

# Corporate Privacy Policy

Custodian GRC	Document ID LEGB-GPOL-GRC-02	Revision 01	Effective Date 08/12/2025
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Reviewed By <b>Risk Management Committee</b>		Reviewed Date <b>08/12/2025</b>	
Approved By <b>Board of Directors</b>		Approved Date <b>08/12/2025</b>	
Signed on behalf of the Board of Directors <b>Dato' Sean H'ng Chun Hsiang</b> Executive Deputy Chairman and GCEO	 ..... (Signature)		

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## REVISION TABLE

Revision No.	Description of Change	Clause(s) Affected	Requestor	Effective Date
1	Adapt to new template & new amendments of the Act	Document content	Manager, GRC	08/12/2025

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## 1.0 PURPOSE

Leader Energy Group Berhad (“**the Company**”) and its subsidiaries (“**the Group**”) are committed to comply with the applicable privacy and personal data protection laws. This includes compliance with the Personal Data Protection Act 2010 (Act 709), as amended by the Personal Data Protection (Amendment) Act 2024 (effective 2025) (collectively, “**the Act**”).

The Group will ensure the collection, use, processing, and storage of personal data relating to the employees, contractors, customers, directors, and the third parties with whom the Group works with, is subject to the highest level of protection, thus safeguarding their personal data and privacy.

The Group strives to maintain its corporate credibility by showing the stakeholders that it takes privacy seriously within its businesses.

This Policy sets out the Group’s privacy commitments in relation to the proper handling and safeguarding of the personal data available within the Group.

## 2.0 SCOPE

- 2.1 In formulating this Policy, the Group has taken into consideration the requirements of the Act, and where applicable, other data protection and privacy laws in jurisdictions where the Group operates.
- 2.2 This Policy applies to the Directors of the Company, Directors and Employees of the Group, and extends to contractors, vendors, service providers, data controllers and data processors engaged to process personal data on behalf of the Group.
- 2.3 Where there is a conflict between the contents of this Policy and the legislation, the relevant provisions contained in the said legislation shall prevail.

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## 3.0

### TERMS AND DEFINITIONS

The terms and definitions used in this procedure are as follows.

Term	Definition
Personal Data Breach	Any breach of personal data, which includes its loss, misuse, or unauthorised access
Data Controller	A person who either alone or jointly or in common with other persons or organisation that processes any personal data or has control over or authorises the processing of personal data but does not include a data processor.
Data Portability	The right of Data Subjects to request the transfer of their personal data to another controller.
Data Processor	A person or organisation that processes personal data on behalf of a data controller.
Data Subject	An individual who is the subject of the personal data and shall not include a deceased individual.
Directors	Include all independent and non-independent directors, executive and non-executive directors of the Company and/or the Group and shall also include alternate or substitute directors.
Employees	All individuals directly contracted to the Group on an employment basis, including permanent and temporary employees and directors.
Law	The system of rules which a particular country or community recognises as regulating the actions of its members and which it may enforce by the imposition of penalties.

## 4.0

### GENERAL PRINCIPLES

4.1 In compliance with the Act, the Group adopted the following principles in handling personal data:

- (i) General Principle - to obtain adequate consent from individuals in requesting information prior to processing of the personal data, which are obligatory to be provided unless stated otherwise.
- (ii) Notice and Choice Principle - to provide individuals with the required Privacy Notice (also known as Personal Data Protection (PDP) Notice, that explains how the group collects and handles the personal data in accordance with the Act and verify that their personal data has been obtained lawfully and that it is relevant for the stated purposes.

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- (iii) Data Integrity Principle - to maintain accurate, complete and up-to-date personal data storage.
- (iv) Retention Principle - to retain the personal data that has been collected only for the period necessary to fulfil the relevant purposes, unless otherwise permitted or required in accordance with the Group's retention schedule and legal requirement.
- (v) Disclosure Principle - to ensure personal data is not disclosed to any third party without the consent of the Data Subject, except as permitted by applicable law.
- (vi) Security Principle - to implement adequate and appropriate security measures for safeguarding personal data against corruption, compromise or loss and to ensure that any Data Processor engaged is contractually bound to implement equivalent security measures.
- (vii) Access Principle - to provide individuals with the ability to exercise their rights under applicable law, such as rights to access, rectify, restrict processing and/ or request the erasure of their personal data where applicable.
- (viii) Breach Notification Principle – to notify the Commissioner and affected individuals without undue delay in the event of a Personal Data Breach that is likely to result in significant harm, to enable individuals to take steps to protect their rights and interests.
- (ix) Data Portability Principle – to provide individuals with the ability to request the transfer of their personal data to another Data Controller by way of electronic means, subject to technical feasibility and the conditions prescribed under applicable law.

## 5.0 REVIEW OF THIS POLICY

- 5.1 The Management shall review and assess the effectiveness and continued relevance of this Policy periodically and in any event whenever there are material changes in applicable legislation or in the Group's operation. Any revisions to the Policy as recommended by the Risk Management Committee will be submitted to the Board for consideration and approval.
- 5.2 This policy, which was reviewed by the Risk Management Committee, was adopted by the Board on 8<sup>th</sup> December 2025 and is available on the Company's website.

## 6.0 LIST OF SUPPORTING DOCUMENTS

Supporting Document	Reference Number
Personal Data Protection Act 2010	-
Personal Data Protection (Amendment) Act 2024	-



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## 7.0 REFERENCES

Reference Document	Reference Number