

Prestige Heritage Services Pte Ltd
Personal Data Protection Policy

We at Prestige Heritage Services Pte Ltd ("PHS") take the protection of your data very seriously. We also recognise the importance of the personal data you have entrusted to us and believe that it is our responsibility to properly manage, protect and process your personal data.

This Data Protection Policy is designed to assist you in understanding how we collect, use and/or disclose the personal data you have provided to us, as well as to assist you in making an informed decision before providing us with any of your personal data.

If you, at any time, have any queries on this policy or any other queries in relation to how we may manage, protect and/or process your personal data, please do not hesitate to contact our Data Protection Officer (the "DPO") at the contact details set out at paragraph 7.2 below.

1 INTRODUCTION

- 1.1 "Personal Data" means data, whether true or not, about an individual who can be identified from that data, or from that data and other information to which an organisation has or is likely to have access. Common examples of personal data could include names, identification numbers, contact information, financial records, credit card information, photographs and video images.
- 1.2 We will collect your personal data in accordance with the applicable data protection laws and regulations (including but not limited to the Singapore Personal Data Protection Act 2012). In general, before we collect any personal data from you, we will notify you of the purposes for which your personal data may be collected, used and/or disclosed, as well as obtain your consent for the collection, use and/or disclosure of your personal data for the intended purposes.

2 PURPOSES FOR COLLECTION, USE & DISCLOSURE OF PERSONAL DATA

- 2.1 The personal data which we collect from you may be collected, used and/or disclosed for the following purposes:
- (a) facilitating and/or processing your transactions with PHS;
 - (b) processing and/or responding to any queries made by you in relation to requested services details with PHS;
 - (c) facilitating, processing, dealing with, administering, managing and/or maintaining your relationship with PHS, including but not limited to:
 - Corporate Services
 - Consultancy Services
 - Compliance Services
 - Holdmail / Correspondence Address Services
 - (d) carrying out your instructions or responding to any enquiry given by (or purported to be given by) you or on your behalf;
 - (e) conducting customer due diligence and personal identification in accordance with laws, regulations and policies (including internal policies) including for the purpose of

complying with any other applicable laws and/or regulatory requirements which obliges PHS to do so;

- (f) processing and sending to you marketing, advertising and promotional information on products, future events, launches and promotions of PHS via postal mail and/or electronic mail;
- (g) if so consented by you, sending you marketing, advertising and promotional information about other products/services that PHS may be offering and which PHS believes may be of interest or benefit to you, by voice call/phone call, SMS/MMS/WATSAPP (text messages) and/or fax;
- (h) conducting research, analysis and development activities (including but not limited to data analytics, surveys and/or profiling) to improve our services and facilities in order to enhance your relationship with us or for your benefit, or to improve any of our products or services for your benefit;
- (i) any other purposes which we notify you of at the time of obtaining your consent.

(collectively, the "**Purposes**")

2.2 As the purposes for which we may/will collect, use, disclose or process your personal data depend on the circumstances at hand, such purpose may not appear above. However, we will notify you of such other purpose at the time of obtaining your consent, unless processing of your personal data without your consent is permitted by the applicable data protection laws and regulations.

2.3 In order to conduct our business 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 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 would be processing your personal data on our behalf for one or more of the above-stated Purposes.

3 SPECIFIC ISSUES FOR THE DISCLOSURE OF PERSONAL DATA TO THIRD PARTIES

3.1 We respect the confidentiality of the personal data you have provided to us.

3.2 In that regard, we will not disclose any of your personal data to any third parties without first obtaining your express consent permitting us to do so. However, please note that we may disclose your personal data to third parties without first obtaining your consent in certain situations, including, without limitation, the following:

- (a) cases in which the disclosure is required based on the applicable laws and/or regulations;
- (b) cases in which the purpose of such disclosure is clearly in your interests, and if consent cannot be obtained in a timely way;
- (c) cases in which the disclosure is necessary to respond to an emergency that threatens the

life, health or safety of yourself or another individual;

- (d) cases in which 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 practicable, notify you of the disclosure and the purposes of the disclosure;
- (e) cases in which the disclosure is necessary for any investigation or proceedings;
- (f) cases in which the personal data is disclosed to any officer of a prescribed law enforcement agency, upon production of written authorisation 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 officer; and/or
- (g) cases in which the disclosure is to a public agency and such disclosure is necessary in the public interest.

3.3 The instances listed above at paragraph 3.2 are not intended to be exhaustive. For an exhaustive list of exceptions, you are encouraged to contact our Data Protection Officer at the contact details as set out in paragraph 7.2 below.

3.4 In all other instances of disclosure of personal data to third parties with your express consent, we will endeavor to provide adequate supervision over the handling and administration of your personal data by such third parties, as well as to provide for adequate forms of protection over such personal data.

3.5 Where personal data is transferred by us to any third parties outside of Singapore, we will as reasonably practicable check that such transfers are compliant with the requirements under the applicable data protection laws and regulations. In this regard, we will take such necessary reasonable measures to ensure that such overseas recipients are bound by legally enforceable obligations to ensure that these overseas recipients provide a standard of protection to the personal data so transferred that is comparable to the protection under the applicable data protection laws and regulations.

