



PERSONAL DATA PROTECTION NOTICE

In-Comix Food Industries Sdn Bhd ("**In-Comix**", "**we**," "**us**," or "**our**") is committed to protecting your privacy and ensuring the security of your Personal Data. This Personal Data Protection Notice ("**Notice**") explains how we collect, use, disclose, and safeguard your Personal Data when you interact with us, including visiting our websites, www.in-comix.com ("**Websites**") or engaging with our services, or communicating with us in any other way. Please read carefully and understand the contents of this Notice before using our Websites and/or providing us with your Personal Data. By using the Websites or providing your information to us, you consent to the practices described in this Notice.

As you are aware, the Personal Data Protection Act 2010 ("**PDPA**") was introduced in Malaysia to regulate the processing of Personal Data in commercial transactions and to safeguard the interests of individuals. We value and respect your privacy and as such we only collect your Personal Data in compliance with the PDPA.

1. Collection and Use of Your Personal Data

Your "**Personal Data**" refers to information that relates directly or indirectly to you and can be used to identify you, either alone or in combination with other information.

During the course of your transaction and dealings with In-Comix, you may be requested to furnish your Personal Data from time to time. In-Comix and their third-party service providers may share the Personal Data with each other and use this data in accordance with this Notice. They may also combine it with other information to enhance and improve In-Comix's products and services.

Often, we collect your Personal Data directly from you, either in physical or in electronic form:

- when you provide Personal Data to us, such as when you sign up or open an account or register with us (whether to become our contractor and/or supplier or customer), when you contact us or make an enquiry with us, purchase products and/or services from us, supply products and/or services to us, filling out an application form, survey or other forms, ask us to provide you with information, or take part in customer surveys, competition or promotional or other marketing campaigns or activities;
- when you enter into an agreement with us or during the course of your performing or undertaking any transaction or dealing with us;
- when you visit our office or any other premises occupied by us, our Websites or any of our social media pages;
- when you interact or communicate with us, such as face-to-face meetings, by electronic mail, letters, telefax, telephone, audio communication or audio and visual communication, or any other forms of telecommunication or network facility and/or equipment; and
- when you use our Websites and/or any social media pages, or post information or any other materials in or via our Websites or social media pages, or conduct transactions using or via our Websites.

In some cases, we may also collect your data from third parties whom we deal with who are

connected with you or whom you have authorised to process your Personal Data (for example, social networks, market research, third party data aggregators, credit reference agencies, regulatory bodies and law enforcement agencies) in order to assess your needs and provide you with better service.

We may collect the following types of information:

- **Personal Data:** Name, email address, phone number, postal address, identification numbers, payment details, social network details, and other information you provide voluntarily.
- **Product Information:** Details of products and/or services which you are buying and which we have sold or delivered to you, details of products and/or services which you are supplying or have supplied to us, purchase history, product preference and product rejected/returned, feedback regarding products and/or services evaluations (such as assessment, comments and complaints) and market research data such as preferred/non-preferred products and sources of supply.
- **Non-Personal Data:** Browser type, IP address, device information, operating system, and usage data collected through cookies and similar technologies.
- **Sensitive Information:** In limited circumstances, we may collect sensitive information (e.g., health data, biometric data) with your explicit consent or as required by law.
- Any other Personal Data or information that you voluntarily disclose during the course of your engagement with us whether verbally, in written form or publicly available information.

2. How We Use Your Information

We may use your information for purposes including, but not limited to:

- To process, facilitate and fulfil your requests for products and/or services, including management of purchase orders, deliveries and product returns;
- To manage sales administration, including processing of payments and execution of payment transaction/instructions;
- To facilitate customer service functions, including addressing inquiries, managing feedback or complaints, and providing ongoing technical or consumer support;
- To facilitate your participation in any contests, events and loyalty or reward programs;
- To assess, evaluate and process applications for employment within the organisation;
- To maintain internal records and facilitate travel arrangements (such as visa applications) where required for business purposes;
- To operate our premises in a manner that ensures the health, safety, and security of all visitors and employees, including the use of security surveillance system;
- To conduct internal investigations, audit and security screening to detect, prevent fraud, unauthorised transactions or security breaches;
- To conduct and support internal marketing analysis and customer experience choices and engagement with In-Comix;
- To create and deliver personalised products and services that are unique to you to

enhance your customer experience;

- To communicate information regarding new products, upcoming events, and promotional materials that may be of interest to you and to transmit seasonal greetings or corporate announcements;
- To store and carry out data analytics processes;
- To improve our products and/or services;
- To collaborate with designated business partner for the purposes of advertising, marketing and commercial campaigns, subject to your consent where required;
- To comply with In-Comix's contractual and regulatory obligations in the conduct of its business;
- To personalise and improve your experience on the Websites;
- To conduct market research, data analytics, and business development to improve quality of products and services;
- To comply with legal obligations and protect our rights, property, or safety.

