

PRIVACY NOTICE PURSUANT TO PERSONAL DATA PROTECTION ACT

This Privacy Notice (“**Notice**”) sets out our privacy principles, our practices and/or the basis which Nippon Sanso Holdings Singapore Pte. Ltd. (referred to herein as the “**Company**”, “**we**”, “**us**”, or “**our**”) may collect, use, disclose or otherwise process personal data about the following persons in accordance with the Personal Data Protection Act in Singapore (“**PDPA**”) and any and all of the related applicable laws and regulations for personal data protection.

This Notice applies to personal data in our possession or under our control, including personal data in the possession of organisations which we have engaged to collect, use, disclose or process personal data for our purposes, and personal data obtained by us from publicly available sources.

1. PERSONAL DATA

“**personal data**” means data, whether true or not, about an individual (the “**data subject**” or “**data owner**”) who can be identified (a) from that data; or (b) from that data and other information to which the Company has or is likely to have access, excluding data of deceased persons. References to you or “**your**” in this Notice are references to the data subject or data owner;

Examples of personal data are:

- (a) Name, national registration identity card number, passport or other identification number, telephone number(s), mailing address and email address
- (b) Your employment history, education background, and income levels;
- (c) Your payment-related information, such as your bank account or credit card information, and your credit history; and
- (d) Information about your usage of and interaction with our website and/or services including computer and connection information, device capability, bandwidth, statistics on page views, traffic to and from our website cookies, IP address, subscription account details, and membership details, but only to the extent that the Company may identify you from such information.

2. COLLECTION OF PERSONAL DATA

(1) Depending on your interaction with us, we may collect and/or receive your personal data in any of the following ways.

(a) Information you provide directly to us:

- i. When you establish an online account with us;
- ii. When you order a product from us or engage our service or transact with us in any business area;
- iii. When you submit a query on our products and/or services;
- iv. When you request to be included in an email or other mailing list;
- v. When you respond to any of our promotions or marketing or related initiatives;

- vi. When you interact with our staff (e.g., customer service officers) via telephone calls or video conferencing (both of which may be recorded), letters, fax, face-to-face meetings, social media platforms or emails;
- vii. When you respond to our job advertisement;
- viii. When you provide feedback or submit a complaint to us;
- ix. When you use our electronic services, or interact with us via our website or use any service on our website;
- x. When you or the entity you are acting on behalf of enter into any agreement or contract with us;
- xi. When your images are captured by us via CCTV cameras while you are within our premises;
- xii. When you submit your personal data to us for any other reason(s).

(b) Information from third-party sources:

We may receive or obtain information about you from publicly and commercially available sources (where permitted by law), which we may combine with other information we receive from or about you. Further, we may receive or obtain information about you from third-party social networking services when you choose to connect with those services.

(2) We may collect other information about you with your consent.

(3) From time to time, we may do a verification exercise with you to update us on any changes to your personal data. Please update us if there are changes to your personal data by informing our Data Protection Officer in writing or via email at the contact details provided below. Failure to do so on your part may result in our inability to provide you with products and services you have requested in a timely manner.

3. PURPOSES OF PERSONAL DATA COLLECTION

(1) We hereby notify you that we may collect, use, store, disclose and/or process your personal data for any or all of the following purposes (the “**Purpose**”):

- (a) administering, processing and/or dealing with any transactions between you and the Company and/or any of its Affiliates including but not limited to any application by you for employment or work with the Company
- (b) performing obligations in the course of or in connection with our provision of the goods and/or services requested by you;
- (c) verifying your identity;
- (d) responding to, handling, and processing queries, requests, applications, complaints, and feedback from you or on your behalf;
- (e) administering, facilitating, processing and/or dealing in any matters relating to your use of any of the Company’s website(s);
- (f) monitoring, processing and/or tracking your use of any of the Company’s websites in order to improve your experience in using such websites;
- (g) carrying out due diligence or other screening activities (including background checks) in accordance with legal or regulatory obligations applicable to us (whether Singapore or non-Singapore);

