



SIMPLIFYING LOGISTICS PAYMENT

## **D&D CONTROL (M) SDN. BHD.**

# PRIVACY POLICY

Version	:	1.1
Date	:	20/11/2025

*NOTE : Please refer to our website for the latest version of this document. Any other copies are considered UNCONTROLLED.*

**Version History**

<b>Version</b>	<b>Date</b>	<b>Description of Amendments</b>	<b>Author</b>
1.0	24/10/2025	Initial copy	Firdaus
1.1	20/11/2025	First amendment	Firdaus

## Table of Contents

<b>SECTION A: POLICY OVERVIEW .....</b>	<b>1</b>
1.0 Overview .....	1
2.0 Purpose.....	1
3.0 Scope .....	2
4.0 Definition .....	3
5.0 Continuous Improvement.....	4
<b>SECTION B: PRIVACY POLICY.....</b>	<b>5</b>
6.0 Collection of Personal Data .....	5
7.0 Reasons for Collecting and Handling Your Personal Data .....	6
8.0 Implications of Not Consenting to this Policy .....	8
9.0 Disclosure of Your Personal Data .....	8
10.0 Accuracy of Your Personal Data .....	9
11.0 Your Rights.....	9
12.0 Retention of Your Personal Data.....	10
13.0 Security of Your Personal Data .....	10
14.0 Personal Data About Minors and Others.....	11
15.0 Transfer of Your Personal Data Outside Malaysia.....	11
16.0 Website .....	11
17.0 Our Contact Information .....	12

## SECTION A: POLICY OVERVIEW

### 1.0 Overview

Safeguarding the Privacy and Personal Data of all individuals, including Directors, Employees, and Business Associates, is D&D's top priority. The protection of Personal Data is both a legal obligation and a fundamental component in maintaining trust and confidence with all stakeholders.

D&D must comply with The Personal Data Protection Act (PDPA) 2010 and other applicable data protection regulations. Accordingly, this Privacy Policy was created in accordance with these requirements, and outlines on how D&D collects, uses, processes, stores and protects the Personal Data.

D&D is very committed in adopting the best practices in handling the Personal Data from every level of D&D's operation. This policy, which covers all Personal Data processed by D&D in any format, such as electronic, paper-based, or verbal, which reflects D&D commitment to upholding individual rights and properly protecting data.

### 2.0 Purpose

This policy mostly aims to create a consistent framework for D&D's Personal Data management and protection. This legislation seeks to:

- a) Verify adherence to relevant international standards including the Malaysian PDPA 2010 and other pertinent data security regulations;
- b) Communicate to internal and external stakeholder on how their Personal Data is collected, used, processed, kept and stored;
- c) Protect Personal Data against illegal access, loss, use, alteration, or disclosure;
- d) Encourage among Directors, Employees, and Business Associates a culture of privacy and security consciousness;

- e) Outlining the roles and responsibilities of the data owner to ensure that Personal Data is processed fairly, transparently, securely, and in accordance with applicable law;
- f) Giving Directors, Employees, and Business Associates a suitable way to exercise their rights, including the ability to view or update their Personal Data; and
- g) Upholding the highest standards of confidentiality and data integrity by exhibiting organisational commitment and accountability.

By complying with this policy, D&D maintains its legal and ethical commitments and enhances its standing as a trustworthy and accountable company.

### 3.0 Scope

This Privacy Policy applies to all D&D Directors, Employees and Business Associates (collectively referred as “**you**”), as defined in the table below.

#### 4.0 Definition

Below is the definition of the terms used in this policy:

Term Used	Definition
<b>Directors</b>	Any member of the D&D Board of Directors, whether in an executive or non-executive role.
<b>Employees</b>	Anyone who works for D&D, whether full-time, part-time, under contract, or temporarily. This includes management staff, administrative staff, technical staff, interns, and anyone directly supervised by the company.
<b>Business Associates</b>	Any external party with a business relationship to D&D. This comprises, but is not restricted to, customers, contractors, consultants, agents, service providers, partners, vendors, and other outside parties hired to work with, carry out tasks, or deliver products on the business's behalf.
<b>Personal Data</b>	Any information that can be used to identify a specific person, whether directly or indirectly. Some of the data examples in identifying a person are names, addresses, identification numbers, contact details, financial information, employment records.
<b>Sensitive Personal Data</b>	Information about an individual that reveals their racial or ethnic origin, political opinions, religious or philosophical beliefs, health, or criminal record that normally a person will not publicly share.
<b>Processing</b>	Any operation or set of operations performed on Personal Data, whether automated or manual, including collection, recording, storage, retrieval, use, disclosure, transfer, and deletion.
<b>Third Party</b>	Any individual or entity, external to D&D, that may be authorized to access or process Personal Data on behalf of the company under contractual agreements.