4 REQUEST FOR ACCESS AND/OR CORRECTION OF PERSONAL DATA

4.1 To the extent required or permitted by applicable laws and regulations, you may request to access and/or correct the personal data currently in our possession at any time by submitting your request to the contact details listed at paragraph 7.2 below.

4.2 For a request to access personal data, once we have sufficient information from you to deal with the request, we will seek to provide you with the relevant personal data within 30 calendar days. Where we are unable to respond to you within the said 30 calendar days, we will notify you of the soonest possible time within which we can provide you with the information requested. Note that there are certain types of personal data which are exempt under the applicable data protection laws from being subject to your access request.

4.3 For a request to correct personal data, once we have sufficient information from you to deal with the request, we will:

- (a) correct your personal data within 30 calendar days. Where we are unable to do so within the said 30 calendar days, we will notify you of the soonest practicable time within which we can make the correction. Note that there are certain types of personal data which are exempt under the applicable data protection laws from being subject to your access request; and
- (b) subject to paragraph 4.4 below, we will send the corrected personal data to every other organisation to which the personal data was disclosed by PHS within a year before the date the correction was made, unless that other organisation does not need the corrected personal data for any legal or business purpose.

4.4 Notwithstanding paragraph 4.3 above, we may, if you so consent, send the corrected personal data only to specific organisations to which the personal data was disclosed by us within a year before the date the correction was made.

4.5 We will also be charging you a reasonable fee for the handling and processing of your requests to access your personal data. We will provide you with a written estimate of the fee we will be charging. Please note that we are not required to respond to or deal with your access request unless you have agreed to pay the fee.

5 REQUEST TO WITHDRAW CONSENT

5.1 You may withdraw your consent for the collection, use and/or disclosure of your personal data in our possession or under our control, receiving our promotional updates, marketing materials, newsletter, etc., at any time by submitting your request to the contact details listed at paragraph 7.2 below.

5.2 We will process your request within a reasonable time from such a request for withdrawal of consent being made, and will thereafter refrain from collecting, using and/or disclosing your personal data in the manner stated in your request.

5.3 However, your withdrawal of consent could result in certain legal consequences arising from such withdrawal. In this regard, depending on the extent of your withdrawal of consent for us to process your personal data, it may mean that we will not be able to continue with your existing relationship with us.

6 ADMINISTRATION AND MANAGEMENT OF PERSONAL DATA

6.1 We will take appropriate measures to keep your personal data accurate, complete and updated, if your personal data is likely to be used by PHS to make a decision that affects you or disclosed to another organisation. However, this means that you must also update us of any changes in your personal data that you had initially provided us with. We will not be responsible for relying on inaccurate or incomplete personal data arising from you not updating us of any changes in your personal data that you had initially provided us with.

6.2 We will also take commercially reasonable efforts to take appropriate precautions and preventive measures to ensure that your personal data is adequately protected and secured.

Appropriate security arrangements will be taken to prevent any unauthorized access, collection, use, disclosure, copying, modification, leakage, loss, damage and/or alteration of your personal data. 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.

6.3 We will also take commercially reasonable efforts to ensure that the personal data in our possession or under our control is destroyed and/or anonymized as soon as it is reasonable to assume that (i) the purpose for which that personal data was collected is no longer being served by the retention of such personal data; and (ii) retention is no longer necessary for any other legal or business purposes.

6.4 Where your personal data is to be transferred out of Singapore or another country, we will comply with the applicable data protection laws in doing so. In this regard, this includes us obtaining your consent unless an exception under applicable data protection laws applies, and 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 data protection law applicable to your country. This may include us entering into an appropriate contract with the foreign recipient organisation dealing with the personal data transfer or permitting the personal data transfer without such a contract if the applicable data protection laws permit us to.

7 COMPLAINT PROCESS

7.1 If you have any complaint or grievance regarding about how we are handling your personal data or about how we are complying with our Data Protection Policy, we welcome you to contact us with your complaint or grievance.

7.2 Please contact us through one of the following methods with your complaint or grievance:

(a) Telephone number: [+65] 6832 5075 / 9452 2768.

(b) E-mail: betty@prestigeheritage.com.sg. Attention it to the 'Data Protection Officer'.

(c) Office address: 1 Fullerton Road, #02-01 One Fullerton, Singapore 049213. Attention it to the 'Data Protection Officer'

7.3 Where it is an email or a letter through which you are submitting a complaint, your indication at the subject header that it is a personal data protection complaint would assist us in attending to your complaint speedily by passing it on to the relevant staff in PHS to handle. For example, you could insert the subject header as "Personal Data Complaint".

7.4 We will certainly strive to deal with any complaint or grievance that you may have speedily and fairly.

8 UPDATES ON DATA PROTECTION POLICY

- 8.1 As part of our efforts to ensure that we properly manage, protect and process your personal data, we will be reviewing our policies, procedures and processes from time to time.
- 8.2 We reserve the right to amend the terms of this Data Protection Policy at our absolute discretion. Any amended Data Protection Policy will be posted on our Website and can be viewed at 1 Fullerton Road, #02-01 One Fullerton, Singapore 049213.
- 8.3 You are encouraged to visit the above website from time to time to ensure that you are well informed of our latest policies in relation to personal data protection.