PERSONAL
DATA PROTECTION
COMMISSIONER MALAYSIA

Ministry of Communication and
Multimedia Malaysia

Compliance to PDPA: a quick guide

SCOPE

Key Terms

The Do's & Don'ts

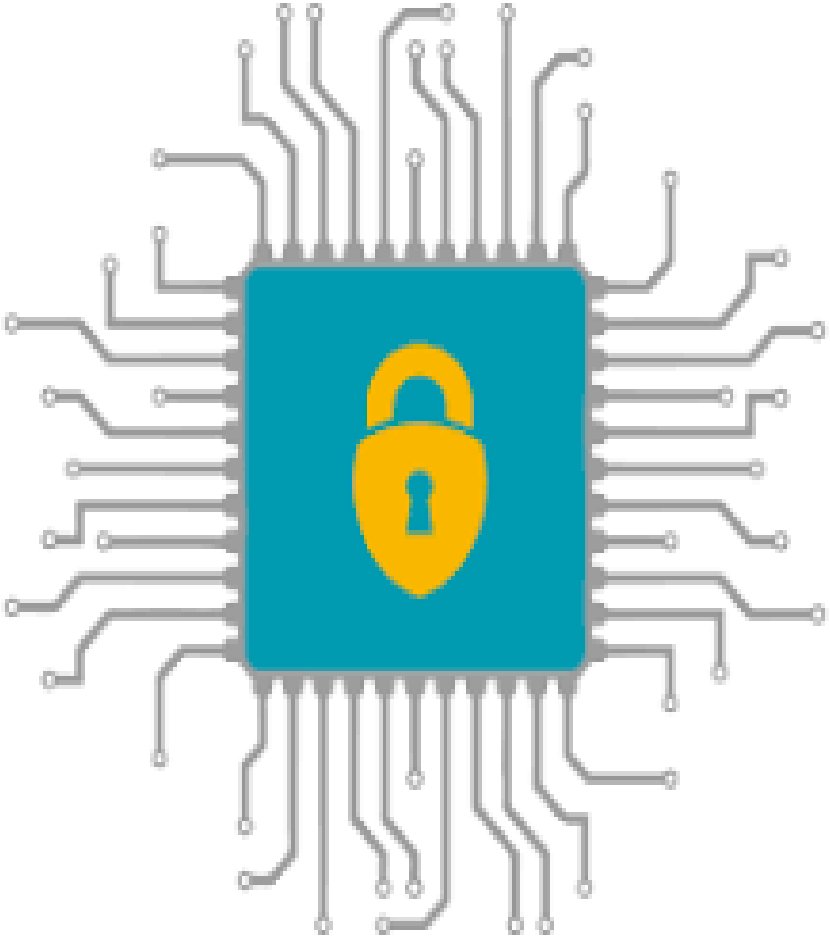
Introduction to data protection

The PDP Principles

Conclusion

1. DATA PROTECTION IN BRIEF

Data Protection



What?

✓ Data protection is all about securing data from unauthorized access, misuse and loss.

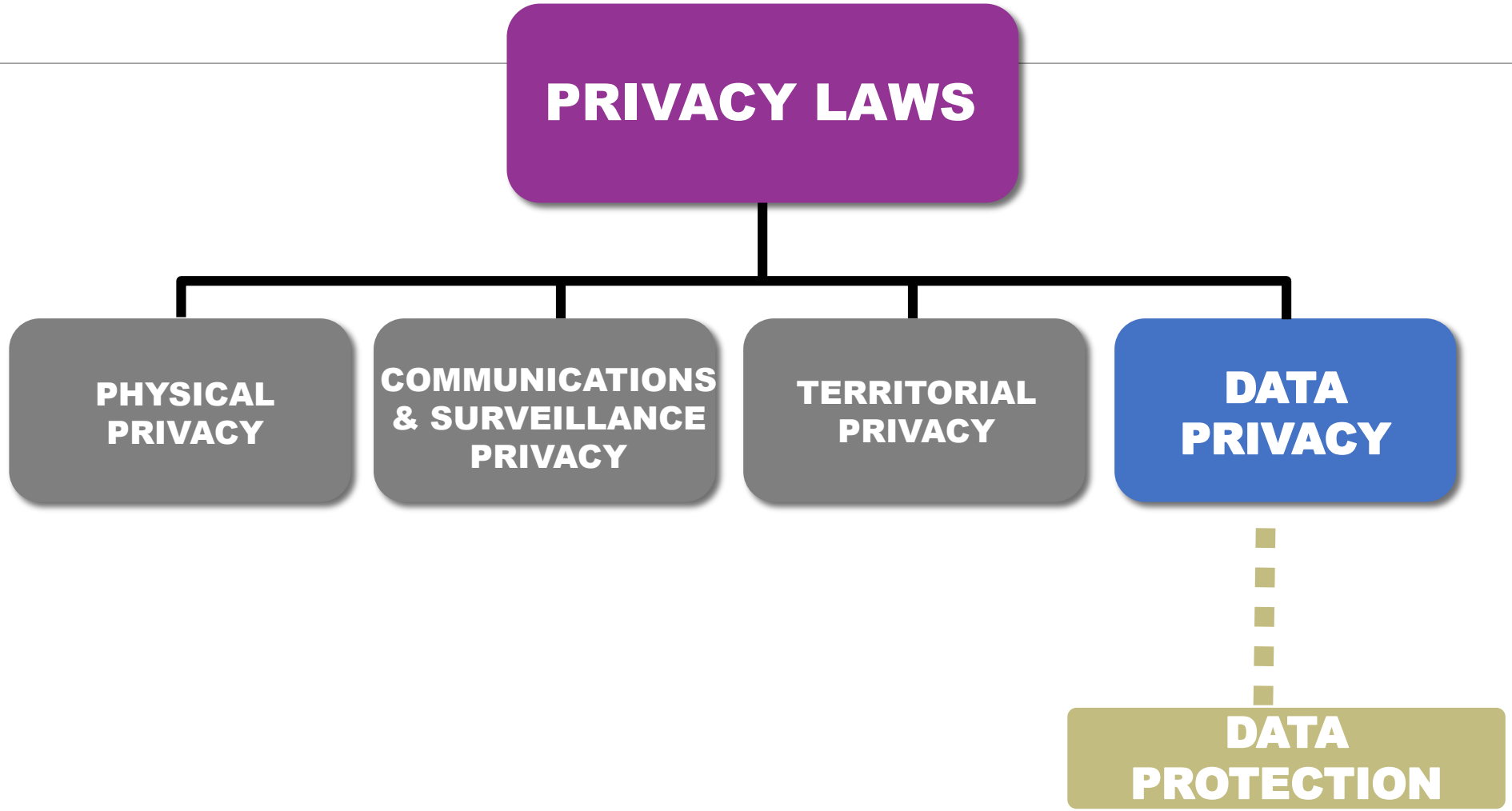
Why it matters?

✓ If personal data is stolen, privacy is not guaranteed which opens the windows to risk for identity and other security breaches.

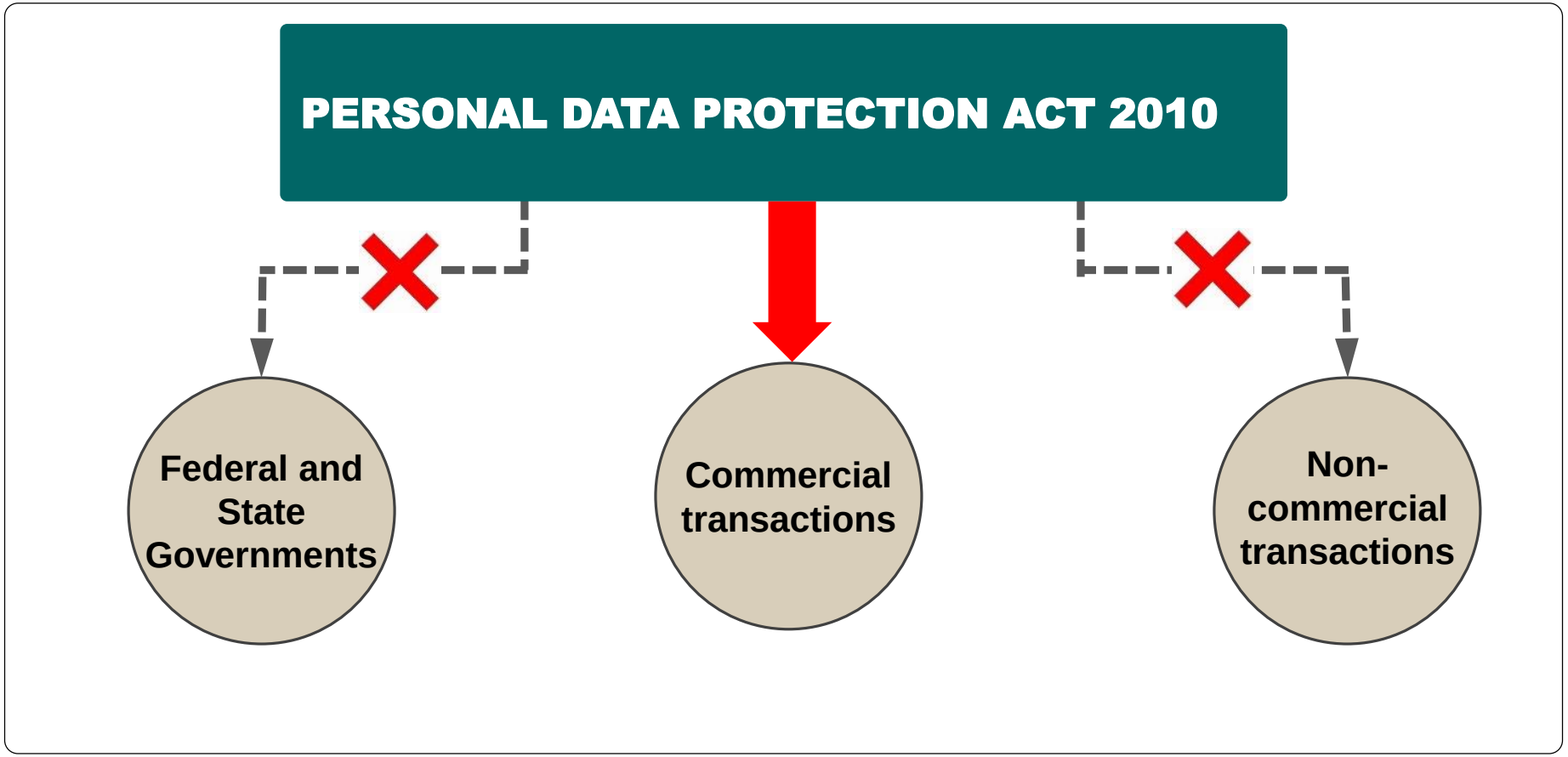
How?

✓ Personal data governance

PRIVACY LAWS IN MALAYSIA



DATA PROTECTION



2. KEY TERMS

Personal Data

01

Any information which may identify a data subject, in which it may be identifiable by one type of personal data or/and a combination of other personal data.

Sensitive Personal Data

02

Information relating to the physical or mental health or condition, political opinions, religious belief or other beliefs of a similar nature.

Processing

03

Carrying out any operation or set of operations on personal data.

Commercial Transactions

04

Any transaction of a commercial nature, which includes the exchange of goods or services, investments, agency, financing, banking and insurance.

Third Party

05

1)A relevant person in relation to a data subject,
2)A data processor; or
3)A person authorized in writing by the data user to process the personal data under the direct control of the data user.