<b>Consent</b>	The voluntary, specific, and informed agreement by the data subject for D&D to process their Personal Data for stated purposes.
<b>Data Protection Officer (DPO)</b>	An individual formally appointed by an organization to oversee, advise, and ensure compliance with data protection and privacy laws. The DPO acts as the main point of contact for all matters related to personal data protection, which both for internal stakeholders (directors, management, employees) and external parties (customers, regulators, or data subjects).

## 5.0 Continuous Improvement

D&D is dedicated to regularly enhancing its policies and procedures regarding privacy policy. Any amendments will be posted on the website. Directors, Employees, and Business Associates are encouraged to access the latest version of the policy via aforementioned channel.

## SECTION B: PRIVACY POLICY

### 6.0 Collection of Personal Data

The purpose of data we collect will determine the specific type of Personal Data and the Personal Data Processing also will include some activities, such as collecting, recording, storing, maintaining, utilizing or sharing the data.

We may collect your Personal Data during interactions or engagements with us, regardless of the method or context of communication. Additionally, we may gather your Personal Data from diverse sources, including but not limited to participation in events, seminars, exhibitions, surveys, or other activities organized or sponsored by us, as well as from publicly accessible platforms. The following are illustrative examples of how we may collect Personal Data:

- Registering your information via our website, portal or applications;
- Submitting purchase orders, requests, or applications for products or services (in-person, over the phone, by post, or electronically);
- Engaging with our customer service representatives or communicating directly with employees at our office about products and services (via email, phone, mail, or other channels);
- Business services (invoice & payment processing, CLA scheme management, container tracking etc.) alongside Partnerships & Academic Collaborations;
- Participating in transactions such as payment or financial transactions, and credit or debit note;
- Subscribing to membership programs such as Container Ledger Account (CLA) scheme;
- Completing surveys or contributing to research activities; and
- Providing information during the hiring process, including forms completed for recruitment and selection purposes or information provided by referees you designate.

Besides, we may obtain, store, and process your Personal Data provided by third parties, such as credit reference agencies, regulatory bodies, or enforcement authorities. This may occur for purposes such as fulfilling our services, meeting contractual obligations, or ensuring compliance with legal and regulatory frameworks.

## 7.0 Reasons for Collecting and Handling Your Personal Data

The Personal Data you provide to us or that we gather from you or other sources, as required to achieve the purposes specified when the data was collected, may be processed for the following objectives (collectively referred to as the “**Purposes**”):

- To establish and maintain communication with you;
- To strengthen and enhance customer relationships;
- To evaluate, process, and deliver products, services, and/or facilities to you;
- To manage and process payments related to the requested products, services, and/or facilities;
- To confirm your identity and verify your background;
- To address your inquiries or complaints and resolve disputes that may arise from interactions with us;
- To share updates or information about our products, services, promotions, and events, either directly or through selected third parties, that may interest you;
- To support your involvement in and our management of events, including contests, campaigns, etc;
- To maintain and update internal records;
- To send seasonal greeting messages periodically;
- To invite you to participate in events, promotions, or product launches;
- To assess, enhance, and refine our products, services, events, and promotional activities;
- To conduct credit assessments and verify creditworthiness, when necessary, for providing products, services, or facilities;
- To manage and formalize your commercial transactions with us (e.g., tender awards or service contracts);
- To process payments linked to your transactions with us;
- To analyse your Personal Data individually or collectively with others;

- To perform market research, surveys, and customer behaviour analysis for strategic planning and trend studies;
- To share your Personal Data with auditors for internal audit and reporting purposes;
- To disclose your Personal Data under agreements or contracts you have entered with us for legal or financial advice or initiating legal actions;
- To share your Personal Data with business or joint venture partners to develop new products, services, or marketing campaigns;
- To provide your Personal Data to insurance providers for obtaining necessary policies;
- To share your Personal Data with financial institutions for securing required credit facilities;
- For risk management, security audits, and related purposes;
- To detect, investigate, and prevent fraudulent, unauthorized, or illegal activities;
- To fulfil our responsibilities and enforce our rights under existing agreements or contracts;
- To transfer or assign rights, interests, and obligations under agreements with us;
- To meet legal or regulatory obligations and disclose information as required by applicable laws, regulations, court orders, or guidelines;
- To enforce and protect both our rights and your rights under relevant laws and regulations;
- To perform background checks and verifications as part of recruitment processes for employment applications with us; and
- For any additional purposes necessary to operate, maintain, and effectively manage our business relationship with you, as specified at the time of obtaining your consent.

You agree and consent to our use and processing of your Personal Data for the purposes outlined in this Policy. If you object to us processing your Personal Data for any of the stated purposes, please contact us using the detail listed in Clause 17.

