

Personal data processing information for applicants in Malaysia

V 1.0 e Malaysia

October 13, 2025

Introduction

These Personal Data Processing Information (“**Information**”) are for the information of applicants in regard to processing in the frame of the application process.

We may process personal data on other occasions, such as our website, the career site or when conducting business with you. In these cases, we will provide you with separate data protection information.

If you read this Information, you are about to send your personal data to a member company of the Exyte Group as an applicant for a position at the Exyte Group, make an account on our career site without application (e.g. for getting information about suitable jobs) or register yourself for our talent pool. If you do not know who we are yet, you will find some useful information on our website www.exyte.net.

With these Information we would like to inform you about how we process personal data (“**Personal Data**”) which you transferred to Exyte, which rights you have as data subject, and provide you with other helpful material about data processing.

Please note that these Information do not constitute a contract or an offer for a contract but are for your information only.

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1. Applicability of these Information and Controller

Firstly, you will want to know who you are actually sending your personal data to and who is processing your personal data as “**controller**” – the entity determining the purpose and means about processing your personal data.

As you may already have seen on our website, Exyte is a company group with many members. You can find a list of all our locations and group members under this [link](#).

This Information is for your application process at the Exyte entities in Malaysia as controllers, namely:

- Exyte Malaysia Sdn Bhd
Company Registration No. 00301034750 (637171-K)

Suite 15-01 & 15-02, Level 15
Wisma UOA Damansara II
No.6 Changkat Semantan
Damansara Heights
50490 Kuala Lumpur
Malaysia

or

Level 19
39 Jalan Sultan Ahmad Shah
10050 Penang
Malaysia
- Exentec Malaysia Sdn. Bhd.
(Company Registration No.: 200501009518 (686565-U)
Level 20, Unit 1 (20.01)
Menara Boustead Penang
39, Jalan Sultan Ahmad Shah
10050 George Town
Penang
Malaysia

If you are applying at another country, we have different data protection information (either globally or specifically for this country) which you can find under this [link](#).

The company operating this website – Exyte Management GmbH in Germany – is only forwarding your information to the entities in Malaysia mentioned above.

Following we refer to the controller as “**Exyte**”, “**we**” or “**us**”.

2. Data Protection Officer

We have appointed a Data Protection Officer (“**DPO**”). You can reach the DPO under the following email address: privacy@exyte.net.

Please feel free to contact the DPO in case of any questions, complaints, inquiries or suggestions regarding processing Personal Data at any Exyte entity.

3. Personal Data we process and sources of Personal Data

Please note that in general you are not obligated to provide any Personal Data to us. However, if you do not provide Personal Data to us, we may not be able to process or consider your application or we may miss important information, which could be to your disadvantage.

In general, we collect personal data directly from you. In this regard, we process all Personal Data you provide to us per communication, in the forms you fill out or documents you upload, such as your CV, motivation letter, certificates and diplomas, photos and others.

Furthermore, we collect personal data when you interact with our systems, the chatbot or the career website. These personal data are connected to your account or your application. You will find information on which data we collect about you on our career website and while interacting with the website and the chatbot [here](#).

Also, we will analyze your application data to assess and profile how you match the desired position. This entails making your application machine readable and having a large language model reading your application. Your personal data is not used to train a large language model. If we use data for training, they are anonymized.

In addition, we may collect and process information about you which you made public on the internet or on social networks (such as LinkedIn).

Please note that we may also collect other personal data about you, depending on the way you interact with us, e.g., via a linked-in application. For these purposes we provide specific data protection declarations or additional information.

As part of our employment process, we also ensure that you are not listed on a sanctioned person list. We receive such lists from the institutions which issue the sanctions and will confirm that you are not listed.