06

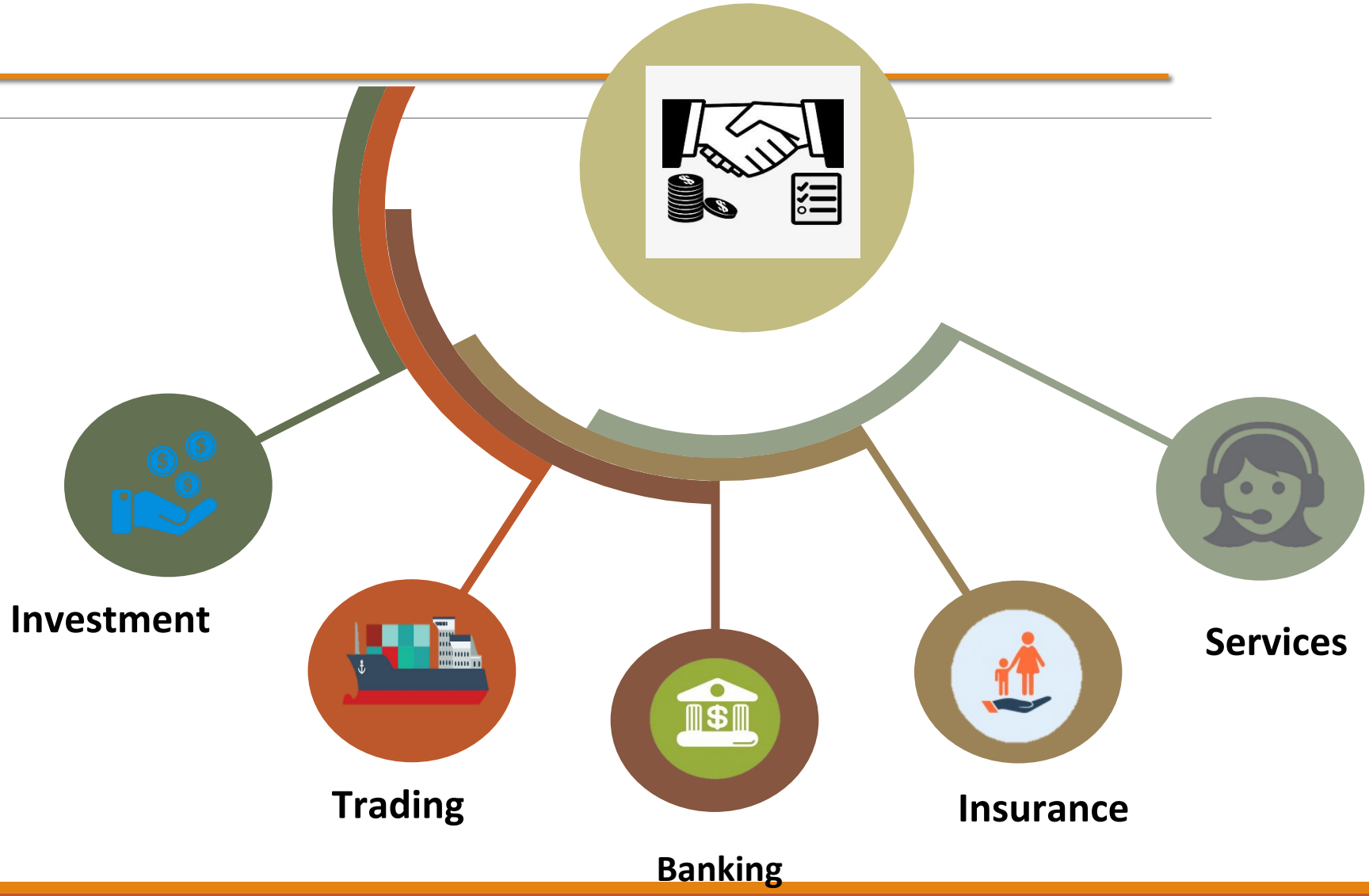
Vital Interest

Matters relating to life, death or security of a data subject.

Commercial Transactions

Any transaction of a commercial nature,

- whether **contractual or not** but does not include credit reporting business under the Credit Reporting Agency Act 2010



PERSONAL DATA

- Full Name
- D.O.B
- P.O.B

- IC
- Passport
- Driving License

- Residential address
- Phone Numbers
- Email
- *IP address*
- *Geo-location*

- Health/Genetic info.
- Health conditions

- Images

- Financial info.

- Religious belief
- Sexual orientation
- Political opinions

Processing of Personal Data

Control

- Collecting
- Holding
- Use
- Recording
- Storing

Disclose

- Transfer
- Transmission
- Dissemination

Access

- Correction
- Retrieval
- Erasure
- Destruction
- Modification

Key Players

Data User

a person who either alone or jointly processes any personal data or has control over or authorizes the processing of any personal data.

Data Processor

any person, who processes the personal data solely on behalf of the data user, and does not process the personal data for any of his own purposes.

Data Subject

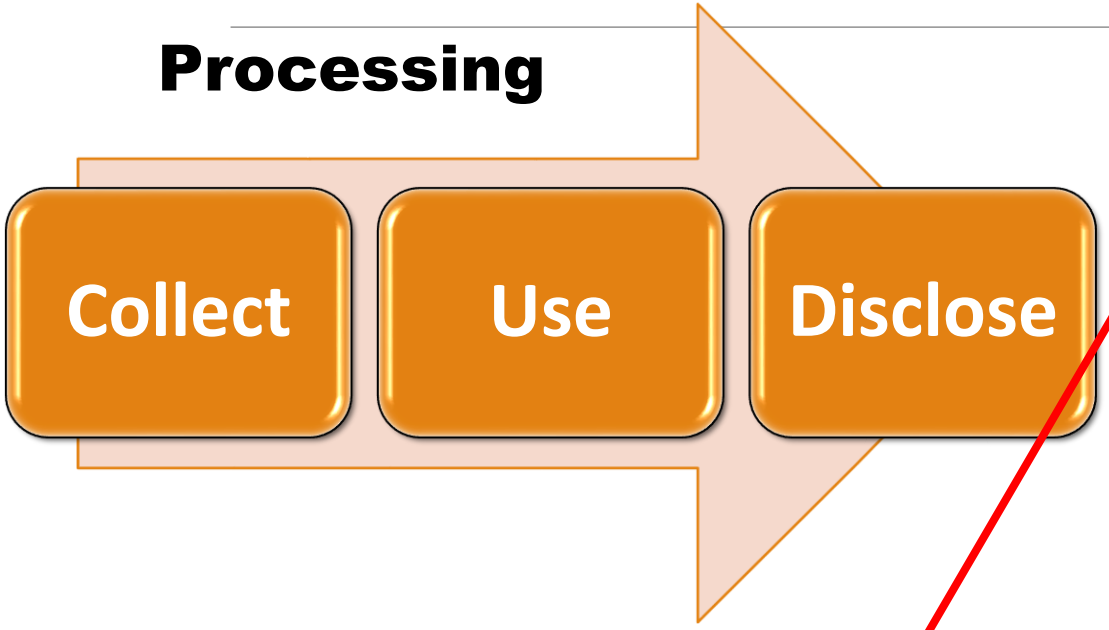
an individual who is the subject of the personal data.
e.g. students, patients, employees, citizens, non-citizens.

3. THE PRINCIPLES OF PDP

THE PRINCIPLES

1. General
2. Notice & Choice
3. Disclosure
4. Security
5. Retention
6. Data Integrity
7. Access

1- GENERAL



Consent Matters	• Process personal data with consent
Lawful Purposes	• The processing is necessary and directly related to business activity
Adequate	• Not excessive and reasonable
Record and maintain consent	• Burden of proof
Incapable Data Subject	• Consent by an authorized person/body
Age of consent	• Consent for “minor” must be obtained from legal guardian

Lawful Purposes: Section 6 (2)

CONSENT

IMPLICIT

- ❑ Implied
- ❑ Voluntary
- ❑ Deemed
- ❑ Inferred by one's action
- ❑ Pre-ticked boxes (by default)

*difficult to prove in legal context but can be done under certain circumstances

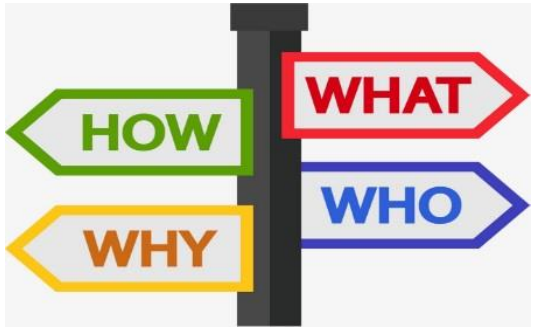
VALID

- ❑ Informed
- ❑ Reasonable
- ❑ Voluntary
- ❑ Specific
- ❑ Current
- ❑ Capacity to consent
- ❑ Unbundled
- ❑ Able to withdraw

EXPLICIT

- ❑ Expressed
- ❑ Verbal/non-verbal
- ❑ Clear affirmative action
- ❑ Option to agree or disagree
- ❑ Active Opt-in

Managing consent



Obtain

How to obtain?

- ❑ Signing a consent clause on a paper form
- ❑ Ticking an opt-in box (paper)
- ❑ Click an opt-in button or link
- ❑ Inform clients that consent can be withdrawn
- ❑ Seek parental consent for under-aged children
- ❑ Do not bundle up consent with other matters by default

Record

Who consented the processing?

- ❑ Name, ID, Relation with Data Subject
- ❑ Keep a copy of the signed document

When and how they consented?

- ❑ Keep a copy of a dated document, online log, call log;
- ❑ Provide a form or phone no. or email for withdrawing consent;
- ❑ Keep a copy of the withdrawn consent (paper/digital)

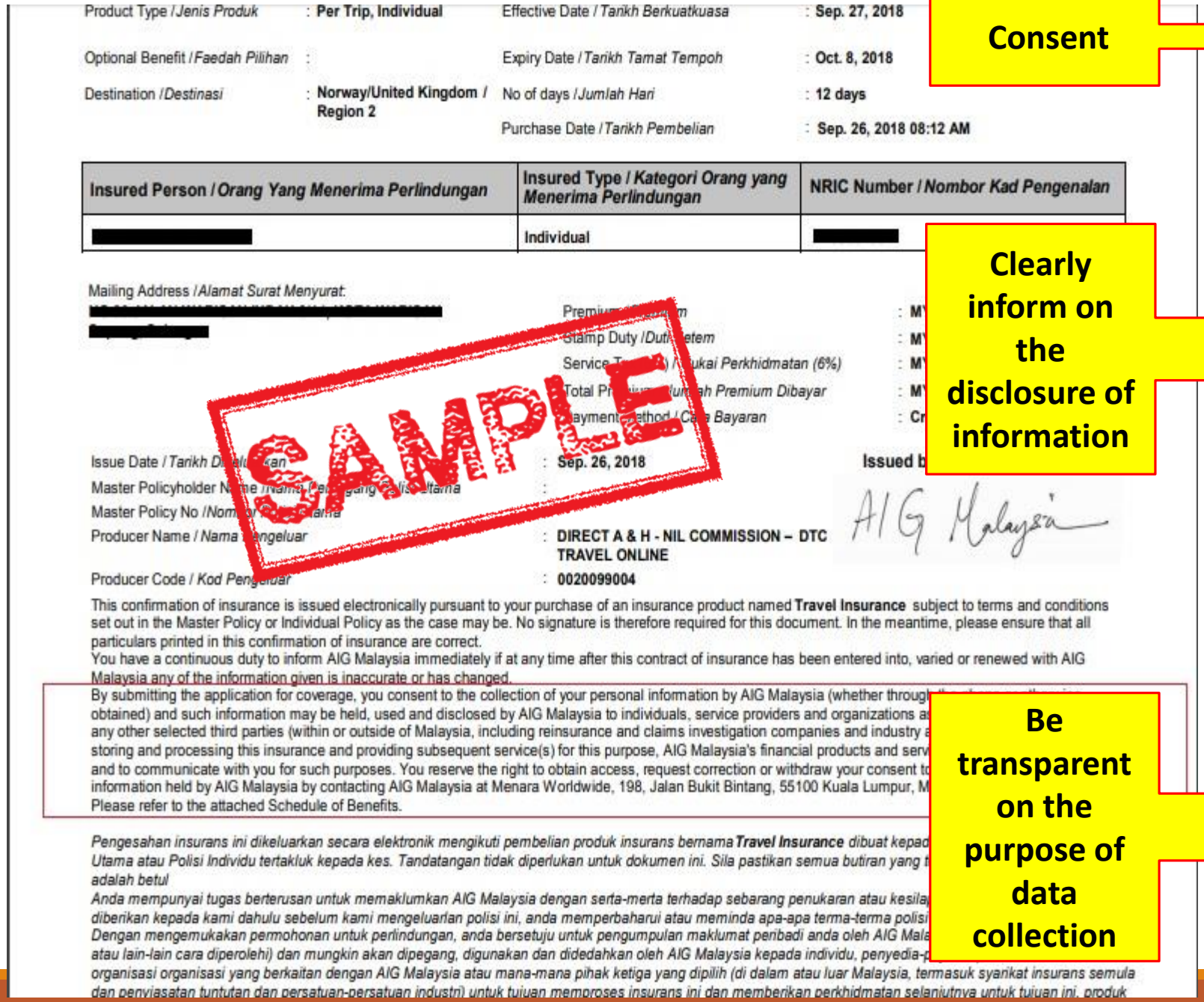
Manage

Check that the processing and the purposes have not changed

- ❑ Keep a copy of the current version of the consent

Keep all documents containing consents in a proper manner

- ❑ All files/documents containing consents must be retrievable



Product Type /*Jenis Produk* : **Per Trip, Individual**
Effective Date / *Tarikh Berkuatkuasa* : **Sep. 27, 2018**
Optional Benefit /*Faedah Pilihan* :
Expiry Date /*Tarikh Tamat Tempoh* : **Oct. 8, 2018**
Destination /*Destinasi* : **Norway/United Kingdom / Region 2**
No of days /*Jumlah Hari* : **12 days**
Purchase Date /*Tarikh Pembelian* : **Sep. 26, 2018 08:12 AM**

