

# 01. Privacy & Data Protection

### Overview

CelcomDigi prioritises data protection and security to ensure employees' and customers' personal data are safe and secure. Our data privacy strategy incorporates strong governance around strengthening of privacy controls and in driving a responsible business culture, supported by continuous awareness on safe privacy practices and information management.

CelcomDigi's Privacy Policy provides guidance on practices that prioritise trust, transparency, and accountability in managing and handling personal data throughout our value chain. We engage with various stakeholders to understand and address emerging regulations and future-proof our day-to-day data management practices. Other referencing documents include:

- i. Business Partner Management Policy and Manual
- ii. Risk Management Policy and Manual
- iii. Privacy Manual
- iv. Privacy Incident Management SOP
- v. Enterprise Data Governance Policy and Manual

We regularly review and update the Privacy Notice and present it in a simplified infographic format to keep customers informed on how CelcomDigi collects, uses, and shares information.

#### **Our Response**

- Implementing organisation-wide programmes and targeted training to enhance employee awareness and knowledge of data privacy and protection
- Conducting regular scrutiny and data protection impact assessments by dedicated privacy and security teams to improve current measures in CelcomDigi's processes, systems, and infrastructure
- Implementing a Privacy Control Framework with defined control requirements and procedures for data life cycle management
- Enhancing our Privacy Notice by disclosing the purposes and uses of our customers' personal data and regularly reviewing relevance in accordance with privacy regulations

#### How do we handle a privacy breach?

The Privacy Incident Management SOP sets out mandatory requirements and guidance to manage any arising privacy incidents. This applies to all CelcomDigi personnel, including business partners who are processing personal data for and on behalf of CelcomDigi. The SOP establishes the roles and responsibilities of organisational functions that will form the Incident Response Team ("IRT") and Crisis Management Team ("CMT"), including procedures to assess the severity and the corresponding response plans.

[Registration No. 199701009694(425190-X)]



## Mitigating actions include:

- Containing the incident with corrective actions
- Timely communication to affected parties and relevant authorities
- Post incident assessment and identification of improvement plans (Review of the causes of the incidents, assess the effectiveness of the response, and identifying requirements for changes to systems, policies, and procedures)