For the purpose of the application, we usually process the following Personal Data about you, however, if you provide additional data, we may also process such additional Personal Data:

- Name, work and contact details as well as address;

- Date of birth and place of birth;
- National Identifier (e.g. ID Card No; Passport No etc.);
- Nationality, citizenship, resident status, work permit;
- Whether you attended military or civil service;
- Your previous employers;
- Your reporting and management relationships, as provided by you;
- Training, education, academic background and certificates;
- Languages you speak;
- Other information on your CV;
- Details about how you intend to work at Exyte (e.g. full time, part time, home office);
- Your career plans;
- Your training and education plans;
- Your past and expected remuneration;
- Your past and expected job position
- Your address and current location (City or city quarter level via IP)
- Phone number
- WhatsApp account
- Your desired work location
- A profile of you, on how you fit with your desired position and based on your consent, with other positions
- Other jobs, which attracted your attention at the Exyte Group
- Video Recordings you sent to us
- Video recordings we made of our interview, whereas we will inform you in advance and request your consent.
- Videos you sent to us as application
- Status of your application
- Status in relation to other applications
- Content of your interview / Transcription
- Time it took you to confirm the interview
- Canceled interviews
- Time track through the application process
- Expenses (e.g. travel expenses for your travel to an interview);
- Assessment test results (e.g. in case you attended an assessment center or conducted a test, OPQ);
- Photos (including meta data contained in the photo);
- Bank data;
- Gender (m/w/d) and how you wish us to address you;
- Marital status;
- Appointments and free time
- Profile assembled from data matched to the job description
- Details you provided to us in relation to our codes of conduct (possible conflict of interests, accounts, trade body relationships),
- Whether you are listed on a sanctioned list

- In rare cases: Personality profiles. However, we will inform you separately in such cases;
- In rare cases, if you apply to sensitive areas, we may process your criminal record or financial status. We will discuss this matter with you before we obtain such information.

Usually, we process the following special categories personal data for the application process:

- Health information (e.g. disabilities);
- Religion;
- Special categories of data you may provide to us in relation to our code of conduct.

Please note that we might not collect all the information above for each application or may require additional information during the application process for specific countries or special positions. We will ask for such information and inform you accordingly.

If your application is successful, we will process several of the Personal Data you provided during the application process for implementing our labor relationship. We will provide you with separate data protection information as well.

4. Purpose of processing Personal Data

We process personal data as listed in No 3 of this Information for the following purposes:

- a. Processing the application for employment including considering other suitable positions for you within the Exyte Group;
- b. Creating a candidate profile for you and assessing and evaluating the profile for deciding whether you are suitable for this job;
- c. Determining whether you are a matching candidate for the position at Exyte respectively which applicant to choose or with your consent with other positions;
- d. Creating and maintaining employment records;
- e. To improve our services and performance, including the efficiency of the process;
- f. Analysis of the effectiveness and improvement of campaigns, website design, user experience and job description;
- g. Which jobs you are interested in, how long which state took and time tracking during the processing are processed in order to create aggregated statistics about our application process.
- h. To organize our application process efficiently;
- i. To ensure that you are not listed as a sanctioned person;
- j. To inform you about other suitable positions for you at the Exyte group;

- k. To contact you to obtain your consent for keeping you in our talent pool for future possible positions for you;
- l. To investigate or assess breaches of laws or our code of conduct;
- m. To process your application, evaluation, assessment and initiate or implement an employment relationship;
- n. Other processing activities as indicated in our communication with you or on forms you fill out;
- o. Based on your consent we will use your contact data to advertise suitable positions in the Exyte Group for you.

If your application was successful, we will process several of the Personal Data you provided during the application process for implementing our labor relationship. We will provide you with separate data protection information for the labor relationship.

5. Legal basis

We are processing your Personal Data in accordance with the requirements of the Malaysian Personal Data Protection Act 2010 (“**PDPA**”).

6. Consent

In case we are processing your personal data based on your consent, you may revoke your consent at any time, in which case we will stop processing your Personal Data. Processing of Personal Data until your revocation of consent remains legal.

The easiest way to revoke your consent is by specifying in an email, which consent you wish to revoke and send it to TalentAcquisition@exyte.net and identify yourself accordingly.

7. Transfer of Personal Data

We may transfer Personal Data between Exyte affiliates within the Exyte Group.

Generally the Exyte Group entity you apply at will process to Personal Data, however other Group member companies may access your personal data in the frame of the Group organization, especially the Exyte Management GmbH, if required to process your Personal Data for the purposes as listed above, but also other Group entities in order to provide technical, professional and practical support.

Exyte Management GmbH provides most of the technical and personnel support as a processor.

