

GREENBYTE IT & MARKETING CONSULTANCY-GBTECH PRIVACY POLICY

Compliant with Malaysia Personal Data Protection Act 2010 (Act 709)

Effective Date: 10 September 2025

Last Updated: 10 September 2025

Registration Number: [TBA]

1.0 INTRODUCTION

GreenByte IT & Marketing Consultancy-GBTECH ("Company," "we," "our," or "us") is committed to protecting your personal data in compliance with the Personal Data Protection Act 2010 (Act 709) of Malaysia ("PDPA") and its amendments. This Privacy Policy explains how we collect, process, use, disclose, store, and protect your personal data when you visit our website [INSERT WEBSITE URL] and use our services.

By accessing or using our website and services, you acknowledge that you have read, understood, and agree to be bound by this Privacy Policy and consent to the processing of your personal data as described herein.

Our Commitment: We adhere to the seven (7) Personal Data Protection Principles under the PDPA:

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

2.0 DEFINITIONS

For the purpose of this Privacy Policy:

- **"Personal Data"** means any information in respect of commercial transactions which relates directly or indirectly to a data subject, who is identified or identifiable from that information or from that and other information in the possession of a data user
- **"Data Subject"** means an individual who is the subject of the personal data
- **"Data User"** means a person who either alone or jointly or in common with other persons processes any personal data or has control over or authorizes the processing of any personal data (GreenByte IT & Marketing Consultancy-GBTECH acts as a data user)
- **"Processing"** means collecting, recording, holding or storing personal data or carrying out any operation or set of operations on personal data
- **"Sensitive Personal Data"** includes personal data consisting of information as to physical or mental health, political opinions, religious beliefs, criminal convictions, and other categories specified under the PDPA

3.0 PERSONAL DATA WE COLLECT

3.1 Types of Personal Data Collected

We may collect the following categories of personal data:

Identification Data:

- Full name (as per NRIC/passport)
- Identity card number (NRIC)/passport number
- Date of birth
- Nationality and place of birth
- Photographs and images

Contact Information:

- Residential and correspondence addresses
- Telephone and mobile phone numbers
- Email addresses
- Emergency contact details

Business and Professional Data:

- Company name and registration details
- Job title and employment details
- Business address and contact information
- Professional qualifications and certifications
- Work experience and resume information

Financial and Commercial Data:

- Bank account details
- Credit card information (processed securely)
- Transaction history and payment records
- Billing and invoicing information
- Tax identification numbers

Technical and Usage Data:

- IP address and device identifiers
- Browser type and version
- Operating system and device information
- Website usage patterns and preferences
- Cookies and similar tracking technologies

Communications Data:

- Correspondence records
- Customer service interactions
- Survey responses and feedback
- Marketing preferences

3.2 Sensitive Personal Data

We may collect sensitive personal data only with your explicit written consent, including:

- Health information (if relevant to our services)
- Criminal background check results (where legally required)
- Religious or philosophical beliefs (if voluntarily provided)

4.0 HOW WE COLLECT YOUR PERSONAL DATA

4.1 Direct Collection

- Registration forms and applications
- Communication with our customer service
- Surveys, feedback forms, and questionnaires
- Business cards and networking events
- Direct interactions during service provision

4.2 Automatic Collection

- Website cookies and tracking technologies
- Server logs and analytics tools
- Mobile applications and software
- CCTV recordings at our premises

4.3 Third-Party Sources

- Public directories and databases
- Business partners and associates
- Government agencies and regulatory bodies
- Credit reporting agencies (with consent)
- Social media platforms (publicly available information)

5.0 PURPOSES OF PROCESSING PERSONAL DATA

We process your personal data for the following lawful purposes under Section 6.0 of the PDPA:

5.1 Primary Purposes (Notice and Choice Principle)

- **Service Provision:** Delivering our products and services to you
- **Account Management:** Creating and maintaining your account
- **Transaction Processing:** Processing payments and managing orders
- **Customer Support:** Responding to inquiries and providing assistance
- **Communication:** Sending service-related notifications and updates

5.2 Secondary Purposes (with consent or as permitted by law)

- **Marketing and Promotion:** Sending promotional materials and newsletters
- **Business Development:** Improving our services and developing new products
- **Research and Analytics:** Conducting market research and data analysis
- **Compliance:** Meeting legal and regulatory obligations
- **Security:** Protecting against fraud and unauthorized access

5.3 Legal Obligations

Processing required to comply with:

