

PERSONAL DATA PROTECTION NOTICE

FOR JOB APPLICANTS & RECRUITMENT-RELATED

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Navigation Panel

Introduction	Types of Personal Data Collected	How is the Personal Data Collected	Purposes of Personal Data
Disclosure & International Transfer of Personal Data	Automated Decision Making	Your Choices & Rights	How do we secure & protect your personal data?
How long is the personal data kept?	Updates to this Notice	Contact Us	

1. Introduction

- 1.1. Your personal data rights are important to **Novugen**. That is why we have designed this Personal Data Protection Notice (“**Notice**”) to provide transparency on how we process certain information that can be used to identify you (also known as “**personal data**”) in compliance with the Malaysia Personal Data Protection Act 2010 (“**PDPA**”) when you apply for a job opportunity with us.

Please note that in this Notice:

- ▶ “we”, “us”, or “our” refers to Novugen entity with which you had, have or will have a contractual relationship or that otherwise decides which of your data are collected and how they are used. If you are uncertain which Novugen entity is processing your personal data, please contact **Novugen Pharma Sdn Bhd** in [\[Contact Us\]](#).
- ▶ reference to “process” or “processing” generally means any operations done on the personal data, such as collection, use, storage, retention, or disclosure. Please refer to [\[Types of Personal Data Collected\]](#) below for more details on the type of personal data that we process.

IMPORTANT! Please read this Notice carefully because by applying for a job opportunity with us, you are agreeing and consenting to us processing personal data in accordance with this Notice, and you represent and warrant to us that:

- ▶ personal data that you provided to us is accurate and complete, and you have not knowingly omitted any related information of an adverse nature. Providing any inaccurate, misleading or falsified information will make you ineligible for employment, or revocation or termination of contract for cases in which offer was issued; and
- ▶ in event you are disclosing personal data of another person to us (e.g. your referees or emergency contacts) that you have provided a copy of this Notice to such other person, and you were authorized by such other person to disclose such personal data to us, and that such personal data is accurate, up-to-date, and complete.

PLEASE DO NOT PROVIDE US WITH PERSONAL DATA IF YOU DISAGREE TO THIS NOTICE.

- 1.2. **Additional Consent.** Please note that this Notice does not replace any other consents you may have previously or separately provided to us in respect of your personal data. Your consent to this Notice is in addition to any other rights which we may have at law to process your personal data.
- 1.3. **Supplement Notice.** This Notice may be supplemented by supplementary notices for specific interactions, products, services, or jurisdiction. Please refer to our [\[Privacy Center\]](#) for more information.
- 1.4. **Additional languages.** This Notice is further available in other languages. Please refer to our [\[Privacy Center\]](#) for more information. In the event of any conflict, inconsistency or ambiguity between the English text of this Notice and other language translation thereof, the English text shall prevail.
- 1.5. **Third-Party links.** If you are visiting or applying for job opportunity through our website at www.novugen.com (“**Site**”), you may notice that our Site may contain links or reference to third-party websites for your convenience (e.g. LinkedIn, Twitter, Facebook, and Youtube). Please be aware, however, that we do not own or control such third-party websites or content, and we do not endorse or recommended such third-party websites, its content, products and/or services. Please keep in mind

that this Notice does not apply to such third-party websites. You are highly recommended to be aware and read the privacy policies carefully of each third-party website you visit.

- 1.6. **Not a promise.** This Notice is not intended and shall not be read to create any express or implied promise or contract for employment, for any benefit, or for specific treatment in specific situations. Nothing in this notice should be construed to interfere with our ability to process personal data for purposes of complying with its legal obligations, or for investigating alleged misconduct or violations of company policy or law, subject to compliance with local legal requirements.

2. Types of Personal Data Collected

- 2.1. The extent of and the exact personal data that are processed vary from case to case depending on a range of factors and circumstances, such as the nature of the position or opportunity, the application stage you are at, and how you interact with us throughout the application (e.g. video calls, phone calls, or in-person at our premises or facilities).

