

PLUS MALAYSIA BERHAD

(Registration No.: 201001039714/923639-A)

PRIVACY POLICY & NOTICES

TABLE OF CONTENTS

1.	**INTRODUCTION**	**2**
2.	**DEFINITIONS**	**2**
3.	**OVERSIGHT AND OWNERSHIP**	**5**
4.	**AUDIENCE**	**5**
5.	**SCOPE**	**5**
6.	**POLICY STATEMENT**	**5**
7.	**TYPES OF DATA COLLECTED**	**6**
8.	**SENSITIVE PERSONAL DATA**	**7**
9.	**SOURCE OF DATA**	**7**
10.	**DATA USAGE PURPOSE**	**8**
11.	**DISCLOSURE OF PERSONAL DATA**	**9**
12.	**RIGHTS AND CHOICES**	**10**
13.	**PERSONAL DATA FROM MINOR AND OTHER PERSONS**	**11**
14.	**DATA SECURITY**	**11**
15.	**RETENTION AND DISPOSAL OF PERSONAL DATA**	**12**
16.	**ENFORCEMENT**	**12**
17.	**FURTHER AMENDMENTS AND CONFLICT**	**12**
18.	**CONTACT DETAILS**	**13**

ATTACHMENTS

Attachment A :	Privacy Notice for Customer and Other Individual	**14**
Attachment B :	Privacy Notice for Vendor	**22**
Attachment C :	Privacy Notice for Business Partner	**28**
Attachment D :	Privacy Notice for Job Applicant and Personnel	**34**

1. INTRODUCTION

1.1 PLUS is committed to maintaining the confidentiality, security and integrity of the Personal Data supplied by data subjects. In line with the Personal Data Protection Act 2010, this Privacy Policy & Notices aims to outline the manner PLUS deals with and processes data subject's Personal Data and the choices available to data subject to correct, access or limit PLUS' access to data subject's Personal Data.

1.2 By registering for an account, providing personal information, visiting online platforms and/ or accessing services provided by PLUS, data subject is hereby giving consent for PLUS to collect, use, disclose and process data subject's personal information as provided under this Privacy Policy & Notices.

1.3 Data subject hereby understand and consent that his/her Personal Data may be transferred to, stored, used and processed in a jurisdiction other than Malaysia, as indicated in this Privacy Policy & Notices or where our servers are located outside of Malaysia.

1.4 The purpose of this Privacy Policy & Notices is to meet the requirements of the PDPA.

2. DEFINITIONS

NO.	TERMINOLOGY/ ABBREVIATIONS	DEFINITION
2.1.	Authorised Third-Party	Refers to PLUS' contractors, agents, third-party suppliers or service providers such as insurance providers, insurance brokers, auditors, lawyers, consultants and other service providers with whom PLUS enters into an agreement;
2.2.	Business Partner	Refers to applicants and business partners, both permanent and temporary such as stall operator, mobile operator, third party developers and other type of business partners who have entered into a contract with PLUS;
2.3.	Biometric Data	Refers to any personal data resulting from technical processing relating to the physical physiological or behavioural characteristics of a person;
2.4.	Customer	Refers to customers of PLUSMiles, PLUSTrack and other customers who provided Personal Data to PLUS;

NO.	TERMINOLOGY/ ABBREVIATIONS	DEFINITION
2.5.	Data Subject	Refers to individuals who are the subject of the Personal Data but shall not include deceased individuals;
2.6.	Fence-line community	Refers to the community living and working within 30km radius or any other parameter as determined by PLUS;
2.7.	GPS	Refers to Global Positioning System;
2.8.	Job Applicant	Refers to any person who has applied to PLUS for any job position including any permanent and temporary positions and any internship programme;
2.9.	NRIC	Refers to National Registration Identity Card;
2.10.	Online platform	Refers to any digital services provided by PLUS via websites or mobile application;
2.11.	Other Individual	Refers to any person who may not be a Customer, Business Partner, Vendor, Job Applicant, or Personnel of PLUS, including but not limited to a member of the fence-line community;
2.12.	PDPA	Refers to Personal Data Protection Act 2010 [Act 709] including any related regulations, guidelines and standards as may at any time be amended;
2.13.	Personal Data	Refers to personal information that a data subject has provided to PLUS or made available to PLUS due to his/her business transaction/ contract/ application for jobs, contracts, programmes or products under PLUS, that relates directly or indirectly to the data subject, who is identifiable from that information, including any Sensitive Personal Data;
2.14.	Personnel	Refers to any person who has entered into an employment contract with PLUS, any person who is a temporary employee or under any internship programme and members of PLUS Board of Director (including executive and non-executive);
2.15.	PLUS	Refers to PLUS Malaysia Berhad (Company No. 201001039714 (923639-A)) and its Group of Companies;
2.16.	PLUSMiles	Refers to a rewards program by PLUS Berhad to reward PLUS customers for using PLUS highways;