- Companies Commission of Malaysia requirements
- Tax obligations under Inland Revenue Board
- Anti-money laundering regulations
- Court orders and legal proceedings
- Regulatory requirements of relevant authorities

6.0 CONSENT AND LAWFUL BASIS FOR PROCESSING

6.1 Consent Requirements

Under the PDPA, we must not process personal data unless written consent has been given by the data subject. We obtain your consent through:

- Electronic consent forms on our website
- Written consent in service agreements
- Opt-in checkboxes for marketing communications
- Explicit consent for sensitive personal data

6.2 Withdrawal of Consent

You may withdraw your consent at any time by:

- Contacting our Data Protection Officer
- Using unsubscribe links in marketing emails
- Updating your account preferences
- Sending written notice to our registered address

6.3 Processing Without Consent

We may process personal data without consent where:

- Required by law or court order
- Necessary to protect vital interests of data subject
- Processing is in the public interest
- Necessary for legitimate interests (balanced against your privacy rights)

7.0 DISCLOSURE OF PERSONAL DATA (DISCLOSURE PRINCIPLE)

7.1 Permitted Disclosures

We may disclose your personal data to the following third parties:

Service Providers and Business Partners:

- IT service providers and cloud hosting companies
- Payment processors and financial institutions
- Professional service providers (legal, accounting, audit)
- Marketing and advertising agencies
- Logistics and delivery companies

Government and Regulatory Authorities:

- Personal Data Protection Department (JPDP)
- Companies Commission of Malaysia (SSM)
- Inland Revenue Board of Malaysia (LHDN)
- Royal Malaysia Police (where required by law)
- Bank Negara Malaysia (for financial services)

Corporate Transactions:

- In connection with mergers, acquisitions, or business sales
- To potential investors or business partners (with anonymization where possible)
- Professional advisors in corporate restructuring

7.2 Cross-Border Data Transfers

We may transfer your personal data outside Malaysia to countries that may not have equivalent data protection laws. Such transfers will only be made:

- With your explicit consent
- To countries with adequate data protection standards
- With appropriate safeguards and contractual protections
- As required or permitted under the PDPA

8.0 DATA SECURITY (SECURITY PRINCIPLE)

When processing personal data, we are required to take practical steps to protect the personal data from any loss, misuse, modification, unauthorized or accidental access or disclosure, alteration or destruction. Our security measures include:

8.1 Technical Safeguards

- Encryption of personal data in transit and at rest
- Secure network protocols and firewalls
- Multi-factor authentication systems
- Regular security vulnerability assessments
- Secure backup and disaster recovery procedures

8.2 Organizational Safeguards

- Staff training on data protection requirements
- Access controls and authorization procedures
- Confidentiality agreements for employees and contractors
- Regular review of data protection policies
- Incident response and breach notification procedures

8.3 Physical Security

- Restricted access to premises and data storage areas
- CCTV monitoring and visitor management systems
- Secure disposal of documents containing personal data
- Locked filing systems for physical records

9.0 DATA RETENTION (RETENTION PRINCIPLE)

9.1 Retention Periods

We retain your personal data only for as long as necessary to fulfill the purposes for which it was collected, unless:

- A longer retention period is required by Malaysian law
- You have consented to longer retention
- Retention is necessary for legal proceedings

Specific Retention Periods:

- Customer account data: 7 years after account closure
- Financial and tax records: 7 years as required by tax laws
- Employment records: 7 years after employment termination
- Marketing data: Until consent is withdrawn plus 1 year
- Website analytics: 2 years from collection
- CCTV recordings: 30 days (unless required for investigation)

9.2 Secure Disposal

When personal data is no longer required, we ensure secure disposal through:

- Secure deletion from electronic systems
- Physical destruction of paper documents
- Degaussing or destruction of storage media
- Certification of destruction where required

10.0 DATA INTEGRITY PRINCIPLE

We take reasonable steps to ensure that personal data is accurate, complete, not misleading, and kept up-to-date. This includes:

- Regular data verification and validation procedures
- Providing mechanisms for you to update your information
- Correcting inaccurate data upon notification
- Implementing data quality controls and checks
- Regular audits of data accuracy and completeness

11.0 YOUR RIGHTS (ACCESS PRINCIPLE)

Under the Access Principle, you have the right to access your personal data held by us and to correct your data so that it is up-to-date. Your rights include:

11.1 Right of Access

You may request:

- Confirmation of whether we hold your personal data
- A copy of your personal data in our possession
- Information about how we process your personal data
- Details of third parties to whom your data has been disclosed

11.2 Right to Correction

You may request correction of your personal data if it is:

- Inaccurate or misleading
- Incomplete or out-of-date
- Not relevant to the purpose of processing

11.3 Right to Withdraw Consent

You may withdraw your consent to processing at any time, subject to:

- Legal obligations requiring continued processing
- Legitimate interests in continuing processing
- Contractual obligations that require the data

11.4 Right to Complain

You have the right to lodge a complaint with:

- Our Data Protection Officer
- Personal Data Protection Department (JPDP)
- Any other relevant regulatory authority

11.5 Exercising Your Rights

To exercise your rights, please submit a written request to our Data Protection Officer. We may require verification of your identity and will respond within thirty (30) days as required under the PDPA.

