

Personal Data Protection Policy

Thank you for visiting the CWL Singapore website (the "**Website**"). Your visit to this Website and your use of our products and services provided herein are subject to the terms and conditions herein contained. Please read these carefully.

General

1. CWL Facilities Management Pte Ltd ("**us**", "**we**", "**our**") is the operator of this Website. We take our responsibilities under Singapore's *Personal Data Protection Act 2012* (the "**PDPA**") 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.
2. In this Policy, as under the PDPA, "**personal data**" means data, whether true or not, 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. Common examples of personal data could include names, identification numbers, dates of birth, contact information, skin records, photographs and video images.
3. This Policy is designed to assist you in understanding how we collect, use, disclose and/or process your personal data.
4. Unless restricted by the PDPA or any other applicable law, you agree that we may process your personal data in the manner, and for the purposes set out in the terms described in this Policy.

How Personal Data is collected

5. We may collect your personal data in several situations, including, without limitation, the following:
 - (a) when you register for an account on the Website, or through any of our apps;
 - (b) when you complete requests or applications for bookings; products or services (by telephone, in person, mail or electronically);
 - (c) when you make a booking; reservation; or purchase on the Website or any other website or app which we have control of, or have been authorised to oversee by your MCST or developer;
 - (d) when you communicate with us directly in relation to our services (in person; *via* our customer service; or *via* our staff, our counters; by email, telephone or any other means);
 - (e) when you use our services that are made available on the Website; our apps or at our management offices or stations in your estate;
 - (h) when you apply for employment with us;

- (i) when you are added into the documents or records of any estate which are providing services for; or
- (j) when you participate in surveys and other types of research we may conduct.

Collection of personal data

- 6. You can use and browse the Website without disclosing your personal data. The provision of your personal data is voluntary. However, if you do not provide your personal data to us, we may not be able to provide some or all of the products and services that you may require from us.
- 7. If you are a candidate for employment, we will collect personal data that you provide to us during the recruitment process, including personal data that is contained in your resume and in any application form that we require you to fill up. Such personal data may include your employment history and working eligibility rights. Further, you consent to us contacting the character references stated therein (if any); and your previous employers to evaluate your suitability for the role you have applied for.
- 8. The types of personal data which we may collect about you include, without limitation:
 - (a) your contact information such as names, addresses, telephone numbers, and email addresses;
 - (b) billing information such as billing address and credit card information;
 - (c) unique information such as NRIC or passport numbers; photographs; contact preferences; and date of birth;
 - (d) details of any membership that you have with us;
 - (e) details of your visits to the Website, such as traffic data; location data; and the resources that you access on the Website; and
 - (f) your transaction history.

Provision of third party personal data by you

- 9. Should you provide us with personal data of individual(s) other than yourself, you represent and warrant to us and you hereby confirm that:
 - (a) prior to disclosing such personal data to us, you would have and had obtained consent from the individuals whose personal data are being disclosed to us, to:
 - (i) permit you to disclose the individuals' personal data to us for the purposes we have disclosed to you; and
 - (ii) permit us to collect, use, disclose and/or process the individuals' personal data for the said purposes;
 - (b) any personal data of individuals that you disclose to us is accurate; and
 - (c) you are validly acting on behalf of such individuals and that you have the authority of such individuals to provide their personal data to us and for us to collect, use, disclose and process such personal data for the purposes.

