



LS HUMAN CAPITAL SDN BHD

GUIDEBOOK

FOR COMPLYING WITH MALAYSIA'S:

- Online Safety Act (ONSA)
- Amended Personal Data Protection Act (PDPA)
- Penal Code Amendments (Workplace Harassment & Doxxing)

(Including All Required Compliance Documents and Policies)

SHAWN SHER, CEO & FOUNDER





INTRODUCTION

Online safety is everyone's business. As practically every business in Malaysia today does some form of business online, the Online Safety Act that went into effect in Malaysia on **January 1st, 2026** applies to practically every business and our employees.

This guidebook is compiled to provide organisations with an easy guide in terms of how to comply with the requirements of this new law. As it also intersects with two revised laws that came into effect in 2025, i.e. the amended Personal Data Protection Act and the amended Penal Code that now criminalises workplace harassment.

Collectively, these laws impose a compliance obligation on employers. This guidebook begins with an introduction to the key requirements under the Online Safety Act before going on to discuss the nine categories of harmful content, age verification requirements, penalties and criminal liabilities, and the intersection with the PDPA and amended Penal Code.

Whether you use WhatsApp for marketing, have a Facebook presence, run a company app, or operate a learning management platform — ONSA imposes a duty of care on your organisation.



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THE NINE CATEGORIES OF HARMFUL CONTENT

There are nine categories of content defined as harmful content under the law.

1 Child Sexual Abuse Materials

2 Financial Fraud or Scam

3 Race, Religion or Royalty (3R's)

4 Obscene Content

5 Indecent Content

6 Cyberbullying and Harassment

7 Incitement to Violence or Terrorism

8 Self-Harm Material for Children

9 Promotion of Dangerous Drugs

PRIORITY HARMFUL CONTENT: Categories 1 & 2 (highlighted in teal) must be addressed or removed within 24 hours. All other categories have a 72-hour window. Race, Religion or Royalty (3R's) should be treated with the same urgency as priority content.



SAMPLE: DIRECTOR'S DUE DILIGENCE CHECKLIST

1. Governance & Oversight

- Designated Online Safety Lead appointed with Board reporting line
- Online Safety Compliance as standing Board agenda item
- Board-approved Online Safety Plan and Community Guidelines

2. Technical Compliance (24-Hour Rule)

- Ability to make Priority Harmful Content inaccessible within 24 hours
- Automated keyword filters and AI moderation tools active
- Documented MCMC liaison process for Written Instructions

3. User Safety & Protection

- Report button visible and functional on every user-generated post
- Risk assessment for shielding minors from harmful content
- Audit trail for user safety inquiry response times

4. Records & Audit (Defense Trail)

- Centralized log of all content removals with timestamps
- Annual internal/external audit of app safety features
- System configured to preserve removed content for law enforcement



SAMPLE: KEY WORD FILTERS FOR AUTO-MODERATION

1. Priority Harm: Financial Fraud & Scams

Category	English Keywords	Malay Keywords
Urgency/Alert	claim now, account locked, update immediately, final notice	tuntut sekarang, akaun disekat, kemas kini segera
Social Engineering	mystery box, unclaimed package, prize winner, giveaway	kotak misteri, bungkusan tak dituntut, pemenang hadiah
Financial/IB	bank transfer, OTP, password, easy money, high returns	pindahan bank, kata laluan, duit mudah, pulangan tinggi

2. Standard Harm: Bullying & Harassment

Category	English Keywords	Malay Keywords
Threats	I will find you, watch your back, kill yourself, die, harass	aku cari kau, jaga kau, mampus, mati, kacau
Doxing Triggers	home address, IC number, phone number, work at, live at	alamat rumah, nombor IC, nombor telefon, kerja kat, tinggal kat

IT STRATEGY TIP: Use "Shadow Ban" for bullying (harasser sees own post only). For Scams, immediately Delete/Block for all users. Enable fuzzy matching (e.g., p3lburan) and whitelist staff accounts.

“

This book and interactive training guide is an excellent, fast-track guide in helping companies comply with the integration of the Online Safety Act, amended Personal Data Protection Act and Penal Code amendments. It will save your company countless hours, cost and energy in understanding the law and what you need to do to comply.

Peter Iruthayaraj D. Pappusamy

Former Industrial Court Chairman

CONTACT

Email: suha@lshumancapital.com / talia@lshumancapital.com

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4 Interactive Training Guide on Online Safety (3 user license, HRD Corp Claimable) with complimentary E-Book (English & BM)

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NOTE: For Hard Copy purchases, please add RM 150 for each version, i.e. RM 150 for English hardcopy and RM 150 for BM hardcopy (inclusive of postage and delivery)

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