

# Singapore Godown's Personal Data Protection Policy

Singapore Godown Pte Ltd respects the confidentiality of Personal Data and privacy of individuals and is committed to complying with the Personal Data Protection Act (PDPA). The PDPA is designed to protect the confidentiality of data and the privacy of individuals by regulating the way in which Personal Data is managed. Please read this Policy so that you know and understand the purposes for which we collect, use and disclose your Personal Data.

In this Policy, when we use "we", "us" or "our", we refer to the company (within the Singapore Godown Pte Ltd Group) which is collecting your personal data, or which is operating the website which you are accessing or using.

This Policy applies to all personal data that you may provide to us and the personal data we hold about you. By providing us with your personal data or by accessing, using or viewing the applicable website or any of its services, functions or contents (including transmitting, caching or storing of any such personal data), you shall be deemed to have agreed to each and all the terms, conditions, and notices in this Policy. If you do not agree, please cease use of the relevant website(s) and/or service(s) and **DO NOT provide any personal data to us.**

## 1. Collection of Personal Data

1.1 When you use our website, any service we provide or in your interaction with us, the personal data we may collect includes:-

- a) **Data collected directly from you.** This may be done through this website, over the phone, by email, or in person when you meet our staff or representatives. The data collected may include, but is not limited to:
  - (i) your contact information, including your first and last name, billing and/or delivery address, birthdate and email address and, your telephone number. We need your e-mail address and telephone number so that we may contact you if we have questions or information for you regarding your order or the service that we are providing or will provide to you;
  - (ii) other information required to be able to process your order or to provide you with the service, such as information concerning the products you have ordered or the service we are providing to you, the billing and/or delivery address, banking and/or credit card details;
  - (iii) if you have contacted customer service, the details of this contact and the contact history.
- b) **Data collected by automated means.** Various technologies may be used on our website and our mobile and web-based applications in order to make them more user-friendly, effective and secure. Such technologies may lead to data being collected automatically by us or by third parties on behalf of us. This data does not generally, but may, contain a user's personal data. Example of such technologies include:
  - (i) **Cookies.** A number of places on our website and our mobile and web-based applications make use of cookies. These are essentially small text files that are

stored on your computer's hard drive or your user device by your web browser. We can use cookies to identify the owner of a user account and to store articles in a shopping basket during the purchasing process. In other words, cookies help to make our website or our (mobile and web-based) applications more user-friendly, more effective and more secure. The cookies usually used by us are so-called "session cookies", which are automatically deleted at the end of the visit to the relevant website. By default, web browsers enable the use of cookies but this function can also be disabled. However, this will result in some services not being available. It is also possible to manually delete cookies after their use via the web browser. More information may be available from your web browser provider.

1.2 If you provide Personal Data of a third party (e.g. information of your alternative contact person, dependant, spouse, children and/or parents) to us, you represent and warrant that the consent of that third party has been obtained for the collection, use and disclosure of the Personal Data for the purposes set out above.

## **2. How is the collected personal data used**

2.1 In general, we collect, use, and disclose your Personal Data for the following purposes:

- a) to provide you with the products or services that have been requested;
- b) to help us manage the delivery of and enhance our products and services, including by analysing customer needs and identifying potential customer needs;
- c) to communicate with you and respond to your queries, requests and complaints;
- d) to provide ongoing information about our products and services which may be of interest to you;
- e) to handle disputes and conduct and facilitate investigations and proceedings;
- f) to protect and enforce our contractual and legal rights and obligations;
- g) to prevent, detect and investigate crime, including fraud and money-laundering, and to analyse and manage other commercial risks; and
- h) to comply with any applicable rules, laws and regulations, codes of practice or guidelines or to assist in law enforce and investigations by relevant authorities.

2.2 In addition, we may collect, use and disclose your Personal Data for the following purposes, depending on nature of our relationship with you:

### **a) If you are a prospective tenant or a tenant:**

- (i) to conduct appropriate due diligence checks;
- (ii) to prepare lease and/or licence documentation and any other documents as may be required;

- (iii) to perform administration of the lease and/or licence;
- (iv) to perform financial transactions such as rental payments;
- (v) to communicate with you changes and development to our policies, terms and conditions and other administrative information; and
- (vi) any other purpose related to any of the above.