Insured Person / *Orang Yang Menerima Perlindungan*	Insured Type / *Kategori Orang yang Menerima Perlindungan*	NRIC Number / *Nombor Kad Pengenalan*
[redacted]	Individual	[redacted]

Mailing Address /*Alamat Surat Menyurat*:
[redacted]

SAMPLE

Issue Date / *Tarikh Dikeluarkan* : **Sep. 26, 2018**
Master Policyholder Name /*Nama Pemegang Polisi Utama* :
Master Policy No /*Nombor Polisi Utama*
Producer Name / *Nama Pengeluar* : **DIRECT A & H - NIL COMMISSION – DTC TRAVEL ONLINE**
Producer Code / *Kod Pengeluar* : **0020099004**

This confirmation of insurance is issued electronically pursuant to your purchase of an insurance product named **Travel Insurance** subject to terms and conditions set out in the Master Policy or Individual Policy as the case may be. No signature is therefore required for this document. In the meantime, please ensure that all particulars printed in this confirmation of insurance are correct.
You have a continuous duty to inform AIG Malaysia immediately if at any time after this contract of insurance has been entered into, varied or renewed with AIG Malaysia any of the information given is inaccurate or has changed.
By submitting the application for coverage, you consent to the collection of your personal information by AIG Malaysia (whether through ... obtained) and such information may be held, used and disclosed by AIG Malaysia to individuals, service providers and organizations a... any other selected third parties (within or outside of Malaysia, including reinsurance and claims investigation companies and industry ... storing and processing this insurance and providing subsequent service(s) for this purpose, AIG Malaysia's financial products and serv... and to communicate with you for such purposes. You reserve the right to obtain access, request correction or withdraw your consent to ... information held by AIG Malaysia by contacting AIG Malaysia at Menara Worldwide, 198, Jalan Bukit Bintang, 55100 Kuala Lumpur, M...
Please refer to the attached Schedule of Benefits.

Pengesahan insurans ini dikeluarkan secara elektronik mengikuti pembelian produk insurans bernama ***Travel Insurance*** *dibuat kepad... Utama atau Polisi Individu tertakluk kepada kes. Tandatangan tidak diperlukan untuk dokumen ini. Sila pastikan semua butiran yang t... adalah betul*
Anda mempunyai tugas berterusan untuk memaklumkan AIG Malaysia dengan serta-merta terhadap sebarang penukaran atau kesila... diberikan kepada kami dahulu sebelum kami mengeluarkan polisi ini, anda memperbaharui atau meminda apa-apa terma-terma polisi... Dengan mengemukakan permohonan untuk perlindungan, anda bersetuju untuk pengumpulan maklumat peribadi anda oleh AIG Mala... atau lain-lain cara diperolehi) dan mungkin akan dipegang, digunakan dan didedahkan oleh AIG Malaysia kepada individu, penyedia-p... organisasi organisasi yang berkaitan dengan AIG Malaysia atau mana-mana pihak ketiga yang dipilih (di dalam atau luar Malaysia, termasuk syarikat insurans semula dan penyiasatan tuntutan dan persatuan-persatuan industri) untuk tujuan memproses insurans ini dan memberikan perkhidmatan selanjutnya untuk tujuan ini, produk

Consent

Clearly inform on the disclosure of information

Be transparent on the purpose of data collection

By submitting the application for coverage, you consent to the collection of your personal info ….(whether through the phone or otherwise obtained)

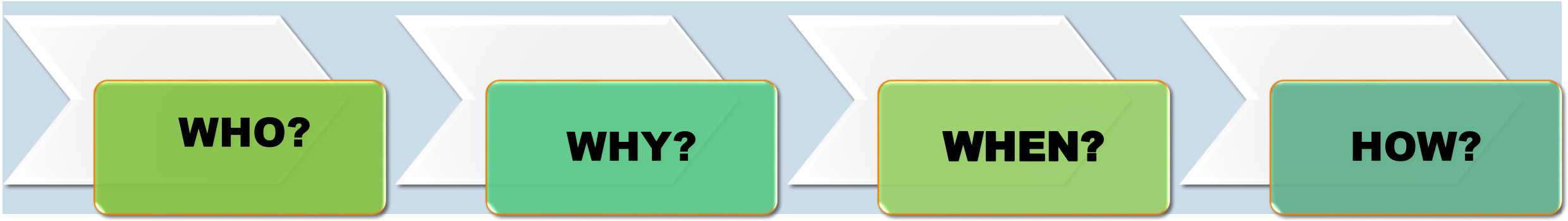
and such information may be held, used and disclosed to individuals, service providers and organizations associated with AIG Malaysia or any other selected third parties (within or outside of Malaysia, including reinsurance and claims investigation companies and industry associations)

for the purpose of storing and processing this insurance and providing subsequent service(s) for this purpose, AIG Malaysia's financial products and services, data matching, surveys, and to communicate with you for such purposes.

2- NOTICE AND CHOICE (Sec.7)

I N F O R M	The Collection	Purpose of data collection and further processed
	The Processing	Whether personal data is processed by / on behalf of the Data user
	The Source	The source where information on data subject is obtained
	The Rights	Access and correction of personal data
	The Disclosure	Disclosure of personal data to / by third parties
	The Choices	Options and ways offered to limit processing
	The Supply	Whether it is mandatory or voluntary to provide personal data
	The Obligation and consequences	If it is obligatory to provide such personal data, inform the consequences if not provided

Serving the notice



New and existing:
- Clients
- Employees

- Assurance
- Legal obligation
- To inform the purposes of data collection
- Provides contact info for inquiries/complaints

- Obtaining consent
- Providing services

- Clear and straightforward language
- Appealing and intelligible
- Online/offline

FRAMEWORK OF A NOTICE

1	Brief information on company and its practice in data protection
2	Collection and processing of personal data
3	Description of the personal data collected by data user
4	Purposes of collection
5	Sources of personal data
6	Disclosure to third parties/subsidiaries/authority bodies
7	Transfer of personal data overseas
8	Security measures to protect personal data
9	Retention of personal data
10	Access and correction of personal data
11	Consequences of failing to supply PD;
12	Marketing and promotional activities
13	Data subject's obligations
14	For Inquiries (contact person)

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Privacy & Policy

MPH Bookstores Sdn Bhd is committed to ensuring that your privacy is protected. This privacy policy is formulated in accordance with the Personal Data Protection Act 2010, which describes how your information is collected and used and your choices with respect to your Personal Data. This policy explains how we use the information we collect about you and the procedures that we have in place to safeguard your privacy whilst you use the website.

MPH Bookstores Sdn Bhd may disclose to third party service providers within and outside of Malaysia certain aggregate information contained in your registration applications but MPH Bookstores Sdn Bhd will not disclose to any individuals your name, address, email address or telephone number without your prior consent except to the extent necessary or appropriate to comply with applicable laws or in legal proceedings.

Information collected by MPH Bookstores Sdn Bhd

MPH Bookstores Sdn Bhd does not sell, share or trade customers personal information collected online with third p

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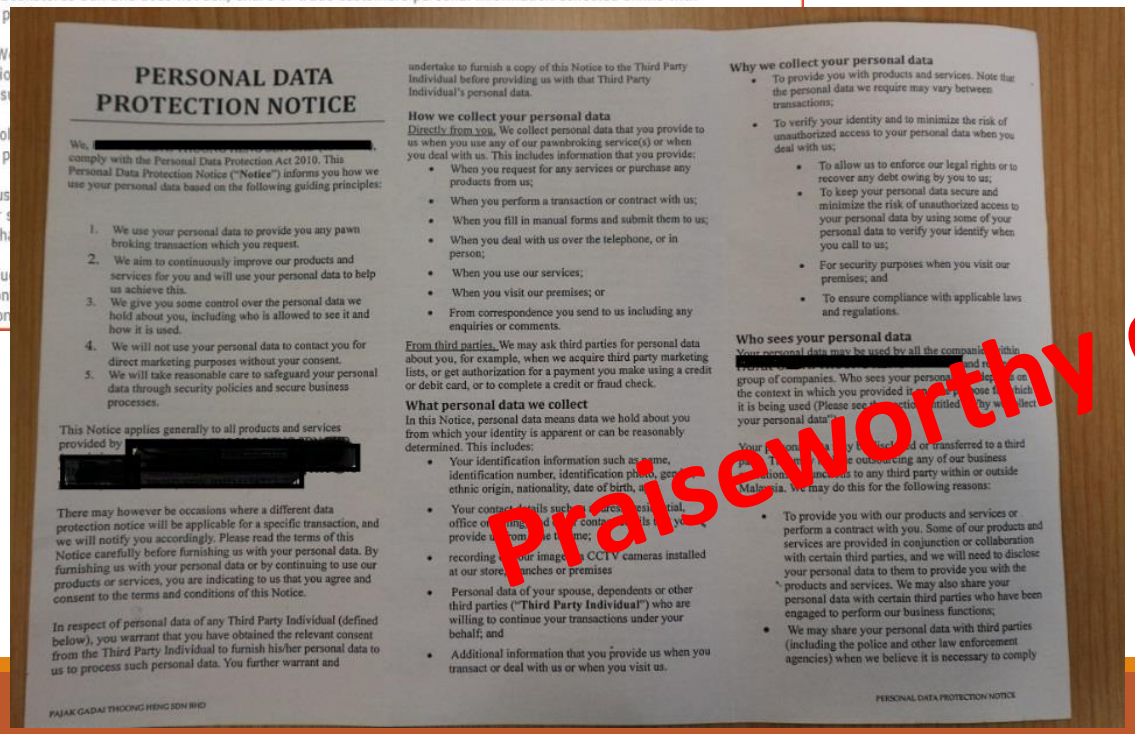


PERSONAL DATA PROTECTION NOTICE

We, [redacted], comply with the Personal Data Protection Act 2010. This Personal Data Protection Notice ("Notice") informs you how we use your personal data based on the following guiding principles:

1. We use your personal data to provide you any pawn broking transaction which you request.
2. We aim to continuously improve our products and services for you and will use your personal data to help us achieve this.
3. 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.
4. We will not use your personal data to contact you for direct marketing purposes without your consent.
5. We will take reasonable care to safeguard your personal data through security policies and secure business processes.

This Notice applies generally to all products and services provided by [redacted]

There may however be occasions where a different data protection notice will be applicable for a specific transaction, and we will notify you accordingly. Please read the terms of this Notice carefully before furnishing us with your personal data. By furnishing us with your personal data or by continuing to use our products or services, you are indicating to us that you agree and consent to the terms and conditions of this Notice.

In respect of personal data of any Third Party Individual (defined below), you warrant that you have obtained the relevant consent from the Third Party Individual to furnish his/her personal data to us to process such personal data. You further warrant and undertake to furnish a copy of this Notice to the Third Party Individual before providing us with that Third Party Individual's personal data.

How we collect your personal data

Directly from you. We collect personal data that you provide to us when you use any of our pawnbroking service(s) or when you deal with us. This includes information that you provide:

- When you request for any services or purchase any products from us;
- When you perform a transaction or contract with us;
- When you fill in manual forms and submit them to us;
- When you deal with us over the telephone, or in person;
- When you use our services;
- When you visit our premises; or
- From correspondence you send to us including any enquiries or comments.