Purposes for Collection, Use, Disclosure

10. The personal data which we collect from you may be used, disclosed and/or processed for various purposes, depending on the circumstances for which we may/will need to process your personal data, including, without limitation:
 - (a) to communicate with you;
 - (b) to maintain and improve our working relationship;
 - (c) to assess, process and provide products, services and/or facilities to you;
 - (d) to administer and process any payments (including refunds) related to products, services and facilities requested by you;
 - (e) to establish your identity and background;
 - (f) to respond to your enquiries or complaints and resolve any issues and disputes which may arise in connection with any dealings with us;
 - (g) to provide you with services or assistance that you have requested;
 - (h) to provide you with information and/or updates on our products, services, upcoming promotions offered by us and/or events organised by us and selected third parties which may be of interest to you from time to time;
 - (i) for direct marketing purposes via SMS, WhatsApp, LINE, WeChat, KaKaoTalk, phone call, email, fax, mail, social media and/or any other appropriate communication channels, if you are a member of any of our loyalty programmes, in accordance with your consent;
 - (j) to facilitate your participation in, and our administration of, any events;
 - (k) to maintain and update internal record keeping;
 - (l) for internal administrative purposes;
 - (m) to send you seasonal greetings messages from time to time;
 - (n) to conduct credit reference checks and establish your creditworthiness, where necessary, when providing you with products, services and/or facilities;
 - (o) to administer, process and fulfil your commercial transactions with us (such as a purchase on the Website, a tender award, contract for service or tenancy agreement);
 - (p) to process any payments related to your commercial transactions with us;
 - (q) to process and analyse your personal data either individually or collectively with other individuals;
 - (r) to share any of your personal data with the auditor for our internal audit and reporting purposes;
 - (s) to share any of your personal data pursuant to any agreement or document which you have duly entered with us for purposes of seeking legal and/or financial advice and/or for purposes of commencing legal action;
 - (t) to share any of your personal data with financial institutions necessary for the purpose of applying and obtaining credit facility(ies), if necessary;
 - (u) for audit, risk management and security purposes;
 - (v) for detecting, investigating and preventing fraudulent, prohibited or illegal activities;
 - (w) for enabling us to perform our obligations and enforce our rights under any agreements or documents that we are a party to;

- (x) to transfer or assign our rights, interests and obligations under any agreements entered into with us;
 - (y) for meeting any applicable legal or regulatory requirements and making disclosure under the requirements of any applicable law, regulation, direction, court order, by-law, guideline, circular or code applicable to us;
 - (z) to enforce or defend our rights and your rights under, and to comply with, our obligations under the applicable laws, legislation and regulations;
 - (aa) to carry out verification and background checks as part of any recruitment and selection process in connection with your application for employment with us;
 - (bb) for other purposes required to operate, maintain and better manage our business and your relationship with us; which we notify you of at the time of obtaining your consent; and/or
 - (cc) administering, facilitating, processing and/or dealing in any matters relating to your use or access of the Website. Without limiting the generality of the foregoing, if you:
 - (i) gain access to or sign into the Website, using your login credentials of a Social Networking Site, or
 - (ii) use any features of a Social Networking Site such as its widgets, plug-ins and browser push notifications, made available to you on our Website, it may result in information or your personal data being collected or shared between us and the third party. For example, if you use Facebook's "Like" feature, Facebook may register the fact that you "liked" a product and may post that information on Facebook. ("**Social Networking Site**" refers to an online or digital platform owned or operated by a third party, that is used by people to build social networks or social relations, or to interact, with other people, such as but not limited to Facebook, Instagram, Twitter, Weibo, WeChat). By your proceeding pursuant to (i) or (ii) above, you consent to such collection, use or disclosure of your personal data.
11. 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 in the instances listed above. However, we will notify you of such other purpose(s) at the time of obtaining your consent, unless we are permitted by the PDPA or any other applicable law to process your personal data without your consent.

Disclosure of personal data to third parties

12. In order to smoothly conduct our business operations or to fulfil our obligations to you, we may also disclose the personal data that you have provided to us to our third party service providers, agents, affiliates or related corporations, which may be situated inside or outside of Singapore, for one or more of the purposes stated in or notified to you under the Purposes for Collection, Use, Disclosure section. We will also disclose your personal data to government regulators or authorities in order to comply with any laws, rules, guidelines, regulations or schemes that apply to us.

