



DATA PRIVACY POLICY



1. Introduction

Tomypak Holdings Berhad ("Tomypak" or "the Company") is committed to safeguarding all types of data, including personal, proprietary, and business-critical information. In line with the Malaysian Personal Data Protection Act 2010 (PDPA) and its amendments, and international standards like the EU General Data Protection Regulation (GDPR), this policy provides a comprehensive framework for data management. This policy also reflects our responsibility to protect Confidential Information, as outlined in Tomypak's Employee Non-Disclosure Agreement (NDA), to ensure data integrity across all operations.

2. Objective

This policy aims to provide clear guidelines for managing personal data, proprietary information, and confidential business data to ensure compliance with data protection regulations and to uphold Tomypak's commitment to data privacy and security. The policy also integrates the principles outlined in the Employee NDA, ensuring that all employees are accountable for maintaining the confidentiality and security of information they access.

3. Scope

This policy applies to all directors, employees, contractors, suppliers, and subsidiaries who handle any type of data, including:

- Personal data (employees, customers, etc.).
- Proprietary information such as intellectual property, business plans, and financial data.
- Confidential information as defined in Tomypak's NDA, including R&D data, technical specifications, and strategic information.
- It encompasses all data processing activities at Tomypak's facilities and ensures that data is handled securely and in compliance with both internal and external obligations.

4. Definitions

- Personal Data: Information that relates to identifiable individuals (e.g., names, contact details, and financial records).
- Confidential Information: This includes but not limited to proprietary data such as business plans, customer information, R&D data, and any information not publicly available that is treated as confidential by Tomypak.
- Data Subject: Any individual whose personal data is processed by Tomypak.
- Processing: Any activity related to personal or confidential data, including collection, usage, storage, and disposal.

5. Compliance with PDPA, GDPR, and Internal Policies

Tomypak adheres to the seven principles of the Malaysian Personal Data Protection Act (PDPA)—General, Notice and Choice, Disclosure, Security, Retention, Data Integrity, and Access—and complies with international standards like the EU General Data Protection Regulation (GDPR) to ensure a consistent global approach to data privacy.

In addition, internal policies, including the Employee Non-Disclosure Agreement (NDA) and the Responsible Research Policy (RRP), safeguard both personal data and confidential business



information, such as proprietary R&D data. Employees are bound by these agreements to maintain confidentiality, with any violations subject to corrective actions as outlined in the NDA and other internal protocols.

6. Data Subject and Stakeholder Rights

Tomypak recognises the following rights:

- Right to Consent: Personal data is processed only with the data subject's consent or for specific purposes, such as fulfilling contracts or legal obligations.
- Right to be Informed and Choose: Data subjects are informed of how their data is used and given the option to provide it when applicable.
- Right to Control Disclosure: Personal and confidential business data will not be disclosed to third parties without consent, unless required by law or for its original purpose.
- Right to Data Security: Tomypak ensures data security measures protect personal and business-critical data from loss, misuse, or unauthorised access.
- Right to Data Retention Limits: Data will be retained only as long as necessary and securely disposed of or anonymised when no longer required.
- Right to Data Accuracy: Data subjects can request corrections to ensure their personal data is accurate and up to date.
- Right to Access and Correct Data: Data subjects have the right to access and correct any inaccurate personal data held by Tomypak.

7. Purpose Limitation

Data will only be processed for specific, legitimate purposes, including:

- Employment management (payroll, evaluations).
- R&D and business development activities.
- Compliance with legal and contractual obligations.
- Any additional processing beyond these purposes requires explicit consent from data subjects or stakeholders.

8. Data Minimisation and Retention

Tomypak limits the collection and retention of data to what is necessary for legitimate purposes. Personal and confidential business data will be securely destroyed or anonymised once it is no longer required, in line with legal obligations and internal policies, including the NDA.

9. Data Security

To safeguard all data, including proprietary and confidential information, Tomypak enforces the following measures:

- Encryption: Applied to all personal and confidential data.



- Access Controls: Only authorised personnel can access confidential and sensitive information, as per the Employee NDA.
- Data Segmentation: Separation of business-critical data and personal data to protect intellectual property.
- Audits: Regular reviews of data handling practices to prevent breaches.

10. Third-Party Data Sharing

Tomypak ensures that third parties, such as contractors, vendors or customers, comply with this policy and sign Non-Disclosure Agreements (NDA) where applicable, particularly for R&D and other proprietary information.

11. Cross-Border Data Transfers

Where data is transferred across borders, Tomypak ensures that international transfers comply with local data protection laws and that binding corporate rules are in place.

12. Breach Response and Notification

In the event of a data breach:

- Affected individuals and stakeholders, including those whose proprietary information is compromised, will be notified promptly.
- Incident Response Plans will be activated, as outlined in the Employee NDA and other internal protocols.

13. Training and Awareness

All employees with access to personal or confidential information must undergo regular training on data protection, in accordance with the Employee NDA and this policy. Special attention will be given to employees working in R&D and confidential business areas to ensure compliance.

14. Accountability and Governance

The Compliance Department, in collaboration with R&D and management teams, is responsible for overseeing the implementation of this policy. Regular Data Protection Impact Assessments (DPIAs) where necessary, and data protection performance will be reported to senior management.

15. Updates and Review

This policy will be reviewed annually or upon any significant changes in laws or operations. All updates will be communicated to employees, contractors, and business partners.

16. Contact Information

For questions or concerns regarding this policy, please contact the Compliance Department at compliance@tomypak.com.my.

17. Approval

This Policy has been reviewed and approved by the Board of Directors.