



FOREVER SABAH BERHAD

(Co No. 1172311-D / 201601001385)

POLICIES AND PROCEDURES FOR COMPREHENSIVE PRIVACY, PERSONAL, AND ORGANIZATIONAL DATA PROTECTION

Revised December 2023

At Forever Sabah Berhad, we recognize the significance of safeguarding privacy and implementing responsible data management practices and abide by the Data Protection Act 2010. We practice ethical standards in the collection, protection and use of diverse data categories essential to our operations. This encompasses personal data and organizational data, which includes program specifics, financial information, and other confidential materials. This comprehensive policy delineates the principles and procedures governing the handling of various data types within our organization.

1. Collection of Data

a. Responsibility:

- The responsibility for collecting data lies with designated personnel who are trained in data collection procedures and adhere to the principles outlined in this policy.
- Personnel collecting data are equipped with a clear understanding of the importance of privacy, ethical considerations, and legal obligations associated with data collection.

b. Inclusivity:

- Data collection efforts encompass a broad spectrum of information critical to Forever Sabah Berhad's operations.
- **Personal Information:** This includes but is not limited to names, job titles, company names, contact information, demographics, and other details necessary for identifying individuals associated with Forever Sabah Berhad.
- **Program Details:** In the context of organizational operations, data related to program specifics, project activities, and outcomes are collected to facilitate effective planning, implementation, and monitoring.
- **Financial Records:** Financial data, including but not limited to budgetary information, expenditure details, and financial transactions, is collected to ensure transparency, compliance, and effective financial management.
- **Other Sensitive Information:** Beyond personal and financial data, the organization recognizes the value of other sensitive information pertinent to its mission. This may include environmental data, GIS files, survey forms, interview records, and social baselines collected during fieldwork.

c. Lawful and Fair Means:

- Forever Sabah Berhad commits to collecting information only through lawful and fair means. This involves obtaining data in a transparent manner, upholding the principles of free prior and informed consent and clearly communicating the purpose of data collection, and seeking explicit consent when required by applicable laws and regulations.

d. Sources of Data:

- Whenever possible, data is directly collected from the individuals or entities to whom it pertains. This includes interactions at the commencement of Forever Sabah Berhad's work with a person or entity and throughout the course of its dealings with them.
- Additionally, data may be obtained from various sources, including:
 - Official registration forms for events, seminars, and other promotional activities.
 - Request for information forms provided by Forever Sabah Berhad employees.
 - Baseline community surveys and citizen science inquiries around project activities.
 - Queries, emails, or correspondences received from individuals making inquiries and/or providing information.
 - Submissions through the organization's website, such as 'contact us' forms, cookies, social media comments and post in Forever Sabah Berhad's social media page.
 - Referrals or recommendations obtained from government agencies, registries, partners, contractors, or associates.
 - Business cards provided to partners, associates, or employees.

2. Purpose of Data Collection

Data is collected with a clear understanding of its multifaceted purposes:

a. Operational Efficiency and Effectiveness:

- The primary objective of data collection is to optimize the operational efficiency of Forever Sabah Berhad. This includes the planning, execution, and monitoring of projects, programs, and organizational functions.
- Data supports decision-making processes, resource allocation, and overall strategic direction, ensuring smooth operations.

b. Financial Transparency and Legal Compliance:

- Data collection is integral to upholding financial transparency and reporting: budgetary information, expenditure details and transactions are meticulously recorded to ensure accountability and adherence to regulatory standards.
- The organization also collects and maintains data to meet legal and regulatory requirements. This includes fulfilling obligations to disclose information under applicable laws, regulations, directives, guidelines, and other legal frameworks.

c. Personalization and Stakeholder Engagement:

- The organization values providing personalized services to stakeholders. Personal data collected, such as contact information and preferences, enables Forever Sabah Berhad to tailor interactions and communications to individual needs and interests, fostering meaningful engagement.

d. Program Planning and Evaluation:

