



SRKK AI BERHAD
(FORMERLY KNOWN AS SRKK TECHNOLOGY SDN BHD)
Registration No.: 202101023109 (1423409-A)

PERSONAL DATA PROTECTION ACT (PDPA) POLICY

This Personal Data Protection Policy (“Policy”) describes how SRKK AI Berhad (formerly known as SRKK Technology Berhad) (“SRKK” or the “Company”) and its subsidiaries (“SRKK Group” or “Group”) use and handle your personal data in accordance with the Malaysian **Personal Data Protection (Amendment) Act 2024** (“Act”).

1. PERSONAL DATA

Personal data means any information which relates to you, from which you are identifiable, including but not limited, to the following:

- a) Personal details such as name, identity card or passport number, gender, race, nationality, date of birth or age, marital status, occupation, photo, credit card number, assets, financial and banking details;
- b) Contact details such as address, telephone number, fax number, mobile number, and e-mail address;
- c) Biometric data means any personal data resulting from technical processing relating to the physical, physiological or behavioural characteristics of a person such as fingerprints, facial recognition, iris scan, voice recognition etc.;
- d) Information in connection with services provided by us or you have registered your interest with us for information, updates, inquiries, etc.;
- e) Billing and payment status;
- f) Other information that are, have been or may be collected by us, or which you provide to us, from time to time, in connection with any service, transaction, survey, questionnaire or communication with us;
- g) Personal interests or preference such as language, product, or content interests, communicating and marketing preferences;
- h) Your images, by way of video or photo shooting during our annual general meeting, corporate event, etc.;
- i) When you visit our websites, there is automatic collection of some information about your computer such as IP address, web browser software and other information about your visit; and
- j) Personal data from credit reporting agencies, government agencies, credit bureau reports, etc.

2. SOURCE OF PERSONAL DATA

Your personal data is collected by us directly from you, or SRKK may collect your personal data from a variety of sources such as:

- a) Publicly available sources such as directories;
- b) Third party sources such as credit bureau or credit reporting agencies; or
- c) Online enquiry/feedback form or cookies with our websites.
- d) Social Media applications like LinkedIn, Facebook, etc.
- e) Marketing campaigns
- f) Business Application Forms
- g) Contract Agreement

3. PURPOSES OF PROCESSING

The purposes for which your personal data is collected and further processed by SRKK, including the following:

- a) To establish a relationship between you and us and/or our subsidiaries;
- b) To evaluate and monitor credit worthiness;
- c) To provide products and services that you have requested;
- d) To help us monitor, enhance, and develop our products and services offered to you;
- e) To understand your requirements and to ensure our products and services meet your needs;
- f) To respond to enquiries and seek feedback from you on our products and services;
- g) To conduct survey or analysis for marketing and research purpose;
- h) To contact you or your company, or send you electronic greetings cards;
- i) For administrative purposes such as auditing, debt collection, payment, data analysis, etc.;
- j) To protect our rights or property and that of our users and, where appropriate, to comply with legal and regulatory process;
- k) To investigate, respond to, or defend claims against, or involving us;
- l) To maintain records required for as permitted by to be collected by law, professional standards, security, claims or other legal purposes;
- m) For such other purposes as permitted by applicable law or with your consent;
- n) For such other purposes incidental and associated with any of the above.

4. DISCLOSURE OF PERSONAL DATA

Your personal data may be transferred, accessed, or disclosed within SRKK and to relevant third parties (within or outside Malaysia) as required by law, or directly related to those purposes in the above-mentioned.

The relevant third parties are in the following:

- a) Third parties engaged by us to provide services for us or on behalf (such as auditors, lawyers, company secretary, consultants, contractors, professional advisors, service providers, printing companies, insurance companies, training organizers, etc.);
- b) Law enforcement agencies, relevant governmental authorities, statutory authorities, local council, and industry regulators; and
- c) To such parties as may be permitted under Malaysian law.

5. WEBSITES**A. Links to third-party websites**

SRKK websites may contain links to third-party websites which may provide more information that is required from you. SRKK is not responsible for the collection, use, maintenance, sharing or disclosure of data and information on the linked sites.

B. Cookies

A cookie may be used in the processing of your information, and it is a text file placed into the memory of your computer and/or device by our computers. A copy of this text file is sent by your computer and/or device whenever it communicates with our server. SRKK uses cookies to identify you. SRKK may also collect information such as the date and time you accessed each page of our websites, the URL of any webpage from which you accessed our website and the web browser

that you are using, during your visit to our websites and/or the fully qualified domain name from which you accessed our sites, or alternatively, your IP address.

Some webpages may require you to provide a limited amount of your personal data to enjoy certain services on our websites (such as contact, e-mail address, mailing address, etc.). This personal data will only be used for its intended purposes only, i.e., to respond to your message or deliver the requested products or services.