NO.	TERMINOLOGY/ ABBREVIATIONS	DEFINITION
2.17.	PLUSTrack	Refers to a prepaid electronic card for fleet subscribers under the PLUSTrack program by PLUS Berhad;
2.18.	Purposes	Refers to the data usage purposes detailed out in Paragraph 10 of this Privacy Policy;
2.19.	Privacy Policy	Refers to this Privacy Policy and Notice;
2.20.	TNG	Refers to Touch 'n Go Sdn. Bhd. (Company No. 199601034048 (406400-X));
2.21.	TNG RFID	Refers to an electronic payment system that uses a radio frequency identification sticker also known as Touch 'N Go Radio Frequency Identification ("TNG RFID") Tag to pass through tolls;
2.22.	Sensitive Personal Data	Refers to information as to an individual's physical or mental health or condition, political opinions, religious beliefs or other beliefs of a similar nature, biometric data, commission or alleged commission of any offence or any other personal data determined by law;
2.23.	Service	Refers to any communications, information, other products or services provided by PLUS to data subject;
2.24.	Third-Party Sites	Refers to websites and/ or applications owned and managed by other companies or organizations; and
2.25.	Vendor	Refers to applicants and vendors who are already registered and contracted under PLUS.

3. OVERSIGHT AND OWNERSHIP

3.1 The Head of Compliance & Integrity is responsible to ensure that the Privacy Policy is managed, reviewed and up to date in the appropriate manner.

3.2 Every Personnel is responsible to read, understand and adhere to this Privacy Policy.

3.3 All data subjects are required to read this Privacy Policy when providing their personal data.

4. AUDIENCE

4.1 This Privacy Policy applies to PLUS including all its Customer, Business Partner, Vendor, Job Applicant, Personnel and Other Individual who provided PLUS with their Personal Data.

5. SCOPE

5.1. This Privacy Policy provides high level guide to ensure PLUS manages Personal Data holistically in compliance with the requirements under the PDPA.

5.2. This Privacy Policy applies to PLUS including all its Customer, Business Partner, Vendor, Job Applicant, Personnel and Other Individual who provided PLUS with their Personal Data.

5.3. This Privacy Policy shall be applicable for Personal Data management within PLUS throughout the six (6) stages of data lifecycle (acquisition, storage, processing, analysis, sharing and disposal).

6. POLICY STATEMENT

6.1 This Privacy Policy encapsulates the seven (7) principles under the PDPA i.e. general principle (consent), notice of choice, disclosure, security, retention, data integrity and access throughout its provisions and PLUS shall take appropriate measures to ensure its compliance to the same.

6.2 PLUS shall only collect and process Personal Data provided by data subject with consent from the latter or on other legal basis as permitted by the PDPA.

6.3 PLUS does not sell or otherwise use, process, record, hold, store, share and disclose data subject's personal information which PLUS collects about the data subject, except as described in this Privacy Policy or otherwise disclosed to the data subject at the time the personal information is collected.

7. TYPES OF DATA COLLECTED

7.1. Customer and Other Individual

PLUS may collect data subject's Personal Data such as name, NRIC, gender, contact details, PLUSMiles and Touch 'n Go identification number, vehicle details, toll plaza information such as entry and exit point, toll fare etc. and customer claims related information such as medical information, bank details, insurance details etc. and other information deemed necessary by PLUS.

A non-exhaustive list of the types of data collected for Customer and Other Individuals is detailed out in Attachment A: Privacy Notice for Customer and Other Individual of this Privacy Policy.

7.2 Vendor

PLUS may collect data subject's Personal Data such as contact information, business contact information, financial information, employment information, medical records and other information deemed necessary by PLUS.