- (h) to prevent or investigate any fraud, unlawful activity or omission or misconduct, whether or not there is any suspicion of the aforementioned; dealing with conflict of interests; or dealing with and/or investigating complaints;
- (i) creating reports with respect to our transactions with you;
- (j) managing your relationship with us;
- (k) processing payment or credit transactions;
- (l) complying with any applicable laws, regulations, codes of practice, guidelines, or rules, or to assist in law enforcement and investigations conducted by any governmental and/or regulatory authority (whether within or outside Singapore);
- (m) facilitating any proposed or confirmed merger, acquisition or business asset transaction involving any part of our organisation, or corporate restructuring process;
- (n) storing, hosting, backing up (whether for disaster recovery or otherwise) of your personal data, whether within or outside Singapore;
- (o) facilitating, dealing with and/or administering external audit(s) or internal audit(s) of the business of the Company and/or its Affiliates;
- (p) dealing with and/or facilitating a business asset transaction or a potential business asset transaction;
- (q) any other purposes for which you have provided the information;
- (r) transmitting to any unaffiliated third parties including our third-party service providers and agents, and relevant governmental and/or regulatory authorities, whether in Singapore or abroad, for the aforementioned purposes; and
- (s) any other incidental purposes related to or in connection with the above as set out in this paragraph 3(1).

(2) The purposes listed above may continue to apply even in situations where your relationship with us or the relationship of the company you are acting on behalf of (for example, pursuant to a contract) 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).

(3) If you have provided us with your consent to receive marketing or promotional information via your Singapore telephone number(s), we may contact you with information on our products and services via voice calls, text, fax and/or other means.

4. STORAGE OF THE PERSONAL DATA AND PERIOD OF RETENTION

- (1) We shall store/keep the personal data in the form of paper and/or soft copy as appropriate.
- (2) We shall retain the personal data for as long as it is necessary, taking into account the above Purpose, or as required or permitted by applicable laws.

5. DISCLOSURE OF PERSONAL DATA TO THIRD PARTIES

- (1) We may disclose your personal data to third parties, whether located within or outside Singapore, for one or more of the above Purpose, as such third parties would be processing your personal data for one or more of the above Purpose. In this regard, you hereby acknowledge, agree and consent that we may be/are permitted to disclose your personal data to such third parties (whether located within or outside Singapore) for one or more of the above Purpose and for the said third parties to subsequently collect, use, disclose and/or process your personal data for one or more of the above Purpose. Without

limiting the generality of the foregoing or of paragraph 3 setting out the Purpose, such third parties include

- (a) **Our Affiliates.** The term 'Affiliates' refers to (i) direct and indirect holding companies of the Company, (ii) subsidiaries of any direct or indirect holding company, and (iii) subsidiaries of the Company;
- (b) **Service providers,** who include any of our agents, contractors, third-party service providers and other organisations that process or will be processing your personal data on our behalf including but not limited to those which provide administrative or other services to us such as telecommunication companies, information technology companies and data centres;
- (c) **Governmental Agencies and Industry Associations**
Government agencies and industry associations that request for and/or require your information.
- (d) **Other Parties When Required by Law or as Necessary to Protect Our Services**
We may disclose your information to other parties to comply with the law or respond to compulsory legal process (such as a search warrant or other court order); to verify or enforce compliance with the policies governing our services; and to protect the rights, property, or safety of the Company, or any of our respective Affiliates, business partners, customers, or third parties whom we work with.
- (e) Third parties, service providers, agents and other organisations for any of the Purpose set out in paragraph 3 above.

(2) In addition to the disclosures described in this Notice, we may share information about you with third parties when you consent to or request such sharing or if permitted under applicable laws.

(3) Where your personal data is to be transferred out of Singapore, we will comply with the PDPA in doing so. In this regard, this includes us taking appropriate steps to ascertain that the foreign recipient organisation of the personal data is bound by legally enforceable obligations to provide to the transferred personal data a standard of protection that is at least comparable to the protection under the PDPA. This may include us entering into an appropriate contract (whether via a standalone contract or included as part of a main transaction) with the foreign recipient organisation dealing with the personal data transfer or permitting the personal data transfer without such a contract if the PDPA or law permits us to.

6. REQUESTS FOR ACCESS, CORRECTION AND/OR WITHDRAWAL

Data owners/subjects may request for the following:

(a) **Withdrawal of Consent**

- i. The consent that you provide for the collection, use, processing and disclosure of your personal data will remain valid until such time it is being withdrawn by you in writing. You may withdraw consent and request us to stop collecting, using, processing and/or disclosing your personal data for

any or all of the Purpose listed above by submitting your request in writing or via email to our Data Protection Officer at the contact details provided below.

