



# Personal Data Protection Act (PDPA) Policy

## 1. Introduction

CXL Group ("CXL"), is committed to protecting the privacy and confidentiality of personal data collected, used, disclosed, and stored in the course of our business activities. This Personal Data Protection Act (PDPA) Policy outlines our commitment to compliance with the Personal Data Protection Act 2010 (PDPA).

## 2. Scope

This policy applies to all personal data collected, used, disclosed, and stored by CXL Group in the course of our business operations, including data collected from customers, employees, contractors, suppliers, and other stakeholders.

## 3. Collection of Personal Data

We only collect personal data that is necessary for the purposes identified at the time of collection or as permitted by law. Personal data collected may include but is not limited to: name, contact information, identification numbers, employment history, and financial information.

We inform individuals of the purposes for which their personal data is being collected and obtain their consent before collecting, using, or disclosing their personal data, except where permitted by law.

## 4. Use and Disclosure of Personal Data

We only use personal data for the purposes for which it was collected or as permitted by law. We do not disclose personal data to third parties except with the consent of the individual or as required by law.

Personal data may be disclosed to third-party service providers who assist us in carrying out our business activities, provided they comply with applicable data protection laws and regulations.

## 5. Protection of Personal Data

We implement appropriate technical and organizational measures to safeguard personal data against unauthorized access, disclosure, alteration, or destruction.

Access to personal data is restricted to authorized personnel who require access for legitimate business purposes.

We regularly review and update our security measures to ensure the ongoing protection of personal data.

## **6. Accuracy of Personal Data**

We take reasonable steps to ensure that personal data collected is accurate, complete, and up to date.

Individuals may request access to and correction of their personal data held by us, subject to verification of identity and applicable legal requirements.

## **7. Retention of Personal Data**

We retain personal data only for as long as necessary to fulfill the purposes for which it was collected or as required by law.

Personal data that is no longer required for business purposes will be securely disposed of or anonymized to prevent unauthorized access or use.

## **8. Compliance with Data Protection Laws**

We comply with all applicable data protection laws and regulations, including the PDPA or similar legislation in other jurisdictions where we operate.

We regularly review and update our policies and procedures to ensure ongoing compliance with data protection laws.

## **9. Training and Awareness**

We provide training and awareness programs to employees to ensure they understand their responsibilities for protecting personal data and complying with data protection laws.

Employees are required to adhere to this PDPA Policy and report any breaches or concerns regarding the handling of personal data.

## **10. Policy Review**

This PDPA Policy will be reviewed regularly and updated as necessary to ensure its continued effectiveness and compliance with data protection laws and regulations.

**Signed:**



Tengku Murni Binti Tengku Zukornain  
Chief Executive Officer  
CXL Group

**Date:** 1<sup>st</sup> January 2026

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