

# Hong Leong Asia Ltd.

## Personal Data Protection Policy

The protection of your Personal Data is important to us.

This Personal Data Protection Policy (“**PDP Policy**”) outlines how we manage your personal data, in accordance with the Singapore Personal Data Protection Act 2012 (“**PDPA**”).

**By your interacting with us, accessing our websites, submitting information to us, or through your continuing employment relationship with us, you agree and consent to Hong Leong Asia Ltd, its subsidiaries and associated companies (collectively, the "Group"), as well as our respective representatives or agents (collectively referred to herein as "HLA", "us", "we" or "our") collecting, using, disclosing and sharing amongst ourselves your Personal Data, and disclosing such Personal Data to the Group's authorised service providers and relevant third parties in the manner set forth in this PDP Policy.**

By accessing our Websites and/or providing us with your personal information, you agree and consent to the terms of this PDP Policy.

### **What Personal Data do we collect?**

In this PDP Policy, “Personal Data” refers to any data 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.

Examples of such Personal Data include (but are not limited to):

- Your name;
- Your residential address, mailing address, email address;
- Your NRIC, passport or other identification number;
- Your date of birth, gender or nationality;
- Your contact telephone and mobile number(s);
- Your payment related information, such as your bank account or credit card information; and
- any other information relating to yourself and any individuals which you have provided us in any forms you may have submitted to us, or via other forms of interaction with you.

### **Collection of Personal Data**

Generally, we collect your Personal Data in the following ways:

- (a) when you submit employment-related forms or applications, including your resumes and/or curriculum vitae (CVs), to us or when a recruitment agency refers your resume/CV to us or when we obtain references from third parties for background screening;
- (b) when you submit to us information in connection with your use or purchase of any of our products or services;
- (c) when you submit queries, requests, complaints or feedback to us;
- (d) 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 the Group's corporate events and/or events hosted by us;

- (e) when you respond to our request for additional Personal Data;
- (f) when you subscribe or ask to be included in our email or other mailing lists;
- (g) when you browse our websites, fill in your particulars in our enquiry form or when you register as a member or establish online accounts with us to use or purchase any of our products or services on websites owned or operated by us or participate in any of our social media offerings;
- (h) when you participate in our marketing and promotional initiatives, market surveys and attend our events and launches; and/or
- (i) when you submit your Personal Data to us for any other reasons.

When you browse our website, you generally do so anonymously. We do not at our website automatically collect Personal Data unless you provide such information or login with your account credentials.

“Cookies” and IP addresses may be used on our websites to improve or customize users’ navigational experience, but are not used to collect information. Please disable these features on your device if you disagree on cookies usage.

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 for you providing us with their Personal Data for the purposes set out below.

### **How we may use your Personal Data**

Generally, HLA collects, uses and discloses your Personal Data for the following purposes:

- (a) to verify your identity;
- (b) to provide you with the products or services that have been requested;
- (c) to help us profile, review, develop, manage and enhance our products and services, including by analysing customer needs and identifying potential customer needs;
- (d) to communicate with you and respond to your queries, feedback, complaints and requests;
- (e) to provide ongoing information about our products and services that may be of interest to you;
- (f) to conduct due diligence and background checks on prospective employees;
- (g) to prevent, detect and investigate crime and manage the safety and security of our premises and services (including but not limited to carrying out CCTV surveillance and conducting security clearances);
- (h) to facilitate any proposed or actual business transactions (which may extend to any reorganizations, mergers, acquisitions and debt or asset sale) involving HLA;
- (i) to handle disputes and conduct and facilitate investigations and proceedings;
- (j) to protect and enforce our contractual and legal rights and obligations;

- (k) to meet or comply with any applicable rules, laws, regulations, codes of practice or guidelines issued by any legal or regulatory bodies which are binding on HLA or to assist in law enforcement and investigations by relevant authorities; and/or
- (l) for purposes which are reasonably related to the aforesaid.

If you are an existing employee, for further information please also refer to the “HLA Employee Data Policy” that will be made separately available to you by HLA.

