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## 1. SCOPE

1.1. This policy applies to the BGMC Group of companies (“Group”), which includes:

- (a) BGMC International Limited (Cayman Island)
- (b) BGMC Malaysia (BVI)
- (c) BGMC Builder
- (d) BGMC Corporation Sdn. Bhd.
- (e) Headway Construction Sdn. Bhd.
- (f) Built-Master Engineering Sdn. Bhd.
- (g) Built-Master Elevator Engineering Sdn Bhd
- (h) KAS Engineering Sdn. Bhd.


1.2. This policy applies to all businesses of the Group.

## 2. PURPOSE

2.1. This policy aims to protect the privacy of the Group’s stakeholders in accordance with Personal Data Protection Act 2010 of Malaysia (“PDPA”).

2.2. The Group’s stakeholders include, but are not limited to:

- 2.2.1. Shareholders and investors
- 2.2.2. Employees and job applicants
- 2.2.3. Clients
- 2.2.4. Suppliers and sub-contractors
- 2.2.5. Consultants and professional service providers
- 2.2.6. Government and regulatory bodies
- 2.2.7. Members of the public

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### 3. STRATEGIES


- 3.1. The Group achieves the abovementioned purpose by ensuring that its stakeholders are clearly informed of the following:
- 3.1.1. The type of personal data that the Group may collect
  - 3.1.2. Why the personal data are collected
  - 3.1.3. How the personal data are collected
  - 3.1.4. The parties with whom the Group shares the personal data
  - 3.1.5. Transfer of personal data outside of Malaysia
  - 3.1.6. The Choices the Group offers its stakeholders with regards to personal data
  - 3.1.7. Responsibilities on personal data
  - 3.1.8. Retention period of personal data
  - 3.1.9. Stakeholders' consent by default when providing personal data

### 4. PERSONAL DATA THE GROUP MAY COLLECT


- 4.1. Personal data that the Group may collect include, but are not limited to, personal and contact information such as full names, contact numbers (mobile phone and fixed line), fax numbers, identity card numbers, designations, employer's names and addresses, official mailing addresses, official email addresses, personal email addresses, bank account information, and EPF as well as SOCSO information.

### 5. WHY THE PERSONAL DATA ARE COLLECTED

- 5.1. The Group collects shareholders' and Investors' personal data in order to perform the following:
- 5.1.1. Communicate with shareholders and investors as part of the Group's obligation as a company listed in the Stock Exchange of Hong Kong.
  - 5.1.2. Maintenance of share registrar.
  - 5.1.3. Better understand the needs of shareholders.
  - 5.1.4. Enhance security and prevent fraud.
  - 5.1.5. Statistical analysis of data.


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- 5.1.6. Marketing activities.
- 5.1.7. Dividend payout to shareholders.
- 5.2. The Group collects personal data of employees for the following purposes:
  - 5.2.1. Maintaining accurate employee database for efficient and effective management, training and development of the Group's human resources.
  - 5.2.2. Internal and external communication as part of day-to-day course of duties.
  - 5.2.3. Contact during emergency.
  - 5.2.4. Purchase of insurances and administration of other staff benefits.
  - 5.2.5. Pay-out of salary and other remuneration, reimbursement and disbursement.
- 5.3. The Group collects personal data of job applicants to achieve efficient and effective recruitment processes, including screening, shortlisting, invitation for interview, information of outcomes, job offer, and background checks (as permitted by applicants).
- 5.4. The Group collects personal data of clients' representatives for the following to carry out day-to-day contractual obligations, such as reporting, coordination, inspections, inquiries, claims, application for variation orders, application for extension of time, value added inputs, and problem solving.
- 5.5. The Group collects personal data of vendors for the following purposes:
  - 5.5.1. Communicate with vendors' representatives to ensure their work is done correctly and properly as per contractual requirements and specifications.
  - 5.5.2. Maintaining an accurate database of vendors for efficient and effective vendor selection, monitoring and evaluation.
- 5.6. The Group collects personal data of consultants and processional service providers to achieve the intended outcomes of the consultancy and professional service.
- 5.7. The Group collects personal data of representatives from the government and regulatory bodies in order to keep in contact with them to ensure the Group's business activities adheres to laws and regulations.
- 5.8. The Group collects personal data of members of the public to communicate with them for matters such as community service, public feedbacks, resolution of complaints, traffic management, promotion and advertising.

