

Data Protection Policy

Document Management

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1	14 Jul 2014	Board approved
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Data Protection Policy

The purpose of this document (“Data Protection Policy”) is to inform you of how Greatearth Pte. Ltd. and its related corporations (collectively, the “Companies”) manage Personal Data (as defined below) which is subject to the Singapore Personal Data Protection Act (No. 26 of 2012) (“the Act”). Please take a moment to read this Data Protection Policy so that you know and understand the purposes for which we collect, use and disclose your Personal Data.

By interacting with the Companies, as well as its representatives and/or agents (collectively referred to herein as “the Group”, “us”, “we” or “our”), submitting information to us, or signing up for any products and services offered by us, you agree and consent to us collecting, using, disclosing and sharing amongst themselves 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 Data Protection Policy.

This Data Protection Policy supplements but does not supersede nor replace any other consents you may have previously provided to the Group in respect of your Personal Data, and your consents herein are additional to any rights which any of the Companies may have at law to collect, use or disclose your Personal Data.

The Group may from time to time update this Data Protection Policy to ensure that this Data Protection Policy is consistent with our future developments, industry trends and/or any changes in legal or regulatory requirements. Subject to your rights at law, you agree to be bound by the prevailing terms of this Data Protection Policy as updated from time to time on our website <http://greatearth.sg/home.aspx>. Please check back regularly for updated information on the handling of your Personal Data.

1. Personal Data

- 1.1 In this Data Protection Policy, “Personal Data” refers to any 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, including data in our records as may be updated from time to time.
- 1.2 Examples of such Personal Data you may provide to us include (depending on the nature of your interaction with us) your name, NRIC, passport or other identification number, telephone number(s), mailing address, email address and any other information relating to any individuals which you have provided us in any forms you may have submitted to us, or via other forms of interaction with you.

2. **Collection of Personal Data**

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

- (a) when you submit any form, including but not limited to application forms or other forms relating to any of our products and services;
- (b) when you enter into any agreement or provide other documentation or information in respect of your interactions with us, or when you use our products and services;
- (c) when you interact with our staff, including customer service officers, for example, via telephone calls (which may be recorded), letters, fax, face-to-face meetings, social media platforms and emails;
- (d) when you use our electronic services, or interact with us via our websites or use services on our websites;
- (e) when you request that we contact you or request that you be included in an email or other mailing list;
- (f) when you respond to our promotions, initiatives or to any request for additional Personal Data;
- (g) when you submit an employment application or when you provide documents or information including your resume and/or CVs in connection with any appointment as an officer, director, representative or any other position;
- (h) 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 events at our premises;
- (i) when you are contacted by, and respond to, our marketing representatives and customer service officers;
- (j) when we seek information about you and receive your Personal Data in connection with your relationship with us, including for our products and services or job applications, for example, from business partners, public agencies, your ex-employer, referral intermediaries and the relevant authorities; and/or
- (k) when you submit your Personal Data to us for any other reasons.

2.2 When you browse our website, you generally do so anonymously but please see the section below on cookies. We do not, at our website, automatically collect Personal Data unless you provide such information, write in through our website or login with your account credentials.

2.3 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 to provide us with their Personal Data for the respective purposes.

- 2.4 You should ensure that all Personal Data submitted to us is complete, accurate, true and correct. Failure on your part to do so may result in our inability to provide you with the products and services you have requested, or delays in providing you with products and services you have requested, or processing your applications.

3. **Purposes for the Collection, Use and Disclosure of Your Personal Data**

3.1 **Generally**, the Group collects, uses and discloses your Personal Data for the following purposes:

- (a) responding to, processing and handling your queries, feedback, complaints and requests;
- (b) verifying your identity;
- (c) managing and planning the administrative and business operations of the Group and complying with internal policies, reporting requirements and procedures;
- (d) facilitating business asset transactions (which may extend to any mergers, acquisitions or asset sales) involving any of the Companies;
- (e) requesting feedback or participation in surveys, as well as conducting market research and/or analysis for statistical, profiling or other purposes for us to design our products, understand customer behaviour, preferences and market trends, and to review, develop and improve the quality of our products and services;
- (f) matching any Personal Data held which relates to you for any of the purposes listed herein;
- (g) preventing, detecting and investigating crime and analysing and managing commercial risks;
- (h) managing the safety and security of our premises and services (including but not limited to carrying out CCTV surveillance and conducting security clearances);
- (i) monitoring or recording phone calls and customer-facing interactions for quality assurance, employee training and performance evaluation and identity verification purposes;
- (j) organising promotional events and roadshows;

- (k) in connection with any claims, actions or proceedings (including but not limited to drafting and reviewing documents, transaction documentation, obtaining legal advice, and facilitating dispute resolution), and/or protecting and enforcing our contractual and legal rights and obligations;
- (l) conducting investigations relating to disputes, billing or fraud;
- (m) meeting or complying with any applicable rules, laws, regulations, codes of practice or guidelines issued by any legal or regulatory bodies which are binding on the Group (including but not limited to responding to regulatory complaints, disclosing to regulatory bodies and conducting audit checks, due diligence and investigations); and/or
- (n) purposes which are reasonably related to the aforesaid.

