

Sim Lian Data Protection Policy

Data Protection Policy

This document (“Data Protection Policy”) applies to all Personal Data collected by Sim Lian Group Limited, Sim Lian Construction Co. (Pte) Ltd, Sim Lian Holdings Pte Ltd, Kuik Ah Han Investments Pte Ltd, Multi Alliance Properties Pte Ltd and all of their subsidiary companies (collectively referred to herein as “SIM LIAN”, “us”, “we” or “our”).

The purpose of this Data Protection Policy is to inform you of how SIM LIAN manages Personal Data. Please take a moment to read this Data Protection Policy so that you know and understand the purposes for which we collect, use and disclose your Personal Data.

By interacting with us, submitting information to us, or signing up for any products or services offered by us, you agree and consent to SIM LIAN, as well as our respective representatives and/or agents collecting, using, disclosing and sharing amongst themselves your Personal Data, and disclosing such Personal Data to SIM LIAN’s authorised service providers and relevant third parties in the manner set forth in this Data Protection Policy.

This Data Protection Policy supplements but does not supersede or replace any other consent you may have previously provided to any entity within SIM LIAN, or any other agreement or arrangement you may have with SIM LIAN, in respect of your Personal Data.

SIM LIAN may from time to time review and amend this Data Protection Policy. The updated Data Protection Policy will supersede earlier versions and will apply to Personal Data in our possession. A copy of our current Data Protection Policy is available on request, or can also be found at www.simlian.com.sg

1. Personal Data

- 1.1. In this Data Protection Policy, “Personal Data” refers to any data, whether true or not, about an individual who can be identified (a) from that data; or (b) from that data and other information to which we have or are likely to have access, including data in our records as may be updated from time to time.
- 1.2. Examples of such Personal Data you may provide to us include your name, NRIC, passport or other identification number, telephone number(s), mailing address, email address, financial information, IP address, transactional information based on your activities on our website and applications, images, and any other information relating to any individuals which you have provided us in any form you may have submitted to us, or via other forms of interaction with you.

Sim Lian Data Protection Policy

2. Collection of Personal Data

2.1. Generally, we collect Personal Data in the following ways:

- (a) when you submit an application form or registration form, or other forms relating to any of our products and services;
- (b) when you enter into any agreement or provide other documentation or information in your interactions with us, or when you use our products or services;
- (c) when you interact or communicate with our customer service officers, for example, via telephone calls, letters, face-to-face meetings, social media platforms and emails;
- (d) when you use our electronic services, or interact with us via any of our websites or use services on any of our websites;
- (e) when you request that we contact you or request that you be included in an email or other mailing list;
- (f) when you respond to our promotions, initiatives or to any request for additional Personal Data;
- (g) when you attend events or functions organised by us, or conducted at our establishments, for example, property launches and sales events, promotional and marketing events and other social events;
- (h) when your images are captured by us via CCTV cameras while you are within the properties that we own or manage, or via photographs or videos taken by us or our representatives when you attend events, functions or meetings organised by us;
- (i) when you are contacted by, and respond to, our marketing representatives and customer service officers;
- (j) when we receive references from business partners and third parties, for example, where you have been referred by them;
- (k) when you fill up surveys administered by our third party surveying service providers;
- (l) when we seek information about you (whether or not from third parties) in connection with your relationship with us or the products or services you have applied for;
- (m) when you submit an employment, internship or secondment application to us or when you provide documents or information including your resume/CVs in connection with such applications; and/or

Sim Lian Data Protection Policy

- (n) when you provide your Personal Data to us for any other reason.
- 2.2. When you browse our websites, you generally do so anonymously but please see the section below on cookies.
- 2.3. If you provide us with any Personal Data relating to a third party (e.g. information of your spouse, children, parents, and/or employees), by submitting such information to us, you represent and warrant to us that you have informed him/her of the purposes for which we are collecting his/her Personal Data and have ensured that he/she has provided valid consent for your provision of his/her Personal Data to us.
- 2.4. You should ensure that all Personal Data submitted to us is complete, accurate and up-to-date. Please inform us of relevant changes to your Personal Data. Failure on your part to do so may result in our inability to provide you with the products or services you have requested.
- 2.5. If you are a minor under 13 years of age, please obtain consent from your parent or guardian before you submit any Personal Data to us. If you are a parent or guardian of a minor and you have reason to believe your child or ward has provided us with their Personal Data without your prior consent, please contact us to request for deletion of their Personal Data.