- In organizational operations, data related to program specifics is collected to enhance program planning, implementation, and evaluation. This includes information about project activities, outcomes, and the impact of initiatives undertaken by Forever Sabah Berhad.

e. Environmental and Social Impact Assessments:

- Beyond personal and financial data, environmental data, GIS files, survey forms, interview records, and economic & social baselines collected during fieldwork serve the purpose of assessing the environmental and social impact of the organization's activities.

f. Research, Development, and Continuous Improvement:

- Data collection supports research and development activities within the organization. This includes the analysis of trends, patterns, and stakeholder feedback to inform continuous improvement in programs, services, and operational processes.

g. Communication, Reporting, and Transparency:

- Collected data is utilized for internal and external communication purposes. This involves sharing information with stakeholders, reporting on project outcomes, and maintaining transparency with the public about the organization's activities.

h. Strategic Planning and Goal Alignment:

- The data collected plays a crucial role in strategic planning initiatives. It informs the development of organizational goals, objectives, and long-term strategies, ensuring alignment with the mission and vision of Forever Sabah Berhad.

3. Protection of Personal and Organizational Data

a. Non-Disclosure Commitment:

- Forever Sabah Berhad is committed to maintaining the confidentiality of all personal and organizational data.
- Where data does need to be shared for programmatic purposes, Forever Sabah uses Non-Disclosure Agreements (NDAs) as legal instruments that explicitly outline the obligations and responsibilities of all parties involved, ensuring that data is not disclosed nor used in any manner inconsistent with the outlined purposes.

b. Prevention of Data Loss:

- The organization employs measures to prevent data loss, encompassing regular data backups, secure storage protocols, and cybersecurity practices.
- Regularly scheduled backups of both personal and organizational data are conducted to mitigate the impact of potential data loss incidents. These measures are implemented to safeguard the integrity and availability of data.

Recoverability Protocols:

- In the unfortunate event of data loss, recovery protocols are in place to minimize operational downtime and ensure the swift restoration of data.
- These protocols include the establishment of comprehensive backup systems, data recovery testing, and efficient procedures for data reconstruction. The organization is committed to maintaining business continuity even in the face of unexpected data challenges.

d. Role-Based Data Access:

- Access to personal and organizational data is strictly regulated based on employees' roles within the organization. This ensures that individuals have access only to information directly relevant to their responsibilities.
- Role-based access controls are implemented to prevent unauthorized access and minimize the risk of data breaches. Employees receive access permissions commensurate with their job functions, fostering a secure data environment.

e. Incident Response Plan:

- Forever Sabah Berhad has a comprehensive incident response plan to effectively manage and mitigate the impact of data breaches or security incidents.
- This plan includes clear reporting procedures for employees, detailed investigation processes, and communication protocols. The organization is committed to transparency in communicating with stakeholders in the event of a data breach.

f. Training and Awareness:

- Employees undergo training to enhance awareness of data protection principles, the importance of compliance, and the potential risks associated with mishandling data.
- Employees are guided around recognizing and responding to potential security threats, promoting a culture of data security throughout the organization.

g. Data Retention and Disposal Guidelines:

- Clear guidelines for the retention of personal and organizational data are specified in accordance with legal and regulatory requirements. Procedures for secure data disposal are outlined, ensuring compliance with established standards.
- Data disposal methods include secure deletion processes, physical destruction of obsolete storage media, and adherence to environmental considerations.

h. Regular Audits and Assessments:

- The organization conducts regular audits and assessments of data protection practices to ensure ongoing compliance and identify areas for improvement.
- Audits cover various aspects, including data access logs, security measures, and adherence to established policies. This proactive approach allows for continuous enhancement of data protection measures.

i. Consent Mechanisms:

- Clear procedures are in place for obtaining and managing consent for the processing of personal data. These mechanisms include transparent communication about data usage purposes and procedures for handling consent withdrawal requests.
- Stakeholders are empowered to make informed decisions regarding the use of their data, and their consent preferences are respected.

j. Technology Safeguards:

- Technological safeguards, including firewalls, antivirus software, and intrusion detection systems, are meticulously implemented to protect against unauthorized access and cyber threats.
- These safeguards are regularly updated and tested to ensure their effectiveness in the ever-evolving landscape of cybersecurity.

