; and

11.6.4. The Group Company shall adopt appropriate access controls, encrypt personal data and update computer security and IT equipment regularly.

### **12. RETENTION PERIOD**

12.1. The Group Company may retain personal data of a stakeholder for as long as the relationship between the Group Company and the said stakeholder exists, for such period as may be deemed necessary to protect the interests of the Group Company and/or its stakeholders, and where otherwise required by the law and/or the Group Company's relevant policies.

-END-

APPENDIX 1

**ACCEPTANCE OF THE MST GOLF GROUP'S PERSONAL DATA PROTECTION POLICY**

BY

<NAME OF GROUP COMPANY>

a company incorporated under the laws of <applicable country>  
and having its registered address at

<registered address>

(hereinafter "Group Company")

**BINDING COMMITMENT**

We hereby expressly confirm our commitment to strictly comply with and to give effect to the provisions of the personal data protection policy enforceable within MST Golf Group Berhad and its subsidiaries including the Group Company, as they exist upon the date of entry into this acceptance form, as well as any subsequent version thereof (hereinafter collectively the "Policy"). We acknowledge that we have received a copy of the Policy.

**TERM**

This acceptance form shall come into force as of the signature date mentioned below and shall remain in effect as long as the Policy itself remains in effect.

Signature :

Name :  
.....  
.....

Company :  
.....

Title :  
.....

Date :  
.....