



NOTICE UNDER THE PERSONAL DATA PROTECTION ACT 2010

SECTION 1

GENERAL AND SCOPE OF APPLICATION

- 1.1 APM Group (as described in Annexure 1) is committed to protecting the personal data of all individuals it engages with, in full compliance with Malaysia's Personal Data Protection Act 2010 ("PDPA").
- 1.2 This Notice under the PDPA ("Notice") applies to all of us in Malaysia and outlines our practice and approach to the collection, use, storage, and processing of personal data, as defined by the PDPA.
- 1.3 This Notice, along with the data protection standards outlined herein, applies to our overseas subsidiaries (listed in Annexure 1) (collectively, "Overseas Group Companies") when they process your Personal Data on our behalf or for the purposes described in this Notice.
- 1.4 However, the application of this Notice to any Overseas Group Company is expressly limited to the extent that it does not conflict with the mandatory personal data protection laws of the territory in which that Overseas Group Company is established and operates ("Local Laws"). In the event of any such conflict, the requirements of the Local Laws shall prevail to the minimum extent necessary for that Overseas Group Company to achieve compliance.
- 1.5 Where an Overseas Group Company has its own personal data privacy notice or policy ("Local Notice"), that Local Notice will primarily govern the processing of personal data under its control. Our commitment is that such Local Notices will uphold standards that are consistent with the principles of this Notice, subject always to compliance with Local Laws.
- 1.6 We take reasonable steps to ensure that our Overseas Group Companies respect and protect your personal data in a manner that is consistent with the principles of the PDPA and this Notice, subject to the limitations described in Sections 1.4 and 1.5 above.

SECTION 2

PRINCIPLES

- 2.1. While our practice and approach are built upon the principles stipulated in the PDPA, our data personal handling practices are further governed by the following commitment:
 - (i) We use your personal data to provide you with goods, services, and other transactional products and services.
 - (ii) We aim to continuously improve our communication with you and our products and services for you and will use your personal data to help us achieve this.



- (iii) We give you some control over the personal data we hold about you, including who is allowed to see it and how it is used.
- (iv) We will not use your personal data to contact you for direct marketing purposes without your consent.
- (v) We will take reasonable care to safeguard your personal data through security policies and secure business processes.

SECTION 3

COLLECTION PRACTICES

- 3.1. The type and category of personal data that we may collect from you includes, without limitation, the following:
- (i) Identification Information: Your full name, identity card or passport number, date of birth, nationality, gender, and relevant details of your next-of-kin or emergency contact.
 - (ii) Contact Information: Your residential, correspondence, business, and billing addresses; telephone numbers; email addresses; and other contact details you provide;
 - (iii) Financial Information: Your bank or other account numbers, credit/debit card details (including cardholder name, number, billing address, and expiry date), and account statements for transaction processing.
 - (iv) Tax Information: Your tax identification number(s) for regulatory compliance, including e-invoicing requirements.
 - (v) Biometric Data: Your biometric data, such as fingerprints or facial recognition scans, for identity verification, security access, and authentication purposes.
 - (vi) Transactional Data: Details related to your dealings with us, including information about senders, recipients, and relevant individuals provided by corporate entities in connection with a contract.
 - (vii) Communication Records: Audio or visual recordings of telephone calls or meetings, where relevant and conducted in accordance with the law. ;
 - (viii) CCTV Footage: Closed Circuit Television or CCTV footage of you when you access our premises or liaise with our officers and employees;



- (ix) Event Imagery: Photographs and videos taken of you during events, functions, or marketing activities.
- (x) Voluntarily Provided Information: Any additional personal data that you choose to provide when interacting or transacting with us.
- (xi) Special Categories for Job Applicants and Employees - For job applicants and employees, personal data collected includes, but is not limited to:
 - Employment Details: Professional qualifications, employment history, income information, and social media profiles (e.g., LinkedIn) relevant to the application or employment.
 - Statutory Information: Malaysia's Employee Provident Fund or EPF, Social Security Organization or SOCSO, and tax identification numbers for mandatory statutory deductions and reporting.
 - Dependent Information: Relevant personal data of your spouse, dependents, and next-of-kin for benefits administration and emergency contacts.
 - Sensitive Personal Data: Where required by law or necessary for specific purposes (e.g., employment benefits), we may process sensitive data such as racial or ethnic origin, religious beliefs, or health information, with your explicit consent.
- (xii) Sensitive Personal Data (Non-Employees): As a rule, we do not collect sensitive personal data from non-employees unless, in the exceptional event that such collection is necessary to meet specific legal obligations or to serve you better, it will only be processed with your explicit consent or as permitted by law.