**b) If you utilise our storage facilities:**

- (i) to conduct due diligence checks;
- (ii) to process your application for the lease of the storage facilities;
- (iii) to prepare storage lease documentation and any other documents as may be required;
- (iv) to perform administration of the storage lease;
- (v) to perform financial transactions such as payments for the lease of storage facility;
- (vi) to communicate with you changes and development to Singapore Godown Pte Ltd policies, terms and conditions and other administrative information; and
- (vii) any other purpose relating to any of the above.

**c) If you are a vendor, a prospective vendor or a contractor:**

- (i) to evaluate your proposal and to conduct background checks on you;
- (ii) to communicate with your deployed staff, after award of contract, who are in our properties to carry out work or services, and for any emergency or/and security concerns; and
- (iii) any other purpose relating to any of the above.

**d) If you submit an application to us as a candidate for employment:**

- (i) to process your application including pre-recruitment checks;
- (ii) to provide or to obtain references for background screening/vetting;
- (iii) to collect information about your suitability for the position applied for;
- (iv) to organise training and staff development programs;
- (v) to assess your performance;

- (vi) to administer benefits and payroll processings;
- (vii) to provide you with tools to facilitate or as required for you to do your job;
- (viii) to communicate with you as required to comply with our policies and processes, including business continuity purposes; and
- (ix) any other purposes relating to the aforesaid.

2.3 Where you have provided us with specific consents, we may also collect, use and disclose your Personal Data for the following purposes:

- a) providing services and extending benefits to you, including promotions, loyalty and reward programmes, and sending you real estate market updates, property newsletters and other information on our products, services, offers or promotions which may be of interest to you;
- b) matching Personal Data with other data collected for other purposes and from other sources (including third parties) in connection with the provision or offering of products and services, whether by us or third parties;
- c) administering contests, competitions and conducting lucky draws, including, where necessary, announcing the results of these contests, competitions and lucky draws and identifying and contacting the winners; and
- d) conducting market research to understand and determine customer locations, preferences and demographics for us to review, develop and improve our products, services and also develop special offers, promotional and/or marketing programmes.

2.4 In relation to particular products or services or in your interactions with us, we may also notify or have specifically notified you of other purposes for which we collect, use or disclose your Personal Data. If so, we will collect, use and disclose your Personal Data for these additional purposes as well, unless we have specifically notified you otherwise.

2.5 Your Personal Data will be protected and kept confidential, but subject to the provisions of any applicable law, your Personal Data may, depending on the products or services concerned, be disclosed to the following third parties:

- a) other divisions or entities within our Group;
- b) our joint venture/ alliance partners;
- c) agents, contractors, third party service providers and specialist advisers who have been contracted to provide us with administrative, financial, research, operational or other services, such as telecommunications, information technology, payment, payroll, processing, training, market research, storage and archival;
- d) any third party business partners who offer goods and services or sponsor contests or other promotional programmes, whether in conjunction with us or not;

- e) insurers or insurance investigators and credit providers;
- f) the Credit Bureau, or in the event of default or disputes, any debt collection agencies or dispute resolution centres;
- g) any business partner, investor, assignee or transferee (actual or prospective) to facilitate business asset transactions (which may extend to any merger, acquisition or asset sale) involving us;
- h) our professional advisors such as our auditors and lawyers;
- i) relevant government regulators or authority or law enforcement agency to comply with any laws or rules and regulations imposed by any governmental authority;
- j) anyone to whom we transfer or may transfer our rights and obligations;
- k) banks, credit card companies and their respective service providers; and
- l) any other party as may be consented to by you, as specified by that individual or in the applicable contract.

### **3. Third-Party Sites**

Our website may contain links to other websites operated by third parties, such as our business partner. We are not responsible for the privacy practices of websites operated by third parties that are linked to our website. We encourage you to learn about the privacy policies of such third party websites. Once you have left our website, you should check the applicable privacy of the third-party website to determine how they will handle any information they collected from you.

### **4. Social Networks**

4.1 Our website and mobile or web-based applications may provide you with social plug-ins from various social networks (such as Facebook and Twitter). If you choose to interact with a social network, your activity on our website or via our mobile or web-based applications will also be made available to social networks such as Facebook and Twitter.

