JTBR GROUP SDN BHD
PRIVACY NOTICE

Issued pursuant as amended by the Personal Data Protection (Amendment) Act 2024

Version	Effective Date	Approved By	Summary of Changes
1.0	*1st September 2026*		*Full revision to align with the Personal Data Protection (Amendment) Act 2024*

1. Introduction

JTBR Group Sdn Bhd (Company No.: 1512257-X) ("JTBR", "we", "us" or "our") is an authorized dealer of Maxis Berhad, providing mobile, broadband and digital services to individual and business customers across Malaysia.

JTBR is a "data controller" within the meaning of the Personal Data Protection Act 2010 ("PDPA"), as amended by the Personal Data Protection (Amendment) Act 2024, and is committed to protecting your personal data in accordance with the PDPA, its subsidiary legislation, the Personal Data Protection Standards, and all applicable guidelines issued by the Personal Data Protection Commissioner ("the Commissioner").

This Personal Data Protection Notice ("Notice") explains how we collect, use, store, disclose and protect your personal data when you interact with us as a customer, prospective customer, business contact, website visitor or walk-in visitor to our outlets. "Personal data" has the meaning given to it in the PDPA and includes any information in respect of commercial transactions that relates directly or indirectly to you and from which you are identifiable.

Please read this Notice carefully. By providing your personal data to us, or by continuing to use our services after having been given this Notice, you consent to the processing of your personal data in accordance with this Notice. Where the PDPA requires your explicit consent (for example, in relation to sensitive personal data), we will obtain that consent separately.

2. Sources of Personal Data

2.1 Directly from You

- Walk-in enquiries and service applications at our physical outlets
- Online registration and subscription forms on our website (www.jtbrgroup.com) or the Maxis dealer portal
- Phone calls, emails, live chat or WhatsApp interactions with our team
- Participation in promotions, contests or customer satisfaction surveys
- Documents you provide to us, such as your identity card (MyKad), passport, bank statements or company registration documents

2.2 From Maxis Berhad (Principal Telco)

As an authorized Maxis dealer, we may receive subscriber data from Maxis Berhad in connection with the activation, porting, upgrading or servicing of Maxis plans and products on your behalf. Such data sharing is governed by Maxis' own privacy notice and our dealer agreement with Maxis.

2.3 From Other Sources

- Credit reporting agencies and credit assessment channels approved by Maxis, for postpaid or business account applications
- Publicly available sources, including the Companies Commission of Malaysia (SSM), for business customer verification
- CCTV recordings at our outlets, which are maintained for security and incident-investigation purposes and are indicated by signage at the premises

3. Personal Data That We Collect

Depending on your interaction with us, we may collect the following categories of personal data:

3.1 Identity and Contact Data

- Full name, identity card (NRIC) number or passport number
- Date of birth, gender and nationality
- Residential, company or correspondence address
- Email address and mobile/telephone number

3.2 Service and Account Data

- Maxis account number, SIM card number (MSISDN) and plan details
- Service subscription history, plan upgrades and usage records
- Device IMEI number (for device purchases or warranty claims)
- Porting-in requests and previous network provider details

3.3 Financial and Payment Data

- Bank statement details (for Maxis credit assessment purposes)
- Billing address and payment history
- Credit assessment information (for postpaid or business account applications)

3.4 Business Account Data

- Company name, SSM registration number and business address
- Authorized contact person's name, designation, NRIC number and contact details
- Company bank account details (for billing purposes)

3.5 Technical and Usage Data

- IP address, browser type and device information when visiting www.jtbrgroup.com
- Pages visited, session duration and click-through data

3.6 Communication and Security Records

- Records of in-store, phone, email or chat interactions with our staff
- Call recordings (where applicable and disclosed at the time of the call)
- Feedback, complaints and service request records
- CCTV footage captured at our outlets

3.7 Sensitive Personal Data

This includes information such as data relating to your physical or mental health, political opinions, religious beliefs, the commission or alleged commission of any offence, or biometric data. Where it becomes necessary to process your sensitive personal data for any reason, We rely on your prior express consent for any processing which is voluntary (e.g. for marketing purposes). If We process your sensitive personal data for other purposes, we rely on the following legal bases:
(i) detection and prevention of crime (including the prevention of fraud); and
(ii) compliance with applicable law (e.g. to comply with our diversity reporting).