SECTION 4

COLLECTION METHODS

- 4.1. Directly from you – We collect personal data that you voluntarily provide when you interact with us. This includes, but is not limited to, information provided when you:
- (i) Inquire about, request, purchase, access, or otherwise use our products or services.
 - (ii) Communicate with us via any channel (e.g., phone, email, in person).
 - (iii) Enter a transaction, arrangement, discussion, or contract with us.
 - (iv) Complete and submit forms, whether physical or digital to us.



- (v) Participate in our customer surveys, competitions, or promotions.
 - (vi) Visit our premises.
 - (vii) Correspond with us, submitting inquiries or feedback.
- 4.2. Automatically through our digital platforms – When you use our websites or applications, we may automatically collect technical information to enhance your experience and for analytics. This data may include:
- (i) Your device information (e.g., browser type, operating system, IP address).
 - (ii) Your usage patterns (e.g., pages visited, links clicked, search queries, time spent on site).
 - (iii) Your behavior patterns (e.g., the type of goods and services sought or viewed).
- 4.3. From third parties – We may obtain personal data about you from third-party sources, such as:
- (i) Credit reference or fraud prevention agencies (where permitted by law and necessary for a transaction).
 - (ii) Payment service providers to authorize your payments.
- 4.4. Corporate Entities – If you are associated with a corporate entity (e.g., as an employee, director, or representative) that has or intends to have dealings with us, we may receive your personal data from that entity. In such cases, the corporate entity is responsible for ensuring it has a lawful basis, including obtaining any necessary consent, to disclose your personal data to us.

SECTION 5

COLLECTION PURPOSE

- 5.1. We process your personal data for specific, explicit, and legitimate purposes as permitted by the PDPA and other applicable laws. The primary purposes include, but are not limited to, the following:
- (i) Service Provision & Transaction Processing: To provide, administer, and manage the products and services you request from us. The specific data required will depend on the nature of the transaction.
 - (ii) Identity Verification & Security: To verify your identity, which helps prevent fraud and unauthorized access to your accounts and our systems.



- (iii) Relationship Management: To personalize your experience, improve our communication with you, and better meet your needs based on your interactions and indicated preferences.
 - (iv) Marketing Communications (with consent): To send you information about products, services, and promotions offered by us or our trusted partners that we believe may interest you. *Please refer to Section 6 for details on data sharing and Section 8 for your right to opt out of marketing.
 - (v) Research & Development: To conduct market research, analysis, and generate internal reports to help us improve and develop our products and services.
 - (vi) Legal & Regulatory Compliance: To comply with legal and regulatory obligations, and to enforce our legal rights or recover any debts owed.
 - (vii) Physical & Digital Security: To ensure the security of our premises (e.g., via CCTV) and our digital platforms (e.g., through activity monitoring).
 - (viii) Operational Safety Monitoring & Compliance: To uphold workplace safety and ensure regulatory and policy compliance through automated operational assessments (e.g., safety checks, operational activity monitoring etc.).
- 5.2. The provision of your personal data is generally voluntary. However, do note that our ability to provide you with certain products, services, or full access to our facilities could be negatively affected if you choose not to share or provide your personal data.

SECTION 6

SHARING, TRANSFER, AND STORAGE

- 6.1. Sharing of Personal Data - Your personal data may be used by any or all of us, depending on the context in which you provided it and the purpose for which it is being used. Please refer to Section 5 for some examples of the context and purpose.
- 6.2. Storage of Personal Data - Your personal data will primarily be stored and processed within Malaysia.
- 6.3. Transfer of Personal Data Outside Malaysia - We may transfer your personal data or part thereof to location(s) outside Malaysia, if necessary (e.g., cloud storage on overseas servers, processing by a regional service provider), depending on the context in which you provided it and the purpose for which it is being used. Please refer to Section 5 for some examples of the context and purpose.



In the event of such a transfer, we will take reasonable and practical steps to ensure that your personal data is protected by a standard of security comparable to that required under the PDPA. These steps may include:

- (i) Transferring data only to jurisdictions prescribed by the relevant Malaysian authorities as having an adequate level of data protection; or
- (ii) Entering into a legally binding agreement with the recipient overseas that imposes data protection standards consistent with the PDPA.