3.2 **In addition**, the Group collects, uses and discloses your Personal Data for the following purposes depending on the nature of our relationship:

- (a) If you are a customer, or an employee, business partner, director or representative of an organisation that is a customer of our corporate businesses (which includes but is not limited to our engineering, construction, power solutions and supply businesses):
 - (i) providing customer service and support (including but not limited to customer relationship management, providing you with administrative support, processing your payments and providing delivery);
 - (ii) facilitating overseas travel arrangements;
 - (iii) facilities management (including but not limited to issuing visitor access passes and facilitating security clearance);
 - (iv) creating and maintaining profiles of our customers in our system database;
 - (v) administering debt recovery and debt management; and/or
 - (vi) purposes which are reasonably related to the aforesaid.
- (b) If you are a property agent, an owner or tenant, or an employee of an organisation that is an owner or tenant of any of our properties:
 - (i) facilitating the sale or lease of our properties;
 - (ii) providing customer service and support (including but not limited to customer relationship management, processing and confirming your purchase or lease, processing your payments, providing you with administrative support, and assisting you with your application for season parking and booking of facilities);

- (iii) creating and maintaining profiles of our purchasers and tenants in our system database;
 - (iv) contacting you in the event of an emergency;
 - (v) administering debt recovery and debt management;
 - (vi) facilitating renovations and new occupancies, maintaining our properties and remedying defects;
 - (vii) managing referrals and payment of commission; and/or
 - (viii) purposes which are reasonably related to the aforesaid.
- (c) If you are a visitor to our properties and project sales gallery:
- (i) facilities management (including but not limited to issuing visitor access passes and facilitating security clearance); and/or
 - (ii) purposes which are reasonably related to the aforesaid.
- (d) If you are an employee, officer or owner of an external service provider or vendor outsourced or prospected by the Group:
- (i) assessing your organisation's suitability as an external service provider or vendor for the Group;
 - (ii) managing project tenders and quotations, processing orders or managing the supply of goods and services;
 - (iii) creating and maintaining profiles of our service providers and vendors in our system database;
 - (iv) processing and payment of vendor invoices and bills;
 - (v) administering training programmes;
 - (vi) facilities management (including but not limited to issuing visitor access passes and facilitating security clearance); and/or
 - (vii) purposes which are reasonably related to the aforesaid.
- (e) If you submit an application to us as a candidate for employment:
- (i) conducting interviews;
 - (ii) processing your application (including but not limited to pre-recruitment checks involving your qualifications and facilitating interviews);

- (iii) obtaining references and for background screening;
 - (iv) assessing your suitability for the position applied for;
 - (v) onboarding successful candidates and facilitating human resource planning and management (including but not limited to preparing letters of employment, name cards and building access passes); and/or
 - (vi) purposes which are reasonably related to the aforesaid.
- (f) If you are an existing employee of the Group:
- (i) providing remuneration and staff benefits (including employee share option schemes, leave, and insurance), reviewing salaries and bonuses, conducting salary benchmarking reviews, staff appraisals and evaluation, as well as recognising individuals for their services and conferring awards;
 - (ii) administrating the employment relationship, its management and termination, including manpower, logistics management, work permit, employment pass or visa applications, providing employee relocation support, processing expense claims, tax clearance and payment to provident funds, facilitating overseas travel arrangements, and reservist management;
 - (iii) training, learning and talent development;
 - (iv) providing you with tools and/or facilities to enable or facilitate the performance of your duties;
 - (v) business continuity, including compiling and publishing internal directories and emergency contact lists;
 - (vi) conducting analytics, surveys and research for human resource planning and management, and for us to review, develop, optimise and improve work-related practices, environment and productivity;
 - (vii) ensuring that the administrative and business operations of the Group function in a secure, efficient and effective manner;
 - (viii) generating incident reports and handling complaints;
 - (ix) administering cessation processes; and/or
 - (x) purposes which are reasonably related to the aforesaid.
- (g) If you are a board member, corporate officer, company secretary or shareholder of the Group:

- (i) onboarding or facilitating your appointment;
- (ii) maintaining statutory registers and to manage the publication of shareholder and director statistics on annual reports and circulars;
- (iii) facilitating the execution of duties and administrative matters (including but not limited to issuing new share certificates, organising meetings, passing resolutions, and approving, executing and signing contracts);
- (iv) administering remuneration, compensation and benefits; and/or
- (v) purposes which are reasonably related to the aforesaid.

3.3 Furthermore, where permitted under the Act, the Group may also collect, use and disclose your Personal Data for the following “Additional Purposes”:

- (a) providing or marketing services, products and benefits to you, including promotions, loyalty and reward programmes;
- (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;
- (c) sending you details of products, services, special offers and rewards, either to our customers generally, or which we have identified may be of interest to you; and/or
- (d) conducting market research, understanding and analysing customer behaviour, location, preferences and demographics for us to offer you products and services as well as special offers and marketing programmes which may be relevant to your preferences and profile; and/or
- (e) purposes which are reasonably related to the aforesaid.

3.4 If you have provided 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, the Group 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.