From third parties. We may ask third parties for personal data about you, for example, when we acquire third party marketing lists, or get authorization for a payment you make using a credit or debit card, or to complete a credit or fraud check.

What personal data we collect

In this Notice, personal data means data we hold about you from which your identity is apparent or can be reasonably determined. This includes:

- Your identification information such as name, identification number, identification photo, gender, ethnic origin, nationality, date of birth, a
- Your contact details such as residential, office or mailing address, contact numbers to provide from time to time;
- recording your image via CCTV cameras installed at our stores, branches or premises
- Personal data of your spouse, dependents or other third parties ("**Third Party Individual**") who are willing to continue your transactions under your behalf; and
- Additional information that you provide us when you transact or deal with us or when you visit us.

Why we collect your personal data

- To provide you with products and services. Note that the personal data we require may vary between transactions;
- To verify your identity and to minimize the risk of unauthorized access to your personal data when you deal with us;
  - To allow us to enforce our legal rights or to recover any debt owing by you to us;
  - To keep your personal data secure and minimize the risk of unauthorized access to your personal data by using some of your personal data to verify your identify when you call to us;
  - For security purposes when you visit our premises; and
  - To ensure compliance with applicable laws and regulations.

Who sees your personal data

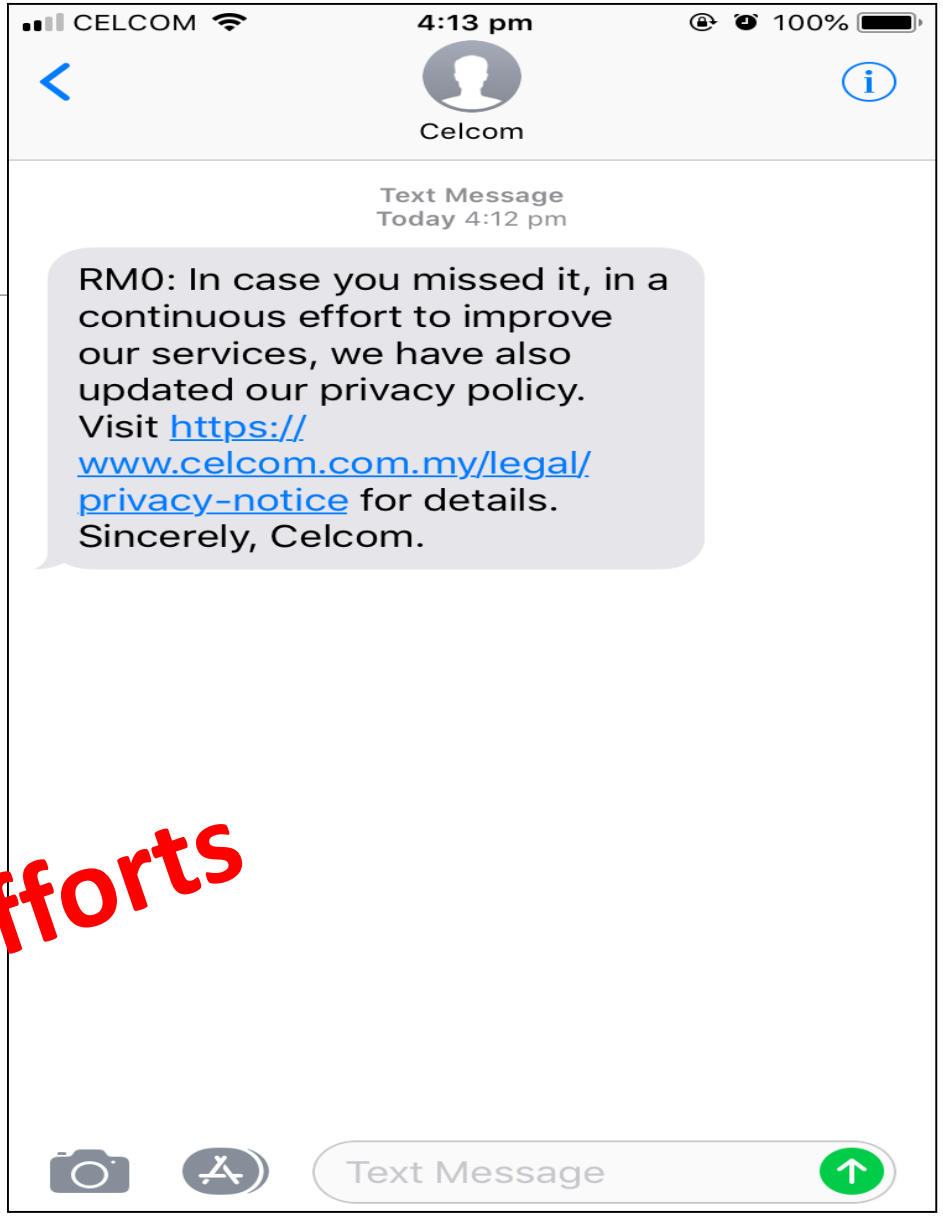
Your personal data may be used by all the companies within [redacted] group of companies. Who sees your personal data depends on the context in which you provided it and the purpose for which it is being used (Please see [redacted] titled "[redacted] your personal data").

Your personal data may be disclosed or transferred to a third party in the course of outsourcing any of our business functions to any third party within or outside Malaysia. We may do this for the following reasons:

- To provide you with our products and services or perform a contract with you. Some of our products and services are provided in conjunction or collaboration with certain third parties, and we will need to disclose your personal data to them to provide you with the products and services. We may also share your personal data with certain third parties who have been engaged to perform our business functions;
- We may share your personal data with third parties (including the police and other law enforcement agencies) when we believe it is necessary to comply

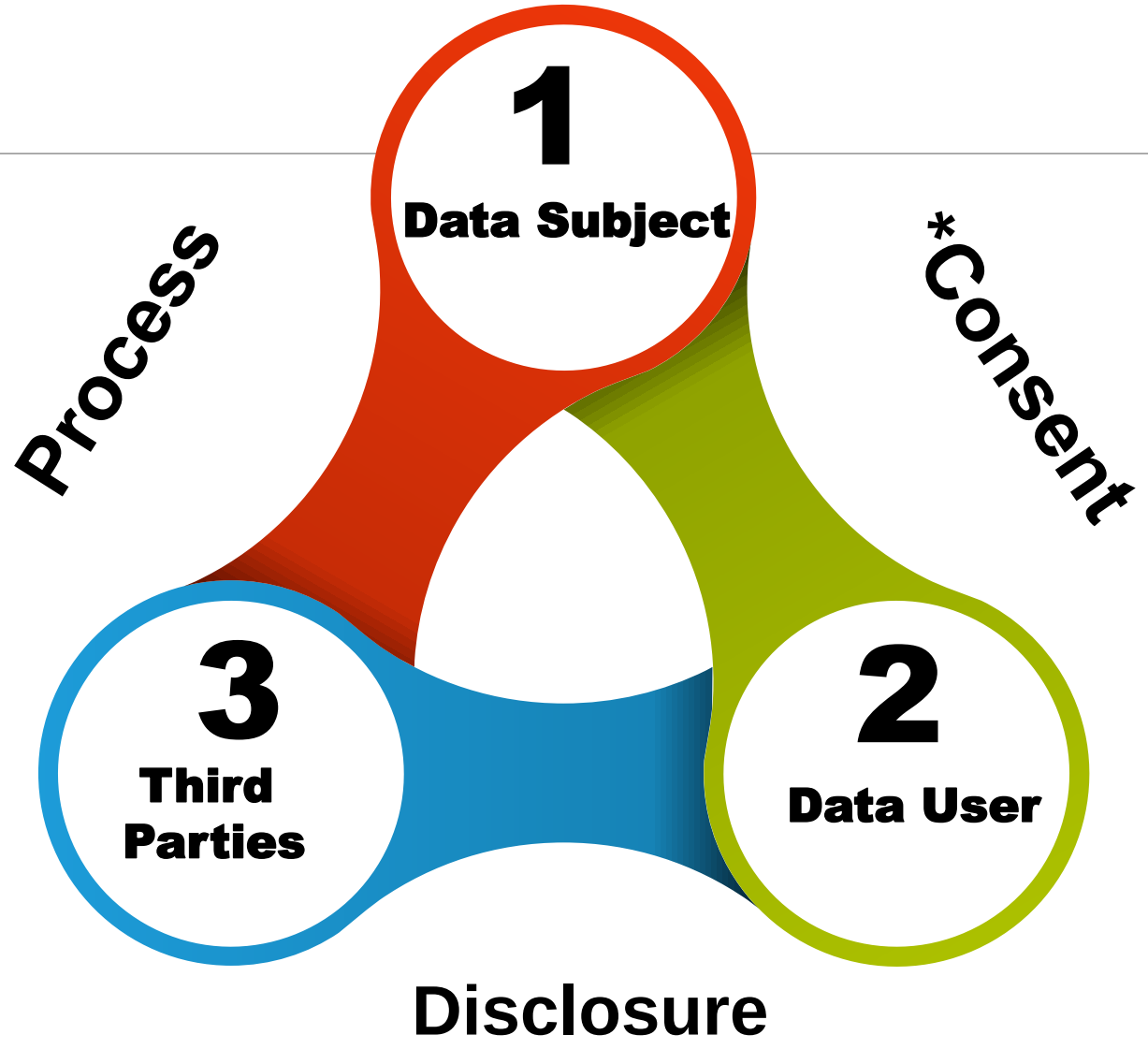
PAJAK GADAI THOONG HENG SDN BHD

PERSONAL DATA PROTECTION NOTICE



Praiseworthy efforts

3- DISCLOSURE (Sec.8)



P.U(A) 335/2013

DISCLOSURE LIST:

For the purpose of Section 8 (b) –

Data user shall keep and maintain a list of disclosures of personal data that have been or are being processed by a third party.

LIST OF DISCLOSURE

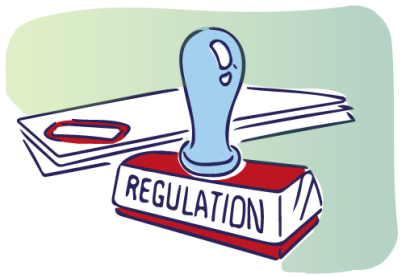
(The list may be reviewed/expanded from time to time)

NO.	THIRD PARTIES
1.	Close family member of Data Subject (Parents, Spouse, Siblings)
2.	Any person notified and authorized by the Data Subject
3	Federal Government or State Government requesting information from the Data User
4.	Financial institutions
5.	Agents/Contractors/Consultants/Vendors/External Auditors/Counsellors/Data Processor Appointed by the Data User
6.	Approved bodies where employees contributions are remitted: ▪ Social Security Organisation (SOCSO) ▪ Pusat Zakat ▪ Baitulmal ▪ Lembaga Tabung Haji ▪ Koperasi ▪ Employees Provident Fund (EPF)
7.	Any person/party appointed by the Data User to recover the outstanding debt of the Data User
8.	Merchants, VISA International Services Association, MasterCard International Incorporated and other card associations (in relation to credit cards issue to Data Subject) for the purpose of payment of electricity bill or other services of the Data User
9.	The parties that the Data User may transfer rights and obligations pursuant to the agreement endorsed with the Data Subject
10.	Panel doctors/clinics/hospitals pharmacist appointed by the Data User
11.	Panel lawyers/legal advisors appointed by the Data User
12.	Wholly owned subsidiaries of the Data User

Permitted disclosure under the law (Sec. 39)

Crime Prevention/ Detection

Law / Court orders



Regulatory functions

Public interest

Tax

Statistics/ Research

Journalistic

4- SECURITY (Sec.9)

Reasonable and practical measures to protect data from:

- **Loss**
- **Misuse**
- **Modification**
- **Destruction**
- **Accidental access/disclosure**

