

Privacy Policy

KOKUYO International (MALAYSIA) Sdn. Bhd. (hereinafter referred to as “we”, “us”, and/or “our”) is committed to respecting and protecting the personal data and privacy of customers and collaborators.

This Privacy Policy (hereinafter referred to as "this Policy") stipulates the methods by which we collect, store, and process personal data of individuals including, but not limited to, customers, our employees, collaborators (which will be subsequently defined), and the public at large, in accordance with Personal Data Protection Act 2010 (as amended from time to time, and all subsidiary legislation, guidelines, standards, and codes of practice issued thereunder) (hereinafter referred to as "PDPA") and Malaysian laws. In this Policy, the terms “personal data”, “collection”, “disclosure”, “processing” and other similar terms, have the same meaning as defined in the PDPA and the corresponding regulations, standards, guidelines, notifications, and practices issued thereunder.

In the event that you provide us with personal data or continue to access our website, which shall include <https://www.kokuyo.com/>, <https://www.kokuyo-furniture.com.my/>, and any other webpages, subdomains, or linked sites operated under or associated with the **KOKUYO Group** (“Website”), you shall be deemed to have read and understood this Policy and agree that we will process your personal data in accordance with the methods set forth in this Policy.

1. Collection of personal data
In accordance with the PDPA, we hereby issue this Policy to all our valued customers (including potential customers), our collaborators, and our employees, where applicable. You may be required to provide personal data that is to be collected, used, and processed by us to provide goods and/or services to you as a customer, or in the event you are providing to us goods and/or services as a collaborator, or enquiries on potential collaborations, or in the course of your employment with us.
2. Purpose of collecting personal data
 - (1) In the event that you are a customer (or potential customer), your personal data is collected by us to the extent required or permitted by law, processed for the following purposes which include but may not be limited to, the following:
 - (a) To communicate for the provision of our goods and services, the means of communication shall include, but not be limited to, telephone, e-mail, mail, SMS messages, social media and, other similar means.
 - (b) To enter into agreements necessary for you to purchase goods and/or services from us, and the execution of our duties under those agreements;
 - (c) To communicate with you about products, services, promotions, advertising, marketing and materials of interest to you;
 - (d) To provide proposals and guidance on customer-specific personalized products and/or services to improve customer experience;
 - (e) To enable third parties to contact you that are affiliated with us for advertising, promotion and marketing campaigns conducted by said third parties;
 - (f) To improve our products and services;
 - (g) For marketing analysis and client profiling of services;
 - (h) For the purpose of maintaining and managing customer records and development;
 - (i) For credit evaluation, financial and background checks;
 - (j) For the prevention and detection of crimes including, but not limited to, the prevention, detection and prosecution of money laundering, terrorism and fraud;
 - (k) For internal investigation, audit or security purposes; and
 - (l) To comply with laws, regulations, regulations, ordinances, orders, guidelines and directives issued by the authorities or issued by the authorities concerned.
 - (2) In the event that you are a collaborator (such as vendors, suppliers, tenants, service providers, or other third parties that collaborate with us in terms of the operations and/or management of our

business), your personal data, to the extent required or permitted by law, is collected by us and processed for the purposes, including but not limited to, the following:

- (a) For the control and performance of commercial transactions;
- (b) For the management and execution of our contractual obligations towards you;
- (c) For credit evaluation, financial and background checks;
- (d) For processing credit account applications;
- (e) For processing payments related to your business transactions;
- (f) For internal investigation, audit or security purposes; and
- (g) To comply with our legal and regulatory obligations in the conduct of our business.

- (3) In the event that you are an employee (or a potential applicant of employment with us), your personal data is collected by us to the extent required or permitted by law, processed for the following purposes which include but may not be limited to, the following:

- (a) maintaining employment records and staff directory;
- (b) communicating with our employees, and administering and managing our employment relationship with employees;
- (c) assessing, appraising, and monitoring work performance and attendance;
- (d) generating employment-related reports, records and statistics;
- (e) engaging in disciplinary and grievance proceedings;
- (f) conducting investigations, assessments and any follow-up actions arising from reports made under our Whistleblowing Policy and Procedures (“Whistleblowing Policy”)
- (g) administering salaries, bonuses, rewards, training and development, and other benefits;
- (h) managing holidays, absentees, and leave days;
- (i) facilitating management decisions;
- (j) administering workplace schemes and initiatives;
- (k) administering adjustment at the workplace to accommodate any disabilities or employees with special needs;
- (l) assessing fitness to work;
- (m) dealing with legal disputes involving employees and contractors, including accidents at work, fraud and employment disputes;
- (n) complying with the relevant health and safety obligations;
- (o) to monitor business communications and use of our information and communication systems, including logs of email and other business system usage;
- (p) to conduct data analytics studies to review and better understand employee retention and attrition rates;
- (q) analyzing workspace usage and working styles to support the improvement and development of space planning services, new workplace-related services, and initiatives aimed at enhancing employees’ individual working styles and overall working environment;
- (r) providing employee references to potential or future employers; and/or
- (s) all other matters incidental or relating to the employment with us as we deem necessary or appropriate.

