

Personal Data Privacy Notice

1. Introduction

At NEC Corporation of Malaysia Sdn Bhd, we are committed to handling your personal data with the utmost responsibility and transparency. This Personal Data Privacy Notice ("Notice") has been designed to adhere to the relevant transparency requirements of applicable data protection laws and regulations including but not limited to the Personal Data Protection Act 2010, Personal Data Protection (Amendment) Act 2024, its applicable regulation(s), guideline(s) and any amendment(s) (collectively referred to as the "Data Protection Laws and Regulations").

The purpose of the Notice is to provide you with information on how NEC Corporation of Malaysia Sdn Bhd ("we", "our", "us" or "NEC") and its group of companies ("NEC Group") collect, use, share or otherwise process your Personal Data (as defined below) in connection with your relationship with us when you use our, or our customers/vendors', products, services, solutions, through (a) our websites, applications, online services accessed via your device (e.g., mobile, computer), or (b) various offline means.

NEC provides a wide array of products, services and solutions which may involve the handling of your Personal Data. Our approach to data protection can vary depending on the specific product, service, or solution, as well as the location in which we operate. This Notice aims to outline our general data protection practices. Additionally, NEC may provide different privacy notices when you use our products or services. We also offer supplementary privacy notices that contain additional information as required by the Data Protection Laws and Regulations.

This Notice does not apply to NEC processing activities as data processor, such as when we process Personal Data on behalf of our customers while providing services to them. The contracts we have with our customers control how we process Personal Data in such context. If you are a customer, end-user, employee, or contractor of one of NEC's customers and have questions about the processing of your Personal Data, we recommend that you contact our respective customer.

Please read this Notice to understand how NEC processes and protects the Personal Data provided and/or to be provided by you. By providing your Personal Data to NEC, you agree to the provisions of this Notice and the processing of your Personal Data as described in this Notice. Rest assured, our commitment to safeguarding your Personal Data is consistent across all our offerings. We are dedicated to maintaining transparency, accountability, and compliance with all relevant Data Protection Laws and Regulations.

2. Data Controller

For the purpose of this Notice, NEC is responsible for the processing of your Personal Data as Data Controller.

NEC Corporation of Malaysia Sdn Bhd

Address: Suite 19.01, Level 19, The Gardens South Tower, Mid Valley City, Lingkaran Syed Putra, 59200 Kuala Lumpur, Malaysia

If you have any questions about this Notice, your Personal Data or its processing, please reach out to us through the "Contact Us" section.

3. How do We Process Your Personal Data

In this Notice, our use of the term personal data encompasses other similar terms under the Data Protection Laws and Regulations, such as "personal information" and "personally identifiable information." Generally, "Personal Data" refers to any information that identifies, relates to, describes, or is reasonably capable of being associated, linked, or linkable you and/or any particular individual ("Data Subject(s)"):

- **Contact Data:** This includes your billing address, email address, and telephone numbers;
- **Identity Data:** This encompasses your first name, last name, username or similar identifier, company, role, and country;
- **Sensitive Data:** This includes information of your physical or mental health or condition, biometric data, political opinions, religious beliefs or other beliefs of a similar nature;
- **Financial Data:** This covers your credit or debit card number and billing information;
- **Marketing and Communications Data:** This involves information on when you receive and read marketing communications from us, the events you attend, and your marketing and communication preferences. If you provide these preferences in your profile on our electronic portals and platforms, they are considered Profile Data. Additional details about the Personal Data we process for marketing are included with the marketing communications we send you.
- **Profile Data:** This includes information you provide on our electronic portals and platforms, such as your usernames and passwords, purchases or orders, interests, biography, profile settings, marketing and communication preferences (e.g., preferred language, content type, frequency of email alerts), alert and display preferences, content that interests you, date of registration, current stage of registration, account status and level of access, and information from forms you fill out, including survey responses and feedback;
- **Usage Data:** This encompasses information about your use of our website, electronic portals, platforms, and local area networking facilities and similar electronic services. It includes interactions with our mobile applications and information collected progressively during your visits to our website, electronic portals, and platforms. This data includes your referral website, pages visited, actions taken, last viewed/visited site information, details of the content viewed (including when and how many times it was viewed), patterns of page visits, visit duration, number of visits, time spent on each page, frequency of visits, path followed (sequence of pages visited), interactions, functionalities, modules used, and chat messages;
- **Comments, Feedback, and Other Information You Provide:** This includes information you send to customer support, messages, appointment inquiries, and other information you wish to share with us;
- **Technical Data:** This includes technical information collected when you access our website or our electronic portals and platforms. It covers your internet protocol (IP) address or domain names of the devices used, login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use; or
- **Information provided in job applications and related documents** when you apply for a position with us.