****No exemption for Security Principle****

Reasonable Steps

01 **WHAT**

- ✓ Paper
- ✓ Electronic

02 **WHERE**

- ✓ Secured environment
- ✓ Level of security

03 **WHEN**

- ✓ Sharing
- ✓ Portability
- ✓ Transfer
- ✓ Access

04 **HOW**

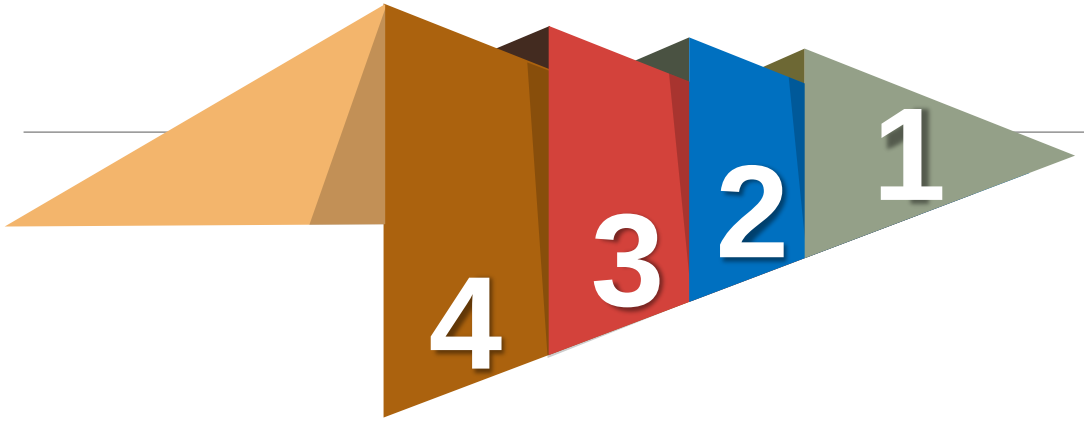
- ✓ Technical
- ✓ Policy/SOP
- ✓ Training

05 **WHO**

- ✓ Top Mgmt.
- ✓ Middle Mgmt.
- ✓ Personnel

Do's	Don'ts
✓Access Controls: ○ Keep paper files locked in cabinets ○ Activate a security system at high-risk location for theft or unauthorized access. ○ Limit access to computer systems or databases ○ Restrict access to sensitive documents ✓ Enhance data security: ○ Use reputable cloud computing services ○ Establish an incident management plan ○ Improve network security ○ Control the use of removable media devices ○ Encrypt data ○ Keeping devices secure ○ Keep passwords private	× Exposure: ○ Viewing or discussing personal information in public/online ○ Access to all personnel × Poor physical and ICT/cyber security practice: ○ Sharing log-in credentials with others ○ Poor Password Management ○ Poor Disaster Recovery/Backup solution ○ Use unreliable cloud provider ○ Devices left unattended/ unprotected

5- RETENTION (Sec.10)



1 WHAT?

Determine:

- **Period of data retention**
- **Nature of data**

(active, inactive, archival, electronic)

- **What records does your business need to keep?**

(Legal / regulatory requirement)

2 WHO?

Responsibilities:

- **Every personnel**
- **Every business unit**

3 WHEN?

Personal data should deleted at the end of retention period

- **Retention period should be reviewed if there is a need to keep them longer**

4 HOW?

Establish:

- **Retention policy**
- **Disposal schedule and Checklist**

Destruction:

- **Irreversible**
- **Secure**
- **Documented**

Disposal of records

01

Reasons for destruction

- To save time and cost of storage,
- To shift focus on the priority of the records
- To records from unauthorized access or loss
- To ensure accountability
- To meet legal requirements

02

Authorization

Seek approval prior to the disposal of records

03

Destruction methods

- For paper: shredding, pulping and burning sensitive documents
- Electronic/Digital: cutting, crushing, shredding reformatting

04

Documentation

- Keep a record of the documents which have been destroyed;
  - the description of documents
  - the disposal action taken
  - who authorized the disposal
  - who performed the disposal

05

Checklist

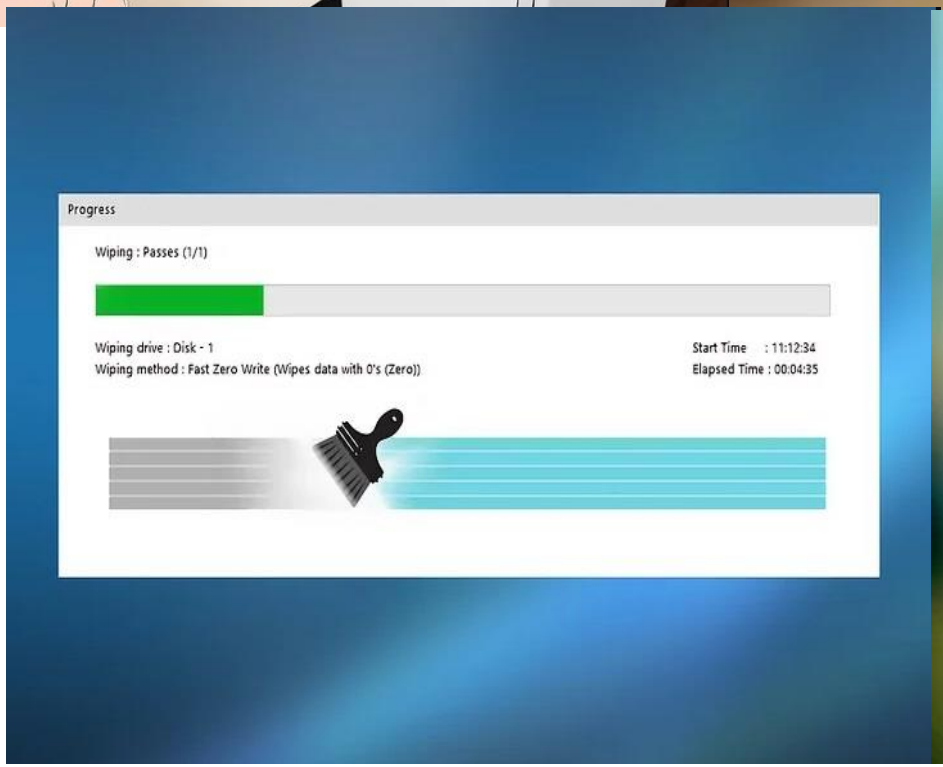
- ✓ The records have been approved for disposal
- ✓ Legal requirement/ administrative/ business purpose have been met
- ✓ The manner of destruction has been documented
- ✓ The means of destruction is appropriate

RETENTION AND DISPOSAL OF RECORDS

Retention And Disposal Schedule						
No.	**Types of Records**	**Descriptions**	**Retention Period**	**Legal/ Administrative Requirements**	**Disposal Action (Hardcopy and Softcopy files/Attachments)**	**Disposal Authority**
1.	Employee Files	-Employee Personal File -Potential candidate -Training records	7 years	-Limitation Act -HR policy	Delete after 7 years	-General Mgr -Assistant Mgr
2.	Financial Record -payroll -tax	-Employee pay histories -Salary ledger card/records -Copy of payroll sheets	9 Years	-Income Tax Act	Delete after 9 years	-General Mgr -Assistant Mgr -Accountant
3.	Attendance record	Staff and student	5 years	HR policy		
4.	Enquiry form		2 years	Customer service policy		

Outsourcing disposal activity

- ✓ Hire a reliable service provider which has
  - comprehensive security;
  - prioritizes safety, confidentiality and the environment.
- ✓ Ensure that destruction service is not limited to paper documents.
- ✓ All personal data in (electronic and non-electronic) must be disposed in a proper manner.
- ✓ Obtain certificate of destruction.



Source: Wiki How

6- DATA INTEGRITY (Sec.11)

Personal data in your possession must be accurate, complete, up-to-date and not misleading

Ensure that the information you want to update is authentic, accurate and correct

Avoid data tampering

Truthful
Accurate
Complete
Verifiable
Retrievable

7- ACCESS (Sec.12)

The right for data subject to access and correct his personal data

WHEN?

- Data access requests must be complied not later than 21 days

HOW?

- Provide forms for data subject (physical/online)

- Any request in writing is considered as a valid request, regardless of the format.

PERSONAL DATA ACCESS REQUEST FORM

SECTION 1: TO BE FILLED IN BY DATA SUBJECT

Full Name (as per NRIC):	
NRIC: (attach copy)	
Contact Number:	
Email address:	

I, hereby certify that the information given in this form and any documents submitted are true and accurate.

Signature: ..... Date: .....

SECTION 2: TO BE FILLED BY RELEVANT PERSON (if the request is made on behalf of data subject)

A: Particular of Data Subject	
Full Name (as per NRIC):	
NRIC: (attach copy)	
B: Particular of Relevant Person	
Full Name (as per NRIC):	
NRIC: (attach copy)	
Contact Number:	
Email address:	
Relationship with data subject:	

I, hereby certify that the information given in this form and any documents submitted are true and accurate.

I, hereby agreed that you may contact the Data Subject to verify my identity.

Signature: ..... Date: .....

SECTION 3: ACCESS OF PERSONAL DATA

Please provide a description of the personal data to be accessed

CHARGES

Do you need a copy of personal data? (tick ✓ in the relevant box) YES ☐ NO ☐

Access without copy		✓
General personal data	RM 2	
Sensitive personal data	RM 5	

Access with copy		✓
General personal data	RM 10	
Sensitive personal data	RM 30	

Common Security Breaches

01 Improper disposal of data

02 Unsecured data transfer

03 Overshare via Social Media

04 Accidental disclosure

Common refusal for compliance

"My business is too small"

"I have no idea where to start"

"Data security is too expensive"

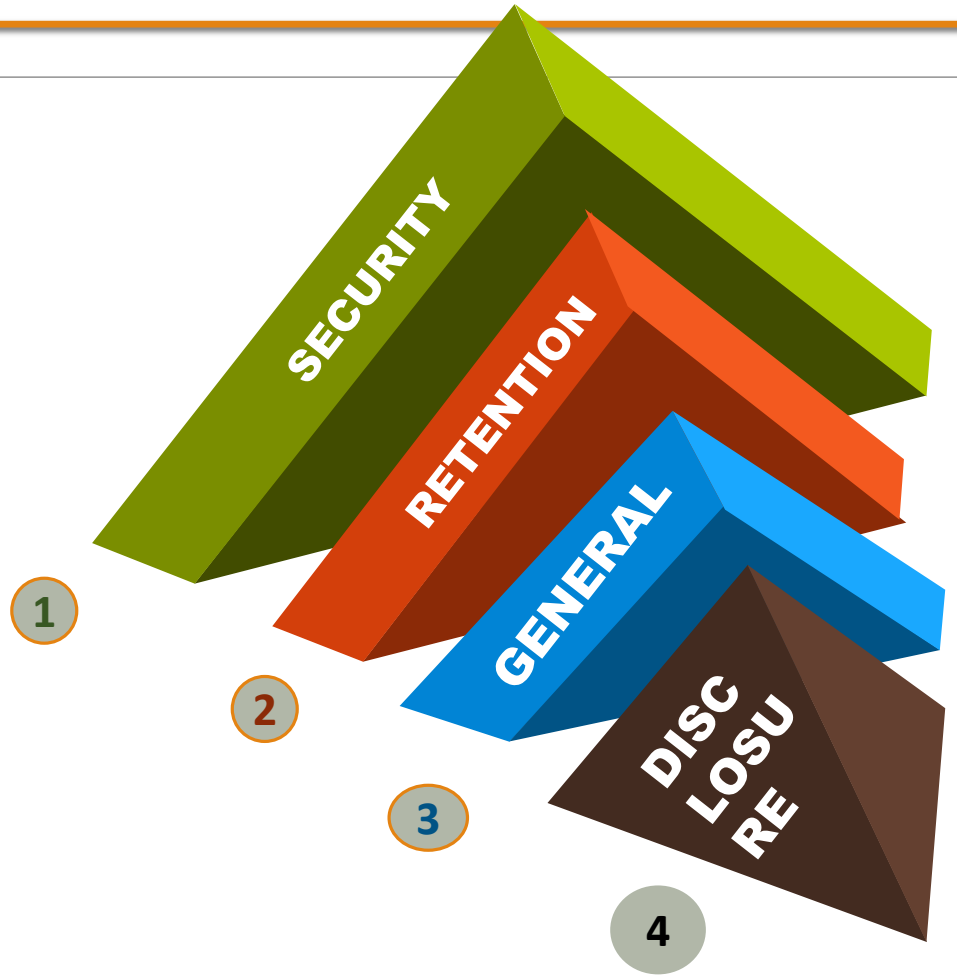
If you think compliance is expensive, try non-compliance.

