



PETRONAS Whistleblowing Privacy Notice

This Whistleblowing Privacy Notice (“Privacy Notice”) describes the personal data collection and retention practices in relation to the whistleblowing system in place and provided by PETRONAS and its group of companies, including its subsidiaries and controlled companies (“**PETRONAS**”, “**we**”, “**our**” “**us**”).

This Privacy Notice must be read together with the Whistleblowing Policy (<https://www.petronas.com/whistleblowing>) and the Employee Privacy Notice as provided to you if you are an employee or if not our PETRONAS Privacy Statement (<https://www.petronas.com/privacy-statement>).

1. Using the Whistleblowing System

Whistleblowers (as defined in the Whistleblowing Policy) may use the whistleblowing system for reporting actual or suspected misconduct or malpractice whether involving our people or third parties working for or on our behalf as set out in the Whistleblowing Policy.

It is not to be used for complaints relating to your own personal circumstances, such as the way you have been treated at work suspected violations of laws or regulations.

In certain countries, PETRONAS may only accept reports through this service on limited topics. Where this is the case and you have reported a topic PETRONAS cannot accept through this channel it will contact you and advise how to proceed. Please see the Whistleblowing Policy for further details.

Use of the whistleblowing system is voluntary.

We encourage you to identify yourself in order for us to follow up with questions we may have.

Please be aware that the information you supply about yourself, your colleagues, or any aspect of PETRONAS’s operations may result in decisions that affect others. Therefore, you should only provide information that you have reasonable grounds to believe or suspect is true. You will not be subject to retaliation from PETRONAS for any report of a suspected violation that is made in good faith and you have raised as a genuine concern, even if it later turns out to be factually incorrect. Please be aware, however, that knowingly providing false or misleading information will not be tolerated.

The information you submit will be treated confidentially except in cases where this is not possible because of legal requirements or in order to conduct an investigation, in which case the information will be handled sensitively and when possible we will inform you in advance.

2. Information Gathering & Usage

The whistleblowing system captures the following personal data and information that you provide when you make a report:

- (i) Your name and contact details (unless you report anonymously) and whether you are employed by PETRONAS;
- (ii) The name and other personal data of the persons you name in your report if you provide such information; and
- (iii) A description of the alleged misconduct as well as a description of the circumstances of the incident.

3. Information Sharing

The personal data and information you provide will be stored in systems which are located on servers hosted and operated by PETRONAS in Malaysia or other jurisdictions. This is because PETRONAS is a global business, with operations located in various jurisdictions, which uses third party service providers based in a number of locations worldwide.

Personal data and information provided in a report may be transferred to Malaysia and other countries for the purpose of administering the whistleblowing system, including follow up investigations. For the purpose of processing and investigating your report and subject to the provisions of local law, the personal data and information you provide may be accessed, processed and used by the relevant personnel of PETRONAS, including Human Resources, Finance, Internal Audit, Legal, Compliance, management, external advisors (e.g. legal advisors), or, in limited circumstances, by technical staff at PETRONAS. Those individuals may be located in Malaysia or elsewhere. All disclosures will be on a need to know basis and limited to where this is necessary in relation to the investigation of the report.

Personal data and information you provide may also be disclosed to the police and/or other law enforcement or regulatory authorities. The relevant bodies that receive and process personal data can be located in Malaysia or elsewhere.

Where such personal data and information is transferred to another country that may not provide the level of data protection available in your home country we will make such transfer in accordance with applicable data protection laws (please see the Employee Privacy Notice as provided to you if you are an employee or if not our PETRONAS Privacy Statement (<https://www.petronas.com/privacy-statement>) for further details).

4. Period for Which We Store Your Personal Data

The personal data you provide will be kept as long as necessary to process your report, or, if applicable, as long as necessary to initiate sanctions or to meet our legal or financial needs. Personal data retention periods will differ depending on the nature of the incident.

Subject to certain exceptions necessary for compliance with local legal obligations, any Personal Data gathered in connection with a submission of a whistleblowing complaint will be retained for a maximum of 10 years following the conclusion of the investigation, or in cases where the complaint did not result in an investigation, a maximum of 10 years from the date of receipt of the whistleblowing complaint.

