

**EMERGING TOWNS & CITIES SINGAPORE LTD. (“Company”)
AND IT’S SUBSIDIARIES (“ETC Singapore”)**

PERSONAL DATA PROTECTION POLICY

The purpose of this document (“Personal Data Protection Policy”) is to inform you of how ETC Singapore manages Personal Data which is subject to the Singapore Personal Data Protection Act (No. 26 of 2012) (“the Act”) and other data protection laws, where applicable. Please take a moment to read this Personal 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, accessing our websites, submitting information to us (whether through our websites or otherwise), or signing up for any products or services offered by us, you agree and consent to ETC Singapore (including its related corporations) (collectively, the “Companies”), as well as its representatives and/or agents (collectively referred to herein as “ETC Singapore”, “us”, “we” or “our”) collecting, using, disclosing and sharing amongst themselves your Personal Data, and disclosing such Personal Data to the Companies’ authorised service providers and relevant third parties in the manner set forth in this Personal Data Protection Policy.

This Personal Data Protection Policy supplements but does not supersede nor replace any other consents you may have previously provided to ETC Singapore in respect of your Personal Data, and your consents herein are additional to any rights which to any of the Companies may have at law to collect, use or disclose your Personal Data.

1. PERSONAL DATA

- 1.1 In this Personal 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 (depending on the nature of your interaction with us) your name, NRIC, passport or other identification number, telephone number(s), mailing address, email address and any other information relating to any individuals which you have provided us in any forms you may have submitted to us, or via other forms of interaction with you.

2. COLLECTION OF PERSONAL DATA

- 2.1 Generally, we collect Personal Data in the following ways:
 - 2.1.1 when you submit any form, including but not limited to application and registration forms or other forms relating to any of our property developments, products or services;
 - 2.1.2 when you enter into any agreement or provide other documentation or information in respect of your interactions with us, or when you use our products and services;

- 2.1.3 when you interact with our staff, including customer service officers, for example, via telephone calls (which may be recorded), letters, face-to-face meetings, social media platforms and emails;
 - 2.1.4 when you use our electronic services, or interact with us via our websites or use services on our websites;
 - 2.1.5 when you request that we contact you or request that you be included in an email or other mailing list;
 - 2.1.6 when you respond to our promotions, initiatives or to any request for additional Personal Data;
 - 2.1.7 when you submit an employment application or when you provide documents or information including your resume and/or CVs in connection with any appointment as an officer, director, representative or any other position;
 - 2.1.8 when your images are captured by us via CCTV cameras while you are within our premises, or via photographs or videos taken by us or our representatives when you attend events at our premises;
 - 2.1.9 when you are contacted by, and respond to, our marketing representatives and customer service officers;
 - 2.1.10 when we seek information about you and receive your Personal Data in connection with your relationship with us, including for our products and services or job applications, for example, from business partners, public agencies, your ex-employer, referral intermediaries and the relevant authorities; and/or
 - 2.1.11 when you submit your Personal Data to us for any other reasons.
- 2.2 When you browse our website, you generally do so anonymously but please see the section below on cookies. We do not, at our website, automatically collect Personal Data unless you provide such information or login with your account credentials.
 - 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 to us that you have obtained the consent of the third party to provide us with their Personal Data for the respective purposes.
 - 2.4 You should ensure that all Personal Data submitted to us is complete, accurate, true and correct. Failure on your part to do so may result in our inability to provide you with the products and services you have requested, or delays in processing your applications.