3.8 Obligatory and Voluntary Data

Personal data marked as mandatory on our forms, or which we tell you is required (including identity, contact, service and credit-assessment data), is obligatory. If you fail to provide obligatory personal data, we may be unable to register you as a customer, process your service application, activate or port your line, complete a credit assessment, or otherwise provide the products and services you have requested. All other personal data is voluntary, and failure to provide it will not affect the delivery of our core services.

3.9 Personal Data of Third Parties and Minors

If you provide us with personal data relating to another individual (for example, a supplementary line user, family member, or your company's authorized contact person), you confirm that you have informed that individual of this Notice and

obtained their consent for the disclosure and processing of their personal data by us. Where our services are subscribed for the benefit of a person under the age of 18, we will process that minor's personal data on the basis of the consent of the parent or legal guardian who enters into the service contract.

4. Cookies, Log Files and Web Beacons

4.1 Cookies

Our website (www.jtbrgroup.com) uses cookies to improve your browsing experience, remember your preferences and analyses website traffic. Cookies are small data files stored on your browser or device. We use the following types of cookies:

- Strictly Necessary Cookies — required for basic website functionality; cannot be disabled.
- Performance Cookies — collect anonymized data on how visitors use our website (e.g., pages visited, errors encountered).
- Functionality Cookies — remember your settings and preferences for a better experience.
- Targeting Cookies — used to show relevant promotions and offers based on your browsing behavior.

4.2 Log Files

Our web server automatically records log files upon each visit to to www.jtbrgroup.com. Log files include your IP address, browser type, referring page URL, date and time of access, and pages viewed. This data is used for security monitoring, troubleshooting and website traffic analysis.

4.3 Web Beacons

We may use web beacons (clear GIFs or pixel tags) in our web pages and promotional emails to track email open rates and measure the effectiveness of our online communications.

4.4 Managing Your Cookie Preferences

You may accept or decline cookies through your browser settings. Note that disabling cookies may affect certain features of our website. For guidance, refer to your browser's help documentation.

5. Purposes of Processing

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

5.1 Service Delivery and Account Management

- To process new service applications, plan subscriptions, SIM activations and device purchases
- To manage your Maxis account, facilitate mobile number portability, and handle plan upgrades or terminations
- To verify your identity and conduct credit assessments in accordance with Maxis' requirements
- To provide after-sales support, warranty processing and device servicing

5.2 Customer Communication and Support

- To respond to your enquiries, service requests and complaints
- To notify you of account changes, service disruptions or updates to this Notice
- To conduct customer satisfaction surveys and service quality assessments

5.3 Marketing and Promotions (Subject to Your Consent)

- To inform you of new Maxis plans, device promotions, exclusive dealer offers and special campaigns
- To personalize promotions and recommendations based on your account and usage profile

We will only send you direct marketing communications where you have consented to receive them. You may withdraw your consent and opt out at any time, free of charge, by contacting us at dpo@jtbrgroup.com, clicking the unsubscribe link in any promotional message, or notifying our staff. We will give effect to your opt-out request as soon as practicable, and in any event within the period required under the PDPA.

5.4 Legal, Compliance and Security

- To comply with the PDPA, our Maxis dealer obligations, and all applicable Malaysian laws, regulations, guidelines and industry codes
- To detect, investigate and prevent fraud, identity theft or unauthorized account access
- To maintain the safety and security of our outlets, staff and customers (including through CCTV)
- To enforce our service terms and conditions and to establish, exercise or defend legal claims
- To respond to lawful requests from regulatory or government authorities

5.5 Business Analytics and Improvement

- To analyses sales trends, outlet performance and customer service quality
- To conduct internal reporting, audits and business planning

Where we rely on your consent to process personal data and you subsequently withdraw that consent, or where we intend to use your personal data for a purpose not described in this Notice, we will notify you and, where required, obtain your fresh consent before doing so.

6. Disclosure of Your Personal Data

We do not sell your personal data. We may disclose your personal data, on a need-to-know basis and only for the Purposes described in this Notice, to the following classes of third parties:

6.1 Maxis Berhad (Principal Telco)

As a Maxis authorized dealer, we are required to share subscriber data with Maxis Berhad for the purposes of service activation, account management, number porting, plan management, credit assessment, and compliance with Maxis' data governance framework. Maxis' handling of your personal data is governed by Maxis' own privacy notice, available at www.maxis.com.my.

