

## Hiap Hoe Group Privacy Policy

### **IMPORTANT NOTICE**

This policy will apply to the personal data you provide to us and the personal data we hold about you. **DO NOT** provide any personal data to us unless you accept this policy.

#### **About this policy**

1. In this Policy, “the Hiap Hoe Group” means Hiap Hoe Limited and/or its subsidiaries. When we use “we”, “us” or “our” in this policy, we mean the Hiap Hoe Group or any of the individual companies within the Hiap Hoe Group.

#### **General**

2. We are committed to safeguarding your personal data. We treat all personal data provided by you in strict confidence, and will only use your personal data in the manner set out in this Policy. This Policy applies to all personal data that you provide to us and the personal data we hold about you. This Policy describes how we may collect, use, disclose, process and manage your personal data. Please DO NOT provide any personal data to us if you do not accept this Policy.
3. **Business Contact Information.** Contact details provided by organisations to us for business purposes are not considered personal data. This Policy does not apply to such business contact information.
4. **What is personal data.** “Personal data” is data that can be used to identify a natural person. Examples of personal data include name, address, contact details, NRIC, or other identification number, telephone numbers, email address, photograph, video image, personal data of family members, education background, employment history, references and results of employment checks.
5. **Voluntary provision of personal data.** Your provision of personal data to us is voluntary. However, if you choose not to provide us with the personal data we require, it may not be possible for us to contact you, or provide products or services which you need from us.
6. **Providing personal data belonging to others.** If you provide the personal data of anyone other than yourself (including your family members), you warrant that you have informed him/her of the purposes for which we are collecting his/her personal data and that he/she has consented to your disclosure of his/her personal data to us for those purposes.
7. **Accuracy and completeness of personal data.** You must ensure that all personal data that you provide is true, accurate and complete.

#### **Amendments to this policy**

8. We review and may amend this Policy from time to time. The current version is available at [www.hiaphoe.com](http://www.hiaphoe.com).

#### **What personal data we collect**

9. We only collect personal data that is relevant to our business relationship with you.
10. Generally, we may collect your personal data when you:
  - a. transact with us;
  - b. send us an email;

- c. ask to be included in our mailing list;
  - d. request that we contact you;
  - e. purchase or lease residential/commercial/industrial properties from us;
  - f. stay at our hotels;
  - g. use facilities within our hotels or properties;
  - h. join our loyalty or membership programmes;
  - i. submit your personal data to us for any other reason.
11. If you are our shareholder, director, corporate officer, manager or employee, we may collect your personal data if it is relevant to our business relationship with you.

#### **How we collect personal data**

12. We usually collect personal data directly from you. This may be done in person when you meet our staff or representatives, or over the phone, by email or through websites we operate.
13. We may also collect your personal data about you from third party sources without directly involving you. For example, we may obtain your personal data from your family members.

#### **Purposes for collection, use or disclosure of your personal data**

14. **Primary purposes.** Our primary purpose in collecting your personal data is to serve you. We use your personal data to process your request(s) for our products and services, to provide those products and services to you and to contact you with news and information about those products and services. Generally, we collect, use or disclose your personal data for the following purposes:
- a. to manage your relationship with us;
  - b. to provide you with the services that you have requested;
  - c. processing your purchase or lease of our properties;
  - d. providing you with services related to your purchase or lease of our properties;
  - e. providing you with repair or maintenance services connected to your purchase or lease of our properties;
  - f. to assist you with your enquiries;
  - g. to contact you for feedback after the provision of our services; and
  - h. to keep you updated on our events.
15. **Business purposes.** We may also use your personal data for purposes connected or relevant to our business, such as:
- a. complying with our legal obligations and requirements;
  - b. enforcing obligations owed to us;
  - c. research into the development of new products and services or improvement of our existing products and services;
  - d. accounting, risk management and record keeping;
  - e. carrying out research, planning and statistical analysis; and
  - f. staff training.
16. **Marketing purposes.** If you have consented, we may use your personal data for the purposes of marketing our products and services and those of our strategic partners and business associates e.g. informing you of latest activities, special offers and promotions. In order for us to market products and 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). We do not provide your personal data to third parties outside the Hiap Hoe Group for their marketing purposes without your consent.
17. **Feedback and complaints.** If you have contacted us with any complaints, feedback, comments or suggestions, we may use and disclose your personal data (including your contact history) to respond to you. If we receive a complaint from you, we may have to

disclose your identity to whoever the complaint is about. If you do not want us to disclose your identity to the party you are complaining about, you must let us know immediately. However, it may not always be possible to handle your complaint on the basis of anonymity.