SECTION 7 RETENTION

- 7.1 Retention of Personal Data - We will not retain your personal data longer than is necessary for the fulfillment of the purposes for which it was collected, as described in Section 5, or as required by applicable laws.
- 7.2. Specifically, we adhere to guidelines that include the following:
 - (i) Contractual and Service Purposes: We will retain your data for the duration of our business relationship and for a reasonable period thereafter to fulfill contractual obligations and handle post-service inquiries.
 - (ii) Marketing Purposes: If you have consented to marketing communications, we will retain the relevant personal data until you withdraw your consent (opt-out). You may opt-out at any time by following the instructions in our communications or by contacting us as detailed in Section 8.
 - (iii) Legal and Regulatory Compliance: We will retain data for as long as necessary to comply with legal or regulatory obligations. For example, financial and transaction records will be kept for at least 7 years as required by Malaysian law.
 - (iv) Legal Proceedings: If your personal data is relevant to an ongoing legal case or investigation, we will retain it for the duration of those proceedings and any applicable limitation periods thereafter.
- 7.3. Once the retention period expires, your personal data will be securely destroyed or anonymized.



SECTION 8 DATA SUBJECT RIGHTS

- 8.1. Subject to the provisions of section 8.2 below, you, as the Data Subject under the PDPA, have the right to:
- (i) Access: Request access to a copy of the personal data we hold about you.
 - (ii) Correction: Request the correction of any inaccurate or incomplete personal data.
 - (iii) Withdrawal of Consent: Withdraw your consent to the processing of your personal data for specified purposes, including direct marketing.
 - (iv) Limitation: Request that we limit the processing of your personal data in certain circumstances.
 - (v) Data Portability: Request that we provide your personal data in a structured, commonly used, and machine-readable format, or transfer it directly to another data user, where technically feasible. We reserve the right to refuse your request for reasons permitted by law.
- 8.2 The exercise of your rights is not absolute and is subject to the following:
- (i) Verification: We will need to verify your identity before processing any request.
 - (ii) Response Time: We will endeavor to respond to your request within 21 days of receiving a complete request and any applicable fee.
 - (iii) Permissible Limitations: We may refuse a request, or charge a prescribed fee for data access requests, as permitted under the PDPA (e.g., if the request is manifestly unfounded, excessive, or repetitive). If a request is refused, we will provide you with the reasons.
 - (iv) Consequences of Withdrawal: If you choose to withdraw consent for the processing of mandatory personal data (i.e., data required to provide you with a product or service or to fulfill a contract), we may be unable to continue providing that product or service. We will notify you of the implications of such withdrawal.
 - (v) Marketing Communications and Opting Out: You can **opt out** of marketing communications at any time by using the "unsubscribe" link in our emails or by contacting us. It may take up to 21 days for an opt out request to be fully processed, during which you might still receive communications. Please note that opting out of marketing does not stop service-related communications.



- (vi) Third-Party Links: Our website may contain links to third-party sites. This Notice does not apply to those sites, and you will need to contact them directly to manage your data preferences.
- (vii) Processing Fee - In line with the PDPA, a reasonable fee may be charged for processing a data subject request. We will inform you of any fee before proceeding with your request.
- (viii) Communicating your Right - In order to exercise your rights or for any inquiries regarding your personal data, please contact the person described in Section 11 of this Notice.
- (ix) Request Refusal - Notwithstanding anything stated or implied in this Notice, we shall have the right to refuse your request for the reasons permitted under the law.

SECTION 9

ACKNOWLEDGEMENTS AND RESPONSIBILITIES

- 9.1. Your Consent and Responsibilities - By providing your personal data to us, communicating with us, or continuing to use our products or services, you acknowledge and confirm that you:
 - (i) Consent to Processing: Have read, understood, and given your consent to the collection, use, disclosure, and processing of your personal data as described in this Notice.
 - (ii) Responsibility for Accuracy: Understand that you are responsible for providing accurate and complete information and agree to promptly inform us of any changes to your personal data to ensure it remains current and accurate.
- 9.2. Third-Party Personal Data - If you provide us with personal data of any third party (e.g., family members, employees, or others), you warrant and undertake to us that you:
 - (i) Have Obtained Valid Consent: Have informed the third party of the purposes for the disclosure and have obtained their explicit consent for us to collect, use, and process their personal data in accordance with this Notice.
 - (ii) Have Verified Accuracy: Have taken reasonable steps to ensure that the third-party personal data you provide to us is accurate, complete, and up-to-date.
 - (iii) Will Inform of Changes: Will promptly notify us of any changes to the third-party data to ensure the information we hold remains current.