6.2 Service Providers and Data Processors

We may engage third-party service providers who process personal data on our behalf, including IT and cloud hosting providers, payment and collection service providers, courier and logistics providers, marketing and communications platforms, and document storage and disposal vendors. We require all data processors to process personal data only on our instructions and to implement security measures consistent with the PDPA, which imposes direct security obligations on data processors.

6.3 Professional Advisers and Financial Institutions

We may disclose personal data to our auditors, accountants, lawyers, insurers, banks and other professional advisers, where necessary for the Purposes or to comply with our legal obligations.

6.4 Regulatory and Government Authorities

We may disclose personal data to the Malaysian Communications and Multimedia Commission (MCMC), the Personal Data Protection Department (JPDP) / Office of the Personal Data Protection Commissioner, the Inland Revenue Board, law enforcement agencies, or other government or regulatory authorities where required or permitted by applicable law.

6.5 Corporate Transactions

In the event of any proposed or actual merger, acquisition, reorganization or sale of our business or assets, personal data may be disclosed to the prospective or actual acquirer and its advisers, subject to appropriate confidentiality obligations.

7. Retention of Your Personal Data

We retain your personal data only for as long as necessary to fulfil the Purposes for which it was collected, or as required by law. Personal data used to provide you with a personalized experience will be kept for a duration permitted by applicable laws. Our retention schedule is as follows:

Data Category	Retention Period
Customer personal data (contracts, subscriptions)	7 years after end of service relationship
Financial and billing records	7 years (Income Tax Act 1967)
Service application and account records	7 years after account closure
Marketing consent records	Duration of consent + 3 years
Complaint and support records	3 years after resolution
CCTV footage	90 days, unless required for an ongoing investigation
Data breach and incident records	5 years

Upon expiry of the applicable retention period, personal data will be securely deleted, anonymized or destroyed in accordance with our data disposal procedures. The 7-year retention period for customer and financial records supports our obligations under the Limitation Act 1953 and the Income Tax Act 1967.

8. Storage, Security and Cross-Border Transfer

We use appropriate measures (described below) to keep your Personal Data confidential and secure. Please note, however, that these protections do not apply to information you choose to share in public areas such as third-party social networks.

People who can access your Personal Data.

Your Personal Data will be processed by our authorized staff or agents, on a need-to-know basis, depending on the specific purposes for which your Personal Data have been collected.

Measures taken in operating environments.

We store your Personal Data in operating environments that use reasonable security measures to prevent unauthorized access. We follow reasonable standards to protect Personal Data. The transmission of information via the Internet is, unfortunately, not completely secure and although We will do our best to protect your Personal Data, we cannot guarantee the security of the data during transmission through our Websites /apps.

Measures We expect you to take.

It is important that you also play a role in keeping your Personal Data safe and secure. When signing up for an online account, please be sure to choose an account password that would be difficult for others to guess and never reveal your password to anyone else. You are responsible for keeping this password confidential and for any use of your account. If you use a shared or public computer, never choose to have your login ID/email address or password remembered and make sure to log out of your account every time you leave the computer. You should also make use of any privacy settings or controls we provide you in our Website /apps.

JTBR implements appropriate technical and organizational security measures in line with the Personal Data Protection Standards issued by the Commissioner, including access controls, password management, encryption of data in transit, staff confidentiality undertakings and training, physical security at our outlets, and secure disposal procedures, to protect your personal data against unauthorized access, loss, misuse, alteration or disclosure.

9. Your Rights as a Data Subject

Under the PDPA, you have the following rights in respect of your personal data held by JTBR:

- **Right of access:** to access, review and request a physical or electronic copy of information held about you. You also have the right to request information on the source of your Personal Data.

- **Right to correction:** to request that we correct any personal data that is inaccurate, incomplete, misleading or not up to date.
- **Right to withdraw consent:** to withdraw, by written notice, any consent previously given for the processing of your personal data. Withdrawal will not affect processing carried out before the withdrawal, and may affect our ability to continue providing certain services to you.
- **Right to complain:** to lodge a complaint with us or with the Personal Data Protection Commissioner if you believe we have breached the PDPA.