Paul McNulty
Former US Deputy Attorney General

4. THE DO'S AND DON'TS

MOST BREACHED PRINCIPLES

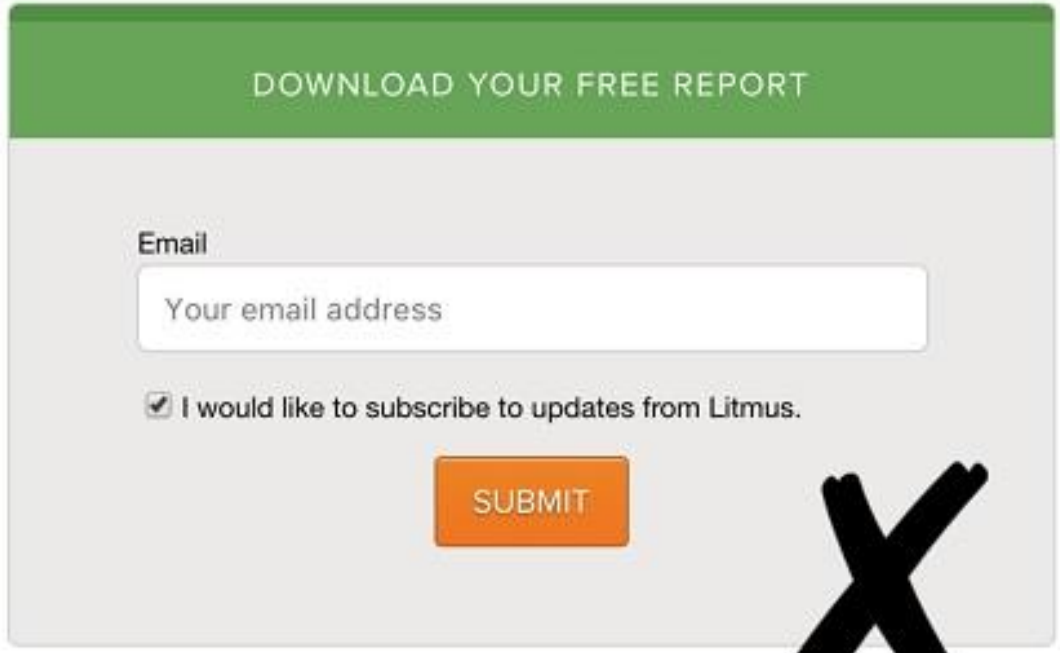
- Security
- Retention
- General
- Disclosure



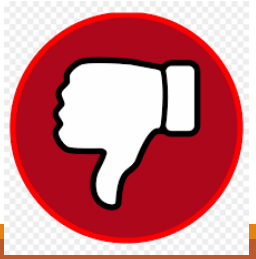
General Principle

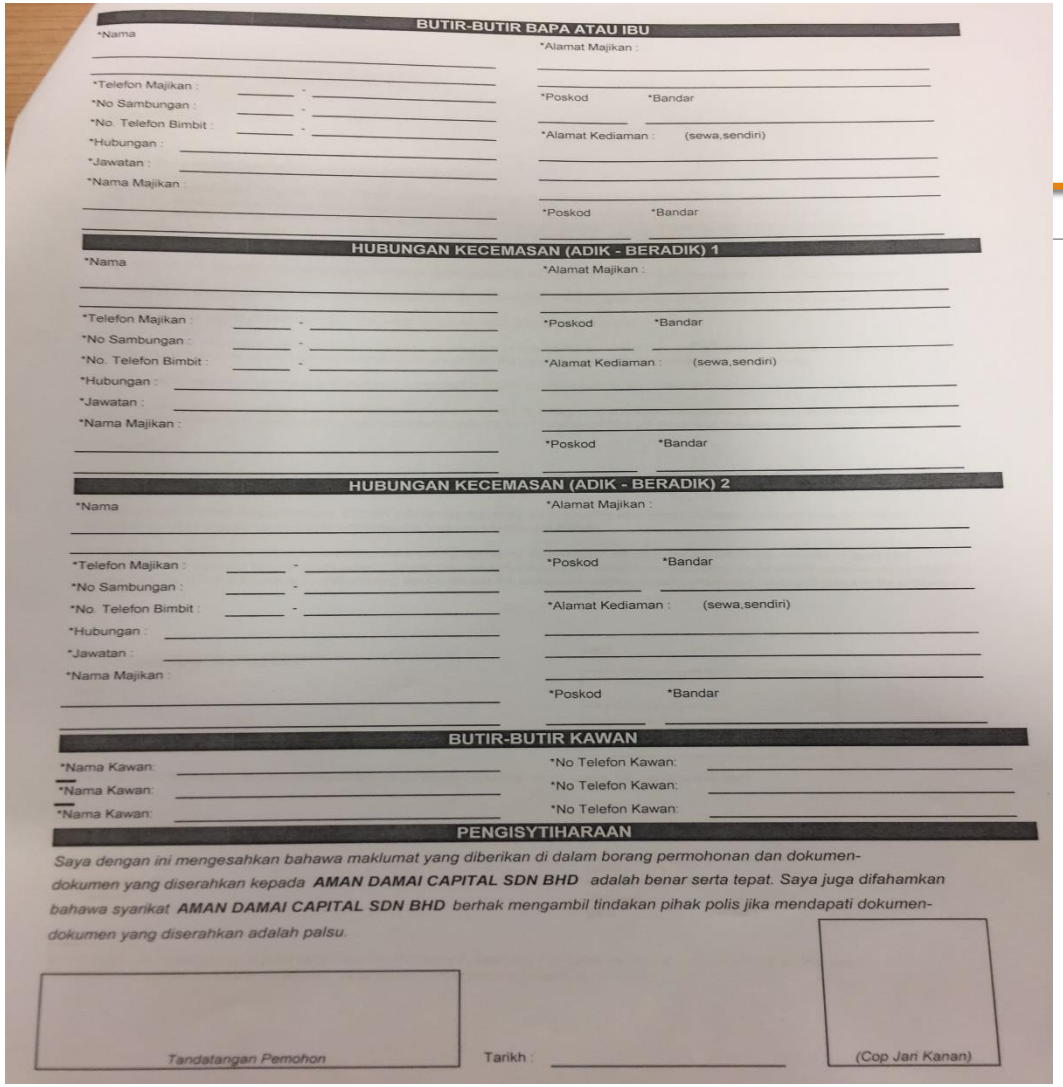
Don’ts

- ❑ Collect personal data excessively.
- ❑ Purposes of data collection is not clearly stated.
- ❑ Consent not recorded and maintained.
- ❑ Consent taken from person below 18.
- ❑ Pre-ticked consent by default (online).



Pre-ticked box





BUTIR-BUTIR BAPA ATAU IBU

*Nama
*Alamat Majikan :
*Telefon Majikan :
*No Sambungan :
*No. Telefon Bimbit :
*Hubungan :
*Jawatan :
*Nama Majikan :
*Poskod *Bandar
*Alamat Kediaman : (sewa,sendiri)
*Poskod *Bandar

HUBUNGAN KECEMASAN (ADIK - BERADIK) 1

*Nama
*Alamat Majikan :
*Telefon Majikan :
*No Sambungan :
*No. Telefon Bimbit :
*Hubungan :
*Jawatan :
*Nama Majikan :
*Poskod *Bandar
*Alamat Kediaman : (sewa,sendiri)
*Poskod *Bandar

HUBUNGAN KECEMASAN (ADIK - BERADIK) 2

*Nama
*Alamat Majikan :
*Telefon Majikan :
*No Sambungan :
*No. Telefon Bimbit :
*Hubungan :
*Jawatan :
*Nama Majikan :
*Poskod *Bandar
*Alamat Kediaman : (sewa,sendiri)
*Poskod *Bandar

BUTIR-BUTIR KAWAN

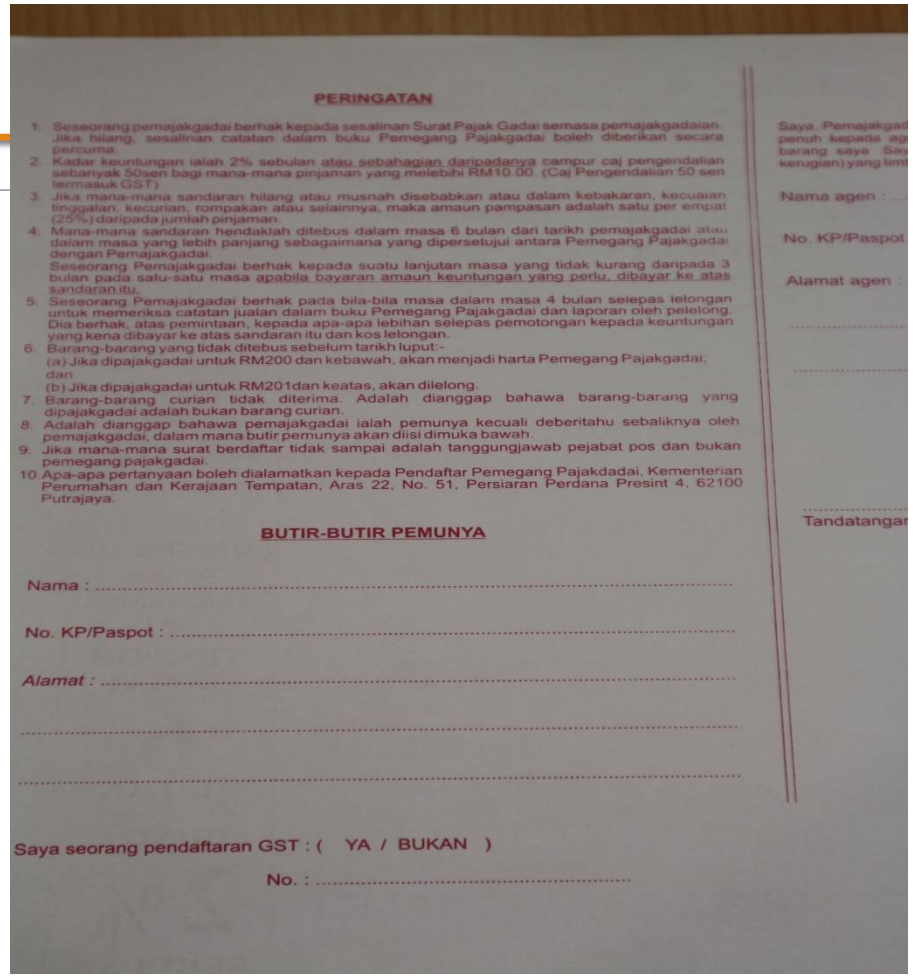
*Nama Kawan:
*Nama Kawan:
*Nama Kawan:
*No Telefon Kawan:
*No Telefon Kawan:
*No Telefon Kawan:

PENGISYTIHARAAN

*Saya dengan ini mengesahkan bahawa maklumat yang diberikan di dalam borang permohonan dan dokumen-dokumen yang diserahkan kepada **AMAN DAMAI CAPITAL SDN BHD** adalah benar serta tepat. Saya juga difahamkan bahawa syarikat **AMAN DAMAI CAPITAL SDN BHD** berhak mengambil tindakan pihak polis jika mendapati dokumen-dokumen yang diserahkan adalah palsu.*

Tandatangan Pemohon
Tarikh :
(Cop Jari Kanan)

Excessive data collection



PERINGATAN

1. Seseorang pemajakgadai berhak kepada sesalinan Surat Pajak Gadai semasa pemajakgadaian. Jika hilang, sesalinan catatan dalam buku Pemegang Pajakgadai boleh diberikan secara percuma.
2. Kadar keuntungan ialah 2% sebulan atau sebahagian daripadanya campur caj pengendalian sebanyak 50sen bagi mana-mana pinjaman yang melebihi RM10.00. (Caj Pengendalian 50 sen termasuk GST).
3. Jika mana-mana sandaran hilang atau musnah disebabkan atau dalam kebakaran, kecuaian tinggalan, kecurian, rompakan atau selainnya, maka amaun pampasan adalah satu per empat (25%) daripada jumlah pinjaman.
4. Mana-mana sandaran hendaklah ditebus dalam masa 6 bulan dari tarikh pemajakgadai atau dalam masa yang lebih panjang sebagaimana yang dipersetujui antara Pemegang Pajakgadai dengan Pemajakgadai.
   Seseorang Pemajakgadai berhak kepada suatu lanjutan masa yang tidak kurang daripada 3 bulan pada satu-satu masa apabila bayaran amaun keuntungan yang perlu dibayar ke atas sandaran itu.
5. Seseorang Pemajakgadai berhak pada bila-bila masa dalam masa 4 bulan selepas lelongan untuk memeriksa catatan jualan dalam buku Pemegang Pajakgadai dan laporan oleh pelelong. Dia berhak, atas pemintaan, kepada apa-apa lebihan selepas pemotongan kepada keuntungan yang kena dibayar ke atas sandaran itu dan kos lelongan.
6. Barang-barang yang tidak ditebus sebelum tarikh luput:-
   (a) Jika dipajakgadai untuk RM200 dan kebawah, akan menjadi harta Pemegang Pajakgadai; dan
   (b) Jika dipajakgadai untuk RM201dan keatas, akan dilelong.
7. Barang-barang curian tidak diterima. Adalah dianggap bahawa barang-barang yang dipajakgadai adalah bukan barang curian.
8. Adalah dianggap bahawa pemajakgadai ialah pemunya kecuali deberitahu sebaliknya oleh pemajakgadai, dalam mana butir pemunya akan diisi dimuka bawah.
9. Jika mana-mana surat berdaftar tidak sampai adalah tanggungjawab pejabat pos dan bukan pemegang pajakgadai.
10. Apa-apa pertanyaan boleh dialamatkan kepada Pendaftar Pemegang Pajakdadai, Kementerian Perumahan dan Kerajaan Tempatan, Aras 22, No. 51, Persiaran Perdana Presint 4, 62100 Putrajaya.

