

STRATEQ GROUP DATA RETENTION AND DISPOSAL POLICY

Include In Countries Local Guides

1. INTRODUCTION

1.1 Objective

Strateq is committed to compliance with data protection laws. This Data Retention and Disposal Policy ("Policy") forms part of Strateq's data protection compliance program and supplements the Group Data Protection Policy.

This Policy applies to the Strateq group of companies worldwide ("Strateq"). All personnel must comply with this Policy when handling data breach incidents involving personal data in connection with Strateq's business and operations.

1.2 Policy Compliance

Laws around the world impose obligations on Strateq to protect and lawfully use personal data that we process in connection with our business. Failing to comply with such laws may expose Strateq to financial penalties, as well as damage to our reputation and customer confidence. Therefore, personal data must at all times be handled in accordance with this Policy and other related policies, procedures, notices, and standards which may be implemented from time to time. Personnel who fail to comply with this Policy may be subject to disciplinary action, up to and including dismissal.

1.3 Applicable of Local Laws

This Policy is based on generally accepted data protection principles and is intended to supplement local laws. Where local laws conflict with or impose stricter requirements than those set out under this Policy, such local laws will take precedence; in such case, the relevant Strateq entity should work with the Group Data Protection Officer ("DPO") to find a practical solution that meets the purpose of this Policy. Where local laws do not govern the processing of personal data, this Policy must still be complied with.

2. POLICY STANDARDS

Generally, any personal data which is no longer required in connection with the purposes for which the data was collected should be permanently deleted or destroyed, unless required to be retained pursuant to applicable laws. Disposal of personal data may take the form of destruction, permanent deletion, or irreversible anonymization of personal data.

Strateq must determine the relevant retention period under applicable local laws relating to the processing of personal data - see below for details.

In addition, Strateq's internal retention and disposal requirements are as follows:

- a) Each business unit / department in Strateq must maintain a monthly record of personal data which has been disposed of, which includes information on which set of personal data has been disposed, when, by whom and by what method. It is

important to ensure that the disposal record itself does not contain personal identifiers. A template for the data disposal form is provided in Appendix 1.

- b) Dispose forms used purely for data collection within 14 days from the use of such forms unless the forms carry legal value in relation to the commercial transaction.
- c) Conduct biannual reviews of personal data usage in Strateq's database and dispose of unwanted / unneeded / unused personal data, taking into consideration when the personal data were last accessed / used by Strateq and any legal provisions requiring such personal data to be retained.
- d) Any personal data which has not been used for a consecutive period of 24 months should be disposed, unless it is subject to specific retention requirements mandated by local laws.

Before permanently deleting or disposing of any personal data, employees should ensure that the personal data is indeed no longer required for the purpose it was collected for and is no longer subject to any retention requirement under applicable laws.

3. LOCAL RETENTION PERIOD

Key data retention periods under local laws in each country is set out as follows:

Jurisdiction	Data Retention Requirements		
	Description	Retention Period	Relevant Legislation
Malaysia	Accounting and tax a) Accounting books and records b) Invoices c) Tax returns	7 Years	Companies Act 2016; Income Tax Act 1967; Service Tax Act 2018.
	Commercial a) Contracts and commercial correspondence b) Emails and letters with customers, vendors and subcontractors.	6 years While there is no statutory retention period, these documents should be retained in line with the statutory limitation period years from the date of termination of the document to protect against contractual claims.	Section 6 of the Limitation Act 1953
	Employment a) Social security related information b) EPF related information c) Employment contracts	a) 7 years b) 6 years c) While the employment continues and 6 years from the date on which	a) Employees' Social Security Act 1969 b) Employees Provident Fund Act 1991 c) Employment Act 1955

Jurisdiction	Data Retention Requirements		
	Description	Retention Period	Relevant Legislation
		employment ceases	
	Data Breach Notification to the Commissioner and Data Subject	2 years upon first notification to the Commissioner.	Personal Data Protection (Amendment) Act 2024 (Act A1727)
Hong Kong	Accounting and tax a) Accounting books and records b) Invoices c) Tax returns	7 years	Inland Revenue Ordinance (Cap. 112)
	Commercial a) Contracts and commercial correspondence b) Emails and letters with customers, vendors, and subcontractors.	7 years (Simple Contracts) ¹ 13 years (Deed) While there is no statutory retention period, these documents should be retained in line with the statutory limitation period years from the date of termination of the document to protect against contractual claims.	Limitation Ordinance (Cap. 347)
	Employment a) Personal data of former employees b) Employment contracts	While the employment continues, and: 7 years from the date on which employment ceases ² (former employees) 2 years from the date of rejection of the applicant ³ (unsuccessful candidates)	Code of Practice on Human Resource Management

¹ The statutory limitation period for bringing proceedings on a simple contract is 6 years from the date on which the cause of action arose. In the case of a deed, the limitation period is 12 years. Recommended retention periods for contracts are generally 7 years (simple contract) and 13 years (deeds) (i.e. statutory limitation period + one year for service of writ).