- (4) We may change the purposes of use as described above in the event of reasonable and relevant requirements catering to the purpose of the original use. In such a situation, we will notify the affected customers, employees and/or collaborators in advance and obtain the permission regarding the change in the terms concerning the usage of personal data on the Website or other platforms such as via e-mail or paper correspondences.

3. Source of personal data

- (1) The personal data we collect, process and use will be collected from mainly, but not exclusively, the following sources:
- (a) Any agreements with our customers concerning our goods and/or services, or with regard to our collaborators, agreements pertaining to goods and/or services by them to us;
 - (b) Formal information request forms provided to you by our employees or agents;
 - (c) E-mail or communication received on information requests or inquiries by customers or collaborators, where applicable;

- (d) Forms submitted by you on our Website;
 - (e) When registering for our newsletter or other promotional material;
 - (f) Business cards and other documents provided to our employees, agents, brokers and related parties;
 - (g) Various documents submitted to us for processing (including but not limited to forms, questionnaires, and financial documents, if necessary) via electronic or physical means;
 - (h) reports, or information provided through our whistleblowing channels;
 - (i) Cookie on our website. Cookies are text files that are placed in the memory of your computer or device by our computer. A copy of this text file is sent each time your computer or device communicates with our server. If you want to disable these cookies; change the browser settings. However, disabling cookies may render all features of our Website unavailable and may also render our Website inaccessible; and
 - (j) In the event that you are an employee, we and/or our third-party service providers may collect your personal data in the form of your resume provided to us by you or on your behalf (for example by a recruitment agency), interviews during the vetting process during the job application stage, and/or over the course of employment with us (including but not limited to internal communications or communications with a third party).
- (2) In no event will we illegally collect or illegally purchase personal data or obtain it commercially through the purchase or transaction of such personal data.
4. Contents of personal data
- (1) Personal data includes, but is not limited to, the following information:
- (a) Name;
 - (b) Date of Birth and age;
 - (c) Address;
 - (d) Telephone Number;
 - (e) Mail address;
 - (f) Gender;
 - (g) Nationality;
 - (h) Place of Work and Position;
 - (i) National Registration Identification Card Number;
 - (j) Passport number;
 - (k) Income;
 - (l) Asset status;
 - (m) Marital status;
 - (n) Images and recorded data recorded by video;
 - (o) Computerized technical information (IP address, computer operating system, web browser, among others); and
 - (p) Other related information.
- (2) In addition to the above, in the event that you are an employee (or a potential applicant of employment with us), personal data may also include the following information:
- (a) Bank account details;
 - (b) Previous employment details and history of an employee;
 - (c) Professional membership details and training certificates (if applicable);
 - (d) Reference details;
 - (e) Medical information, physical or mental health condition;
 - (f) Information regarding the commission or alleged commission of any offence or proceedings for any offence committed or alleged to have been committed by an employee;
 - (g) Details of communications (whether internally or with a third party) during the line of duty; and/or
 - (h) Any other forms or types of personal data to which is necessary for the execution of our duties as employers.

- (3) We will not process any sensitive personal data, which consists of information as to the physical or mental health or condition of a data subject, his political opinions, his religious beliefs or other beliefs of a similar nature, the commission or alleged commission by him of any offence biometric data (e.g. facial recognition, finger print, iris scan) or any other personal data as the Minister may determine by order published in the *Gazette*. Please note that by providing consent to us on the processing of your personal data based on this Policy, you have also explicitly, unequivocally provided to us the consent for us to process your sensitive personal data based on the terms as stipulated herein.
5. Mandatory processing of personal data
- (1) Please note that all personal data provided to us is for the execution of the purposes as stipulated in this Policy.
- (2) In the event that you do not provide us with the necessary personal data and/or the consent in processing the same is limited or withdrawn, we may not be able to adhere to any of our obligations that we have towards you.
6. Disclosure of personal data
- (1) Personal data that is provided to us may be processed by us and our affiliated third parties (whether in Malaysia or abroad).
- (2) Such affiliated third parties shall include, but not limited to the following:
- (a) Any third party for whom we are required by law or at the request of any competent authority or governmental agency to disclose
 - (b) Our related entities within the KOKUYO Group, including our parent company, sister companies and subsidiaries as listed on <https://www.kokuyo.com/en/about/group/> ;
 - (c) Our business partners, banks and financial institutions that we have business relationships with pertaining to the execution of the purposes;
 - (d) Third parties that provide services to us in the course of our business, such as marketing, research and advertising;
 - (e) Law enforcement agencies, government agencies and statutory authorities;
 - (f) Auditors, consultants, accountants, attorneys at law, or other financial or professional advisers, among others, that were appointed by us; and
 - (g) Third party real estate management companies or organizations that we liaise and/or collaborate with in relation to the services that we provide to our customers.
- You will be informed in advance of any changes within the parameters of disclosure of the aforementioned affiliated third parties.
- (3) Please be informed that affiliated third parties may be established in countries that may not offer the level of data protection which is equivalent to the law in Malaysia. You hereby clearly give us permission to transfer and store your personal data to any place within and outside Malaysia. However, we will always strive to ensure that all third parties outside Malaysia will not use or process your personal data other than for the intended purposes and in accordance with the Policy and while upholding the confidentiality and privacy of your personal data properly.
7. Retention
- Your personal data provided to us will be retained as long as it is necessary for the execution the purposes herein. We shall destroy your personal data from our records and systems in accordance with the relevant rules and regulations, in the event that your personal data is no longer needed for the purposes of this Policy.
8. Security
- We take all reasonable steps to ensure that your personal data is kept confidential and secure and strive to take appropriate controls, security measures, policies and procedures to prevent the unauthorized and illegal processing of your personal data and the accidental loss, destruction or damage to your personal data. However, while care is taken to protect your personal data, no data transmission is guaranteed as totally and definitely secure. Accordingly, we cannot ensure the absolute security of any information you send to us or receive from us.