4. Legal basis for Processing Your Personal Data

We only process Personal Data in a lawful and fair manner and when permitted to do so. We receive your Personal Data directly from you, from your employer (e.g., our customer or business partners) or

through automated means. We may aggregate your Personal Data to a non-identifiable format and use such data to improve and develop our services and solutions.

Where required under the Data Protection Laws and Regulations, we rely on one of these legal basis:

- You have clearly given your voluntary consent to the processing;
- The processing is necessary for entering into, or performance of a contract to which you are party;
- The processing is necessary to comply with a legal obligation;
- The processing is necessary to protect the vital interests of an individual;
- The processing is necessary for the performance of a task carried out in the public interest; or
- We, or a third party, have a legitimate interest in using your Personal Data to achieve the purposes of processing, except where such interests are overridden by your interests or fundamental rights.

Where processing of your Personal Data is based on your consent, you have the right to withdraw your consent at any time by contacting us. Please note that this will not affect processing undertaken prior to the withdrawal of your consent, or any processing based on legal bases other than your consent.

*Where we need to collect Personal Data by law or under the terms of a contract we have with you and you fail to provide the Personal Data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with services). In this case, we may have to decline to provide or receive the relevant services, but we will notify you if this is the case at the time the Personal Data is collected.

5. Purposes for Processing Your Personal Data

- **Administrative and Contract Management:** NEC processes Personal Data about customer, supplier, and partner representatives for administrative purposes, contract management, contract performance, sales and sourcing activities, delivery of products and services, invoicing, and managing business relationships with our customers, suppliers, and partners.
- **Service Development and Improvement:** We use relevant Personal Data to develop our services, improve the quality of NEC's solutions and services, and for business and customer engagement planning.
- **Personalized Customer Support:** NEC may process customer representatives' Personal Data regarding their use of our customer support services to provide a personalized experience on the support platform and continuously improve the user experience of our services.
- **Security and Troubleshooting:** We may process Personal Data for troubleshooting and to protect our services, products, and solutions against security and cyber threats, and to prevent such threats. NEC primarily processes Personal Data to respond to customer support requests and provide support services on behalf of our customers.
- **Customer Experience Surveys:** NEC conducts regular customer experience surveys to validate customer needs and improve and develop our services.
- **Inquiry and Request Management:** If you contact us with an inquiry, order, or request for information or support, we use this Personal Data to respond and manage further correspondence.
- **Sales and Marketing Communications:** NEC processes Personal Data for sales and marketing communications, including email marketing. We may combine this information with data from other sources (such as cookies) to improve its accuracy and tailor our interactions with you. We also use your data for analytics, service development, and improvement.

- **Social Media Administration:** NEC administers certain business pages on social media sites and may act as a joint controller with the social media platform provider when processing Personal Data about visitors to these pages for advertising purposes, even if we do not access any Personal Data.
- **Website and Digital Service Analysis:** We analyze the use of our website and digital services to make them more intuitive, improve functionality, and deliver better content.
- **Public Surveys and Contests:** From time to time, we may request information from users via surveys, sweepstakes or contests. Participation is voluntary, and users can choose whether to disclose this information. Survey information is used for marketing, monitoring, or improving the use and satisfaction of our websites and services.
- **Event Registration and Marketing:** We process Personal Data when you register for or attend our or our partners' online or offline events. Personal Data collected in connection with events may be used to send you marketing communications, provided we have your consent for marketing.
- **Assess your interest in job opportunities and communicate with you about potential employment within NEC.**

6. Sharing Your Personal Data

Your Personal Data will be accessed by NEC personnel on a need-to-know basis. We will share Personal Data within NEC Group where necessary for the specific processing purposes described in this Notice.

We engage with third-party service providers who may process your Personal Data on our behalf as part of their service provision to us, or for their own legitimate purposes. We limit the Personal Data provided to these service providers to what is reasonably necessary for them to perform their functions. We also require them to comply with the Data Protection Laws and Regulations and maintain the confidentiality of such Personal Data. Additionally, we may share your Personal Data with professional advisors, such as auditors, law firms, or accountancy firms, in our legitimate interest in maintaining our business or as required by applicable law.

