PRIVACY NOTICE FOR CUSTOMER AND OTHER INDIVIDUAL

1. Introduction

1.1 We, PLUS Malaysia Berhad (Registration No. 201001039714 (923639-A)), our subsidiaries and associate companies (collectively hereinafter referred to as, "PLUS", "we", "us" or "our") respect the right of the data subject (hereinafter referred to as, "you" or "your") to privacy and we respect all personal information provided to us.

1.2 We are committed to protecting all personal information kept by us. PLUS is bound by the Personal Data Protection Act 2010 ("PDPA") and all other applicable law in Malaysia in respect of privacy protection which set out a number of principles concerning personal information and consumer protection in Malaysia.

1.3 This Privacy Notice applies to all of our Customers and Other Individual who provided us with their Personal Data.

1.4 You are obligated to read our full Privacy Policy and Notices available at PLUS corporate website i.e. www.plus.com.my every time before providing us with your Personal Data. By providing PLUS with your Personal Data, you are hereby giving consent for us to collect, use and process your Personal Data.

1.5 You hereby understand and consent that your Personal Data may be transferred to, stored, used and processed in a jurisdiction other than Malaysia, as indicated in this Privacy Notice or where our servers are located outside of Malaysia.

1.6 Unless stated otherwise, the definitions for this Privacy Notice for Customer and Other Individual shall follow the definition provided under the Privacy Policy.

2. Types of Data Collected

2.1 We may collect the following Personal Data: -

- name;
- NRIC / passport number and its image/picture;
- gender;
- contact details such as your email address, home address, mobile number and device ID or serial number etc.;
- nationality;
- religion;
- race;
- date of birth;

- country, state and city that you live in and including precise location-based information;
- medical records;
- bank details;
- anonymised bank card and e-wallet details, if required;
- insurance details;
- education background;
- your Touch 'n Go Radio-Frequenct Identification ("TNG RFID") Tag number;
- data relating to your vehicle(s) such as the country in which your vehicle is registered in, vehicle type, vehicle make, vehicle model, vehicle manufacturing year, vehicle registration number, vehicle registration card and vehicle image;
- your Touch 'n Go Card manufacturing identification number;
- payment transactions and lifestyle related transactions;
- details of transaction made by you using online platforms owned by PLUS including aggregate data on content you engaged with;
- information collected at PLUS toll plazas such as entry and exit point, time of entry and exit and toll fare;
- details of your occupation including but not limited to type of occupation, employer, contact details of employer and office address; and
- other electronic data or information to you such as IP addresses, cookies, activities log, online identifiers, and location data when you use our products and services.

2.2 In order for you to enjoy the full benefits of the PLUSMiles programme, any other payment such as claims, zakat or any other contribution from PLUS, we require you to provide us with your Personal Data. Should you decline to provide the Personal Data as mentioned in Paragraph 2.1 above, or withdraws or limits your consent for us to process the Personal Data, we will not be able to provide you with the full or part of such benefits, services and payment as may be offered presently or may be introduced by us from time to time.

2.3 The types of data collected as listed in Paragraph 2.1 above is non-exhaustive and may vary as deemed necessary by PLUS.

3. Sensitive Personal Data

3.1 Where required under the laws of Malaysia, PLUS will obtain consent from you before we process your sensitive personal information.

3.2 PLUS will process personal information or sensitive personal information without your consent only in those limited circumstances as permitted by the laws of Malaysia.

