

Ledgen Singapore Pte. Ltd.

Personal Data Protection Policy

1. Purpose and Scope of The Policy

- 1.1 The purpose of this document (“**Data Protection Policy**”) is to inform you of the policies of Ledgen Singapore Pte. Ltd. (referred to herein as “**the Company**”, “**us**”, “**we**” or “**our**”) regarding data collection, usage, disclosure, processing and protection, which are subject to the Singapore Personal Data Protection Act 2012 (“**PDPA**”) and to obtain your consent for the collection, use, processing and disclosure of Personal Data (as defined below).
- 1.2 This Data Protection Policy supplements but does not supersede or replace any other consent you may have previously provided by the Company in respect of your Personal Data, and your consent herein is additional to any rights which the Company may have at law to collect, use or disclose your Personal Data.
- 1.3 The Company may from time to time update this Data Protection Policy at its absolute discretion, to ensure that it is consistent with any changes in legal or regulatory requirements.

2. Definitions

- 2.1 In this Personal Data Protection Policy, “**Personal Data**” refers to any data, whether true or not, about an individual who can be identified (i) from that data; or (ii) from that data and other information to which the Company has or is likely to have access, including data in our records as may be updated from time to time.
- 2.2 Examples of such Personal Data are unique identifiers (e.g. NRIC or FIN number, passport number etc.) as well as any set of data (e.g. name, age, address, photo or video image, personal email address, thumbprint, DNA profile, telephone number, occupation, etc.) which when taken together would be able to identify the individual.

3. Consent

- 3.1 You hereby consent to the collection, use, disclosure, transfer and processing of Personal Data in accordance with and subject to the terms and conditions of this Data Protection Policy.
- 3.2 You may, at any time, withdraw your consent to the collection, use, disclosure, transfer and/or processing of Personal Data in accordance with the procedure set out in paragraph 7.

4. Collection of Personal Data

- 4.1 Generally, the Company collects Personal Data in the following circumstances:
 - a) when you submit a job application for employment with the Company;
 - b) when you become an employee of the Company;
 - c) when you interact with our employees (whether via telephone calls, letters, emails or during face-to-face meetings);
 - d) in the course of providing our services to our clients; and
 - e) when you submit your Personal Data to us for any other reasons.
- 4.2 If you provide us with any Personal Data relating to a third party (e.g. information of your spouse, children, family members, directors, shareholders or your employees etc.), 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 set out herein.
- 4.3 You must ensure that all Personal Data submitted to us is complete, accurate and up to date. Please update us if there are any changes to your Personal Data by informing our Personal Data Officer within thirty (30) days of such change.

- 4.4 The Company only collects Personal Data to the extent that it is required for the specific purpose for which it is collected and which has been notified to the individual from whom the Personal Data is collected. The Company does not collect any Personal Data, which is not reasonably necessary for the purpose for which it is collected.

5. Purposes for The Collection, Use and Disclosure of Your Personal Data

- 5.1 Without limiting the general purposes set out in the Privacy Policy of our website, the Company will collect, use and disclose the Personal Data which we collect from you for the following purposes, and you hereby consent to the use of the Personal Data collected by us for the following purposes:

- a) Provision of any goods and/or services;
- b) Responding to, processing and handling your queries, feedback, complaints and requests;
- c) Verifying your identity;
- d) For audit, administration including internal record keeping and emergency purposes such as for emergency contact;
- e) Carrying out due diligence or other screening activities (including background checks) in accordance with legal or regulatory obligations or risk management procedures that may be required by law or put in place by the Company;
- f) Monitoring the use of the Company's computer network resources, including emails and internet usage with the Company email accounts, portals;
- g) Conducting investigations and proceedings in the event of any disputes, possible fraud, misconduct, unlawful action or omission, and utilizing electronic access and video systems to maintain office security of persons or property, control access and investigate suspicious or inappropriate activities;
- h) Ensuring the ongoing safety of the office and the ongoing safety and security of our employees and staff;
- i) Responding to requests for information from government or public agencies, ministries, statutory boards or other similar authorities or non-government agencies authorized to carry out specific Government or regulatory services or duties;
- j) Taking of any photographs and/or videos (whether by the Company's staff or third party photographers and/or videographers) during events organized by the Company;
- k) Meeting or complying with any applicable rules, laws, regulations, codes of practice or guidelines issued by any legal or regulatory bodies (including but not limited to responding to regulatory complaints, disclosing to regulatory bodies and conducting audit checks, due diligence and investigations);
- l) Facilitating business asset transactions (which may extend to any mergers, acquisitions or asset sales);
- m) Any purposes reasonably related to the foregoing; and
- n) Any other purposes which the Company may inform you of in writing from time to time, but for which the Company will seek your separate consent.