4. Rights of Access, Correction & Withdrawal

a. Transparency in Access:

- Stakeholders, including individuals and entities associated with Forever Sabah Berhad, have the unequivocal right to request access to their personal and organizational data held by the organization.
- The organization is committed to transparency in providing access to requested data, allowing stakeholders to verify and review the accuracy and completeness of their information.

b. Correction Requests, Concerns, Inquiries, Data Retention Periods & Complaints:

- Individuals possess the right to request corrections to their personal data if inaccuracies, omissions, or outdated information is identified.
- Individuals are empowered to raise concerns, make inquiries, or file complaints regarding the processing of their personal and organizational data.
- Stakeholders have the right to request an explanation of the policies and procedures governing the handling of their personal and organizational data
- Stakeholders can request information about the data retention period for their personal data. This includes understanding how long their data will be retained and the criteria used for determining retention periods.
- Stakeholders and individuals who have previously provided consent for the processing of their personal data have the right to withdraw that consent.
- Forever Sabah Berhad acknowledges the importance of maintaining accurate data and encourages stakeholders to actively participate in ensuring the correctness of their information.

c. Contact Information:

- A designated contact person, in this case, Cynthia Clare Ong Gaik Suan, Director, is provided for stakeholders to exercise their rights of access, correction, and inquiries.
- This contact information ensures a direct and accessible avenue for stakeholders to communicate their preferences and requirements related to their personal and organizational data.

5. Disclosure of Data

a. Legal Mandates and Regulatory Compliance:

- Disclosure of personal and organizational data is carried out in strict accordance with legal mandates and regulatory requirements. This includes scenarios where Forever Sabah Berhad is obligated to disclose data pursuant to applicable laws, regulations, directives, or court orders.
- Such disclosures are made solely to fulfill legal obligations and adhere to the framework set by governing authorities.

b. Affiliates, Partners, and Third Parties:

- The organization may disclose personal and organizational data to affiliates, partners, third parties, service providers, representatives, and agents when deemed relevant to the potential, existing, or past work of Forever Sabah Berhad.
- These disclosures are governed by agreements and contracts that establish the responsibilities of the parties involved, ensuring that data is handled with the same level of care and confidentiality as outlined in this policy, if necessary with NDAs.

c. Auditors, Consultants, and Advisers:

- Personal and organizational data may be shared with auditors, consultants, accountants, or financial institutions engaged by Forever Sabah Berhad or its donors and partners. This is conducted for auditing, financial assessments, and consultancy purposes.
- Data shared with these entities is limited to what is necessary for the fulfillment of their respective roles and is subject to confidentiality agreements.

d. Suppliers, Contractors, and Sub-contractors:

- To facilitate project implementation and organizational operations, data may be disclosed to other partners.
- These disclosures are made in accordance with contractual agreements, ensuring that the recipients adhere to data protection standards consistent with those outlined in this policy, if necessary protected by NDAs.

e. Public Engagement:

- Names and images of individuals associated with Forever Sabah Berhad may be displayed on the organization's website, publications, newsletters, and other materials.
- Such displays are conducted with the consent of the individuals involved, and Forever Sabah Berhad retains control over the use of personal data in these contexts.

f. Donors and Partners:

- Data may be disclosed to donors, partners, or their auditors, consultants, and advisers for purposes related to project funding, collaboration, and assessment.
- These disclosures are conducted with the understanding that the recipients will uphold the same data protection standards as outlined in this policy.

g. Communication with Stakeholders:

- Personal and organizational data may be used to communicate information about Forever Sabah Berhad's works or prospective projects to stakeholders via email, regular postal mail, telecommunication means, and social chat applications.
- Stakeholders are assured that their data remains under the control of Forever Sabah Berhad, and explicit consent is obtained before disclosing data to third parties for communication purposes.