3. PURPOSES FOR THE COLLECTION, USE AND DISCLOSURE OF YOUR PERSONAL DATA

- 1. Generally, ETC Singapore collects, uses and discloses your Personal Data for the following purposes:
 - 3.1.1 transacting with you and providing our products and services;
 - 3.1.2 responding to your queries, feedback, complaints and requests;
 - 3.1.3 verifying your identity;

- 3.1.4 managing the administrative and business operations of ETC Singapore and complying with internal policies, reporting requirements and procedures;
 - 3.1.5 facilitating business asset transactions (which may extend to any mergers, acquisitions or asset sales) involving any of the Companies;
 - 3.1.6 requesting feedback or participation in surveys, as well as conducting market research and/or analysis for statistical, profiling or other purposes for us to design our products, understand customer behaviour, preferences and market trends, and to review, develop and improve the quality of our products and services;
 - 3.1.7 matching any Personal Data held which relates to you for any of the purposes listed herein;
 - 3.1.8 preventing, detecting and investigating crime and analysing and managing commercial risks;
 - 3.1.9 managing the safety and security of our premises and services (including but not limited to carrying out CCTV surveillance and conducting security clearances);
 - 3.1.10 monitoring or recording phone calls and customer-facing interactions for quality assurance, employee training and performance evaluation and identity verification purposes;
 - 3.1.11 in connection with any claims, actions or proceedings (including but not limited to drafting and reviewing documents, transaction documentation, obtaining legal advice, and facilitating dispute resolution), and/or protecting and enforcing our contractual and legal rights and obligations;
 - 3.1.12 conducting investigations relating to disputes, billing or fraud;
 - 3.1.13 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 ETC Singapore (including but not limited to responding to regulatory complaints, disclosing to regulatory bodies and conducting audit checks, due diligence and investigations); and/or
 - 3.1.14 purposes which are reasonably related to the aforesaid.
- 3.2 In addition, ETC Singapore collects, uses and discloses your Personal Data for the following purposes:
- 3.2.1 If you are a shopper or visitor to our retail shops/malls:
 - (a) providing customer service and support (including but not limited to customer relationship management, processing your payments, administering rewards and benefits and attending to your requests for any other goods and services whether or not offered by ETC Singapore);
 - (b) purposes which are reasonably related to the aforesaid.
 - 3.2.2 If you are an owner or tenant, or an employee, business partner, director or representative of an organisation that is an owner or tenant of any of our properties, whether existing or prospective:

- (a) facilitating and administrating the sale or lease of our properties; (including but not limited to customer relationship management, processing and confirming your purchase or tenancy, providing you with administrative support, processing your payments and administering rewards and benefits);
- (b) providing services and facilities;
- (c) administering debt recovery and debt management;
- (d) maintaining our property developments and remedying defects;
- (e) managing referrals;
- (f) billing and processing of payments for utilities, services and facilities; and/or
- (g) purposes which are reasonably related to the aforesaid.

3.2.3 If you are a visitor to our properties or office premises:

- (a) facilities management (including but not limited to issuing visitor access passes, and recording entries to and exits from our premises);
- (b) providing services and facilities; and/or
- (c) purposes which are reasonably related to the aforesaid.

3.2.4 If you are an employee, officer or owner of an external service provider or vendor outsourced or prospected by ETC Singapore:

- (a) assessing your suitability as an external service provider or vendor for ETC Singapore;
- (b) managing project tenders and quotations, processing orders or managing the supply of goods and services;
- (c) processing and payment of vendor invoices and bills;
- (d) managing business operations and product development; and/or
- (e) purposes which are reasonably related to the aforesaid.

3.2.5 If you submit an application to us as a candidate for an employment or internship:

- (a) conducting interviews;
- (b) processing your application (including but not limited to pre-recruitment checks involving your qualifications and facilitating interviews);
- (c) obtaining references and for background screening;
- (d) assessing your suitability for the position applied for;
- (e) onboarding successful candidates and facilitating human resource planning and management; and/or
- (f) purposes which are reasonably related to the aforesaid.

3.2.6 If you are an existing employee or intern of ETC Singapore:

- (a) providing remuneration, reviewing salaries and bonuses, conducting salary benchmarking reviews, staff appraisals and evaluation, as well as recognising individuals for their services and conferring awards;
- (b) administrative and support processes relating to your employment, including its management and termination, as well as staff benefits, manpower, business continuity and logistics management or support, processing expense claims, employee mobility, medical insurance applications, leave administration, training, learning and talent development, managing provident funds, and planning and organising corporate events;
- (c) providing you with tools and/or facilities to enable or facilitate the performance of your duties;
- (d) compiling and publishing internal directories and emergency contact lists for business continuity;
- (e) conducting analytics, surveys and research for human resource planning and management, and for us to review, develop, optimise and improve work-related practices, environment and productivity;
- (f) ensuring that the administrative and business operations of ETC Singapore function in a secure, efficient and effective manner (including but not limited to providing internal communications and maintenance);
- (g) administering cessation processes; and/or
- (h) purposes which are reasonably related to the aforesaid.