4.2 If you are logged in on one of the social networks during the visit of one of our websites or mobile or web-based applications, the social network might add this information to your profile. If you are interacting with one of the social plug-ins, this information will be transferred to the social network. In case you do not wish such a data transfer, please log off on your social network before you enter one of our websites or mobile or web-based applications.

4.3 We cannot influence this data collection and data transfer via the social plug-ins. Please read the privacy policies of those social networks for detailed information about the collection and transfer of personal data, what rights you have and how you can achieve satisfactory privacy settings.

## **5. Geo-location Services**

Our website and mobile or web-based applications may offer location-enabled services, such as Google Maps and Bing Maps. If you use those mobile or web-based applications, they may receive information about your actual location (such as GPS signals sent by a mobile device) or information that can be used to approximate a location. You are always asked if the geo-location service can be activated and you can also object to this geo-location service within the respective mobile or web-based application.

## **6. Security**

We endeavor to take precautions to ensure that the information you have provided is protected against unauthorised or unintended use, access or disclosure. However, we cannot be held responsible for unauthorised or unintended use, access or disclosure that is beyond our control.

## **7. Disclaimer**

TO THE MAXIMUM EXTENT PERMITTED BY LAW, WE SHALL NOT BE LIABLE IN ANY EVENT FOR ANY SPECIAL, EXEMPLARY, PUNITIVE, INDIRECT, INCIDENTAL OR CONSEQUENTIAL DAMAGES OF ANY KIND OR FOR ANY LOSS OF REPUTATION OR GOODWILL, WHETHER BASED IN CONTRACT, TORT (INCLUDING NEGLIGENCE), EQUITY, STRICT LIABILITY, STATUTE OR OTHERWISE, SUFFERED AS A RESULT OF UNAUTHORISED OR UNINTENDED USE, ACCESS OR DISCLOSURE OR YOUR PERSONAL DATA.

## **8. Review of this Policy**

We may review and update this Policy from time to time. The updated Policy will be publicised on our website.

## **9. Storing of Personal Data**

We will safeguard the confidentiality of your Personal Data, whether you interact with us personally, by telephone or mail, over the Internet or other electronic media. We hold Personal Data in a combination of secure computer storage facilities and paper based files and other records and take steps to protect the Personal Data we hold from misuse, loss, unauthorised access, modification or disclosure. Where we no longer require any Personal Data that we hold, that Personal Data would be destroyed or have particulars or information which may identify individuals removed.

## **10. Withdrawal of Consent**

You may withdraw your consent given for any or all purposes set out in this Policy in writing. If you withdraw your consent to any or all purposes and depending on the nature of your request, we may not be in a position to continue to provide our products or services to you. Without prejudice to the foregoing, you agree and acknowledge that any withdrawal of your consents in accordance with the terms set out in this Policy will not affect any consent which you may have provided us prior to your withdrawal of consent.

## **11. How to contact us**

11.1 If you have any questions about the processing of your personal data or about our Policy, if you do not accept the amended Policy, if you wish to withdraw any consent you have given us at any time, or if you wish to update or have access to your personal data, you are welcome to contact us. The contact details are:

Attention to : Singapore Godown Data Protection Officer

Email : [sgdpo@singaporegodown.com.sg](mailto:sgdpo@singaporegodown.com.sg)

Telephone number : 62399111

Mail : 25 Tagore Lane #01-03,  
Singapore Godown Building,  
Singapore 787602

11.2 All requests for correction or for access to your personal data must be in writing. We will endeavor 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.

11.3 We may be prevented by law from complying with any request that you may make. We may also decline any request that you may make if the law permits us to do so.

11.4 In many circumstances, we need to use your personal data in order for us to provide you with products or services which you require or have requested. If you do not provide us with the required personal data, or if you do not accept the amended Policy or 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 or have requested.

11.5 We may charge you a fee for responding to your request for access to the personal data which we hold about you, or for information about the ways in which we have (or may have) used your personal data. If a fee is to be charged, we will inform you of the amount beforehand and respond to your request after payment is received.

11.6 We will evaluate all complaints in a timely manner. After we have completed our evaluation, the SGDPO (or a duly appointed representative) will respond to the complainant with the results of the evaluation.

## **12. Governing Law**

This 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 Policy