6. RIGHT TO ACCESS AND CORRECT PERSONAL DATA

Subject to any exemptions under applicable law, you have the right to access and correct your personal data SRKK holds about you.

If you would like to access or correct in respect of your personal data, you may, by writing, to contact us in the following:

**SRKK AI Berhad
(formerly known as SRKK Technology Sdn Bhd)**

No. 15-1, Port Tech Tower,
Jalan Tiara 3/ KU01, Bandar Baru Klang,
41150 Klang, Selangor, Malaysia
Tel: +603-3000 6698
E-mail: legal@srkk.com

SRKK may refuse to comply with your request for access and/or make any correction to your personal data in accordance with the Act and any other applicable law. Also, SRKK may charge a fee for processing your request for access to your personal data.

If you do not wish your personal data to be collected via cookies on the websites, you may deactivate cookies by adjusting your internet browser settings to block or remove the cookies, deleting your browsing history and deleting the caches and databases from your internet browser.

7. REQUESTS TO TRANSMIT DATA TO ANOTHER DATA CONTROLLER

In accordance with the Act, you have the right to request that your personal data be transmitted directly to another data controller of your choice. This right is subject to technical feasibility and data format compatibility. To make a request, please submit your request via email to legal@srkk.com. We will respond to your request within 5 working days and will keep you updated on its progress. We will take all reasonable steps to ensure that your data is transmitted securely and that the data format is compatible with the recipient data controller. In case of any data breach during transmission, we will inform you and the relevant authorities as required by law as stated in Clause 10.

8. LIMITING THE PROCESSING OF PERSONAL DATA, FURTHER ENQUIRIES AND COMPLAINTS

Subject to any exemptions under applicable law, you have the right to request limiting the processing of your personal data and/or make any enquiries or complaints in respect of your personal data.

9. PERSONAL DATA SECURITY & SAFEGUARD

SRKK will take reasonable steps to protect the personal data it holds from loss, misuse, modification, unauthorized or accidental access or disclosure, alteration or destruction. To ensure the security of personal data, SRKK shall implement the following safeguards:

9.1 Organizational Security Measures

- Access to personal data is strictly limited to authorized personnel only, based on roles and responsibilities.
- Employees are required to adhere to strict confidentiality obligations and undergo periodic data protection training.
- Personal data handling procedures are reviewed and updated regularly.

9.2 Technical Security Measures

- Use of encryption for data in transit and at rest, where applicable.
- Implementation of firewalls, antivirus software, and intrusion detection systems.
- Secure data backup on Cloud and disaster recovery protocols.
- Regular system audits and vulnerability assessments.

9.3 Physical Security Measures

- Restricted access to facilities where personal data is stored.
- Use of surveillance and alarm systems to protect physical premises.
- Secure disposal of documents and devices containing personal data.

9.4 Third-Party Data Processors

- All third-party service providers handling personal data on behalf of the Company shall be required to enter into relevant agreements.
- Such providers must demonstrate adequate security controls in compliance with Section 9 of the PDPA.

By adopting these measures, SRKK aims to uphold the integrity, confidentiality, and availability of personal data under its care.

10. DATA BREACH NOTIFICATION & ACTION

In the event of a suspected or confirmed personal data breach, the company will notify the Personal Data Protection Commissioner (the "Commissioner") under Section 12B of the Act as soon as practicable but no later than 72 hours after the occurrence of the data breach. The notification to the Commissioner will include the following details:

- **Nature of the Breach:**
A description of the incident, including the type of personal data affected, the number of data subjects impacted, and the potential consequences of the breach.
- **Reason for Suspicion:**
The basis for the belief that a breach has occurred, such as unauthorized access, data loss, or data misuse.
- **Steps Taken:**
The measures taken to contain the breach, address the incident, and mitigate the potential harm to data subjects.
- **Contact Details:**
The company's contact details for further information and investigation by the Commissioner.
- **Data Subjects Affected:**
A list or summary of the data subjects whose personal data may have been compromised.

The company will cooperate fully with the Commissioner in their investigation and will comply with any reasonable instructions or directions issued by the Commissioner in relation to the data breach.

11. ACKNOWLEDGEMENT AND CONSENT

By publishing this policy on the SRKK website, SRKK shall deem our customers and/or clients have already been notified.

By engaging with SRKK (through its products and services) and/or in the absence of any written notification from you, SRKK will deem you have read and understand this Policy and consent to the use, processing, and transfer of your personal data to SRKK as described in this Policy.

12. BOARD APPROVAL

This Policy (Version No. 1.1) was reviewed and adopted by the Board on **16th June 2025**