We may share your Personal Data with commercial partners who work with us or enter into agreements to help deliver our services or support our business activities. Depending on the nature of the collaboration, these partners may reach out to you with information about products or services that may interest you.

In exceptional cases, we may disclose your Personal Data if required by law or if we believe that such action is necessary to comply with legal obligations, such as responding to a court order, subpoena, or warrant, or cooperating with law enforcement or other governmental authorities. We may also disclose your information to establish, defend, or exercise legal claims, or to protect ourselves, our property, or others from fraudulent, abusive, or unlawful activities.

In certain circumstances, we may disclose or transfer Personal Data to a prospective buyer, acquirer, successor, seller, new owner, assignee, or other relevant third party as necessary during negotiations or in connection with any change in corporate control, such as a reorganization, merger, sale, joint venture, assignment, transfer, or other disposition of all or any portion of our business, assets, or stock (including in connection with bankruptcy or similar proceedings). This is done in our legitimate interest to ensure the continued success of our business.

6.1 Data Transfers to Places Outside of Malaysia

Since NEC Group operates globally and NEC drives a global business, we may transfer your Personal Data outside of Malaysia. This includes transfers to NEC Group companies, NEC's third-party service providers, business partners, or, in limited circumstances, to cooperate with law enforcement or other government agencies. The countries to which your Personal Data may be transferred may not have data protection laws similar to those of Malaysia. However, we will protect your Personal Data as described in this Notice or as otherwise disclosed to you.

We comply with the Data Protection Laws and Regulations when transferring Personal Data to countries other than Malaysia.

Such transfer will always be conducted to the extent necessary and will not exceed or alter the purposes and means of processing that you have originally consented. Should you require such information in the meantime, please reach out to us through the "Contact Us" section.

7. How Long Do We Keep Your Personal Data

NEC limits the retention of Personal Data to a proportionate period during which the Personal Data is needed to accomplish the purposes for which it was collected or processed. When determining the length of time to retain your Personal Data, we consider several criteria, including whether we need the Personal Data to continue to provide you with our services, enforce our contractual agreements, prevent harm, promote safety, security, and integrity, or protect ourselves, including our rights, property and interests.

We will also retain and use your Personal Data to the extent necessary to comply with our legal obligations, resolve disputes and enforce our terms and conditions, other applicable terms of service, and our policies. The retention period may also depend on requirements in the Data Protection Laws and Regulations.

In some circumstances we may anonymise your Personal Data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information without further notice to you.

8. Data Security

Taking into account the state of the art, the costs of implementation and the nature, scope, context and purposes of processing as well as the risk of varying likelihood and severity for the rights and freedoms of individuals, we implement appropriate technical and organisational measures to ensure a level of security appropriate to the risk of processing. However, there are always risks involved with providing Personal Data as no technology is completely risk-free or can be guaranteed to be 100% secure. In this regard, we will take the appropriate reasonable security measures to prevent and minimise such risks but we will not be held responsible in the event that any third party gains unauthorised access to your Personal Data.

9. Links to other Websites or Services

Our websites or services may contain features or links to websites and services provided by third parties. Any information you provide on third-party sites or services is provided directly to the operators of such services and is subject to those operators' policies, if any, governing privacy and security, even if accessed through our website or services. We are not responsible for the content or privacy and security practices and policies of third-party sites or services to which links or access are

provided through our website. We encourage you to learn about third parties' privacy and security policies before using their services and providing them with information.

10. Minor's Privacy

Our products, solutions, and services, including our websites, are not intended for minors, and we do not knowingly collect Personal Data from them. If you are a minor, please refrain from using or accessing our services. If we become aware that we have collected Personal Data from a minor without verifiable parental consent, we will take appropriate steps to delete that Personal Data.