A non-exhaustive list of types of data collected for Vendor is detailed out in Attachment B: Privacy Notice for Vendor of this Privacy Policy.

7.3 Business Partner

PLUS may collect data subject's Personal Data such as name, NRIC, gender, address, marriage status, occupation, referees' information, bank account details, sales/ income records and other information deemed necessary by PLUS.

A non-exhaustive list of types of data collected for Business Partner is detailed out in Attachment C: Privacy Notice for Business Partner of this Privacy Policy.

7.4 Job Applicant and Personnel

PLUS may collect data subject's Personal Data such as name, date of birth, religion, race, gender, marital status, NRIC, contact details, education background, work experience and other information deemed necessary by PLUS.

A non-exhaustive list of types of data collected for Job Applicant and Personnel is detailed out in Attachment D: Privacy Notice for Job Applicant and Personnel of this Privacy Policy.

7.5 Should a data subject declines to provide the Personal Data as requested by PLUS, withdraws or limits his/her consent for PLUS to process the Personal Data, PLUS will not be able to provide the data subject with the full or part of the benefits of its programmes and services, employment opportunities, or enter into a commercial relationship as Vendor or Business Partner under PLUS.

8. SENSITIVE PERSONAL DATA

8.1 During the course of any job application, employment, directorship tenure or contracts as Vendor or Business Partner, PLUS may process data subject's sensitive Personal Data such as health, biometric data religion and misconducts (if any). If data subject volunteers to provide such information, the data subject is giving his/her explicit consent for PLUS to process such information for the purposes described in this Privacy Policy.

8.2 PLUS may also obtain sensitive personal information from other parties upon data subject's explicit consent or when it is allowed by law.

9. SOURCE OF DATA

9.1 In addition to the Personal Data provided directly by data subject to PLUS, PLUS may collect data subject's Personal Data from a variety of other sources such as:

- when data subject fills up PLUS' applications forms, registration forms or other forms;
- when data subject provides PLUS with any inquiries, feedbacks, complaints or claims;
- from publicly available sources such as directories;
- from data subject's interaction with PLUS through social media pages, such as following, commenting, liking or messaging PLUS on such pages;
- when data subject interacts and communicates with PLUS at any events, activities or correspondences;
- when data subject uses Touch 'N Go card/ TNG RFID at PLUS' toll plazas;
- when data subject carries out transactions through online platform owned by PLUS;
- when data subject enters contests or participate in any surveys organized by PLUS;
- from PLUS' various entities or divisions as well as its related, associated or affiliated companies (this includes entities within the PLUS Group of Companies);
- from PLUS' Business Partners, including but not limited to Touch 'n Go Sdn. Bhd. and TNG Digital Sdn. Bhd. such as when data subject signs up for TNG RFID Tag and/ or TNG's account-based transaction electronic payment system such as Pay Direct;by visiting, interacting and communicating with PLUS and using the services on online platform owned by PLUS, data subject's Personal Data may also be collected from cookies, web beacons, GPS and other technical methods which may involve the transmission of Personal Data either directly to PLUS or to another party authorised by PLUS to collect information on its behalf;

- when individuals enroll for a service or require access to premises, biometric samples may be collected for authentication purposes to which consent for processing biometric data is obtained explicitly or deemed given as part of the enrollment process for the relevant service or access.

9.2 The source of data stated in Paragraph 9.1 above is non-exhaustive and may vary as deemed necessary by PLUS.

9.3 Online platform owned by PLUS may be linked to Third-Party Sites. This Privacy Policy does not apply to such Third-Party Sites as those sites are outside of PLUS' control. If data subject chooses to access Third-Party Sites using the links provided, the operators of these sites may collect data subject's personal information. Data subject is obligated to read and consent to the privacy policies of these Third-Party Sites before submitting any personal information. PLUS shall not be held responsible legally or otherwise for the activities, privacy policies or levels of privacy compliance of these Third-Party Sites.

10. DATA USAGE PURPOSE

10.1 Customer and Other Individual

PLUS may collect data subject's Personal Data for purposes such as to assess, process application and registration for PLUS loyalty programme, payments such as zakat, to communicate with data subject on gift redemption, to fulfill its contractual obligation to data subject, to process the data subject's accident claims and for other marketing purposes.