9. Access, modification and portability of personal data
- (1) You have the right to access and modify the personal data provided to us as the subject of the data, and you may request the following:
- (a) Correcting inaccurate, incomplete, or non-current personal data;
 - (b) Access to your personal data that is under our care;
 - (c) Advise on the rules and procedures for processing the provided personal data;
 - (d) Stop processing personal data (including but not limited to marketing purposes);
 - (e) Restricting the processing of your personal data;
 - (f) To withdraw any consent previously given to us (in whole or in part) in accordance with any applicable legal restrictions, terms and conditions and a reasonable period of time during which the withdrawal of consent becomes effective; and/ or
 - (g) Data portability, whereby you may request that your personal data be provided to you or transmitted to another data controller in a structured, commonly used and machine readable format, where technically feasible and legally feasible subject to a notice in writing given to us via electronic means in the manner provided in Paragraph 9(2) below
- (2) Please contact us for inquiries, requests regarding access, modification, portability or deletion of personal data, personal data handled by us, and information regarding this Policy based on the following particulars:

Contact information

KOKUYO International (MALAYSIA) Sdn. Bhd.

Address: E-31-08, Menara Suezcap 2, KL Gateway, No. 2, Jalan Kerinchi, Gerbang Kerinchi Lestari, 59200 Kuala Lumpur

Contact information: Sharon Chan

Telephone number: +60 12 210 6859

E-mail address: sharon_chan@kokuyo.com

- (3) We will take reasonable steps to ensure that the information we hold is accurate, complete and up to date. To assist us in doing this, please provide us with the correct information and inform us if there are changes to your personal data based on the information above.
- (4) We may charge an administrative fee for the processing of such amendments. In any event, you are responsible for ensuring that the personal data you provide is accurate, complete and not misleading and that such personal data is kept up to date. Failure to provide the same may result in difficulty in observing our obligations to you.
- (5) Notwithstanding the above and the rest of the Policy, we reserve the right to reject an application for access, withdrawal, restriction and/or amendments of personal data, if granting access to you may be a risk to your privacy, such access is deemed illegal, or the circumstances in which the rights of others may also be interrupted or jeopardized. We also reserve such rights of rejection in the event that we are not provided enough information or evidence to proceed with such application by you.
10. Personal data of minors
- We will not intentionally collect personal data from individuals under the age of 18. If you are under 18 years of age, please obtain the consent of your parents or legal guardians before you provide us with your personal data. If it is found that personal data was collected from a child under the age of 18 without the unequivocal consent of the parent or legal guardian, we shall immediately delete such information.
- If you suspect that we may have personal data under the age of 18 without the consent of your parents or legal guardians, please contact us.
11. Revision
- We may amend this Policy at any time and we may publish or notify the amended or revised Policy on our Website or by e-mail. The revised Policy shall prevail over all versions. You are responsible for reviewing the current version from time to time. Your continued relationship with us following such publication shall constitute your acceptance of the revised Policy.

This policy is also published in Bahasa Malaysia, and if there is a conflict between the English and Bahasa Malaysia versions, the English version shall prevail.

12. Third party links

In the course of using the Website or perusing physical documents printed by us, you may encounter links to websites or contact details belonging to other parties which are owned or operated by other parties. These third-party sites have separate and independent privacy policies. As such, we are not responsible for information on, or the privacy practices of, such parties.

Established on 15th day of December in 2025