Below is an overview of the categories and example personal data that we may process in the application:

- i. **Identification data** such as name, title, gender, date of birth, national registration identity card or passport number, and driving license
- ii. **Contact data** such as correspondence address, e-mail address, fax number and telephone number
- iii. **Immediate family data**, such as name, age, occupation and employer company name.
- iv. **Job application data** such as cover letter, resume, curriculum vitae (CV), and any other supporting information or documents provided to us in support of the job application. This may include past and current professional or employment details (such as job title, function, department, professional experiences, other professional achievements and qualifications, and whether you are subject to prior employer obligations), academic or education details (such as history, certificate, and transcripts), references name and contact details, job preferences details (such as desired position, compensation and benefits; location preferences and willingness to relocate)
- v. **Aptitude and leadership skills-related data** such as information provided by you when you answer any skill, cognitive ability and/or a personality assessment or test
- vi. **Audio-visual data** which you may be identified. This may be provided to us when you use opt for interview through video or phone. Also, if you visit our premises or facilities for interview, you might be recorded by surveillance system or device (e.g. CCTV) that were placed for security purposes
- vii. **Verification checks data**, such as verification received from referees and academic institutions you have provided, and conduct any other verification or backgrounds checks that are necessary due to the nature of the role applied for and are permitted or allowed by applicable law
- viii. **any other data that you voluntarily share** such as your hobbies and interests

Most of the personal data is collected on a voluntarily basis. We will indicate when it is obligatory to provide the personal data to us to enable us to process your data in relation to specific purpose. If you decline to provide such obligatory personal data, we may not be able to process or evaluate your application fully or accurately.

- 2.2. **Sensitive personal data.** Sensitive personal data under the PDPA includes the following:
 - i. physical or mental health or condition
 - ii. political opinions
 - iii. religious beliefs or other beliefs of a similar nature,
 - iv. the commission or alleged commission offence

As a general rule, we try not to collect or process sensitive personal data during the recruitment process. However, in limited circumstances, we may process your sensitive personal data where:

- v. you voluntary disclose it during the recruitment process, or you provided your explicit consent, or the data is publicly available, or data is relevant to your future working environment with us. For example, you may volunteer your physical or mental health or condition information to allow us to make reasonable accommodations or adjustments for the recruitment process or subsequent job role, and for or for the future administration of employment benefits if successful, and
- vi. we have a legal obligation to do so, or where it is permitted or necessary by law. For example, for compliance with legal obligations. This may include for purpose in relation for equal opportunities,

diversity or human resource initiatives (e.g., gender, race or ethnicity information), health, safety, security and environmental compliance (e.g. if you meet with us in-person at our premises, your body temperature, health symptoms, vaccination status, and other related information in connection with public and workplace health and safety plans and protocols designed to prevent the transmission of COVID-19 or other infectious diseases), and detection and prevention of crime (including the prevention of fraud, e.g., perform verification checks for certain roles which may involve the processing of criminal convictions or offences information)

3. How is the Personal Data Collected

- 3.1. **Directly from you**, such as when apply for a job opportunity with us, and attend an interview.
- 3.2. **Third-party sources.** Sometimes, we may receive information from other third-party sources. Overview of such third-party sources are:
 - i. Third-party that you have authorized to act on your behalf
 - ii. Third-party that you have consented to disclose your personal data, such as your referees and recruiters
 - iii. Third-party that may provide recommendation, attestation or validation for you, such as our personnel, and your professional and academic referees and institutions
 - iv. Third-party job or career sites you may use to apply for a job with us. This may include sites like LinkedIn. For details on how your personal data is processed by such third-party sites that you have used to submit your information, please consult the Privacy Notice on such third-party sites.
 - v. Government sources such as regulatory authorities, court, and enforcement officials
 - vi. Publicly available data sources, such as information on the Internet
 - vii. Other third-parties service providers that support our legitimate business operations and needs, for example,
 - ▶ Employment agencies and recruitment service providers
 - ▶ Security-related providers that assist with due diligence, compliance, and fraud prevention and detection such as background check providers and employment screening agencies (where permitted by law)

Such information may identify you (and as such be considered as personal data) but may also be in the form where it is aggregated and anonymized where it cannot identify you. Where it involves personal data, we take reasonable steps to ensure such third-parties were legally permitted to disclose such personal data to us.

- 3.3. Where permitted by the law, we may combine both the information you provide us and automatically collected information with other information collected from third-party sources.