13. Examples of third parties that we disclose your personal data include, without limitation:
 - (a) data entry service providers;
 - (b) professional advisors, consultants and/or external auditors;
 - (c) storage and warehousing facility providers (which may include data storage and processing servers located overseas);
 - (d) third party service providers who provide administrative or operational services in connection with our business such as telecommunications, information technology, logistics, delivery, printing and postal services or services relating to marketing and promotional activity;
 - (e) relevant government regulators or authorities;
 - (f) the CWL group of companies; and our related corporations and affiliates either in Singapore or overseas; and
 - (g) third-party credit reporting or employment agencies as part of the recruitment and selection process and/or otherwise in connection with your application for employment with us.

14. The third parties which we conduct business are only authorized to use your information to perform the service for which they were hired. As part of our agreement with them, they are required to adhere to the PDPA and any policies that we provide, and to take reasonable measures to ensure your personal data is secure.

15. We respect the confidentiality of the personal data that you provide to us. We do not sell personal data to any third party.

Request for Access and/or Correction of Personal Data

16. You may request to access and/or correct your personal data that is in our possession or under our control by writing to us at dpo@cw1.sg.

17. For a request to access personal data, we shall reasonably endeavour to provide you with the relevant personal data within thirty (30) days from such a request being made. Where information you request requires more time and expense, we shall reach agreement with you on terms on how to process your request. Depending on the scope and nature of the work required to process your access request, we may be required to impose a fee to recover our administrative costs. This will be assessed on a case-by-case basis by our Data Protection Officer. Where such a fee is to be imposed, we will provide you with a written estimate of the fee for your consideration. Please note that we will only process your request once you have agreed to the payment of the fee. In certain cases, we may also require a deposit from you before we process the access request. You will be notified if a deposit is required when we provide you with the written estimate of the fee, if any.

18. For a request to correct personal data, we will correct your personal data as soon as practicable after the request has been made unless we have reasonable grounds not to do so.
19. You understand that we are reliant on you to provide us with accurate and complete personal data and with updates if there are any changes to your personal data. We will not be responsible for relying or using any inaccurate or incomplete personal data where you have provided with such personal data and/or have failed to update us of any changes in your personal data.

Request to Withdraw Consent

20. You may withdraw your consent for the collection, use and/or disclosure of your personal data that is in our possession or under our control by writing to us at dpo@cwl.sg.
21. We will process your request within a reasonable time from such a request for withdrawal of consent being made, and will thereafter not collect, use and/or disclose your personal data in the manner stated in your request.
22. Your withdrawal of consent may result in certain consequences. For example, it may mean that we will not be able to provide you with certain products or services that you have requested or that we will not be able to continue with your existing relationship with us. We will inform you of such consequences after we receive your request for withdrawal.
23. However, you understand that notwithstanding your withdrawal of consent, we will still be entitled to collect, use or disclose your personal data if we are required or authorised to do so under the PDPA or any other applicable law.

Protection and Destruction of Personal Data

24. We will put in place reasonable security arrangements to ensure that your personal data is adequately protected and secured. In particular, reasonable 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.
25. We may retain your personal data for as long as it is necessary to fulfil the purpose for which it was collected, or as required or permitted by applicable laws. We will also put in place measures to ensure that any of your personal data that is in our possession

or under our control is destroyed and/or anonymized as soon as it is reasonable to assume that:

- (a) the purpose for which that personal data was collected is no longer being served by the retention of such personal data; and
- (b) retention is no longer necessary for any other legal or business purposes.