18. **Other purposes.** If we need to use your personal data for any other purposes, we will notify you and obtain your consent beforehand. You will be given the opportunity to withhold or withdraw your consent for the use of your personal data for these other purposes.
19. **Contacting you.** When using your personal data to contact you for the above purposes, we may contact you via regular mail, fax, e-mail, SMS, telephone or any other means.

#### **Disclosure of personal data**

20. We will not sell your personal data to third parties.
21. **Consent for disclosure to others.** If you have consented to our disclosure of your personal data to us or our strategic partners and business associates, we will be entitled to disclose your personal data to them. They will use your personal data only for the purposes you have consented to.
22. **Disclosure to service providers.** You agree that we may disclose or share your personal data with third parties who provide necessary services to us, such as:
  - a. service providers and data processors working on our behalf and providing services such as hosting and maintenance services, analysis services, e-mail messaging services, delivery services, handling of payment transactions, marketing etc.
  - b. our professional advisers (such as accountants, lawyers, auditors);
  - c. our consultants (such as architects, engineers, contractors or surveyors); and
  - d. sales agents who are appointed by the Hiap Hoe Group to market our properties.
23. We may from time to time disclose your personal data to other third parties, including:
  - a. service providers which provide products and services requested by you; and
  - b. your representatives and service providers to you (such as your lawyer, banker, executor, administrator or trustee).
24. **Other permitted disclosure.** We may also disclose your personal data as required or permitted by law. We may disclose your personal data to regulatory authorities, statutory bodies or public agencies for the purposes of complying with their respective requirements, policies and directives.

#### **Transfer of personal data out of Singapore**

25. **Transfer outside Singapore.** You fully understand and unambiguously consent that we may transfer your personal data to any location outside of Singapore for the purposes set out above.
26. **Protection of your personal data.** If we transfer your personal data to a country or territory outside of Singapore, we will ensure that the recipient of the personal data provides a standard of protection that is comparable to the protection which your personal data enjoys under the laws of Singapore. Where these countries or territories do not have personal data protection laws which are comparable to that in Singapore, we will enter into legally enforceable agreements with the recipients to ensure that they protect your personal data to the same standard as required under the laws of Singapore.

#### **Security**

27. While precautions will be taken to ensure that the information you provide is protected against unauthorised or unintended access, we cannot be held responsible for unauthorised or unintended access that is beyond our control.

### **How long do we keep your personal data**

28. We keep your personal data only for so long as we need the data for our business and legal purposes.

### **Your rights**

29. You have the right to:
- a. request to be provided with your personal data which is in our possession;
  - b. ask for information about the ways in which we have (or may have) used your personal data in the one-year period preceding your request;
  - c. make corrections to your personal data which is in our possession; and
  - d. withdraw your consent to our use of your personal data.
30. **Fee for access.** We may charge you a fee for responding to your request for access to your personal data held by us, or for information about the ways in which we have (or may have) used your personal data in the one-year period preceding your request. If a fee is to be charged, we will inform you of the amount beforehand and respond to your request after payment is received. We will endeavour to respond to your request within 30 days, and if that is not possible, we will inform you of the time by which we will respond to you.
31. While we will use reasonable efforts to comply with your requests to provide you with, correct or delete our records of your personal data, we may be prevented by law from complying with your request. We may also decline your request if the law permits us to do so.

### **What happens if you do not allow us to use your personal data**

32. In many circumstances, we need to use your personal data in order for us to provide you with products or services which you require. If you do not provide us with the required personal data, or if you withdraw your consent to our use and/or disclosure of your personal data for these purposes, it may not be possible for us to continue to serve you or provide you with the products and services that you require.

### **Governing law**

33. This Policy is governed by the laws of Singapore. You consent to submit to the exclusive jurisdiction of the Courts of Singapore in any dispute relating to this Policy.

### **How to Contact Us.**

34. If you have any issues about this Policy, if you wish to correct your personal data or have access to your personal data, if you wish to withdraw any consent you have given us, or if have any complaints please contact:

Data Protection Officer

Email : ginmeng.toh@hiaphoe.com

Address : 18 Ah Hood Road #13-51,  
Hiap Hoe Building At Zhongshan Park  
Singapore 329983

Telephone number : 6250 2200

(This is a recorded line.)

35. If you are making a complaint, please provide the name, contact number and address of the person submitting the complaint, and provide the relevant details required such as the relevant time period, our employees or who involved, or copies of relevant documents.

36. All complaints and feedback will be evaluated by the Data Protection Officer in a timely manner. After the Data Protection Officer has completed his evaluation he will respond to the person who submitted the complaint or feedback in writing, with the results of the evaluation.