4. Purposes Of Personal Data

- 4.1. Your personal data is processed for the following purposes:
 - i. Perform your request, i.e., recruitment. This includes allowing us to receive, evaluate, and process job applications (including scheduling interviews); to communicate with you about the recruitment process and/or your application, including, in appropriate cases, informing you of other potential career opportunities at Novugen; to prepare a contract for you following a decision to make you an offer of employment
 - ii. Fulfill legitimate business interest, including:
 - ▶ Implementing human resource initiatives such as improving the recruitment process, and promote and foster diversity and inclusion in the workplace
 - ▶ To create and ensure safe and secure environment, and improve thereof, including conducting due diligence and verification of application and information provided (such as pre-employment background checks and health screening, reference checks, conflict of interest checks) where we find it necessary due to the nature of the role or position applied for, and where permitted or allowed by law

- ▶ To establish, pursue, exercise and enforce our rights, and further defend ourselves in any legal claims or proceedings which we may be involved in
- iii. Fulfill legal obligations, including:
 - ▶ Complying with the law (which includes regulatory requirements, industry standards and court orders) that we are subjected to. This may include for purpose in relation for equal opportunities, diversity or human resource initiatives (e.g., gender, race or ethnicity information), health, safety, security and environmental compliance (e.g. if you meet with us in-person, your body temperature, health symptoms, vaccination status, and other related information in connection with public and workplace health and safety plans and protocols designed to prevent the transmission of COVID-19 or other infectious diseases)
 - ▶ Respond legal requests, such as providing support in investigations by regulatory or enforcement authorities, comply with a subpoena, respond to any legal process
- iv. Fulfill any other purposes permitted or required by the law, and are incidental to any of the purposes detailed in this Notice.

5. Disclosure & International Transfer of Personal Data

- 5.1. As a multinational company operating worldwide, your personal data may be disclosed, transferred, and processed for the purposes indicated in [\[Purposes of Personal Data\]](#) above to any of the following categories or classes of parties whether within or outside Malaysia:
- i. **our personnel**, including members of the HR department, interviewers involved in the recruitment process, managers in the business area with a vacancy and IT staff if access to the data is necessary for the performance of their roles
 - ii. **members within our group companies**, including our affiliates and subsidiaries for the purpose of group or central human resource management and internal reporting. Your personal data may be further shared with members within our group companies if you have expressed that you are open to global mobility or alternative job vacancy in your job application
 - iii. **our external advisors** such as lawyers, accountants, company secretary, auditors, insurers and brokers
 - iv. **our service providers**. Like many businesses, we may engage specialized providers to facilitate the recruitment processes, such as recruiters and pre-employment screening services
 - v. **relevant government regulators or authorities, statutory boards, law enforcement agencies, industry regulators** or any person to whom we are compelled or required to do so under law
 - vi. **potential acquirers and other stakeholders** in the event of potential, proposed or actual business transfer, whether in whole or in part, sale of business, disposal, acquisition, merger, spin-off, joint venture, assignment, reorganisation of our business, assets or stock or similar transaction
 - vii. **any other party to whom you authorize** us to disclose your personal data
- 5.2. By applying or working with us, you are consenting to any such transfer, disclosure, and processing of your personal data outside Malaysia. We will, however, endeavour that reasonable steps are taken by the above categories of parties to protect and/or maintain confidentiality of your information that we may disclose to them.

6. Automated Decision-Making

Automated decision-making means that a decision concerning you is made automatically on the basis of a computer determination (using software algorithms), without human review, such as CV screening.

As technology advances, we or recruitment service providers may use processes which involve automated decision-making to support the initial stage of recruitment where permitted by law to facilitate the recruitment process for you. We or recruitment service providers may further use pre-employment tests, cognitive, numerical reasoning, and behavioural tests to measure your suitability for a specific position. Such test results are never used as the sole determining factor in the recruitment process.

Please note that our recruitment process and hiring decision will still be made by various personnel and with consideration a combination of factors such as your education, job experience, qualifications, and cultural fit.

Depending on your jurisdiction, you will be notified in advance if automated decision-making is used and the right to object to the automated decision-making and ask for human intervention. Please [\[Contact Us\]](#) for more information on this.