We may also ask you for your permission to transfer and store personal data in the talent pool at Exyte Management GmbH. However, we will inform you about processing and your consent separately.

We may further transfer your Personal Data to other entities of the Exyte Group in order to consider you for other positions, which your profile might fit for. In addition, we may transfer your Personal Data within the Group based on your consent – e.g. in our talent pool. To the extent legally permitted we may share your

personal data with other group members for support, whereas it is our legitimate interest to organize our company group efficiently and to find the most suitable candidate for positions within the Exyte Group.

Other Exyte Group Entities or third-party service providers may process your Personal Data as our processors based on our instructions.

We do not transfer Personal Data to a country or territory outside Malaysia except in accordance with requirements prescribed under the PDPA. All group members are subject to a Data Protection Policy to ensure a constant level of data protection. All Exyte Group members therefore signed a Data Processing and Joint Controller Agreement (“**DPJCA**”) which includes standard contractual clauses to safeguard the processing of Personal Data throughout the group, i.e., all Exyte Group members are contractually obligated to comply with an adequate data protection level. Also, third party processors are subject to such standard contractual clauses if there are no other safeguards.

Please find a list of all Exyte entities belonging to the Exyte Group under this [link](#).

Besides the transfer within the Exyte Group and to our processors a transfer of Personal Data to third parties takes place in case:

- Transfer with your permission;
- Transfers to third parties to which we are legally obliged, for example to the tax office or other governmental authorities ;
- Transfers to third parties to fulfill our commercial and tax obligations, for example to our tax auditor, even if the transfer is not mandatory but required for our legitimate interest to efficiently communicate and proceed with authorities and comply with our obligations;
- In order to assert legal claims, conduct investigation about legal claims or to defend against legal claims we may transfer data to authorities or to lawyers, agents, experts, authorities etc..

Please note that as you are applying for a position at an Exyte Group Member outside the EEA, the Exyte Management GmbH will transfer your application to such entity.

If you need any further information about transfers or safeguards, you can contact us any time.

8. Duration of processing

We will process your Personal Data for the time only, which is necessary to complete the purpose. Specifically, in compliance with the PDPA, your Personal Data will only be retained for as long as necessary to fulfill the purposes for which it was collected, or to meet applicable legal, regulatory, or business requirements. Thereafter, the data will be securely deleted or anonymized.

In case your application was not successful we will usually delete or anonymize your Personal Data from the application after six (6) month upon informing you that your application was not successful or receiving notice from you that you do not intend to proceed with the application, unless you have provided us with your consent to keep your application in our talent pool.

In case we process your personal data to assert or defend from a legal claim, we will process your Personal Data as long as necessary for this purpose.

In some cases, or for some personal data, we may have to store your Personal Data longer, e.g. in case of compliance investigations, security logs in our system (usually 1 year) or systematic automated deletion of emails. We may also store your data longer for purposes, such as tax or compliance documentation, e.g. in case we provided you with travel expenses to visit us for an interview as well as if we processed personal data in other occasions, such as visiting our [website](#). On such other occasions we provide you with separate information.

9. Profiling and automated decision making

We do not base decisions which produce legal or similar significant effects to you solely on automated decision making, such as automated profiling.

In some cases, we may assemble profiles on scientific basis to assess indications for specific abilities or attributes for an important position. We will discuss this with you separately as the case may be and will expressly indicate such profiling in advance.

We may classify and organize your data for searchability and classification to match the profile to attributes of the job description and easier match you or search your profile in terms of such criteria. This will involve parsing, reading your profile via a large language model and comparing them to job descriptions. Final decisions are always made by humans.

10. Your rights

You are entitled under the PDPA to:

- Request access to and obtain a copy of your personal data held by us;
- Request correction of your personal data where it is inaccurate, incomplete, misleading, or not up-to-date;
- Withdraw your consent to the processing of your personal data, subject to legal or contractual restrictions; and
- Prevent the processing of your personal data for purposes of direct marketing.

To exercise these rights, please contact us at TalentAcquisition@exyte.net.

You also have the right to lodge a complaint with the competent supervisory authority for data protection matters. The competent authority in Malaysia is the Personal Data Protection Commissioner (PPDP), an agency under the Digital Ministry.