3.2.7 If you are a board member of ETC Singapore:

- (a) onboarding or facilitating your appointment;
- (b) facilitating the execution of duties and administrative matters (including but not limited to approving, executing and signing contracts, processing of bills, facilitating overseas travel arrangements and credit management);
- (c) maintaining statutory registers and to manage the publication and dissemination of director statistics on annual reports, newsletters and circulars;
- (d) administering compensation and benefits; and/or
- (e) purposes which are reasonably related to the aforesaid.

3.2.8 If you are a shareholder of ETC Singapore:

- (a) onboarding or facilitating your appointment as a shareholder, including the verification of your identity and/or the identity of your proxy (as may be applicable);
- (b) maintaining statutory registers and to manage the publication and dissemination of shareholder statistics on annual reports, newsletters and circulars; and/or
- (c) purposes which are reasonably related to the aforesaid.

- 3.3 Furthermore, where permitted under the Act, ETC Singapore may also collect, use and disclose your Personal Data for the following “ETC Singapore Additional Purposes”:
- 3.3.1 invitations to launches of property developments, exhibitions, seminars and similar events;
 - 3.3.2 providing or marketing services, products and benefits to you, including promotions, loyalty and reward programmes;
 - 3.3.3 matching Personal Data with other data collected for other purposes and from other sources (including third parties) in connection with the provision or offering of products and services, whether by ETC Singapore or other third parties;
 - 3.3.4 administering contests and competitions, and personalising your experience at ETC Singapore's touchpoints;
 - 3.3.5 sending you details of products, services, special offers and rewards, either to our customers generally, or which we have identified may be of interest to you; and/or
 - 3.3.6 conducting market research, understanding and analysing customer behaviour, location, preferences and demographics for us to offer you products and services as well as special offers and marketing programmes which may be relevant to your preferences and profile.
- 3.4 If you have provided your telephone number(s) and have indicated that you consent to receiving marketing or promotional information via your telephone number(s) or where we are permitted to do so under the PDPA, then from time to time, ETC Singapore may contact you using such telephone number(s) (including via voice calls, text, fax or other means) with information about our products and services.
- 3.5 In relation to particular products and services or in your interactions with us, we may also have specifically notified you of other purposes for which we collect, use or disclose your Personal Data. If so, we will collect, use and disclose your Personal Data for these additional purposes as well, unless we have specifically notified you otherwise.
- 3.6 You have a choice to withdraw your consent for receiving marketing or promotional materials/communication. You may contact us using the contact details found below.
- 3.7 Please be aware that once we receive confirmation that you wish to withdraw your consent for marketing or promotional materials/communication, it may take up to 30 working days for your withdrawal to be reflected in our systems. Therefore, you may still receive marketing or promotional materials/communication during this period of time. Please note that even if you withdraw your consent for the receipt of marketing or promotional materials, we may still contact you for other purposes in relation to the products and services that you have requested from ETC Singapore.