4. Source of Data

4.1 In addition to the Personal Data you provide to us directly, we may collect your Personal Data from a variety of sources including the details from: -

- when you fill up application forms, registration forms, or other forms under PLUS;
- when you provide us with any inquiries, feedbacks, complaints or claims;
- from publicly available sources such as directories;
- from your interaction with us through our social media pages, such as following, commenting, liking or messaging us on such pages;
- when you interact and communicate with us at any events, activities or correspondences;
- when you use your Touch 'N Go card/ TNG RFID at PLUS's toll plazas and from recordings of Closed-Circuit Television (CCTV) installed at our premises or when our RFID or Automatic Number Plate Recognition (ANPR) products or services are offered;
- when you carry out transactions through our online platform;
- when you enter contests or participate in any surveys organized by us;
- from our various entities or divisions as well as our related, associated or affiliated companies (this includes entities within the PLUS Group of Companies);
- from our Business Partners, including but not limited to Touch 'n Go Sdn. Bhd. and TNG Digital Sdn. Bhd such as when you sign 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 us and using our services on our online platform, your 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 us or to another Authorised Third-Party to collect information on our behalf used on the online platform.
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4.2 Our online platform may be linked to Third-Party Sites. This Privacy Notice does not apply to such Third-Party Sites as those sites are outside of our control. If you choose to access Third-Party Sites using the links provided, the operators of these sites may collect your personal information. You are obligated to read and consent to the privacy policies of these Third-Party Sites before submitting any personal information. We shall not be held responsible legally or otherwise for the activities, privacy policies or levels of privacy compliance of these Third-Party Sites.

5. Data Usage Purpose

5.1 General Purpose

We collect Personal Data for the following purposes:

- to assess and process your application and registration for our customer loyalty programmes and services including but not limited to our PLUSMiles and JustGo programme;
- to process and assess your application for any payments including but not limited to zakat and other contributions by PLUS;
- to process transactions made by you using mobile applications or any other platforms owned by PLUS;
- to communicate with you regarding any gift redemptions under our loyalty programmes such as our PLUSMiles programme, including for purposes of delivery of such gift redemptions;
- to provide services such as communications, information or other products or services provided by PLUS to you;
- to fulfil our contractual obligations towards you;
- to process and investigate any claims made by you;
- for research purposes including historical and statistical purposes and for service or goods improvement;
- to match any data held by us or our related companies relating to you from time to time;
- to enable us to understand, analyze, develop, enhance, monitor, review and improve the products and services which we offer (including non-highway or toll services which PLUS may offer) as well as your needs and preferences;
- for assessment and analysis of our market, customers, products and services, including asking you for your opinions on our products and services and carrying out market research;
- to enhance your experience as a user of our highways such as for management of traffic flow, promotion of highway safety, etc.;
- to provide you with regular communications (other than direct marketing materials) from us such as traffic conditions, facilities available etc.
- for investigation of complaints and suspected suspicious transactions;
- to process your participation in any events, activities, contests, promotions, polls or surveys organised by us;
- for our internal administrative and operational purposes, such as auditing, data analysis and database records;
- to respond to your queries, comments, feedback or data access requests and to facilitate our daily operations;
- to comply with legal or regulatory requirements or as authorized by legal or regulatory requirements both within and outside of Malaysia;
- for purposes of detection, prevention and prosecution of crime whether within or outside of Malaysia;
- to manage risk **s**uch as commercial related risk and non-compliance risk etc.; and
- for such other purposes which you have consented.

5.2 Marketing and Promotional Purposes

We may also use and process your Personal Data for other purposes such as:

- to send you alerts, newsletters, updates, mailers, promotional materials, special privileges, festive greetings from us, as well as our Business Partners, sponsors or advertisers;
- to notify and invite you to events, activities or contests organised by us, our Business Partners, sponsors or advertisers;
- to process your registration to participate in or attend an event, activity or contests and to communicate with you regarding your attendance at the event or activity;
- to share your Personal Data with our Business Partners, advertisers, event companies or sponsors who may communicate with you to market their products, services, events or promotions; and/ or
- by way of post, telephone call, messaging service, by hand and/ or by email.

5.3 If you do not consent to us processing your Personal Data for the purposes stated in Paragraph 5.1 above and in the manner as identified in this Privacy Notice, please notify us through the email address specified in Paragraph 12 (Contact Details) below.