If the request is submitted by a person other than you, without providing evidence that the request is legitimately made on your behalf, the request will be rejected. Please note that any identification information provided to Us will only be processed in accordance with, and to the extent permitted by applicable laws.

Please note that, in certain circumstances, we will not be able to delete your Personal Data without also deleting your user account. We may be required to retain some of your Personal Data after you have requested deletion, to satisfy our legal or contractual obligations. We may also be permitted by applicable laws to retain some of your Personal Data to satisfy our business needs.

Where available, our websites have a dedicated feature through which you can review and edit the Personal Data that you have provided. Please note that We require our registered consumers to verify their identity (e.g. login ID/email address, password) before they can access or make changes to their account information. This helps prevent unauthorized access to your account.

We hope that We can satisfy queries you may have about the way We process your Personal Data. However, if you have unresolved concerns, you also have the right to complain to competent data protection authorities.

10. Your Choices

We strive to provide you with choices regarding the Personal Data that you provide to Us. The following mechanisms give you the following control over your Personal Data:

10.1 Marketing Communications

You may opt out of receiving promotional communications from JTBR at any time by contacting us at dpo@jtbrgroup.com, clicking the 'unsubscribe' link in any marketing email or SMS, or notifying our staff. Opting out will not affect service-related communications, which we will continue to send where necessary for the operation of your account.

If you decide that you no longer wish to receive such communications, you can subsequently unsubscribe from receiving marketing-related communications at any time, by following the instructions provided in each such communication. To unsubscribe from marketing communications sent by any medium, including third party social networks, you can opt-out at any time by unsubscribing through links available in our communications, logging into the Websites/apps or third-party social networks and adjusting your user preferences in your account profile by unchecking the relevant boxes. Please note that, even if you opt-out from receiving marketing communications, you will still receive administrative communications from Us, such as order or other transaction confirmations, notifications about your account activities (e.g. account confirmations, password changes, etc.), and other important non marketing related announcements.

10.2 Cookies

You manage your consent via (i) our consent management solution or (ii) your browser so as to refuse all or some cookies/similar technologies, or to alert you when they are being used.

Cookies are text files that are placed on your computer by websites that you visit. Cookies are then sent back to the originating website on each subsequent visit, or to another website that recognizes that cookie. They are used in order to make websites work, or work more efficiently, as well as to provide information to the owners of the website.

We use the term "cookies" throughout this notice to also cover all similar technologies

10.3 Sharing with Maxis

Certain data sharing with Maxis Berhad is a condition of subscribing to Maxis services through JTBR and cannot be restricted without affecting your ability to receive those services. This is external company that We use to help Us run our business (e.g. order fulfilment, payment processing, fraud detection and identity verification, website operation, market research companies, support services, promotions, website development, data analysis etc.). Service providers, and their selected staffs, are only allowed to access and use your Personal Data on Our behalf for the specific tasks that they have been requested to carry out, based on our instructions, and are required to keep your Personal Data confidential and secure.

11. Changes to This Notice

If We change the way We handle your Personal Data, We will update this Notice. We reserve the right to make changes to our practices and this Notice at any time, please check back frequently to see any updates or changes to our Notice. Any updates will be published on our website (www.jtbrgroup.com) with a revised version number and effective date.

In accordance with section 7(3) of the Personal Data Protection Act 2010, this Notice is issued in both the English and Bahasa Malaysia languages. In the event of any inconsistency between the two versions, the English version shall prevail. The Bahasa Malaysia version is available at our outlets and at www.jtbrgroup.com.

12. Contact Us – Data Protection Officer

To ask questions or make comments on this Notice and our privacy practices or to make a complaint about our compliance with applicable privacy laws, please contact Us at:

Data Protection Officer (DPO)
JTBR Group Sdn Bhd
Address: 1-4, Jalan Kuchai Maju 11, Kuchai Entrepreneurs Park, 58200 Kuala Lumpur, Malaysia
Email: dpo@jtbrgroup.com
Telephone: 603 – 7971 2473
Website: www.jtbrgroup.com

We will acknowledge and investigate any complaints regarding our handling of personal data.

Language

This Privacy Notice is provided in both English and Bahasa Malaysia. In the event of any discrepancy or inconsistency between the two versions, the English version shall prevail.