After this period, Personal Data will be securely deleted or anonymized, where applicable.

In all instances, Personal Data will be retained:

- i. For a specific duration if there is a legal or regulatory requirement to do so (and will be deleted once it is no longer necessary for the stated legal or regulatory purpose), or
- ii. For a specific duration if an individual raises an objection to the processing of their Personal Data and there is no longer a legitimate reason to retain it.

5. Your Rights to Your Personal Data

PETRONAS will promptly notify any person who is the subject of a report to this service, except where notice needs to be delayed to ensure the integrity of the investigation, preservation of relevant information or the prevention and detection of a crime. Further, you have the right to request access, correction, or erasure of personal data or to object to the processing or receive a copy of the personal data held through this service as set out more fully in the Employee Privacy Notice as provided to you where you are our employee or PETRONAS Privacy Statement (<https://www.petronas.com/privacy-statement>) as applicable.

In some cases, the subject of the report may access information concerning the report, including the source from which the report originates (with the exception of the identity of the whistleblower), and request correction of personal data that is inaccurate or incomplete in accordance with applicable law.

6. United Kingdom / European Processing Grounds

This section applies if you are based in the European Economic Areas (EEA) or UK during your interactions with us (other than solely for travel purposes).

It sets out the additional information that we are required to provide to you under UK and European Union ("EU") data protection law.

Under EU and UK law, we are required to inform you of the "lawful bases" on which we rely to process your personal data. Below, we set out the "lawful bases" that we use as the basis for our use of your personal data for each of the purposes mentioned in the main Privacy Statement. You can find an explanation of each of the grounds relied on below:

Processing Activity	Lawful Bases
Purpose for which we collect and use personal data	
To receive personal data when Whistleblowers report concerns or disclosures related to misconduct or improper activities within our organization.	Legitimate Interests.
To communicate effectively with the Whistleblower in gathering information and evidence, providing status update and the outcome of the investigation.	Legitimate Interests.

To provide a secure and confidential platform for individuals to report any wrongdoing, misconduct, or unethical behavior within the organization.	Legitimate Interests.
To conduct preliminary assessment of the complaint in determining the category of misconduct and ensuring the completeness and validity of information to establish the basis of the complaint.	Legitimate Interests.
For deliberation on case assignment to relevant Investigation Party, case closure and assignment of required further action to relevant Further Action Party.	Legitimate Interests.
To enable the organization to investigate and take appropriate actions in response to the complaint.	<ul style="list-style-type: none"> • Legal Obligation. • Legitimate Interests.
To protect the privacy and anonymity of Whistleblower, where applicable, in accordance with legal and regulatory requirements.	Legal Obligation.
To ensure that the organization complies with relevant legal and regulatory obligations pertaining to whistleblowing and data protection.	Legal Obligation.

How We Use Special Category of Personal Data

Under EU and UK data protection laws, Special Category Data has greater protections.

Typically for UK/EEA-resident individuals, we will use the Special Category of Personal Data in the following ways:

- a. We will use information about the health record if it is relevant in processing and deliberating the complaints. We process this personal data in connection with our rights and obligations under employment, social security or social protection laws, or in compliance with our legal obligations;
- b. We will use information about race or national or ethnic origin, religious, philosophical, or moral beliefs, or your sexual life or sexual orientation, if it is relevant in processing and deliberating the complaints. We process this personal data in connection with our rights and obligations under employment, social security or social protection laws, or in compliance with our legal obligations.

We have in place an appropriate policy document and safeguards, which we are required by law to maintain when processing such data.

Additional information on details of PETRONAS's wider use of personal data, data protection contacts and your data protection rights can be found in the Employee Privacy Notice as provided to you or PETRONAS Group Privacy Statement (<https://www.petronas.com/privacy-statement>) as applicable.

7. Changes to Privacy Notice

This privacy notice may be changed by us unilaterally from time to time, in particular, if we change our data processing or in case of new legislation. Please refer often to this page for the latest information and the effective date of any changes. The version published on this website is the current version.

8. Contact Details

If you have any questions, comments or request regarding this Privacy Notice or your personal data, may reach out to us at whistle@petronas.com.

This Privacy Notice was last updated on 14th November 2023.