Cookies and Mobile Technology

- 26. *Cookies.* For users of the Website, please note that we may deposit “cookies” in your computer or your mobile device in order to identify you. Cookies are small data text files that are sent from a server computer during a browsing session. Cookies are typically stored on the computer’s hard drive and are used by websites to simulate a continuous connection to the site. Security measures have been employed to prevent unauthorized access to visitor data. However, visitors acknowledge that we do not control the transfer of data over telecommunication facilities including the Internet. Therefore, to the extent permitted by law, we will not be responsible for any breach of security or the unauthorized disclosure or use of any such data on the Internet, through no fault of ours. Not all cookies collect personal data and you may configure your browser to reject cookies. However, this may mean you may not be able to take full advantage of the services or features on the Website. Where the data collected by such cookies constitute your personal data, such personal data is being collected, used or disclosed for one or more of the purposes. By continuing to use the Website, you are agreeing to the use of cookies on the Website. However, please note that we have no control over the cookies used by third parties.
- 27. *Flash Cookies.* “Flash Cookies” (also called Local Shared Objects or “**LSOs**”) are data files similar to cookies, except that they can store more complex data. Flash Cookies are used to remember settings, preferences, and usage, particularly for video, interactive gaming, and other similar services.
- 28. *Web Beacons.* Web beacons are small graphic images on a web page or in an e-mail that can be used for such things as recording the pages and advertisements clicked on by users, or tracking the performance of e-mail marketing campaigns.
- 29. *Analytics Tags.* We use analytical tags to analyse what our clients like to do and the effectiveness of our features and advertising. They can also help us customize your browsing and shopping experience. We may use information collected through analytical tags or tracked links in combination with your Personal Data. We may also combine personal data you provide to us with other personal data (such as purchase history and demographic information). We often work with other companies such as, to help us track, collect and analyse this information but they are prohibited from using this information for any other purpose.

30. *Web Server Logs.* Web server logs are records of activity created by the mobile device or computer that delivers the webpages you request to your browser. For example, a web server log may record the search term you entered or the link you clicked to bring you the webpage. The Web server log also may record information about your browser, such as your IP address and the cookies set on your browser by the server.
31. *Geo-Location Technologies.* Geo-location technology refers to technologies that permit us to determine your location. We may ask you to manually provide location information (like your postal code), or to enable your mobile device to send us precise location information. For example, the first time you download the App you will/may be asked to choose between allowing or not allowing the App to access your location and/or to send you mobile notifications. If you choose “Do Not Allow,” you will have opted-out of having the App accessing your location to send you location-specific offer notifications. If you choose “OK” the App will communicate with your mobile device and collect certain data as provided in this Policy in order to send you targeted offers based on your location. You can always opt-out of sharing location data with the App by changing your device settings.
32. Our Website contains areas where you can submit information to us (such as our registration service), and we also have features (such as cookies and performance tracking technology) that automatically collect information from the visitors to our Website. During the registration process, you must provide us with a password, your name, address and a valid email address, etc. It is your responsibility to keep your password strictly confidential.

Complaint Process

33. If you have any complaint or grievance regarding about how we are handling your personal data or about how we are complying with the PDPA, we welcome you to contact us by writing to us at dpo@cw1.sg.
34. We will certainly strive to deal with any complaint or grievance that you may have speedily and fairly.

Contact Us

35. You may contact us (or send us any request or complaint form) by email at the following address:

Data Protection Officer
CWL Facilities Management Pte Ltd
Email Address: dpo@cw1.sg

36. 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.
37. We reserve the right to amend the terms of this Personal Data Protection Policy at our absolute discretion. Any amended Personal Data Protection Policy will be posted on the Website and can be viewed at www.cwl.sg. No individual notice will be sent to you.
38. You are deemed to have acknowledged and agreed to any amended version of this Personal Data Protection Policy if you continue to use the Website after the changes have taken place. As such, 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.

Effect of Policy and Changes to Policy

39. This Policy applies in conjunction with any other notices, contractual clauses and consent clauses that apply in relation to the collection, use and disclosure of your personal data by us.
40. You are encouraged to check this Website for this Policy from time to time to ensure that you are well informed of our latest policies in relation to personal data protection. We may revise this Policy 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. Your continued use of our services constitutes your acknowledgement and acceptance of such changes.