

Privacy & Personal Data Protection Notice

Version 1.0 – Effective 1 July 2025

1. INTRODUCTION

Easi Wealth Management Sdn. Bhd. (Company No. 201101040580) is an approved financial adviser regulated by **Bank Negara Malaysia**. We respect your privacy and are committed to protecting your **personal data** in accordance with:

- Personal Data Protection Act 2010 ("PDPA");
- Bank Negara Malaysia Policy Document on **Management of Customer Information & Permitted Disclosures** (April 2023); and
- Guidelines on **Data Breach Notification** issued by the Personal Data Protection Commissioner (February 2025).

2. SCOPE

This Notice applies to all **current / prospective clients, investors, guarantors, beneficial owners, authorised persons, business partners, employees and website users** whose personal data we collect or receive.

3. PERSONAL DATA WE COLLECT

We may process (including collect, record, store, adapt, use, disclose and transfer) the following categories of personal data:

Category	Examples
Identity & Profile	Full name, NRIC / passport, date of birth, gender, nationality, photograph, signature, marital status.
Contact & Demographic	Residential / mailing address, mobile & landline numbers, email address, emergency contact.
Financial & Risk Profile	Income, net-worth, investment objectives, risk tolerance, source of funds, banking details, credit-worthiness.
Products & Services	Transaction history, portfolio holdings, premiums paid, claims history, policy numbers.
Technical & Usage	IP address, device identifiers, cookies, logs, browsing behaviour on our websites / apps.
Sensitive Personal Data (only with explicit consent)	Health information relevant to insurance / investment-linked products, political opinions, religious beliefs, criminal convictions.

4. SOURCES OF PERSONAL DATA

- **Directly from you** (application forms, risk-profiling questionnaires, e-mails, phone calls, meetings, website interactions).
- **Third parties** (banks, credit bureaus, unit-trust companies, insurers, your employer, introducers, public registries).
- **Automated technologies** (cookies, web-beacons, analytics tools).

5. PURPOSES OF PROCESSING

We process your personal data for the following **legitimate business purposes** ("Purposes"):

1. **Client On-boarding & KYC:** verifying identity, risk profiling, suitability assessment, AML/CFT compliance.
2. **Provision of Financial Advisory Services:** investment, insurance, estate-planning advice, portfolio management, execution of transactions.
3. **Administration & Operations:** maintaining client records, processing premiums / investments / redemptions, claims handling.
4. **Regulatory & Legal Compliance:** complying with Bank Negara Malaysia, Securities Commission, Inland Revenue Board, PDPC and other statutory requirements.
5. **Marketing & Communications** (with consent): sending you updates, newsletters, market insights, seminar invitations, product offers.
6. **Security & Fraud Prevention:** monitoring transactions, preventing or investigating fraud, cyber-security, audit.
7. **Business Improvement & Analytics:** conducting research, statistical analysis, product development, benchmarking.
8. **Employment & HR** (for staff): recruitment, payroll, performance management.

6. CONSENT

- **Consent is required** for any processing of personal data (and **explicit consent** for sensitive personal data) unless an exemption under PDPA applies.
- You may **withdraw consent** at any time by contacting our **Data Protection Officer (DPO)**; however, this may affect our ability to continue providing services to you.
- Where you provide personal data of **third parties** (e.g., spouse, dependents), you warrant that you have obtained their consent for us to process their data for the Purposes.

7. DISCLOSURE & TRANSFER

We do **NOT sell or rent** your personal data. We may disclose it to:

Type of Recipient	Reason
Regulators & Authorities	Bank Negara Malaysia, Securities Commission, Inland Revenue Board, PDPC, law-enforcement agencies.



Type of Recipient	Reason
Product Providers	Fund houses, insurers, banks, trustees, custodians for execution, administration or settlement.
Service Providers	IT vendors, cloud-hosting, printing, mailing, data-storage, auditors, professional advisers bound by confidentiality.
Business Transfers	Successors-in-interest in the event of merger, acquisition, sale of assets.

Cross-border transfers will only be made:

- to jurisdictions approved by the Minister under PDPA; or
- with your **explicit consent** and adequate safeguards (e.g., standard contractual clauses).

8. DATA SECURITY

We implement **physical, technical & administrative measures** (encryption, firewalls, role-based access, dual-factor authentication, staff training) to protect your personal data against:

- accidental or unlawful destruction
- loss, alteration, unauthorised disclosure or access
- other unlawful processing.

9. DATA RETENTION

We retain your data **only as long as necessary** to fulfil the Purposes or as required by Bank Negara Malaysia / other regulators, including:

- Investment / Insurance records:** minimum **7 years** after termination of relationship (BNM guideline).
- Marketing suppression lists:** **5 years** after withdrawal of consent.
- CCTV footages:** **30 days** unless investigation requires longer.

Upon expiry, data will be **irretrievably destroyed or anonymised**.

10. YOUR RIGHTS UNDER PDPA

You may at any time:

Right	How to Exercise
Access	Request a copy of your personal data we hold.
Correction	Request rectification of inaccurate or incomplete data.



Right	How to Exercise
Withdraw Consent	For direct marketing or any processing based on consent.
Restrict Processing	Temporarily restrict processing while we investigate your objection.
Data Portability	Receive your data in a structured, machine-readable format (where technically feasible).

No fee is charged for exercising these rights unless permitted by law. Requests must be made in writing to our **DPO** (details below) and we will respond within **21 business days**.

11. AUTOMATED DECISION-MAKING

We may use automated tools (e.g., risk-profiling algorithms) to assess suitability of investment products. You have the right to **request human intervention**, express your point of view and contest the decision.

12. COOKIES & ONLINE TRACKING

Our website uses **essential, analytics and marketing cookies**. You may **disable non-essential cookies** via the cookie banner or browser settings without affecting core functionality.

13. DATA BREACH NOTIFICATION

In the event of a **notifiable data breach** (i.e., likely to cause **significant harm** or affects **≥1,000 data subjects**):

- We will notify the **Personal Data Protection Commissioner** within **72 hours** of discovery; and
- We will notify **affected clients** without undue delay and **within 7 days** after the Commissioner's notification, explaining the breach, potential impact and remedial measures.

14. CONTACT US

Data Protection Officer (DPO):

Easi Wealth Management Sdn Bhd

2-2nd floor, Jalan Tiara 3/KU1, Bandar Baru Klang, 41150 Klang, Selangor

E-mail: snlim@easiwealth.com.my

Tel: +60 18-2944236 (Mon–Fri, 8:30 am–5:30pm)

15. CHANGES TO THIS NOTICE

Any material changes will be published on our website **30 days in advance** and may also be sent to you via e-mail or hard copy.