The list of data usage purposes for Customer and Other Individual is detailed out in Attachment A: Privacy Notice for Customer and Other Individual of this Privacy Policy.

10.2 Vendor

PLUS may collect data subject's Personal Data for purposes such as to communicate with data subject, to provide services to data subject, to respond to data subject's inquiries, to process data subject's payment transaction, to conduct market surveys and trend analysis, etc.

The list of data usage purposes for Vendor is detailed out in Attachment B: Privacy Notice for Vendor of this Privacy Policy.

10.3 Business Partner

PLUS may collect data subject's Personal Data for purposes such as to evaluate data subject's application as Business Partner, to respond to any inquiries, to inform on customer complaints, to promote products and services by Business Partner on any online platform owned by PLUS, to allow PLUS to monitor, re-analyze and improve the product and services offered by PLUS, to meet PLUS' contractual obligation, etc.

The list of data usage purposes for Business Partner is detailed out in Attachment C: Privacy Notice for Business Partner of this Privacy Policy.

10.4 Job Applicant and Personnel

PLUS may collect data subject's Personal Data for purposes such as to evaluate data subject's job application, recruitment process, character assessment/ credit checks, to assess data subject's suitability for employment with PLUS, for administration and management purposes, statistical analysis etc.

The list of data usage purposes for Job Applicant and Personnel is detailed out in Attachment D: Privacy Notice for Job Applicant and Personnel of this Privacy Policy.

10.5 If data subject does not consent to PLUS processing data subject's Personal Data for any of the purposes under the Privacy Policy, please notify PLUS using the Contact Details found in Paragraph 18 below.

11. DISCLOSURE OF PERSONAL DATA

11.1 Customer and Other Individual

PLUS may disclose data subject's Personal Data to its related, associated or affiliated companies (this includes entities within PLUS Group of Companies), Authorised Third-Party, to its Business Partners, loyalty partners, payment partners and any other partners, where their products and services may be of interest to data subject, etc.

The list of disclosure parties in relation to Customer and Other Individual's Personal Data is detailed out in Attachment A: Privacy Notice for Customer and Other Individual of this Privacy Policy.

11.2 Vendor

PLUS may disclose data subject's Personal Data to Authorised Third-Party who performs services on behalf of PLUS.

The list of disclosure parties in relation to Vendor is detailed out in Attachment B: Privacy Notice for Vendor of this Privacy Policy.

11.3 Business Partner

PLUS may disclose data subject's Personal Data to its related, associated or affiliated companies (this includes entities within the PLUS Group of Companies), Authorised Third-Party, any actual or proposed assignee, transferee, participant or sub-participant of PLUS' rights or business such as in connection with its actual or proposed business etc.

The list of disclosure parties in relation to Business Partner is detailed out in Attachment C: Privacy Notice for Business Partner of this Privacy Policy.

11.4 Job Applicant and Personnel

PLUS may disclose data subject's Personal Data to PLUS Group of Companies, and Authorised Third-Party.

The list of disclosure parties in relation to Job Applicant and Personnel is detailed out in Attachment D: Privacy Notice for Job Applicants and Personnel in of this Privacy Policy.

11.5 PLUS may disclose data subject's personal information if required by law or in good faith, if such action is necessary to:

- comply with any requirement from Government bodies, regulatory bodies or law enforcement agencies, court orders or legal process; or
- protect and defend the rights or property of the PLUS Group of Companies and their users.

11.6 PLUS might sell or buy companies, subsidiaries, or business units as it continues to develop its business. In such transactions, data subject's information may be disclosed to third parties involved in the transactions. If data subject, as a Personnel, is to be placed in another entity, that data subject's information will be transferred to that entity.

12. RIGHTS AND CHOICES

12.1 Data subject may make any inquiries, complaints, access or correction requests or request for PLUS to limit the processing of data subject's Personal Data regarding the Data Usage Purpose as provided in Paragraph 10 above by contacting PLUS using the Contact Details in Paragraph 18 below.

12.2 PLUS reserves the right to impose a fee for access of data subject's Personal Data in the amounts as permitted under law. In respect of data subject's right to access and/ or correct data subject's Personal Data, PLUS has the right to refuse data subject's request to access and/ or make any correction to data subject's Personal Data for the reasons permitted under law, such as where the expense of providing access to data subject is disproportionate to the risks towards the data subject's or another person's privacy.