- 5.2 In addition, we also collect, use and disclose your Personal Data for the following purposes, depending on the nature of our relationship:

- a) If you are a job applicant or an employee:
 - i) Conducting interviews and evaluating your job application and your suitability for employment;
 - ii) Conducting background and verification checks, including obtaining references and other information from former employers;
 - iii) Facilitating your enrolment as an employee of the Company, including making applications for work permits, visas, employment passes and filing income tax, keeping the internal staff directory updated;
 - iv) Conducting evaluations and staff appraisals to determine your continuing suitability, eligibility or qualification for your job and considering you for promotion, training, secondment and transfer;
 - v) Providing remuneration and processing payroll as well as reviewing salary, bonuses, incentives, allowances and payments and administering and processing benefits, claims, compensation and benefits (including but not limited to processing expense claims and medical / health insurance);

- vi) Managing and terminating the employment relationship and administering termination or cessation processes; and
 - vii) Purposes, which are reasonably related to the aforesaid.
- b) If you are a third party vendor or an employee, officer or owner of a third party vendor:
- i) Assessing your organization's suitability as an external service provider or vendor for the Company;
 - ii) Managing project tenders and quotations, processing orders and/or managing the supply of goods and services;
 - iii) Creating and maintaining profiles of our service providers and vendors in our system database;
 - iv) Processing and payment of vendor invoices and bills;
 - v) Managing facilities management (including but not limited to issuing visitor access passes and facilitating security clearance); and
 - vi) Purposes, which are reasonably related to the aforesaid.
- c) If you are our client or an employee, officer or owner of our client:
- i) Fulfil our client's requests for services or products for delivery, customer service, account management, support and training and to provide other services related to our client's relationship with us;
 - ii) Manage our business needs such as payment processing, contract management, website administration, security and fraud prevention, corporate governance, report and legal compliance, business continuity and complaint, claim or litigation management;
 - iii) Mail electronic publications including bulletins, updates, alerts, reviews, invitations and announcements; and
 - iv) Purposes, which are reasonably related to the aforesaid.

5.3 In order to conduct our operations more smoothly, we may also be disclosing the Personal Data you have provided to us to our third party service providers, agents and/or our affiliates or related corporations, which may be sited locally or outside of Singapore, for one or more of the above stated Purposes. This is because such third party service providers, agents and/or affiliates or related corporations may be processing your Personal Data on our behalf for one or more of the above-stated Purposes.

5.4 We may also disclose or transfer your Personal Data to third party agents who provide administrative, storage, information technology, security, communication, compliance, payment and other data processing services. Where necessary, we will take reasonable steps to ensure such third party agents, suppliers and contractors process your Personal Information, on our behalf, with the same level of security and confidentiality applied by us.

5.5 The purposes listed above may continue to apply even in situations where your relationship with us has been terminated or altered in any way, for a reasonable period thereafter (including, where applicable, a period to enable us to enforce our rights under any contract with you).

6. Disclosure of Personal Data to Third Parties

6.1 Without prejudice to the foregoing, the Company may also disclose Personal Data to third parties without first obtaining consent in certain situations, including, without limitation, the following:

- a) the disclosure is required based on the applicable laws and/or regulations;
- b) the purpose of such disclosure is clearly in your interests and consent cannot be obtained in a timely way;
- c) the disclosure is necessary to respond to an emergency that threatens the life, health or safety of yourself or another individual;
- d) there are reasonable grounds to believe that the health or safety of yourself or another individual will be seriously affected and consent for the disclosure of the data cannot be obtained in a timely way, provided that we shall, as soon as may be practical, notify you of the disclosure and the purposes of the disclosure;
- e) the disclosure is necessary for any investigation or proceedings;

- f) the Personal Data is disclosed to any officer of a prescribed law enforcement agency, upon production of written authorization signed by the head or director of that law enforcement agency or a person of a similar rank, certifying that the Personal Data is necessary for the purposes of the functions or duties of the office; and/or
- g) the disclosure is to a public agency and such disclosure is necessary in the public interest.