4 DISCLOSURE OF PERSONAL DATA

- 4.1 ETC Singapore will take reasonable steps to protect your Personal Data against unauthorised disclosure. Subject to the provisions of any applicable law, your Personal Data may be disclosed, for the purposes listed above (where applicable), to the following entities or parties, whether they are located overseas or in Singapore:
- 4.1.1 ETC Singapore's related corporations and employees;
 - 4.1.2 companies providing services relating to medical screening and insurance to ETC Singapore;
 - 4.1.3 companies providing architectural, engineering and construction services to ETC Singapore;
 - 4.1.4 real estate management agents;
 - 4.1.5 agents, contractors or third party service providers who provide operational services to ETC Singapore, such as courier services, customer service, telecommunications, information technology, payment, printing, billing, payroll, processing, technical services, training, market research, call centre, security, employee recognition or other services to ETC Singapore;
 - 4.1.6 vendors or third party service providers in connection with marketing promotions and services offered by ETC Singapore;
 - 4.1.7 any business partner, investor, assignee or transferee (actual or prospective) to facilitate business asset transactions (which may extend to any merger, acquisition or asset sale) involving any of the Companies;
 - 4.1.8 external banks, credit card companies and their respective service providers;
 - 4.1.9 building and car park management and their respective service providers;
 - 4.1.10 share registrars;
 - 4.1.11 companies which provide depository, clearing and book-entry settlement services;
 - 4.1.12 our professional advisers such as consultants, auditors and lawyers;
 - 4.1.13 foreign embassies in relation to facilitating overseas travel arrangements;
 - 4.1.14 relevant government ministries, regulators, statutory boards or authorities or law enforcement agencies to comply with any laws, rules, guidelines and regulations or schemes imposed by any governmental authority; and/or
 - 4.1.15 any other party to whom you authorise us to disclose your Personal Data to.

5 RETENTION OF PERSONAL DATA

- 5.1 We may retain your Personal Data for as long as it is necessary for the purposes it has been collected, and in most cases, up to 5 years, unless otherwise required by applicable law or for disputes or litigation purposes. Where we no longer require your Personal Data for those purposes, we will cease to retain such Personal Data in accordance with our internal retention policy.

6 USE OF COOKIES

- 6.1 When you interact with us on our websites, we automatically receive and record information on our server logs from your browser. We may employ cookies in order for our server to recognise a return visitor as a unique user including, without limitation, monitoring information relating to how a visitor arrives at the website, what kind of browser a visitor is on, what operating system a visitor is using, a visitor's IP address, and a visitor's click stream information and time stamp (for example, which pages they have viewed, the time the pages were accessed and the time spent per web page).
- 6.2 Cookies are small text files stored in your computing or other electronic devices which allow us to remember you. The cookies placed by our server are readable only by us, and cookies cannot access, read or modify any other data on an electronic device. All web-browsers offer the option to refuse any cookie, and if you refuse our cookie then we do not gather any information on that visitor.
- 6.3 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.

7 DATA SECURITY

- 7.1 ETC Singapore 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 website (for example viruses, bugs, trojan horses, spyware or adware). 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 use our mobile services, and we urge you to take every precaution to protect your Personal Data when you use such platforms. 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 breaches, on unauthorised and/or fraudulent use of your username and password.

8 CONTACTING US – WITHDRAWAL OF CONSENT, ACCESS AND CORRECTION OF YOUR PERSONAL DATA

8.1 If you:

8.1.1 have any questions or feedback relating to your Personal Data or our Personal Data Protection Policy;

8.1.2 would like to withdraw your consent to any use of your Personal Data as set out in this Personal Data Protection Policy; or

8.1.3 would like to obtain access and make corrections to your Personal Data records, you can approach us via the following channels:

- Call: 6245 2313
- Fax: 6245 2351
- Email: info@etcsingapore.com

8.2 Please note that if your Personal Data has been provided to us by a third party (e.g. a referrer, or your company), you should contact that organisation or individual to make such queries, complaints, and access and correction requests to ETC Singapore on your behalf.

8.3 If you withdraw your consent to any or all use of your Personal Data, depending on the nature of your request, ETC Singapore may not be in a position to continue to provide its products and services to you, administer any contractual relationship in place, which in turn may also result in the termination of any agreements with ETC Singapore, and your being in breach of your contractual obligations or undertakings. ETC Singapore's legal rights and remedies in such event are expressly reserved.

9 GOVERNING LAW

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

9.2 For the avoidance of doubt, the applicable data protection laws will apply to the processing of your Personal Data.

10 REVIEW OF POLICY

This policy will be reviewed regularly and updated as and when required.

Approved by the Emerging Towns & Cities Singapore Ltd. Board on 7 August 2018 and updated on 7 November 2018.