SECTION 10 AMENDMENTS

- 10.1 We may amend and update this Notice from time to time to reflect changes in our practices, legal requirements, or services. Any revisions will be posted on our official website(s).
- 10.2 The most current version of the Notice will always be available on our website, with the effective date clearly indicated. Your continued use of our services after such changes constitutes your acknowledgment and acceptance of the updated Notice.
- 10.3 This Notice is published in both Bahasa Malaysia and English. In the event of any inconsistency or discrepancy, the English version shall prevail.

SECTION 11 CONNECTING WITH US

- 11.1. Your privacy is of paramount importance to us. Should you have any inquiries, comments, or requests pertaining to this Personal Data Protection Notice or the processing of your personal information, please do not hesitate to reach out to our Data Protection Officer at:
 - Email: dpo@apm.com.my
 - Address: APM Automotive Holdings Berhad
Company Number 199701009342 (424838-D)
Lot 600, Pandamaran Industrial Estate, Locked Bag 218, 42009 Port Klang, Selangor Darul Ehsan, Malaysia
 - Tel: +603-31618888 (Ext. 8933 Group Legal)

This Notice was last updated on 14 October 2025



Annexure 1 – APM Group

APM Automotive Holdings Berhad (199701009342) and its related corporations, subsidiaries, and associated companies listed below:

1. Able Motor Sdn Bhd (199201019027)
2. APM Aluminium Castings Sdn Bhd (201101020286)
3. APM Auto Electrics Sdn Bhd (198101010309)
4. APM Auto Mechanisms Sdn Bhd (198201013099)
5. APM Auto Parts Marketing (Malaysia) Sdn Bhd (201201007630)
6. APM Auto Parts Marketing Sdn Bhd (198601003338)
7. APM Auto Safety Systems Sdn Bhd (198201013175)
8. APM Automotive Modules Sdn Bhd (201101020296)
9. APM Automotive Systems Sdn Bhd (201101041501)
10. APM Chalmers Suspensions Sdn Bhd (199701006111)
11. APM Climate Control Sdn Bhd (198201000419)
12. APM Coil Springs Sdn Bhd (198001009494)
13. APM Corporate Services Sdn Bhd (200901037128)
14. APM Delta Seating Systems Sdn Bhd (201701000364)
15. APM Engineering & Research Sdn Bhd (201001025282)
16. APM Interiors Sdn Bhd (198201001295)
17. APM Automotive Seats Sdn Bhd (198201011219)
18. APM Plastics Sdn Bhd (199001016855)
19. APM Seatings Sdn Bhd (199601009180)
20. APM Shock Absorbers Sdn Bhd (198001006268)
21. APM Springs Sdn Bhd (198401000734)
22. APM TACHI-S Seating Systems Sdn Bhd (201301005212)
23. APM Tooling Centre Sdn Bhd (199101013425)
24. APM-Coachair Sdn Bhd (198101007251)
25. APM EV Solutions Sdn Bhd (198401003320)
26. Auto Parts Holdings Sdn Bhd (198501010865)
27. Auto Parts Manufacturers Co. Sdn Bhd (197101001197)
28. Fuji Seats (Malaysia) Sdn Bhd (200201007504)
29. KAB Otomotif Sdn Bhd (198101003175)
30. Omnimatics Sdn Bhd (201501021115)
31. Pandamaran Special Steel Sdn Bhd (198301009593)
32. Perusahaan Tilam Kereta Sdn Bhd (198101003173)
33. Frontedge Auto Parts Malaysia Sdn. Bhd. (202501010683)
34. APM Automotive International Ltd. (LL04501)
35. APM Automotive Indonesia Ltd. (LL10821)
36. APM Automotive Global Ltd. (LL10819)
37. APM Automotive IndoChina Ltd. (LL09242)
38. APM Automotive Thailand Ltd. (LL09249)
39. APM Automotive Myanmar Ltd. (LL09252)



OVERSEAS

- 40. APM Auto Components (Thailand) Ltd
- 41. APM Auto Components Myanmar Company Limited
- 42. APM Springs (Vietnam) Co. Ltd
- 43. APM Marketing (Vietnam) Company Limited
- 44. APM Auto Components (Vietnam) Co. Ltd
- 45. P.T. APM Automotive Indonesia
- 46. P.T. APM Armada Suspension
- 47. P.T. APM Auto Components Indonesia
- 48. P.T. APM Leaf Springs Indonesia
- 49. P.T. APM Shock Absorbers Indonesia
- 50. McConnell Seats Australia Pty. Ltd
- 51. APM Auto Components (USA) Inc.
- 52. APM Auto Components Europe B.V.
- 53. APM Automotive International (UK) Ltd