3.5 In relation to particular products and services or in your interactions with us, we may also 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.

3.6 You have a choice to withdraw your consent for receiving marketing or promotional materials/communication. You may contact us using the contact details found below.

- 3.7 Please be aware that once we receive confirmation that you wish to withdraw your consent for marketing or promotional materials/communication, it may take up to 30 working days for your withdrawal to be reflected in our systems. Therefore, you may still receive marketing or promotional materials/communication during this period of time. Please note that even if you withdraw your consent for the receipt of marketing or promotional materials, we may still contact you for other purposes in relation to the products and services that you have requested from the Group.

4. **Disclosure of Personal Data**

- 4.1 The Group will take reasonable steps to protect your Personal Data against unauthorised disclosure. Subject to the provisions of any applicable law, your Personal Data may be disclosed, for the purposes listed above (where applicable), to the following entities or parties, whether they are located overseas or in Singapore:
- (a) the Group's related corporations and employees;
 - (b) companies providing services relating to medical screening and insurance to the Group;
 - (c) agents, contractors, sub-contractors or third party service providers who provide operational services to the Group, such as courier services, telecommunications, information technology, payment, printing, billing, payroll, processing, technical services, transportation, training, market research, call centre, security, employee recognition, laundry, sales and marketing, or other services to the Group;
 - (d) vendors or third party service providers in connection with marketing promotions, products and services offered by the Group;
 - (e) 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 any of the Companies;
 - (f) external banks, credit card companies and their respective service providers;
 - (g) our professional advisers such as consultants, auditors and lawyers;
 - (h) our customers, clients and business partners in relation to managing project tenders and obtaining appropriate security clearance on behalf of our vendors and service providers;
 - (i) companies providing insurance and warranty services;
 - (j) clearing and depository houses;
 - (k) foreign embassies, travel agencies and hotels in relation to facilitating overseas travel arrangements;

- (l) relevant government ministries, regulators, statutory boards or authorities or law enforcement agencies to comply with any laws, rules, guidelines and regulations or schemes imposed by any governmental authority; and/or
- (m) any other party to whom you authorise us to disclose your Personal Data to.

5. **Use of Cookies**

- 5.1 When you interact with us on our websites, we automatically receive and record information on our server logs from your browser. We may employ cookies in order for our server to recognise a return visitor as a unique user including, without limitation, monitoring information relating to how a visitor arrives at the website, what kind of browser a visitor is on, what operating system a visitor is using, a visitor's IP address, and a visitor's click stream information and time stamp (for example, which pages they have viewed, the time the pages were accessed and the time spent per web page).
- 5.2 Cookies are small text files stored in your computing or other electronic devices which allow us to remember you. The cookies placed by our server are readable only by us, and cookies cannot access, read or modify any other data on an electronic device. All web-browsers offer the option to refuse any cookie, and if you refuse our cookie then we do not gather any information on that visitor.
- 5.3 Should you wish to disable the cookies associated with these technologies, you may do so by changing the setting on your browser. However, you may not be able to enter certain part(s) of our website.

6. **Data Security**

- 6.1 The Group will take reasonable efforts to protect Personal Data in our possession or our control by making reasonable security arrangements to prevent unauthorised access, collection, use, disclosure, copying, modification, disposal or similar risks. However, we cannot completely guarantee the security of any Personal Data we may have collected from or about you, or that for example no harmful code will enter our website (for example viruses, bugs, Trojan horses, spyware or adware). You should be aware of the risks associated with using websites.
- 6.2 While we strive to protect your Personal Data, we cannot ensure the security of the information you transmit to us via the Internet or through the use of our electronic services, and we urge you to take every precaution to protect your Personal Data when you use such platforms. We recommend that you change your passwords often, use a combination of letters and numbers, and ensure that you use a secure browser.
- 6.3 If applicable, you undertake to keep your username and password secure and confidential and shall not disclose or permit it to be disclosed to any unauthorised

person, and to inform us as soon as reasonably practicable if you know or suspect that someone else knows your username and password or believe the confidentiality of your username and password has been lost, stolen or compromised in any way or that actual or possible unauthorised transactions have taken place. We are not liable for any damages resulting from any security breaches, on unauthorised and/or fraudulent use of your username and password.

7. **Contacting Us – Withdrawal of Consent, Access and Correction of your Personal Data**

7.1 If you:

- (a) have any questions or feedback relating to your Personal Data or our Data Protection Policy;
- (b) would like to withdraw your consent to any use of your Personal Data as set out in this Data Protection Policy; or
- (c) would like to obtain access and make corrections to your Personal Data records,

please contact us as follows:

- Call: 6818 8681
- Email: DPO@greatearth.sg
- Address:

Data Protection Officer
12 Ang Mo Kio Street 64
#03-13
UE Bizhub Central
Singapore 569088

7.2 Please note that if your Personal Data has been provided to us by a third party (e.g. a referrer, or your company), you should contact that organisation or individual to make such queries, complaints, and access and correction requests to the Group on your behalf.

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

8. **Governing Law**

- 8.1 This Data Protection Policy and your use of this website shall be governed in all respects by the laws of Singapore.