

PRIVACY AND PERSONAL DATA PROTECTION NOTICE

(Specific Notice for SEA Manifesto Endorsement Programme - CENDEF OUM)

1. INTRODUCTION

Open University Malaysia (“**OUM**”) respects and is committed to protecting the personal data of individuals in accordance with the **Personal Data Protection Act 2010 and all subsequent amendments thereto (“PDPA”)**, its subsidiary regulations, codes of practice, and applicable guidelines issued by the Personal Data Protection Commissioner.

This Personal Data Protection Notice (“**Notice**”) applies to individuals who submit personal data in connection with the **SEA Manifesto Endorsement Programme** administered by the **Centre for Digital Education Futures (“CENDEF”), OUM**.

This Notice shall be read **together with and subject to:** -

- (a) OUM’s general Privacy and Personal Data Protection Notice, which can be accessed at <https://www.oum.edu.my/personal-data-protection-act-pdpa/>; and
- (b) The METEOR Group Privacy Policy, which can be accessed at <https://meteor.com.my/wp-content/uploads/2019/10/METEOR-GROUP-PRIVACY-POLICY.pdf>,

both of which shall continue to apply. In the event of any inconsistency, OUM’s general Privacy and Personal Data Protection Notice shall prevail, followed by the METEOR Group Privacy Policy, and thereafter this Notice.

2. DATA CONTROLLER

For the purposes of the PDPA, the data controller is: -

Open University Malaysia

(acting through its Centre for Digital Education Futures - CENDEF)

OUM forms part of the **METEOR Group**, and personal data may be processed in accordance with group-wide data protection policies, governance frameworks, and shared services arrangements.

3. SCOPE OF PERSONAL DATA

The personal data collected and processed may include, without limitation: -

- (a) Full name;
- (b) Email address;
- (c) Country of residence;

- (d) Affiliation, organisation, or professional designation;
- (e) Institutional or professional profile information;
- (f) Any information voluntarily provided through forms, correspondence, confirmations, or follow-up communications; and
- (g) Any data generated in the course of verification, administration, record-keeping, reporting, or compliance activities.

Where applicable, personal data may be collected directly from you or indirectly through authorised representatives or publicly available sources, subject to PDPA requirements.

4. PURPOSES OF PROCESSING

Your personal data is collected, used, disclosed, stored, and otherwise processed for purposes including but not limited to the following: -

- (a) Receiving, recording, verifying, administering, and managing endorsement of the SEA Manifesto;
- (b) Communicating with you in relation to the manifesto, including updates, publications, events, initiatives, or related activities;
- (c) Publishing, displaying, or disseminating endorsement information (including names, affiliations, organisations, and country) through websites, reports, publications, digital platforms, or promotional materials;
- (d) Academic, research, policy development, advocacy, and institutional reporting purposes, whether in identifiable or anonymised form, subject to applicable ethical, legal or institutional approvals;
- (e) Internal governance, audit, risk management, compliance, record-keeping, and institutional administration;
- (f) Managing stakeholder engagement, partnerships, collaborations, and institutional communications;
- (g) Any ancillary or reasonably related purpose consistent with the objectives of the programme; and
- (h) Any other purpose permitted under applicable law or for which consent has been obtained.

5. VOLUNTARY OR MANDATORY PROVISION OF DATA

The provision of personal data is **voluntary**. However, failure or refusal to provide required personal data may result in: -

- (a) Inability to process or recognise your endorsement;
- (b) Exclusion from endorsement listings, publications, or communications; and/or
- (c) Inability to participate in related initiatives or engagements.

6. CONSENT

By submitting your personal data, you: -

- (a) Consent to the collection, use, processing, disclosure, retention, and storage of your personal data in accordance with this Notice, OUM's Privacy Notice, and the METEOR Group Privacy Policy;
- (b) Acknowledge and agree that certain personal data may be made **publicly available**, including through online platforms and publications;
- (c) Confirm that the personal data provided is accurate, complete, and not misleading; and
- (d) Express consent for OUM to edit, moderate and/or adapt comments, statements, or submission for clarity, brevity, appropriateness, or consistency prior to publication, without altering the substantive intent of the submission.