7. Withdrawal of Consent and/or Request for Access, Correction of your Personal Data

Withdrawal of Consent

- 7.1 The consent that you provide for collection, use and disclosure of your Personal Data will remain valid until such time it is being withdrawn by you in writing. You may at any time withdraw any consent already given, or deemed to have been given under the PDPA, in respect of the collection, use or disclosure by the Company of Personal Data about you for any purpose on giving reasonable notice to the Company by contacting the Data Protection Officer at the contact details provided in paragraph 10.
- 7.2 The Company does not prohibit an individual from withdrawing his consent to the collection, use or disclosure of Personal Data about the individual but this shall not affect any legal consequences arising directly or indirectly from such withdrawal.
- 7.3 On withdrawal of consent, the Company shall cease (and cause its data intermediaries and agents to cease) collecting, using or disclosing the Personal Data, as the case may be, unless such collection, use or disclosure, as the case may be, without the consent of the individual is required or authorized under the PDPA or other written law.
- 7.4 If you withdraw your consent to any or all use of your Personal Data, depending on the nature of your request, the Company may not be in a position to continue to provide its services to you, administer any contractual relationship in place, which in turn may also result in the termination of your agreement with the Company, and may result in you being in breach of your contractual obligations or undertakings. The Company's legal rights and remedies in such event are expressly reserved.

Request to Access or Correct Personal Data

- 7.5 Please contact the Data Protection Officer at the contact details provided in paragraph 10 if you wish to make: a) an access request for access to your Personal Data or information about the ways in which we use or disclose your Personal Data; or b) a correction request to correct any of your Personal Data.
- 7.6 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. We will respond to your access request as soon as reasonably possible. If we are unable to respond to your access request within 30 days after receiving the request, we shall inform you in writing within 30 days of the time by which we will be able to respond to your access request.
- 7.7 We will respond to your correction request as soon as practicable from the time the correction request is made. If we are unable to respond to your correction request within 30 days after receiving the request, we shall inform you in writing within 30 days of the time by which we will be able to correct the Personal Data.

8. Management and Care of Personal Data

Protection of Personal Data

- 8.1 The Company shall protect Personal Data in possession or under its control by making reasonable security arrangements to prevent unauthorized access, collection, use, disclosure, copying, modification, disposal or similar risks. You should be aware, however, that no method of transmission over the internet or method of electronic storage is completely secure. While

security cannot be guaranteed, we strive to protect the security of your Personal Data and are constantly reviewing and enhancing our information security measures.

- 8.2 The Company does not assume responsibility for any unauthorized use of your Personal Data by third parties, which are wholly attributable to factors beyond our control.
- 8.3 The Company shall take reasonable measures to keep your Personal Data accurate, complete and updated.

Retention of Personal Data

- 8.4 The Company shall take reasonable effort to destroy or anonymize documents containing Personal Data, or remove the means by which the Personal Data can be associated with particular individuals, as soon as it is reasonable to assume that:
 - a) the purpose for which the Personal Data was collected is no longer being served by retention of the Personal Data; and
 - b) retention is no longer necessary for legal, regulatory, tax accounting, reporting or business purposes.

9. Transfer of Personal Data outside of Singapore

- 9.1 Please note that the third parties to whom we may provide your Personal Data in accordance with this Data Protection Policy may be located in jurisdictions other than Singapore. Such jurisdictions may have varying legal protections applicable to Personal Data.
- 9.2 Where your Personal Data is to be transferred out of Singapore, we will comply with the PDPA in doing so. This includes taking appropriate steps to ascertain that the overseas recipient of the Personal Data is bound by legally enforceable obligations such that the transferred Personal Data is accorded a standard of protection that is at least comparable to the protection accorded under the PDPA.

10. Notification of Data Breach

- 10.1 If we have credible grounds to believe that a data breach has occurred, we will take reasonable and expeditious steps to assess whether you are required to be notified of such data breach in accordance with the PDPA and our data breach management plan.
- 10.2 If you are required to be notified of the data breach, we will endeavour to use the most efficient mode of notification to inform you of the data breach, and we will provide such relevant details of the data breach as we, to the best of our knowledge and belief, deem appropriate. We will also include the contact details of at least one authorised representative whom you can contact for further information or assistance.

11. Data Protection Officer

You may contact our Data Protection Officer if you have any questions or feedback relating to this Data Protection Policy, or if you wish to make any request at the details below:

Email: dpo@ledgengroup.com
Telephone No: +65 64230030
Write in:
Data Protection Officer
Ledgen Singapore Pte. Ltd.
100 Tras Street 100 AM #16-01
Singapore 079027

12. Governing Law

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

Ledgen Singapore Pte. Ltd. at its option, may change, delete, suspend, or discontinue parts of the above policies in its entirety, at any time without prior notice.