- ii. Upon receipt of your written request to withdraw your consent, we may require reasonable time (depending on the complexity of the request and its impact on our relationship with you) for your request to be processed and for us to notify you of the consequences of us acceding to the same, including any legal consequences which may affect your rights and liabilities to us. In general, we shall seek to process your request within a reasonable time from our receipt of your request.
- iii. Whilst we respect your decision to withdraw your consent, please note that depending on the nature and scope of your request, we may not be in a position to continue providing our goods or services to you or to continue our purchase of your goods or services (as applicable) or to complete any of the Purpose set forth in paragraph 3 above or otherwise notified to you and we shall, in such circumstances, notify you before completing the processing of your request. Should you decide to cancel your withdrawal of consent, please inform us in writing in the manner described in paragraph 6(a)(i) above.
- iv. Please note that withdrawing consent does not affect our right to continue to collect, use, process and/or disclose personal data where such collection, use, processing and/or disclosure without consent is permitted or required under applicable laws.

(b) Access to and Correction of Personal Data.

- i. If you wish to make (a) an access request for access to 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 any of your personal data which we hold about you, you may submit your request in writing or via email to our Data Protection Officer at the contact details provided below. We will need enough information from you in order to ascertain your identity as well as the nature of your request, so as to be able to deal with your request.
- ii. 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.
- iii. For a request to access personal data, once we have sufficient information from you to deal with the request, we will respond to your request as soon as reasonably possible.
- iv. For a request to correct personal data, once we have sufficient information from you to deal with the request, we will correct your personal data as soon as practicable. We may send the corrected personal data to other organisations to which the personal data was disclosed by us within a year before the date the correction was made (unless that other organisation does not need the corrected personal data).

- v. If we are unable to provide you with any personal data or to make a correction requested by you, we shall generally inform you of the reasons why we are unable to do so (except where we are not required to do so under the PDPA).

7. PROTECTION OF PERSONAL DATA

- (1) To safeguard your personal data from unauthorised access, collection, use, disclosure, copying, modification, disposal or similar risks, we have introduced reasonable administrative, physical and technical measures, and disclosing personal data both internally and to our authorised third-party service providers and agents only on a need-to-know basis. However, we cannot assume responsibility for any unauthorized use of your personal data by third parties which are wholly attributable to factors beyond our control.
- (2) You should be aware, however, that no method of transmission over the Internet or method of electronic storage is completely secure.

8. USE OF COOKIES

We may use cookies and similar technologies when you visit our website. They are either necessary for the functioning of our services, help us improve our performance, or serve to provide you with extra functionalities.

Cookies are small text files stored by your browser as you browse the Internet. They can be used to collect, store, and share data about your activities across websites, including on our website. Cookies also allow us to remember things about your visits to our website, like your preferred language, and to make the site easier to use.

Please note that most browsers automatically accept cookies. Therefore, if you do not wish cookies to be used, you may need to actively delete or block the cookies. If you reject the use of cookies, you will still be able to visit our website but some of the functions may not work correctly.

9. LINKS

This website may contain links to other websites. The other websites are linked to provide information to our users. However, please note that we are not responsible for the content or privacy of other websites. Please read the privacy statement of such websites.

10. EFFECT OF NOTICE AND CHANGES TO NOTICE

- (1) This Notice applies in conjunction with any other notices, contractual clauses and consent clauses that apply in relation to the collection, use, processing and disclosure of your personal data by us.
- (2) We may revise this Notice from time to time without any prior notice. You may determine if any such revision has taken place by referring to the date on which this Notice was last updated on the Company's website. Please check the Notice from time to time for such changes. Your continued use of our website, services or continued

dealing with us following the posting of changes to this Notice constitutes your acknowledgement and acceptance of such changes.

11. CONTACT CHANNEL

You may contact our Data Protection Officer if you have any enquiries or feedback on our personal data protection policies and procedures, or if you wish to make any request, in the following manner:

Data Protection Officer
Nippon Sanso Holdings Singapore Pte. Ltd.
Address: 8 Jurong Town Hall Road #23-03/04 The JTC Summit, Singapore 609434

12. Governing Law

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

Effective Date: 17 July 2022