## 8.0 Implications of Not Consenting to this Policy

Providing your Personal Data to us may be either mandatory or voluntary, depending on the stated purposes. If it is compulsory for you to supply your Personal Data and you fail to do so, choose not to provide it, or do not agree with this Policy, we may be unable to deliver the products or services requested ideally or engage in further interactions with you.

## 9.0 Disclosure of Your Personal Data

We do not sell, rent, transfer, or share your Personal Data with any third party without your consent. However, your Personal Data may be shared with the following parties for one or more of the stated purposes:

- Our branches in Malaysia or internationally;
- Immediate family members and/or emergency contacts notified to us;
- Successors in title to our business;
- Individuals bound by confidentiality obligations who assist in fulfilling our commitments to you;
- Entities involved in legal proceedings or potential disputes;
- Auditors, consultants, lawyers, accountants, or other professional advisors working under confidentiality agreements;
- Designated entities for the creation of shared databases where legitimate interests align;
- Data centres and servers, either within or outside Malaysia, for storage or related purposes;
- Payment platforms, including financial institutions, for verifying and processing payments related to your transactions;
- Government agencies, regulatory bodies, courts, ministries, and other authorities, as required by laws, regulations, or legal orders;
- Business partners, vendors, contractors, and agents providing services or products connected to our operations, such as IT companies, call centres, logistics providers, and insurers;

- Government agencies and financial institutions for processing financing/loan application and securing credit facilities or policies if needed;
- Credit card organizations and merchants involved in your transactions;
- The public, for instance, if you win a contest, where your details may be published for publicity;
- Employment or credit agencies during recruitment processes; and
- Third parties involved in mergers, acquisitions, reorganization, or asset sales related to our business.

By providing your consent, you acknowledge that such disclosures and transfers may occur to ensure our business operations and compliance with the stated purposes.

#### **10.0 Accuracy of Your Personal Data**

We endeavour in ensuring your Personal Data is accurate, complete, up to date and reliable. Thus, your cooperation in achieving this is highly appreciated. You may:

- Confirm that all provided Personal Data is accurate, up-to-date, and complete, without omitting any material details, to enable us to offer relevant products, services, or facilities; and
- Notify us promptly of any changes to your Personal Data to maintain its accuracy and relevance.

#### **11.0 Your Rights**

You are entitled, subject to the exceptions outlined in the PDPA, to:

- Request access to or obtain a copy of your Personal Data;
- Update or correct your Personal Data held by us;

- Request limitations on processing or usage of your Personal Data, such as opting out of marketing communications;
- Withdraw, wholly or partially, your consent for us to process your data, subject to legal, contractual, and operational considerations.

Please note, withdrawal of consent may impact your relationship with us or the continuity of services.

## **12.0 Retention of Your Personal Data**

Your Personal Data is retained only for as long as necessary to fulfil the purposes for which it was collected. It will be securely disposed of once it is no longer required unless a longer retention period is mandated for operational, legal, or regulatory compliance.

## **13.0 Security of Your Personal Data**

We are committed to safeguarding your Personal Data through technical, physical, electronic, and procedural security measures in compliance with applicable laws and industry standards. While we take reasonable precautions, communications over the Internet, such as emails, may not always be secure. Unauthorized access or loss beyond our control cannot be completely prevented.

#### **14.0 Personal Data About Minors and Others**

If you provide Personal Data about family members, dependents, or minors, you confirm that you have explained the implications and obtained their consent. For minors or those unable to provide legal consent, you represent their interests and consent on their behalf.

#### **15.0 Transfer of Your Personal Data Outside Malaysia**

Our data storage systems and servers may be located outside Malaysia, and your Personal Data may be transferred to entities in jurisdictions with varying levels of data protection. By providing your consent, you permit these transfers, and we will take reasonable steps to protect your data's privacy and confidentiality.

#### **16.0 Website**

External Links:

- Links to other websites are not governed by this policy, and we are not responsible for their content or practices;
- Personal Data shared directly with third-party partners will be subject to their privacy policies; and
- We recommend reviewing the privacy policies of external websites before sharing any Personal Data.

## 17.0 Our Contact Information

If you need to reach out to us regarding your Personal Data or have any concerns, we kindly request that you allow us the chance to address and resolve the matter first by getting in touch with us through the contact details provided below:

Position : Data Protection Officer (DPO)  
Address: : D&D Control (M) Sdn. Bhd.  
109 – 111, Persiaran Pegaga  
Taman Bayu Perdana, 41200,  
Klang, Selangor.  
Tel. No. : 03 – 3853 0300  
Email Address: : [dpo@dnd.com.my](mailto:dpo@dnd.com.my)

For any other compliance or governance-related matters, you may also reach out to our Compliance Officer at [compliance@dnd.com.my](mailto:compliance@dnd.com.my) .

**- End of document -**