



PERSONAL DATA PROTECTION POLICY

1. Introduction & Commitment

At Coffex Coffee (M) Sdn Bhd, we respect and are committed to protecting the personal data of our employees, customers, suppliers, directors, business partners, and any other stakeholders associated with our business operations.

We recognize our responsibility to manage personal data in compliance with the Personal Data Protection Act 2010 (PDPA) of Malaysia. As a responsible organization, we handle personal data carefully, transparently, and securely to maintain trust and uphold the reputation of our company.

This policy sets out how Coffex Coffee collects, uses, stores, shares, and protects personal data while ensuring compliance with legal obligations and ethical practices.

2. Objective

The purpose of this policy is to:

- Ensure Coffex Coffee's compliance with **PDPA 2010** and other applicable regulations.
- Protect the confidentiality, integrity, and security of personal data.
- Define clear responsibilities regarding the collection, usage, processing, retention, and disposal of personal data.
- Promote transparency to employees, customers, suppliers, and business partners on how their personal data is managed.

3. Scope

This policy applies to:

- **All employees, directors, and management** of Coffex Coffee (M) Sdn Bhd.
- **All departments, and branches** within the company.
- **Third-party service providers, contractors, consultants and business partners** who process personal data on behalf of Coffex Coffee.
- All personal data collected from:
 - Employees (current and past)
 - Customers
 - Suppliers, distributors and dealer
 - Shareholders and directors
 - Any other stakeholders involved in our operations

4. Guiding Principles

Coffex Coffee follows the **seven principles of PDPA 2010** to ensure personal data is managed responsibly:

1. **General Principle**

We only collect and process personal data with **consent** or when it is legally permissible.

2. **Notice & Choice**

We provide clear notifications about the data collected, its purpose, and how it will be used.

3. **Disclosure Principle**

Personal data will not be shared with third parties without consent, unless required by law.

4. **Security Principle**

We implement **strict data security controls** to safeguard personal data from unauthorized access, loss, misuse, or breaches.

5. **Retention Principle**

We only retain personal data **for as long as necessary** to fulfil business, legal, or regulatory requirements.

6. **Data Integrity Principle**

We ensure that personal data collected is accurate, complete, and kept up to date.

7. **Access Principle**

Employees, customers, suppliers, and related parties **do not have direct access** to Coffex's stored personal data. Any updates, corrections, or changes to personal information must be made **through the designated person-in-charge or via official platforms provided by Coffex Coffee (M) Sdn Bhd** to ensure accuracy, security, and confidentiality.

5. Policy Commitment

At Coffex Coffee (M) Sdn Bhd, we are **fully committed** to upholding the PDPA principles and ensuring transparency, accountability, and ethical practices in handling personal data.

Specifically, we commit to:

- **Obtaining consent** before collecting personal data where applicable.
- Ensuring **data is used strictly for intended business purposes** and not for unrelated or unauthorized activities.
- Protecting personal data using **physical, technical, and administrative safeguards** (e.g., secure storage, password protection, and restricted access).
- Limiting data access strictly to authorized personnel on a **need-to-know basis**.

- Ensuring all third-party vendors and service providers handling data on behalf of Coffex comply with our data protection standards.
- Educating and training employees regularly on their obligations regarding personal data protection.
- Implementing incident response measures to **manage and report any data breaches promptly** in compliance with regulatory requirements.
- Cooperating with regulatory authorities in the event of audits, inspections, or investigations related to personal data.

Failure to comply with this policy may result in **disciplinary action**, including warnings, suspension, termination, or legal action where necessary.

6. Monitoring & Review

Coffex Coffee (M) Sdn Bhd will:

- Conduct periodic audits to ensure compliance with this policy and PDPA regulations.
- Review and update this policy **annually** or whenever significant legal or business changes occur.
- Provide continuous awareness training to employees on data protection responsibilities.
- Report significant breaches or violations to relevant authorities as required under Malaysian law.

7. Policy Ownership

This policy is owned and maintained by the **Human Resources Department** in collaboration with **IT & Compliance** teams.

For any questions, clarifications, or requests regarding personal data:

Department: Human Resources Department

Company: Coffex Coffee (M) Sdn Bhd

Email: hr.admin@coffexcoffee.com

Phone: +603-5562 8822