3. Purposes for the Collection, Use and Disclosure of Your Personal Data

- 3.1. Generally, SIM LIAN collects, uses and discloses your Personal Data for purposes connected or relevant to our business, or to manage your relationship with us, such as:
 - (a) Verifying your identity;
 - (b) Creating and maintaining your profile in our system database for internal record and reference;
 - (c) Facilitating your use of our online portals;
 - (d) Responding to your queries, feedback, complaints and requests in relation to any products, services, information session, event and programme offered by us;
 - (e) Processing your transactions with us (including processing credit card payments), or to provide any products or services to you;
 - (f) Administering and conducting information sessions, events and programmes for you (including facilitating registration, recording attendance, contacting you for administrative purposes);

Sim Lian Data Protection Policy

- (g) Facilitating and providing opportunities for networking between yourself and other participants of our information sessions, events and programmes;
- (h) Monitoring or recording our phone calls and other customer-facing interactions (including taking photographs or videos of you during our information sessions, events and programmes) for quality assurance, employee training and performance evaluation, identity verification purposes and to generate publicity materials;
- (i) Requesting feedback or participation in surveys, as well as conducting market research and/or analysis for statistical, profiling or other purposes for us to review, develop and improve the quality of our products and services;
- (j) Facilitating business asset transactions (which may extend to any merger, acquisition or asset sale) involving SIM LIAN;
- (k) Managing the administrative and business operations of SIM LIAN including audit, finance, IT, HR and legal matters, quality assurance and staff training, and complying with internal policies and procedures;
- (l) Facilities management, managing the safety and security of our premises or events (including but not limited to carrying out CCTV surveillance and conducting security clearances);
- (m) Preventing, detecting and managing commercial risks;
- (n) Conducting investigations relating to disputes, billing or fraud;
- (o) In connection with any claims, actions or proceedings (including but not limited to drafting and reviewing documents, obtaining legal advice, and facilitating dispute resolution), and/or protecting and enforcing our contractual and legal rights and obligations;
- (p) Meeting or complying with any applicable rules, laws, regulations, codes of practice or guidelines issued by any legal or regulatory bodies which are binding on SIM LIAN (including but not limited to responding to regulatory complaints, disclosing to regulatory bodies and conducting audit checks, due diligence and investigations) and internal policies and procedures, such as audit, accounting, risk management and record keeping;
- (q) Matching any Personal Data held which relates to you for any of the purposes listed herein; and
- (r) Any other reasonable purposes related to the aforesaid.

Sim Lian Data Protection Policy

- 3.2. In addition to the purposes listed at paragraph 3.1 above, if you are a job applicant or existing employee, SIM LIAN may collect, use and disclose your Personal Data for the following purposes:
- (a) Assessing and evaluating your suitability for employment or continued employment in any position within SIM LIAN;
 - (b) Facilitating your job placements with other subsidiary companies in SIM LIAN;
 - (c) All administrative and human resources related matters within SIM LIAN, including administering payroll, tax, granting access to our premises and computer systems, processing leave applications, administering your insurance and other benefits (including medical services), processing your claims and expenses, investigating any acts or defaults (or suspected acts or defaults) and developing human resource policies;
 - (d) Managing and terminating our employment relationship with you, including monitoring your internet access and your use of your email to investigate potential contraventions of our internal or external compliance regulations, and resolving any employment related grievances;
 - (e) Ensuring business continuity for SIM LIAN in the event that your employment with us is terminated;
 - (f) If you are required to take courses (including Continuing Education & Training courses):
 - (i) Administering the relevant courses and assessments;
 - (ii) Notifying you of the course and assessment details and updates;
 - (iii) Facilitating your use of online test portals; and
 - (g) Any other reasonable purposes related to the aforesaid.
- 3.3. Furthermore, where permitted by law and/or where you have provided your consent to SIM LIAN separately, SIM LIAN may also collect, use and disclose your Personal Data for the following additional purposes:
- (a) Providing or marketing services, products and benefits to you, including but not limited to informing you of our latest activities, special offers, special events and promotions from SIM LIAN;
 - (b) Providing joint marketing or cross promotions with our partners;
 - (c) Administering and organising contests, lucky draws, promotional events, competitions and marketing campaigns, and personalising your experience at SIM LIAN's portals and websites, including through our agents;

Sim Lian Data Protection Policy

- (d) Conducting market research, analytics and surveys to enable SIM LIAN to understand and determine customer preferences and demographics for us to offer you products and services as well as special offers and programmes which may be relevant to your preferences and profile; and/or
- (e) Any other purpose reasonably related to the aforesaid.

In order for us to market products or services which are of special interest and relevance to you, we may analyse and rely on your overall interaction with us (such as but not limited to your participation in promotions or events and your interactions with us).

- 3.4. If you have provided your Singapore telephone number(s) and have indicated that you consent to receiving marketing or promotional information via your Singapore telephone number(s), then from time to time, SIM LIAN may contact you using such Singapore telephone number(s) (including via voice calls, text, fax or other means) with information about our products or services.
- 3.5. When we contact or send you information for the purposes described in this Data Protection Policy, we may do so by post, e-mail, SMS, telephone or such other means provided by you. If you do not wish to receive any communication or information from us, or wish to restrict the manner by which we may contact or send you information, you may contact us in accordance with paragraph 8.1.

4. Disclosure of Personal Data

- 4.1. SIM LIAN will take reasonable steps to protect your Personal Data against unauthorised disclosure.
- 4.2. Subject to the provisions of any applicable law, your Personal Data may be disclosed by SIM LIAN, for the purposes listed above to the following entities or parties, whether they are located overseas or in Singapore:
 - (a) The various entities within SIM LIAN; and
 - (b) Agents, contractors or third party service providers who provide operational, administrative, business support or any other services to SIM LIAN.