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## 6. HOW THE PERSONAL DATA ARE COLLECTED

- 6.1. The Group only collects personal data directly from the data subject or persons or companies associated with the data subject. The rest of this section describes the processes in which the Group would obtain personal data.
- 6.2. The Group normally collects shareholders' and investors' personal data in the following processes:
  - 6.2.1. Shareholder registration process when the shareholder purchased his/her shares.
  - 6.2.2. Establishment of investment agreements where investor's personal data forms part of the agreement.
- 6.3. The Group normally collects personal data of employees and job applicants in the following processes:
  - 6.3.1. Application for employment where applicants submit their resumes to the Group.
  - 6.3.2. Background checks performed by the Group as permitted by the applicants.
  - 6.3.3. Interview sessions where further personal data may be disclosed by the applicants.
  - 6.3.4. Employee data update where employees are required to keep the Group updated on their personal information.
- 6.4. The Group normally collects personal data of clients', consultants' and professional services providers' representatives in the following processes:
  - 6.4.1. Exchange of contact information in the normal day-to-day course of business between clients', consultants' and professional service providers' representative and the Group's employees.
  - 6.4.2. Establishment of contracts where a client's, consultant's and professional service provider's personal data forms part of the contract.
- 6.5. The Group normally collects personal data of vendors in the following processes:
  - 6.5.1. Vendor pre-qualification where vendors fill in the Group's vendor pre-qualification forms.
  - 6.5.2. Vendor registration into the Group's procurement system application.
  - 6.5.3. Exchange of contact information in the normal day-to-day course of business between vendors' representative and the Group's employees.
  - 6.5.4. Establishment of contracts where a vendor's personal data forms part of the contract.

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- 6.6. The Group normally collects personal data of representatives from the government and regulatory bodies via websites, hotlines, and inquiries to personnel within the government and regulatory body.
- 6.7. The Group collects personal data of members of the public via inquiries made for community service organising, receipt of public feedbacks, and roadshows.

## **7. THE PARTIES WITH WHOM THE GROUP SHARES THE PERSONAL DATA**

- 7.1. The Group only discloses personal data to a third party for the purposes described in “Why the Personal Data are Collected”.
- 7.2. The Group may disclose personal data to the following parties:
- 7.2.1. Federal or state government, law enforcement agencies, government agencies and regulatory bodies
  - 7.2.2. Companies or organisations that act as our agents, contractors, service providers or professional consultants
  - 7.2.3. Companies or organisations that assist us in processing and/or otherwise fulfilling transactions and providing you with services that you have requested
  - 7.2.4. Our business associates and other parties for purposes that are related to the purpose of collecting and using your personal data
  - 7.2.5. Other parties in respect of whom you have given your express or implied consent

## **8. TRANSFER OF PERSONAL DATA OUTSIDE OF MALAYSIA**

- 8.1. It may be necessary for the Group to transfer its stakeholders’ personal data outside Malaysia if any of the Group’s service providers or business partners involved in providing whole or part of the Group’s services are located in countries outside Malaysia. By supplying his/her personal data to the Group, a stakeholder consent to the Group transferring his/her personal data outside Malaysia.
- 8.2. The Group shall take reasonable steps to ensure that any such service providers or business partners are contractually bound not to use the personal data for any reason other than to provide the services they are contracted to provide and to adequately safeguard the personal data.

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## 9. THE CHOICES THE GROUP OFFERS ITS STAKEHOLDERS


- 9.1. There are situations in the Group's course of businesses where a stakeholder may or may not be obligatory to supply the Group with his/her personal data. In both cases, a stakeholder has a choice to either supply or not supply his/her personal data to the Group. If the stakeholder chooses to not supply his/her personal data, he/she understands that such refusal may result in the Group not being able to properly perform or discharge the Group's obligations to the said stakeholder.
- 9.2. Any of our stakeholders whose personal data has been collected by the Group may at any time submit the following to the Group:
- 9.2.1. Request for access to his/her personal data
  - 9.2.2. Inquiry about his/her personal data
  - 9.2.3. Request to make corrections to his/her personal data subject to compliance of such request not being refused under the provisions of PDPA and/or existing laws.
  - 9.2.4. Request to withdraw or limit the Group's rights to retain and/or use his/her personal data, and by doing so, understand that such withdrawal or limitation may result in the Group not being able to properly perform or discharge the Group's obligations to the stakeholder making such request.

## 10. RESPONSIBILITIES ON PERSONAL DATA

- 10.1. The Group is committed in ensuring the confidentiality, protection, security and accuracy of its stakeholders' personal data, and endeavours to take all reasonable steps to protect and secure its stakeholders' personal data.
- 10.2. It is the stakeholder's obligation to ensure that all personal data submitted to and retained by the Group are accurate, not misleading, updated and complete in all aspects. The Group and/or its employees or authorized officers or agents will not be responsible for any personal data supplied to the Group that is inaccurate, misleading, incomplete and not updated.
- 10.3. It is also the stakeholder's obligation to obtain, with his/her best endeavours, the consent of third parties whose personal data is made available by the said stakeholder to the Group.

## 11. RETENTION PERIOD

- 11.1. The Group retains personal data of a stakeholder for as long as the relationship between the Group and the said stakeholder exists, for such period as may be deemed necessary to protect the interests of the Group and/or its stakeholders, and where otherwise required by the law and/or the Group's relevant policies.

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## 12. STAKEHOLDERS' CONSENT

- 12.1. By submitting his/her personal data, a stakeholder consent to the use of that personal data as set out in this policy. If the Group changes its policies on personal data protection, the Group will publish the amended version. However, stakeholders can request for a copy of the latest policy from the Group. Continued use of the Group's service will signify that a stakeholder agrees to any such changes.

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