² Employee data can be retained for longer if 1) there is a subsisting reason that obliges Strateq to retain the data for a longer period; or 2) the former employee has given prescribed consent for the data to be retained beyond seven years.

³ Unsuccessful job applicant data can be retained for longer if 1) there is a subsisting reason that obliges Strateq to retain the data for a longer period; or 2) the applicant has given prescribed consent for the data to be retained beyond seven years.

Jurisdiction	Data Retention Requirements		
	Description	Retention Period	Relevant Legislation
Singapore	Accounting and tax a) Accounting and other records to sufficiently explain transactions/financial position of the company and enable true and fair financial statements (e.g., credit/investment contracts, bank balances, accounting books, financial reports, tax documents, etc.) b) Records for Income Tax (i.e., records from the year of assessment to which any income relates to) c) Records for Goods and Services Tax purposes (e.g., business and accounting records; copies of invoices and receipts issued by Strateq)	5 years	Companies Act; Income Tax Act; and Goods and Services Tax Act
	Commercial a) Documents related to procurement and sales	6 years. While there is no statutory retention period, these documents should be retained in line with the statutory limitation period years from the date of termination of the document to protect against contractual claims.	Limitation Act
	Employment a) Recruitment documents (e.g. resumes, records of interview and records of job offers)	At least 1 year for recruitment documents. During employment + 1 year after	a) Ministry of Manpower Fair Consideration Framework b) Employment (Employment

Jurisdiction	Data Retention Requirements		
	Description	Retention Period	Relevant Legislation
	b) Employee records - employees' personal particulars (e.g., name, address, date of birth, gender, national identification number, first and last day of period of continuous employment) c) Employee records - employees' working hours, remuneration, and leave taken (e.g., basic salary, allowances and additional payments paid to an employee, dates when leave is taken, deductions made from salary during each salary period). d) Social security information	employment ends for employee personal particulars. 2 years after entry is made + 1 year after employment ends for employee working hours, remuneration, and leave taken. 2 years for social security information.	Records, Key Employment Terms and Pay Slips) Regulations 2016 c) Central Provident Fund Rules (Singapore)
	Corporate a) Documents laid before Strateq at its Annual General Meeting b) Copies of charging instruments and register of charges	5 years	Companies Act
Thailand	Accounting and tax a) Accounting books and records b) Invoices c) Tax returns	10 years These documents should be retained in line with the statutory limitation period years from the end of the tax period.	Civil and Commercial Code; Revenue Code
	Commercial a) Contracts and commercial correspondence b) Emails and letters with customers, vendors and subcontractors.	10 years While there is no statutory retention period, these documents should be retained in line with the statutory limitation period	Civil and Commercial Code

Jurisdiction	Data Retention Requirements		
	Description	Retention Period	Relevant Legislation
		years from the date of termination of the document to protect against contractual claims.	
	Employment a) Social security related information b) EPF related information c) Employment contracts	While the employment continues and 10 years from the date on which employment ceases. 10 years from the date on which employment ceases or the cessation of employee's membership, whichever is earlier. While the employment continues and 10 years from the date on which employment ceases.	Civil and Commercial Code

Jurisdiction Data Retention Requirements	
United States	<p>Protected Health Information shall be kept for a period of at least 6 years pursuant to the Health Insurance Portability and Accountability Act (HIPAA).</p> <p>Please see also Strateq's HIPAA Policies (including the Documentation Policy and the HIPAA Documentation Retention Policy). In the event of any inconsistency between this Data Retention and Disposal Policy and Strateq's HIPAA Policies, the latter will prevail.</p>
China	<p>Retain internet logs for at least 6 months.</p> <p>Such logs generally refer to information concerning user log-in / log-off, IP address and dial-in number (if applicable) and data concerning operation and management of the systems/applications.</p>

APPENDIX 1: PERSONAL DATA DISPOSAL RECORD TEMPLATE

BUSINESS UNIT/ DEPARTMENT:			
MAINTAINED BY:	Name of Personnel:		
	Designation:		
	Current As Of: [insert date]		
Brief Description of Personal Data Disposed	Date of Disposal	Details of Strateq personnel carrying out the disposal (specify name & designation)	Method of disposal (e.g., permanent deletion of digital copies, shredding of hard copies, etc.)