**Disclosure of your Personal Data**

Reasonable steps will be taken to protect your Personal Data against unauthorised disclosure, but subject to the provisions of any applicable law, your Personal Data may, for the purposes listed above (where applicable), be disclosed to the following:

- (a) other divisions, organizations, entities and business units within the Group and our related corporations and other divisions, organizations, entities and business units within our related corporations;
- (b) insurers, credit providers and insurance investigators;
- (c) recruitment agencies;
- (d) agents, contractors or third party service providers who have been contracted to provide administrative, financial, research, operational or other goods and services to the Group, such as courier services, telecommunications, information technology, advertising, payment, payroll, processing, training, market research, storage, or archival;
- (e) any business partner, investor, assignee or transferee (actual or prospective) to facilitate business transactions (which may extend to any reorganization, merger, acquisition or debt or asset sale) involving HLA;
- (f) local and overseas banks, credit card companies and their respective service providers;
- (g) our professional advisers such as our consultants, auditors and lawyers;
- (h) our co-brand and other business partners;
- (i) business and charity partners in relation to events planning;
- (j) relevant government, statutory or regulatory authority (including securities exchange) and/or law enforcement agencies, whether local or overseas, including but not limited to the Inland Revenue Authority of Singapore, the Central Provident Fund Board, the Police Licensing and Regulation Department, and Ministry of Manpower to comply with any laws, rules and regulations, guidelines, schemes or directions issued or administered by any of them or any order, notice, directive or judgment of any court, tribunal, arbitration or mediation body; and/or
- (k) any other party to whom you authorise us to disclose your Personal Data to.

### **Do not call (DNC) Provisions**

We abide with the relevant DNC provisions as set out in the PDPA.

If you have provided us with 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, we may contact you using such Singapore telephone number(s) (including via voice calls, text, fax or other means) with information about our products and services, and other event invitations.

### **Update or Correction of Personal Data**

Reasonable steps are taken to ensure accuracy and completeness of all personal data that we collect.

We however understand that this information changes from time to time with changes of address, contact information and other personal circumstances. We encourage you to contact us as soon as possible through the contact details indicated below to enable us to update your Personal Data held by us.

### **Access to Personal Data by individuals**

If you wish to access the Personal Data we hold about you, please submit a written request to us at the contact details listed below.

Access to Personal Data may be refused in a number of circumstances, such as where the Personal Data relates to anticipated legal proceedings or the request for access is frivolous or vexatious. If we deny or restrict your access, we will explain the reasons as required by applicable laws.

### **Transfer and storage of Personal Data**

Due to the global nature of our business, Personal Data we collect from you may be transferred, processed and stored overseas. We will take all reasonable steps to ensure that your Personal Data is treated securely, and in accordance with this PDP Policy and any applicable laws. By submitting your personal information, you agree to this transfer, storage and/or processing.

Unfortunately, the transmission of information via the Internet is not completely secure. Although we will do our best to protect your Personal Data, we cannot guarantee the security of your data transmitted to our Website; any transmission is at your own risk. Once we have received your data, we will use strict procedures and security features to try to prevent unauthorised access.

### **Security of Personal Data**

Appropriate technical, organisational and administrative security measures are in place to protect your Personal Data against unauthorised access, collection, use, disclosure, copying, alteration, accidental loss or theft, destruction, damage or similar risks. We do not collect any of your Personal Data, other than information you voluntarily provide through our websites.

On our websites, we may have links to other websites or you may have been referred to our website through a link from another website. Since we are not owners of such websites operated by third parties, we cannot be responsible for the privacy policies and practices of these websites. Such content is subject to their terms of use and any additional guidelines and privacy information provided in relation to that use on their websites.

We recommend that you check the policy of each website you visit to better understand your rights and obligations especially when you are submitting any type of content on these third party websites. Please contact the owner or operator of such website if you have any concerns or questions.

## **Contact Us**

Should you wish to:

- (a) Communicate with us any questions, complaints or feedback relating to our management of your Personal Data;
- (b) Withdraw your consent for our use of your Personal Data as set out in this PDP Policy; or
- (c) Obtain access and make corrections to your Personal Data records under our control or in our possession,

please contact HLA as follows:

Write in:           Data Protection Officer  
                          16 Raffles Quay  
                          #26-00 Hong Leong Building  
                          Singapore 048581

Email:               DPO@corp.hla-grp.com

Please note that if your Personal Data has been provided to us by a third party, you should contact that third party to make such queries, complaints, and access and correction requests to us on your behalf.

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

We only retain your Personal Data for as long as is reasonably necessary in the circumstances to enable us to fulfil the purposes outlined in this PDP Policy, subject to applicable law.

## **Governing Law**

This PDP Policy shall be governed in all respects by the laws of Singapore.

## **Update of Policy**

Our PDP Policy may be updated or modified from time to time. Please check back regularly to understand how we handle your personal data.