BUTIR-BUTIR PEMUNYA

Nama : .....

No. KP/Paspot : .....

Alamat : .....

.....

.....

Saya seorang pendaftaran GST : (YA / BUKAN)

No. : .....

Saya, Pemajakgad... penuh kepada ag... barang saya Sen... kerugian) yang tim...

Nama agen : ...

No. KP/Paspot ...

Alamat agen : ...

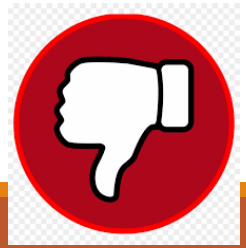
.....

.....

.....

Tandatangan ...

No consent clause



Do's

- ❑ **Consent clause is incorporated in data collection form.**
- ❑ **Data collection is not excessive and relevant with nature of business**

REGISTRATION FORM

		ARRIVAL DATE	DEPARTURE DATE	ROOM NO.
NO. OF GUEST	ROOM TYPE	ROOM RATE	CONFIRMATION NO.	

GUEST NAME MR / MRS / MISS	NATIONALITY
GUEST ADDRESS	PASSPORT / I.C. NO.
	DATE & PLACE OF ISSUE
COMPANY NAME	DATE OF BIRTH
BUSINESS ADDRESS	OCCUPATION / PROFESSION
	BILLING ACCT NO.

INSTRUCTIONS

☐ CREDIT CARD ☐ CAR REGISTRATION NO. RECEPTIONIST

NOTICE TO GUEST

a. Check out time : 12:00 noon
b. Your complete address is required by law under the Hotel Licensing Regulation.
c. Under section 4 of the Inn Keepers Ordinance No. 16 of 1952, the Hotel will not be held responsible for any valuables or money left by Guests in thier rooms. Safe Deposit Boxes are available for use to Hotel Guests at no extra charge.

PRIVACY STATEMENT

Pursuant to the Personal Data Protection Act 2010 of Malaysia that came into force on 15 November 2013, we will process your personal data in accordance with our Personal Data Protection Notice which can be viewed at www.nilaisprings.com.my. We are committed to ensuring that your personal data is handles with care. If you do not respond to us within seven (7) days upon signing this registration form, we will take it that you have consented to the processing of your personal data as set out in the Notice.

I agree that I am personally liable for the payment of the following statement and if the person, company or association indicated by me as responsible for payment of the same does not do so, that my liability for such payment shall be joint & several with such person, company or association. I agree that I am liable to pay RM 20.00 should I fail to return the room key to the reception counter.

GUEST'S SIGNATURE

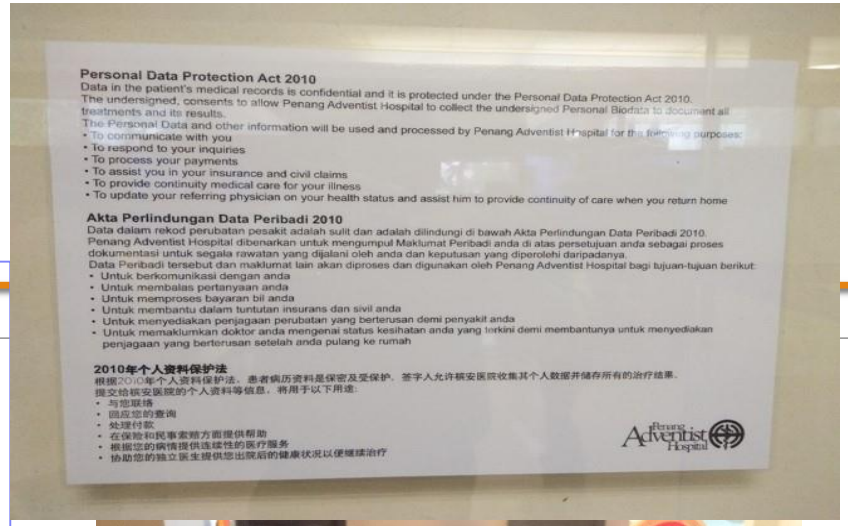
Notice and Choice

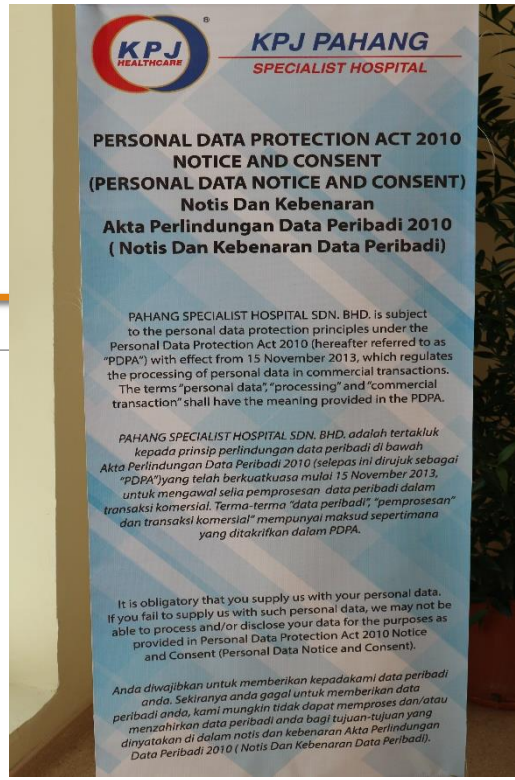
Don’ts

- **Privacy notice not available on premise/website.**
- **Privacy notice is placed at inappropriate location such as hallway, not in public’s view.**

Do's

- ❑ Client friendly
- ❑ Understandable
- ❑ Readable
- ❑ Accessible to public





Praiseworthy efforts

Disclosure List

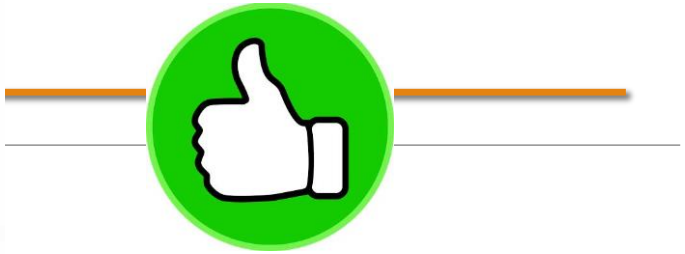
- Consists of all the relevant third parties that company is serving or dealing with in which involves the circulation of clients' personal data.
- Keep track data movement and monitor the third party that handle your data.
- Facilitates investigation and protects your interest.

Appendix V

LIST OF DISCLOSURES

(This Appendix is not intended to be exhaustive but may be amended from time to time as approved by the PDP Commissioner)

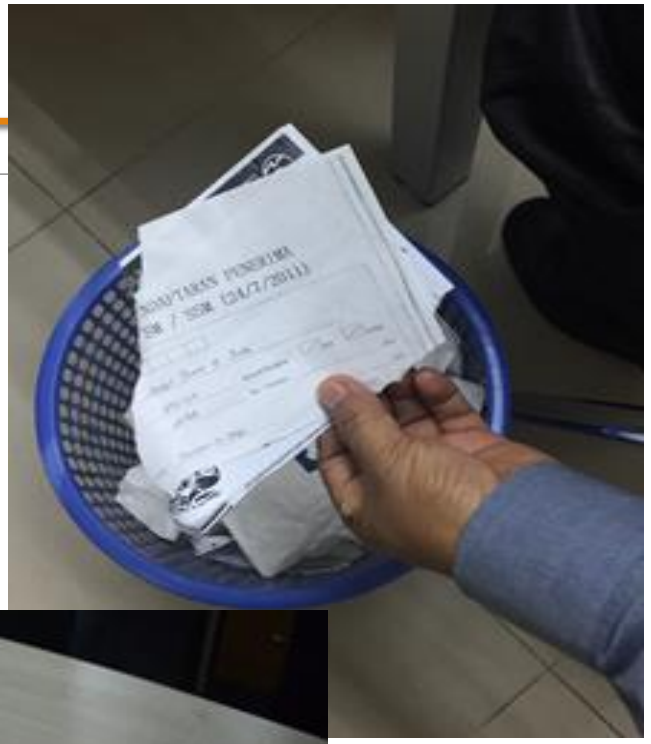
NO.	THIRD PARTIES
1.	Financial institutions, merchants, VISA International Services Association, MasterCard International Incorporated and other card associations (in relation to credit cards issue to Data Subject) for the purpose of payment of electricity bill or other services of the Data User
2.	Postal providers which provide postal services to the Data User
3.	Telecommunication providers which provides telecommunication services to the Data User
4.	Service providers which assist the Data User in processing the services that the Data User requested
5.	Agents/ contractors/ consultants/ vendors/ external auditors/ counsellor/ data processor appointed by the Data User
6.	Approved bodies where employees contributions are remitted: • Social Security Organisation (SOCSO) • Baitulmal • Pusat Zakat • Lembaga Tabung Haji • Yayasan Pembangunan Ekonomi Islam Malaysia (YaPEIM) • Employees Provident Fund (EPF) • Koperasi Wawasan Pekerja-Pekerja Berhad (KOWAJA) • Koperasi TNB • Insurer/ Broker
7.	Close family members of Data Subject: • Father • Mother • Husband • Wife • Siblings

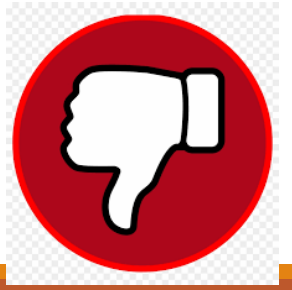


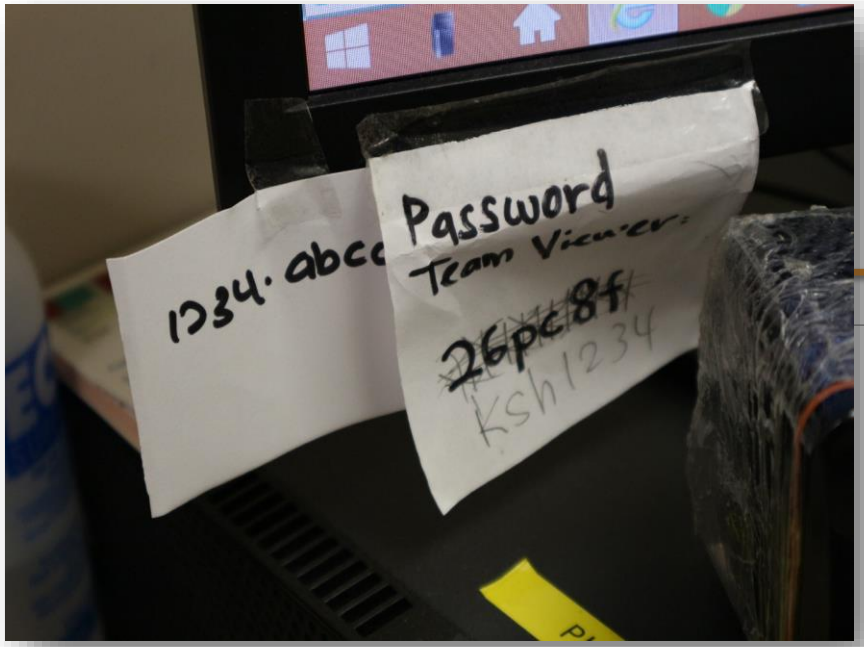
TNB provides a comprehensive disclosure list in the COP