3. Disclosure of Personal Data

Your Personal Data may be shared with:

- Affiliates & Subsidiaries: Within our corporate group to provide integrated services.
- Service Providers & Partners: Third parties such as banks, payment processors, legal consultants, auditors, and IT support services.
- Government Authorities: When required to comply with legal or regulatory obligations.
- Business Transfers: In case of mergers, acquisitions, or corporate restructuring.
- Other Third Parties: With your explicit consent or as permitted by law.

We take reasonable steps to ensure that these parties adhere to strict confidentiality and data protection policies.

4. Transfer of Personal Data

In-Comix will not transfer your Personal Data outside Malaysia unless the recipient of the data agrees to abide by a data privacy standard at least on par with the applicable laws in Malaysia, or enter into a contractual arrangement. The only exceptions are where you have consented to the transfer, where the transfer is necessary to protect your vital interests concerned in a 'life or death' situation, or to enter into or perform a contract with (or for the benefit of) you.

5. Protection of Personal Data

In-Comix takes reasonably necessary precautions, both administrative and technical to safeguard your Personal Data against loss, theft, misuse and unauthorised access, disclosure, usage, alteration or destruction.

6. Retention of Personal Data, Updating Personal Data, and Access to Personal Data

In-Comix shall endeavour to make it easy for you to keep your information accurate, complete and up to date. However, it is your responsibility to ensure that all Personal Data provided to In-Comix is accurate, complete, and up to date. You should promptly notify In-Comix in writing of any changes to the Personal Data previously submitted, so as to enable In-Comix to maintain accurate and current records. In-Comix shall not be liable for any loss or damage arising from your failure to provide accurate and updated Personal Data. We will retain your Personal Data for the period necessary to fulfil the many different purposes outlined in this Notice unless a longer retention period is permitted or required by law. You can help ensure that your contact information and preferences are accurate, complete, and up to date by contacting the following. For other Personal Data, we make good faith efforts to provide you with access so you can request that we correct the data if it is inaccurate or delete the data if In-Comix is not required to retain it by law or for legitimate business purposes.

Department Name:

Contact No.:
Email Address:

General Affairs

+607-4151211
pdp@hupseng.com

We will keep your Personal Data as long as necessary unless a longer retention period is required by the Malaysian law. We will take all reasonable steps to ensure that all Personal Data is destroyed or permanently deleted if it is no longer required for the purpose for which it was collected and processed.

7. Your Rights as a Data Subject

You have the right to access and correct your Personal Data held by In-Comix and, where applicable, to request the transmission (portability) of your Personal Data in accordance with the PDPA. You also have the right to limit the processing of your Personal Data, and to withdraw your consent where the processing is based on your consent. However, the exercise of this right is subject to our contractual rights and obligations under relevant laws and regulations. We may decline to process requests that are unreasonably repetitive, require disproportionate technical effort, jeopardise the privacy of others, are extremely impractical, or for which access is not otherwise required by local law.

You may exercise any of these rights by contacting us at the above details, or by giving a notice in writing to In-Comix at pdp@hupseng.com.

If you do not provide your consent or choose to withdraw your consent for the collection, use, or processing of your Personal Data, in the manner prescribed herein, we may be unable to provide or continue providing our goods or services to you. This may also affect our ability to perform any contractual obligations we have with you. In such circumstances, we shall notify you of the likely consequences of your withdrawal of consent, before we complete processing your request.

8. Usage of Cookies

Our Websites may transmit to your computer a "cookie", which enables us to store information on your computer when you visit our Websites. A cookie is a package of data that allows our server to identify and interact more effectively with your computer without having to spend time identifying each customer, thereby also providing additional login convenience. You may configure and personalise your current browser to refuse, reject or delete such cookies. Should you choose to do so, it is possible (depending on the browser you are using), for you to be prompted before accepting any cookies, or to prevent your browser from accepting any cookies at all. This may, however, cause certain features of our Websites not to be accessible.

9. Language

In accordance with the requirement of Malaysian data protection and privacy law, this Notice

is issued in both English and Bahasa Malaysia. In the event of any inconsistencies or discrepancies between the English version and the Bahasa Malaysia version, the English version shall prevail.

10. General

In-Comix reserves the right to update and amend this Notice from time to time. Any material changes will be posted on our Websites with the updated Notice.

Should you have any complaints, questions or enquiries about this Notice and/or our Personal Data handling practices, kindly reach out to us through pdp@hupseng.com.