7. Your Choices & Rights

7.1. You have the following rights under the PDPA:

- i. **Right to access your personal data.** You can obtain information on the processing of your personal data and to receive a copy these data
- ii. **Rights to correct your personal data.** You can correct or complete your personal data to the extent it is inaccurate, incomplete, misleading or not up-to-date. You should keep us informed of any changes to your personal data.
- iii. **Rights to limit the processing of personal data, or withdraw your consent.**

7.2. [\[Contact Us\]](#) if you like to exercise any of the above rights. Please note that we value the security and confidentiality of personal data. Hence, for any request submitted, we will first verify the identity of the requester to ensure that the requester is either:

- legitimately the person about whom we collected the personal data, or
- authorized by the person about whom we collected the personal data

We verify every request carefully. You are encourage to ensure that request submitted has:

- sufficient details that allows us to reasonably verify you are the person about whom we collected personal data or an authorized representative, and
- sufficient details that allows us to properly understand, evaluate, and respond to it.

We will always aim to help you when you wish to exercise your rights but in some instances we may have lawful grounds to reject your request, such as when we cannot verify your identity to determine if the requested personal data relates to you, or when there is an existing legal or contractual basis, or where permitted by the relevant law.

We will investigate any request you make promptly and will respond to you within the timelines provided by the PDPA. Kindly note that period may be extended where this is needed to help us respond properly (e.g. if the request is complicated for us to deal with and we need more time) but we will let you know the reasons for the delay.

Fees. Kindly note as permitted under the PDPA or relevant law, we may charge a reasonable fee if your request, particularly where the request is complex, or otherwise repetitive or excessive.

7.3. **Specific Rights.** In some applicable jurisdictions, you may have certain rights under relevant data protection laws. Please see the addendum to this Notice for specific additional information by region/country in the [\[Privacy Center\]](#). Alternatively, you may [\[Contact Us\]](#).

8. How do we secure & protect your personal data?

8.1. **Our safeguards.** We will use reasonable endeavour to protect personal data in our possession or control against risks of loss, misuse, unauthorized or accidental access or disclosure, unauthorized collection, use, copying, modification, disposal or destruction, through reasonable and appropriate security measures. We strive to ensure that our systems are secure and meet industry standards. To prevent unauthorized access, we have put in place appropriate physical, electronic and managerial procedures to safeguard and secure the personal data we collect.

8.2. **Your responsibilities.** Despite our security measures, please note that no method of transmission over the Internet or method of electronic storage is completely secure or error free. Safeguarding and protecting personal data is a shared responsibility. You play an important role in protecting and safeguarding your personal data. It is your responsibility to employ adequate safeguards such as:

- secure web browser
- have adequate passwords (if any), and maintain the secrecy of your password
- ensure that the electronic device you are using is adequately secured and protected against malicious software, such as trojans, computer viruses and worm programs. Such security includes up-to-date anti-virus software and firewall

- do not use, access or download of files or software from dubious sources
- always log-out, and do not have your email address and password remembered if you are using a shared or public electronic device

You are aware of the fact that without adequate safeguards there is a risk that your personal data could be disclosed to unauthorized third-parties from your end.

9. How long is the personal data kept?

We may retain your personal data for as long as it is necessary to fulfil the purpose for which it was collected, or as required or permitted by the PPDA. We will cease to retain your personal data, or remove the means by which the data can be associated with you, as soon as it is reasonable to assume that such retention no longer serves the purpose for which the personal data was collected, and is no longer necessary for legal or business purposes.

10. Updates To This Notice

From time to time, we may amend this Notice for various reasons, for example:

- i. to improve this Notice, such as changing the design or look of the Notice, or adding clarification where required, or correcting inadvertent errors,
- ii. to accurately reflect our data handling practices,
- iii. to reflect new developments on products, services, or other technological advancement, and
- iv. to comply with changes with the applicable law, regulatory requirements, and industry practices.

The amended Notice will be effective on the posting date detailed above.

We will notify you of the amended Notice by displaying prominently on our website at www.novugen.com ("Site") that there are amendments to the Notice.

Your continued interaction with us or sharing of your personal data with us on or after the display of the amended Notice on the Site indicates your consent to the process your personal data as per the amended Notice.

You are responsible to periodically review the Site for the latest information on our data handling practices.

11. Contact Us

If you have any queries about this Notice or our data handling practices, please contact our data privacy officer at the following:

- Email : privacy@novugen.com
- Phone : +603 5870 2242