12.0 DATA BREACH NOTIFICATION

Effective 1 June 2025, we are required to notify the Personal Data Protection Commissioner of any personal data breach that causes or is likely to cause significant harm to affected individuals. We will report any data breaches to the Personal Data Protection Department (JPDP) within 72 hours.

12.1 Breach Response Procedures

In the event of a data breach, we will:

- Immediately assess the scope and impact of the breach
- Contain the breach to prevent further unauthorized access
- Notify the JPDP within the required timeframe
- Notify affected data subjects if there is a risk of significant harm
- Implement remedial measures to prevent future breaches
- Cooperate fully with regulatory investigations

13.0 COOKIES AND TRACKING TECHNOLOGIES

13.1 Types of Cookies

Our website uses cookies and similar technologies:

Essential Cookies:

- Session management and authentication
- Shopping cart and transaction processing
- Security and fraud prevention

Analytics Cookies:

- Website usage statistics
- Performance monitoring
- User behavior analysis

Marketing Cookies:

- Personalized advertising
- Social media integration
- Conversion tracking

13.2 Cookie Consent

We obtain your consent before placing non-essential cookies on your device. You can manage cookie preferences through your browser settings or our cookie preference center.

14.0 DATA PROTECTION OFFICER

Registration for Data Protection Officers became mandatory starting from 1 June 2025. Our designated Data Protection Officer is responsible for:

- Monitoring compliance with the PDPA
- Conducting privacy impact assessments
- Serving as the point of contact for data protection inquiries
- Providing training and guidance on data protection matters
- Liaising with the Personal Data Protection Department

Contact Information: Data Protection Officer

GREENBYTE IT & MARKETING CONSULTANCY-GBTECH

Unit 2-1, Level 2, The Podium, Tower 3, UOA Business Park, Jalan Pengaturcara U1/51, Kawasan Perindustrian Temasya, 40150 Shah Alam, Selangor

Email: support@gbtech.my

Phone: +60176545057

15.0 CONTACT INFORMATION

For any questions, concerns, or requests regarding this Privacy Policy or our data protection practices, please contact:

GREENBYTE IT & MARKETING CONSULTANCY-GBTECH

Unit 2-1, Level 2, The Podium, Tower 3, UOA Business Park, Jalan Pengaturcara U1/51, Kawasan Perindustrian Temasya, 40150 Shah Alam, Selangor

Email: support@gbtech.my

Phone: +60176545057

Business Registration: **SSM No: 202303252648**

Personal Data Protection Department (JPDP):

Level 6, Block 2K

Cyber 4, 63000 Cyberjaya

Selangor Darul Ehsan

Tel: 03-8800 7000

Email: pdp@kkmm.gov.my

Website: www.pdp.gov.my

16.0 UPDATES TO THIS PRIVACY POLICY

We may update this Privacy Policy from time to time to reflect changes in our practices, technology, or legal requirements. Material changes will be communicated through:

- Prominent notice on our website
- Email notification to registered users
- Direct communication for significant changes
- Publication of updated policy with clear effective date

Continued use of our services after policy updates constitutes acceptance of the revised terms.

17.0 GOVERNING LAW

This Privacy Policy is governed by the laws of Malaysia, including:

- Personal Data Protection Act 2010 (Act 709)
- Communications and Multimedia Act 1998
- Computer Crimes Act 1997
- Electronic Commerce Act 2006
- Other applicable Malaysian legislation

18.0 SEVERABILITY

If any provision of this Privacy Policy is found to be unenforceable or invalid, such provision shall be limited or eliminated to the minimum extent necessary so that this Privacy Policy shall otherwise remain in full force and effect.

This Privacy Policy is effective as of 10 September 2025 and was last updated on 10 September 2025

PDPA Registration Number: [TBA]

**Company Registration Number: GREENBYTE IT & MARKETING CONSULTANCY ENTERPRISE (GBTECH)
(SSM No: 202303252648)**