11. Your Data Protection Rights

Subject to the Data Protection Laws and Regulations, you may have the following rights in relation to your Personal Data:

- **Right to access:** You have the right to obtain confirmation on whether NEC processes Personal Data about you and receive a copy of such data, as well as information on how we process your Personal Data.
- **Right to rectification:** You have the right to rectify any inaccurate Personal Data we process about you or have any incomplete Personal Data about you completed.
- **Right to erasure:** You have the right to have your Personal Data deleted, if (i) the Personal Data has been unlawfully processed; (ii) we no longer need such data for the purposes of the processing; or (iii) the processing is based on consent and you withdraw your consent, and we have no other legal basis for processing the Personal Data. However, NEC will not delete your Personal Data if NEC has a legal obligation to retain the data, the Personal data is still necessary for the purposes of processing, or if NEC's legitimate interests override your interests.
- **Right to data portability:** You have the right to receive the Personal Data concerning you that you have provided to us in a structured, commonly used, and machine-readable format, and you may have that data ported directly to another controller, where such Personal Data is processed based on your consent or to perform a contract with you.
- **Right to restriction:** You have the right to restrict our processing of your Personal Data where you believe that the Personal Data we process is inaccurate or our processing is unlawful. You may also restrict our processing if NEC no longer needs the Personal Data, but you want us to store the data for the establishment, exercise, or defense of legal claims. You may also require us to restrict the processing of your Personal Data for the period when we assess your right to object to the processing of your Personal Data.
- **Right to object:** You have the right to object to our processing of your Personal Data when we rely on our legitimate interests or those of a third party, or if we perform tasks in the public interest in an exceptional case. If you object to our processing, we will cease processing your Personal Data and erase the data, unless we can demonstrate compelling legitimate grounds for the processing that override your interests, or if the data is needed for the establishment, exercise, or defense of legal claims. You always have the right to opt out of receiving direct marketing from us.
- **Right to information:** You have the right to receive transparent information about how we process your Personal Data.
- **Right to withdraw your consent:** You have the right to withdraw any consent for processing that you have provided at any time. To withdraw consent for cookies, please refer to our Cookies Policy in section 15 for detailed instructions. To withdraw consent for direct marketing, you can unsubscribe from our direct marketing communications and profiling activities, if applicable. For any other cases, please reach out to us through the "Contact Us"

section. Withdrawing consent does not affect the lawfulness of processing based on consent before its withdrawal.

Please note that a number of these rights only apply in certain circumstances, and all these rights may be limited by law. If you wish to exercise your rights, please reach out to us through the "Contact Us" section.

12. Contractual Obligations

This Notice is not intended to, nor does it create any obligations on us in respect of any other party or on behalf of any other party.

13. Severability

If any of part of this Notice is invalid or unenforceable, it will be struck out and the remaining parts will remain in force.

14. Governing Law

This Notice will be governed and construed in accordance with the laws of Malaysia. Use of this site is unauthorised in any jurisdiction that does not give full effect to all provisions of this Notice, including without limitation to this section and liability exclusions above.

15. Cookies Policy

Our website uses cookies and similar technologies to facilitate proper functioning of our website and to help collect Personal Data.

We may use cookies to recognise and track your computers or devices. Cookies are small pieces of data stored on your computer's hard drive, rather than on the websites. Our use of cookies is to (i) help subscribers speed up their activities on this site; (ii) track frequency and use of this site and our services; (iii) measure aggregate usage and traffic to this site and specific services and offerings; and (iv) eliminate the need for you to enter your password frequently during a session. You may configure your browser to reject cookies but this may interfere with some functionality of this site and the services.

16. Contact Us

If you have any questions or concerns about our privacy practices, or if you wish to exercise your rights regarding your Personal Data which you have provided to NEC, you may submit your written request to:

Mailing Address: **NEC CORPORATION OF MALAYSIA SDN BHD**
Suite 19-01, Level 19, The Gardens South Tower, Mid Valley City,
Lingkaran Syed Putra, 59200 Kuala Lumpur, Malaysia.

Kind Attention: Personal Data Protection Unit

Email: pdpa@nec.com.my

Amendments to the Notice

This Notice may be revised and/or updated from time to time. Notice of any such revision and/or update will be available on NEC's website and/or by such other means of communication deemed suitable by NEC or as required by the Data Protection Laws and Regulations.

In the event of any conflict between this English language Notice and its corresponding Bahasa Malaysia Notice "Notis Perlindungan Data Peribadi", the terms in this English language Notice shall prevail.

Version History

Issue	Description	Effective Date
1.0	Personal Data Notice	7/03/2014
2.0	Personal Data Protection Notice	17/08/2021
3.0	Personal Data Privacy Notice	7/12/2022
4.0	Personal Data Privacy Notice	8/11/2024
5.0	Personal Data Privacy Notice	24/12/2024
6.0	Personal Data Privacy Notice	30/6/2025