6. Disclosure of Personal Data

6.1 We may disclose your Personal Data to:-

- our Authorised Third-Party, including those who work with us on the PLUSMiles programme as well as other programmes or services which may be introduced by us and our related, associated or affiliated companies (this includes entities within the PLUS Group of Companies) from time to time;
- our Business Partners, loyalty partners, payment partners and any other partners, where their products and services may be of interest to you;
- any Authorised Third-Party who has been appointed by us or its related, associated or affiliated companies to provide products/services in relation to their businesses, whether in or outside Malaysia subject to sufficient security controls over the information such as data processing services, systems and website maintenance, media and marketing services, delivery services, audit, banking;
- any actual or proposed assignee, transferee, participant or sub-participant of our rights or business such as in connection with a corporate transaction, such as a sale of a subsidiary or a division, merger, consolidation, or asset sale, or in the unlikely event of winding-up;

- any person to whom we are under an obligation to make disclosure under the requirements of any law, rules, regulations, court order, codes of practice or guidelines binding on us including, without limitation, any applicable regulators, governmental bodies, or industry recognised bodies, and where otherwise required by law, whether within or outside of Malaysia; and/ or
- to such parties as may be permitted under laws of Malaysia.

6.2 We may disclose your personal information if required to do so by law or in good faith, if such action is necessary to:

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

We might sell or buy companies, subsidiaries, or business units as we continue to develop our business. In such transactions, your information may be disclosed to third parties involved in the transactions.

7. Rights and Choices

7.1 If you would like to make any inquiries, complaints, access or correction requests or request for us to limit the processing of your Personal Data relating to the Data Usage Purpose as provided under Paragraph 5 above, please contact us through the email address specified in Paragraph 12 (Contact Details) below.

7.2 We reserve the right to impose a fee for access of your Personal Data in the amounts as permitted under law. In respect of your right to access and/ or correct your Personal Data, we have the right to refuse your request to access and/ or make any correction to your Personal Data for the reasons permitted under the laws of Malaysia, such as where the expense of providing access to you is disproportionate to the risks to your or another person's privacy.

7.3 Where you elect to limit our right to process your Personal Data, you may contact us through the email address specified in Paragraph 12 (Contact Details) below.

7.4 If you do not wish for your Personal Data to be collected via cookies on the online platform, you may deactivate cookies by adjusting your internet browser settings to disable, block or deactivate cookies, by deleting your browsing history and clearing the cache from your internet browser.

8. Personal Data from Minor and Other Person

8.1 In the event Personal Data of minors (individuals under eighteen (18) years of age) is provided to us, you, 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 Notice and take responsibility for his/her actions.

8.2 In some circumstances you may have provided Personal Data relating to other persons such as your spouse, family members or friends and in such circumstances you represent and warrant that you are authorised to provide their Personal Data to us and you have obtained their consent for their Personal Data to be processed and used in the manner as set forth in this Privacy Notice.

9. Retention and Disposal of Personal Data

9.1 The Personal Data collected will be retained by us for the duration permitted/required under the laws of Malaysia, which may extend to the period after termination of your contractual relationship with us.

9.2 Where your 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.

10. Data Security

We ensure 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 your Personal Data;
- our Personnel only has access to your Personal Data on a "need to know" basis; and
- our Authorised Third-Party has put in place the appropriate security measures as per our contract with them.

11. Further Amendments and Conflict

11.1 We reserve the right to update and/ or amend this Privacy Notice from time to time. As such, you are expected to read this Privacy Notice each time you wish to provide your Personal Data to PLUS.

11.2 If you continue to subscribe to any of our programmes including PLUSMiles programme or proceed to provide us with your Personal Data via any form e.g. email, phone call, letter, etc. you shall be deemed to have accepted such changes in our Privacy Notice.

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

12. Contact Details

If you would like to make any inquiries, complaints, access or correction requests or request for us to limit the processing of your Personal Data relating to the Data Usage Purpose as provided under Paragraph 5 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