5. Use of Cookies

- 5.1. A cookie is a small piece of information that is placed on your computer when you visit certain websites. The cookies placed by the servers hosting our websites are readable only by us, and cookies cannot access, read or modify any other data on an electric device, nor does it capture any data which allows us to identify you individually. All web-browsers offer the option to refuse any

Sim Lian Data Protection Policy

cookie, and if you refuse our cookie then we do not gather any information on that visitor.

- 5.2. Should you wish to disable the cookies associated with these technologies, you may do so by changing the setting on your browser. However, you may not be able to enter certain part(s) of our website.

6. **Transfer of Personal Data to other countries**

- 6.1. SIM LIAN operates in several jurisdictions including Singapore, Malaysia and Australia. We may transfer your Personal Data to countries outside of Singapore for the purposes described in this Data Protection Policy.
- 6.2. In the event that your Personal Data is transferred out of Singapore, we will ensure that your Personal Data continues to receive an adequate level of protection that is at least comparable to that provided under Singapore law. For example, we may enter into contracts with recipients or impose binding corporate rules to protect your Personal Data in a manner that is consistent with applicable laws.

7. **Data Security and Retention Period**

- 7.1. SIM LIAN will take reasonable efforts to protect Personal Data in our possession or our control by making reasonable security arrangements to prevent unauthorised access, collection, use, disclosure, copying, modification, disposal or similar risks. However, we cannot completely guarantee the security of any Personal Data we may have collected from or about you, or that for example no harmful code will enter our websites (for example viruses, bugs, Trojan horses, spyware or adware and other vulnerabilities). You should be aware of the risks associated with using websites.
- 7.2. While we strive to protect your Personal Data, we cannot ensure the security of the information you transmit to us via the Internet or when you use our online portals, and we urge you to take every precaution to protect your Personal Data when you are on the Internet. We recommend that you change your passwords often, use a combination of letters and numbers, and ensure that you use a secure browser.
- 7.3. If applicable, you undertake to keep your username and password secure and confidential and shall not disclose or permit it to be disclosed to any unauthorised person, and to inform us as soon as reasonably practicable if you know or suspect that someone else knows your username and password or believe the confidentiality of your username and password has been lost, stolen or compromised in any way, or that actual or possible unauthorised transactions have taken place. We are not liable for any damages resulting from any security breach, or unauthorised and/or fraudulent use of your username and password.

Sim Lian Data Protection Policy

- 7.4. We may retain your Personal Data for as long as it is necessary to fulfil the purposes for which they were collected, or as required or permitted by applicable laws.
- 7.5. In some circumstances, we will anonymise your Personal Data so that it is no longer associated with you, in which case we may use this information indefinitely without further notice to you.

8. Contacting Us – Withdrawal of Consent, Access and Correction of your Personal Data

8.1. If you:

- (a) would like to withdraw your consent to any use of your Personal Data as set out in this Data Protection Policy; or
- (b) would like to obtain access and make corrections to your Personal Data records,

you can contact the following of our Data Protection Officer(s):

For all PDPA-related matters relating to Sim Lian Group Limited and Sim Lian Construction Co. (Pte) Ltd and all its subsidiary companies, please contact Data Protection Officer:

Mr Shajimoon DPO@simlian.com.sg 6303 6200

For all PDPA-related matters relating to Sim Lian Holdings Pte Ltd, Kuik Ah Han Investments Pte Ltd, Multi Alliance Properties Pte Ltd and all its subsidiary companies, please contact Data Protection Officer:

Ms Josephine Toh DPO@slhdgs.com.sg 6892 2188

- 8.2. You may withdraw your consent to our collection, use and disclosure of your Personal Data in accordance with paragraph 8.1 above. However, if you withdraw your consent to any or all use of your Personal Data, SIM LIAN may not be in a position to administer any contractual relationship in place, which in turn may also result in the termination of any agreements with SIM LIAN, and your being in breach of your contractual obligations or undertakings. SIM LIAN's legal rights and remedies in such event are expressly reserved. We will require time to process any withdrawal of consent. We also wish to highlight that a withdrawal of consent does not affect our rights to continue to collect, use and disclose Personal Data where it is permitted or required under applicable laws.
- 8.3. If you wish to make (a) an access request for a copy of the Personal Data which we hold about you or information about the ways in which we use or disclose your Personal Data, or (b) a correction request to correct or update your Personal Data which we hold, you may submit your request to one of our Data

Sim Lian Data Protection Policy

Protection Officers in accordance with paragraph 8.1 above. Before we respond, we may require that you submit certain forms or provide certain information, including verification of your identity.

- 8.4. Please note that a reasonable fee may be charged for an access request. If so, we will inform you of the fee before processing your request.

9. **Governing Law**

- 9.1. This Data Protection Policy and your use of our website shall be governed in all respects by the laws of Singapore.