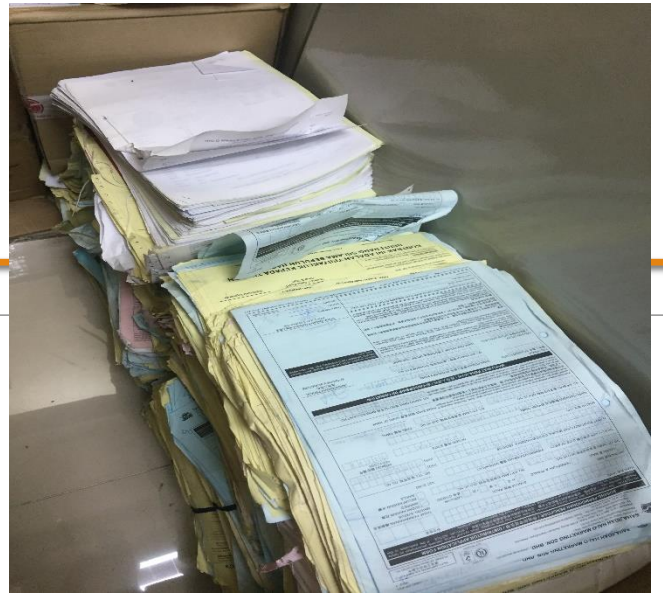
Security

- Documents containing personal data are placed at inappropriate location
- Documents are exposed, not properly kept.
- Malfunctioned CCTV.
- Documents are not properly disposed.
- Passwords to computer log in system are exposed and shared with colleagues.





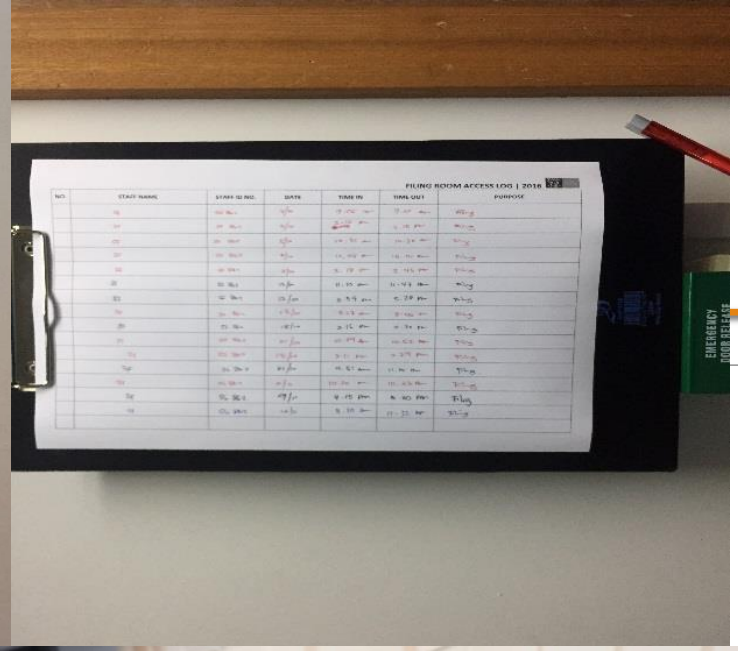

1234. abc
Password
Team Viewer:
26pc8f
Ksh1234




DEBIT NOTE

Do's

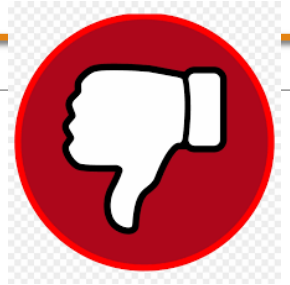
- ❑ Access control is well established and practiced.
- ❑ ID and Password management is well established and maintained.
- ❑ Documents are kept at secure locations/databases.

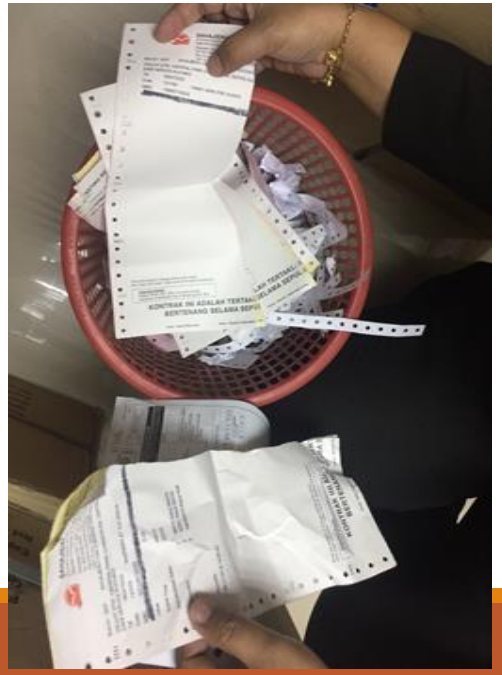


Retention

Don’ts

- Improper storage of business contracts and financial documents.
- Improper use of storage cabinets.
- No policy on data retention & disposal.
- Cabinets used to store items other than documents.





Do's

- All documents containing personal data are stored at secure location.
- A good practice of record disposal is well demonstrated

RETENTION & DISPOSAL SCHEDULE FOR RECORDS OF

NO.	DESCRIPTION	RECOMMENDED MINIMUM RETENTION PERIOD	DISPOSAL ACTION *(HARD COPY AND SOFT COPY OF FORMS AND/ OR ATTACHMENTS)*
20.	ENQUIRY FORMS	2 years after date of submission	Destroy all forms and/ or attachments in 2015 at the end of 2017
21.	SPECIAL NEEDS SUPPORT	2 years after date of completion of service	Destroy all forms and/ or attachments in 2015 at the end of 2017
22.	CAREER COUNSELLING	2 years after date of last contact	Destroy all forms and/ or attachments in 2015 at the end of 2017
23.	TRAININGS/ WORKSHOPS ADMINISTRATION	2 years after administrative use has concluded	Destroy all forms and/ or attachments in 2015 at the end of 2017
24.	ATTENDANCE RECORDS	2 years after completion of unit of study	Destroy all forms and/ or attachments in 2015 at the end of 2017

Access Request

PUBLIC BANK
PUBLIC ISLAMIC BANK

GENERAL INFORMATION, cont.

Processing Fee

- A processing fee which will depend on the type of request being made as per Table 1 below, is payable and should be submitted with this form.

Table 1:

Item	Type of Data Access Request (DAR)	Fees (RM)
1	DAR for Data Subject's personal data with a copy	10
2	DAR for Data Subject's personal data without a copy	2
3	DAR for Data Subject's sensitive personal data** with a copy	30
4	DAR for Data Subject's sensitive personal data** without a copy	5

Note: For statement requests, the Bank will advise the Requestor on the prevailing fees other than those stated under Table 1.

Contact Us

- If you have any queries or require any guidance in completing this form, you may contact any of our branch Officers or our Customer Service Department at 1-800-22-5555.

** Sensitive personal data encompasses sensitive personal information which relates to information relating to your health, political opinion, religious beliefs or other beliefs of a similar nature and the commission or alleged commission of an offence.

SECTION 1A: DATA SUBJECT
(To be completed by a Data Subject making this data access request)

I am a customer of Public Bank Berhad/Public Islamic Bank Berhad* and I would like to access my personal data.

Data Subject's Particulars

Name of Individual Customer : _____

IC/Passport* No. : _____

CIS No. : _____ *(for Bank use only)*

Mailing Address : _____

_____ Postcode: _____

Telephone No. (House) : _____

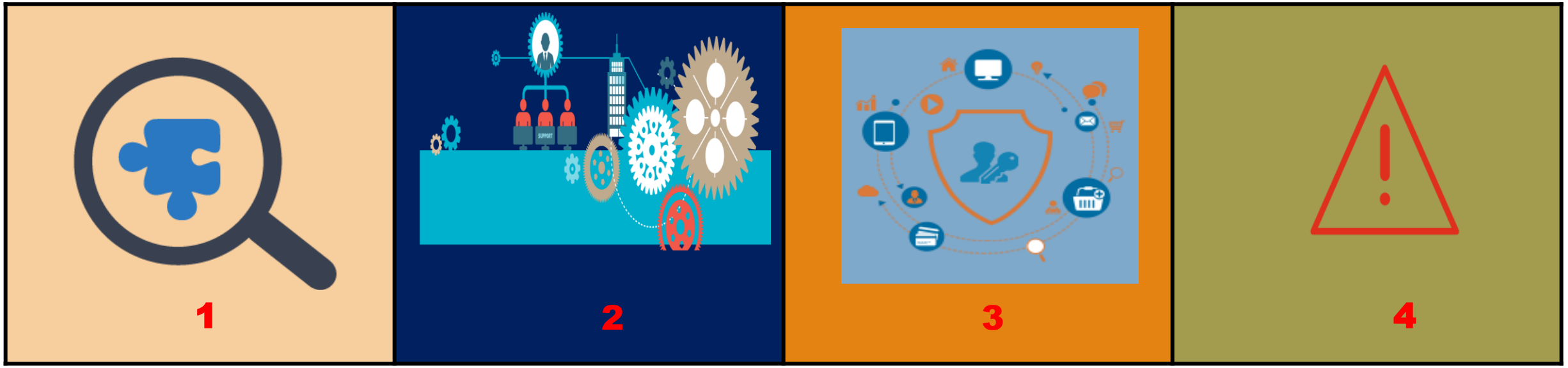
Telephone No. (Office) : _____

Mobile Phone No. : _____

Praiseworthy efforts by Public Bank

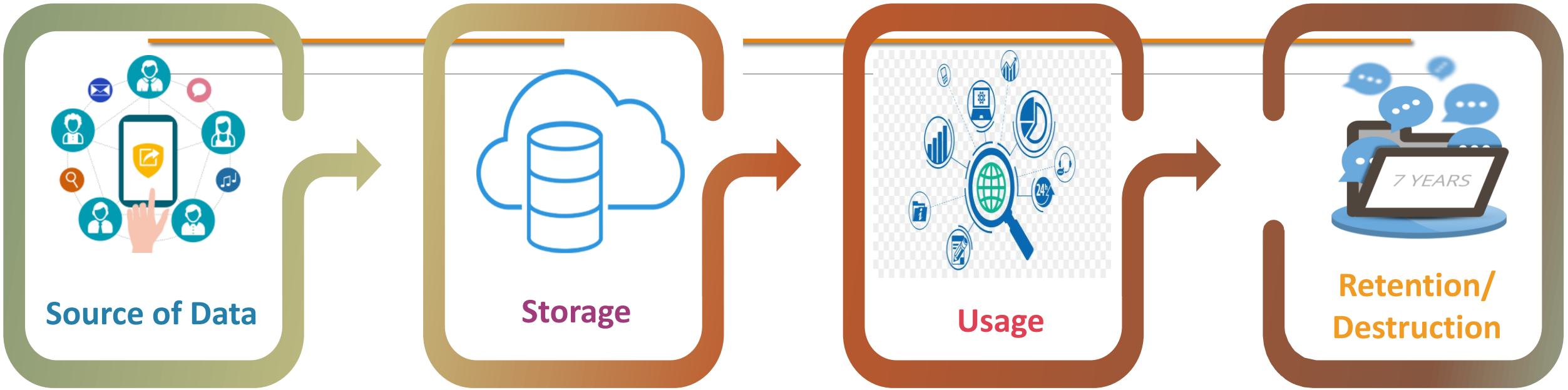
5. CONCLUSION

Business continuity



1. Identify source of personal data and where those data are located.
2. Govern how personal data is used and accessed.
3. Implement security controls to minimize risk.
4. Establish a Disaster / Incident Response Plan.

Personal Data Governance



- Data subject
- Online
- 3rd party

- Structured databases
- Physical storage
- Backup system
- Cloud

- In applications/system
- By employees/marketers
- Shared with 3rd Parties

- Archive
- Destruction

IDENTIFY **PROTECT** **CONTROL** **PLAN**

Thank you