12.3 Where data subject elects to limit PLUS' right to process data subject's Personal Data, data subject may contact PLUS in writing at the email address provided in Paragraph 18 below.

12.4 If data subject does not wish for his/her Personal Data to be collected via cookies or GPS on the online platform, data subject may deactivate cookies by adjusting his/her internet browser settings to disable, block or deactivate cookies, by deleting his/her browsing history and clearing the cache from his/her internet browser.

12.5 For Job Applicants, PLUS will not provide data subject with the information of other person, including but not limited to the assessments and/ or views of the interviewers or assessors of that data subject.

12.6 If a data subject requested for data subject's Personal Data as provided to PLUS to be transmitted to any other data controller (as defined under the PDPA) including to themselves or to another organization, PLUS will assist in the transmission of such Personal Data, within a reasonable period of time, subject to technical feasibilities and compatibility of the data format.

13. PERSONAL DATA FROM MINOR AND OTHER PERSONS

13.1 In the event Personal Data of minors (individuals under eighteen (18) years of age) is provided to PLUS, data subject as their parent or legal guardian hereby consent to the processing of the minor's Personal Data and personally accept and agree to be bound by this Privacy Policy and takes responsibility for his/her actions.

13.2 In some circumstances, data subject may have provided Personal Data relating to other persons such as data subject's spouse, family members or friends and in such circumstances, data subject represents and warrants that the data subject is authorised to provide their Personal Data to PLUS and the data subject has obtained their consent for their Personal Data to be processed and used in the manner as set forth in this Privacy Policy.

14. DATA SECURITY

14.1 PLUS ensures the security of Personal Data as follows:

- sufficient security control system by combining electronical and physical access control, firewall technology and other reasonable security steps to protect the security and privacy of data subject's Personal Data;
- PLUS Personnel only has access to data subject's Personal Data on a "need to know" basis; and
- ensure that Authorised Third-Party has put in place security measures which are acceptable by PLUS .

15. RETENTION AND DISPOSAL OF PERSONAL DATA

15.1 Customer, Other Individual, Vendor and Business Partner

The Personal Data collected will be retained by PLUS for the duration permitted/ required under the laws of Malaysia, which may extend to the period after termination of data subject's contractual relationship with PLUS.

15.2 Job Applicant and Personnel

Data subject's information will be kept for a reasonable period in accordance with the laws in Malaysia as follows:

- successful applicants

  If a data subject is successful in his/her application, PLUS will keep the data subject's information in accordance with its retention period.

- unsuccessful applicants

  If a data subject's application is unsuccessful, PLUS will keep the data subject's information for a period allowed under the law unless that data subject requests that it be deleted from its recruitment system.

15.3 Where the Personal Data is no longer necessary, such Personal Data will be disposed according to PLUS' data disposal related policy and procedure unless the laws in Malaysia requires it to be archived in the public interest.

16. ENFORCEMENT

16.1 Violation of this Privacy Policy by a PLUS Personnel may result in serious consequences affecting an individual's employment such as disciplinary action, up to and including dismissal.

16.2 Violation of this Privacy Policy by Authorised Third-Party may result in legal action by PLUS.

17. FURTHER AMENDMENTS AND CONFLICT

17.1 PLUS reserves the right to update and/ or amend this Privacy Policy from time to time. As such, data subject is expected to read this Privacy Policy each time he/she wishes to provide Personal Data to PLUS.

17.2 If data subject continues to subscribe to any programmes provided by PLUS or proceed to provide PLUS with data subject's Personal Data via any form e.g. email, phone call, letter, etc. the data subject shall be deemed to have accepted such changes in this Privacy Policy.

17.3 In the event of any conflict between the English and other language versions of this Privacy Policy, the English version shall prevail.

18. CONTACT DETAILS

18.1 If data subject would like to make any inquiries, complaints, access or correction requests or request for PLUS to limit the processing of data subject's Personal Data relating to the Data Usage Purpose as provided under Paragraph 10 above, please contact us at:-

Head of Compliance & Integrity

- Projek Lebuhraya Usahasama Berhad: DPO@plus.com.my
- JustGo Digital Berhad: DPO@justgo.com.my
- Other PLUS Group of Companies: compliance@plus.com.my