

PERSONAL DATA PROTECTION POLICY

Universal Robina Munchy's Group of Companies which consist of URC Snack Foods (Malaysia) Sdn Bhd (Company No. 198201012921), Munchy Food Industries Sdn Bhd (Company No. 199101010041) and MunchWorld Marketing Sdn Bhd (Company No. 199001009927) ("URM") acknowledge our responsibilities towards your privacy and Personal Data and are hereby committed to protect your privacy and Personal Data in accordance to Personal Data Protection Act 2010 ("PDP Act"). This Personal Data Protection Policy ("the Policy") sets out the basic principles where URM may collect, process, use, disclose and transfer your Personal Data.

Definition of Personal Data ("the Personal Data")

For the purpose of this Policy, personal data shall have the meaning as stipulated under the PDP Act and shall include the following:

- (a) Name, identification number, passport number
- (b) Age, gender, date of birth, photograph
- (c) Race, ethnic, nationality
- (d) Phone number, address, email address
- (e) Financial and banking details, credit/debit card details
- (f) Marital status, details of spouse and children, family details
- (g) Job title, work history, income, past employment
- (h) Any other information and data that is deemed necessary

Source of Personal Data

URM may collect and obtain the Personal Data directly and/or indirectly from you or from any other sources such as website, agency, online platforms and/or any forms provided by URM.

Purposes for Collect and Process the Personal Data ("Purposes")

Your Personal Data may be collected, processed and/or used for the following purpose:

1. **Consumer / Customer -**
 - (a) Provide you with URM's latest information on products and/or services;
 - (b) Notify you of events, contests, promotions and other related marketing information;
 - (c) Facilitate your purchase of URM's products;
 - (d) Provide you with URM's after-sale services;
 - (e) Responding to, handling and processing queries, requests, applications, complaints and feedback from you;
2. **Distributor / Vendor: -**
 - (a) To make effect of such commercial transaction such as Distributorship Agreement, Contract and/or Sale and Purchase Agreement;
 - (b) To provide support in connection with URM's products and/or services;
 - (c) To process with any payment related to the commercial transaction;
 - (d) To provide with new information on URM's new products and/or service;
 - (e) For due diligence, audit or security purposes;
 - (f) To comply with any URM's legal and regulatory obligations in the conduct of its business;
 - (g) For URM's record purposes.
3. **Employee / Potential Employee**
 - (a) To perform obligations stated in the employment contract;
 - (b) To comply with any applicable laws, regulations and/or assist in law enforcement;
 - (c) To process with any payment related to your salary, tax, loan and/or statutory deductions;
 - (d) For recruitment purpose, to review and verify your data before hiring;
 - (e) To comply with any URM's legal and regulatory obligations in the conduct of its business.

Any other incidental association purposes or in connection with the above purposes.

Sensitive Data

URM generally will not acquire, use or disclose to any third party on any sensitive Personal Data including information such as political affiliation, medical condition or any other sensitive Personal Data unless it is authorized by law in certain circumstances.

Failure to Provide Personal Data

Personal Data shall always be provided voluntarily by you. However, there might be circumstances whereby you are obligated to provide URM your Personal Data in which failure to do so may result in URM inability to complete commercial transactions, to provide you information as requested and/or any other matters that require such Personal Data.

Disclosure of Personal Data

Your Personal Data may be disclosed to third parties such as following:

- (a) Any person whom URM are required to do so under the law or in response to a competent authority of government agencies;
- (b) URM's Group of Companies on overseas and affiliates and/or any subsidiaries;
- (c) URM's appointed Distributors, Vendors, Suppliers, Agent and Service providers;
- (d) Auditors, consultant, lawyer;
- (e) Any other person which you have consented to release to.

All disclosure of Personal Data shall be in accordance with Section 8 of the Personal Data Protection and/or any other law of Malaysia.

Data Transferred and Shared Usage

URM may transfer and share your Personal Data outside Malaysia for the purpose of data storage and processing and/or when necessary for such transfer and share your Personal Data for the Purposes.

Security and Protection

URM shall maintain and process your Personal Data in a secure manner and prevent any unauthorized access to such Personal Data. URM is committed to protect your Personal Data by implementation of appropriate administrative and security procedures whenever applicable.

Retention of Personal Data

URM shall retain your Personal Data for as long as necessary for URM to carry out the Purposes with your consent. Your Personal Data shall be disposed in appropriate manner when there is no longer necessity for URM to use, process and/or store such Personal Data.

Right of Access and Correction

You shall have the right to access and if required, correct, delete and/or limit processing of such personal data which have been kept by URM. URM generally rely on Personal Data provided by you thus to ensure that your Personal Data is accurate and/or up-to-date, kindly contact URM to correct inaccurate data and/or information, incomplete data and/or information, and any data and/or information which is related to you. You may also withdraw your consent given to the processing of your Personal Data and/or to raise any questions, enquiries in relation to your Personal Data.

Any matters related to your Personal Data shall be channelled to the following:

Name : Syakirah Eliza See
Designation : Legal & Corporate Affairs Manager
Tel No. : +603-33447888
Fax No. : +603-33442266

Email : customercare@urc.com.my

Consent

You hereby agreed to this Policy by submitting your Personal Data to URM. You hereby confirm that the Personal Data provided by you is accurate, complete and up-to-date. You also represent and warrant that the consent of any third parties whose Personal Data you have provided and disclosed have been lawfully obtained to allow URM to process the same to fulfil the Purposes. In the event URM does not receive any feedback and/or response from you in writing, URM shall assume that you have given your consent and agreeable to the same.

Languages

This Personal Data Protection policy shall be issued in both English and Bahasa Malaysia in accordance to Section 7(3) of the PDP Act. In the event of any inconsistencies, the English version shall prevail.