You may withdraw your consent by written notice. However, withdrawal of consent may affect the continued validity, recognition, or use of your endorsement and does not affect processing carried out prior to withdrawal where permitted by law.

7. DISCLOSURE OF PERSONAL DATA

Your personal data may be disclosed, on a need-to-know basis, to: -

- (a) OUM, CENDEF, and other entities within the METEOR Group;
- (b) Government authorities, regulators, statutory bodies, or enforcement agencies;
- (c) Professional advisers, auditors, consultants, or legal counsel;
- (d) Technology service providers, system vendors, cloud service providers, and data processors engaged by OUM;
- (e) Collaborating institutions, partners, sponsors, or stakeholders in connection with the manifesto or related initiatives;
- (f) Any other party where disclosure is required or permitted by law, regulation, court order, or regulatory guidance.

8. CROSS-BORDER TRANSFER OF PERSONAL DATA

Your personal data may be transferred to, stored in, or processed in jurisdictions **outside Malaysia**, including through cloud-based or international collaboration platforms.

Such transfers shall be carried out in accordance with: -

- (a) Section 129 of the PDPA as explained by the Cross Border Personal Data Transfer (CBPDT) Guideline (where applicable);
- (b) Reasonable safeguards; and
- (c) OUM and METEOR Group data protection requirements.

9. DATA SECURITY

OUM takes reasonable and appropriate measures to safeguard personal data against loss, misuse, unauthorised access or disclosure, alteration, or destruction, in accordance with the PDPA and its internal governance framework.

The nature and extent of such measures may vary depending on operational requirements, risk considerations, and the manner in which personal data is processed.

10. DATA RETENTION

Personal data will be retained: -

- (a) For as long as necessary to fulfil the purposes stated in this Notice;
- (b) For the duration required to meet legal, regulatory, audit, academic, or institutional requirements; and
- (c) Thereafter securely deleted, anonymised, or archived, where practicable and appropriate.

11. RIGHTS OF DATA SUBJECTS

Subject to the PDPA and applicable exemptions, you have the right to: -

- (a) Request access to your personal data;
- (b) Request correction of inaccurate, incomplete, or outdated personal data;
- (c) Withdraw consent to processing (subject to legal, regulatory, or institutional obligations); and
- (d) Limit or object to certain forms of processing where permitted by law.

Requests may be submitted to: -

Centre for Digital Education Futures (CENDEF)

Open University Malaysia

Email: cendef_adm@oum.edu.my

OUM reserves the right to refuse requests to the extent permitted under the PDPA.

12. UPDATES AND AMENDMENTS

OUM reserves the right to amend, vary, or update this Notice at any time. Any amendments shall take effect upon publication on OUM's official website or through such other means as OUM deems appropriate.

13. PREVAILING LANGUAGE

In the event of any inconsistency or conflict between the English version of this Notice and any translation, the **English version shall prevail**.

14. DISCLAIMER

This Notice is issued in compliance with the PDPA and is intended to provide general information on the manner in which personal data is processed by Open University Malaysia (“OUM”) in connection with the SEA Manifesto Endorsement Programme.

Nothing in this Notice shall be construed as: -

- (a) limiting, restricting, or qualifying OUM’s or any METEOR Group entity’s rights, powers, obligations, or discretions under any applicable law, regulation, directive, order, or guideline;
- (b) creating any contractual obligation, representation, warranty, or assurance on the part of OUM or the METEOR Group beyond those expressly required by law;
- (c) conferring any additional rights or remedies on any individual other than those expressly provided under the PDPA or other applicable legislation; and/or
- (d) restricting OUM’s or the METEOR Group’s ability to process, disclose, retain, or otherwise deal with personal data where such processing is permitted or required by law, regulatory requirement, court order, or governmental authority.

This Notice shall be read subject to all applicable laws, regulations, policies, contractual arrangements, and institutional governance requirements. In the event of any inconsistency between this Notice and any mandatory legal or regulatory requirement, the latter shall prevail.

(End of Notice)