

## **Data Protection Policy**

The purpose of this document (“Data Protection Policy”) is to inform you of how Orchardgateway Private Limited & 218 Orchard Pte Ltd manages 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 us, submitting information to us, or signing up for any products or services offered by us, you agree and consent to Orchardgateway Private Limited & 218 Orchard Pte Ltd (including its related corporations and business units) (collectively, the "Companies"), as well as their respective representatives and/or agents (“Representatives”) (the Companies and Representatives collectively referred to herein as "OGW", "us", "we" or "our") collecting, using, disclosing and sharing amongst themselves your Personal Data, and disclosing such Personal Data to the Companies' 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 OGW in respect of your Personal Data, and your consents herein are additional to any rights which to any of the Companies may have at law to collect, use or disclose your Personal Data.

OGW 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 the Data Protection Policy as updated from time to time on our website <http://www.orchardgateway.sg>. 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.

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, transactional data, images, photographs, videos and any other information relating to any individuals which you have provided us in any forms you may have submitted to us (including in the form of biometric data), 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, declaration, proposal or referral forms;
  - (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 services;
  - (c) when you interact with any of our staff (including customer service officers, marketing representatives and agents), for example, via telephone calls (which may be recorded), letters, fax, face-to-face meetings and email;
  - (d) when you submit complaints, queries, requests, feedback and suggestions to us;
  - (e) when you use some of our electronic services, interact with us via our websites or use services via our websites;

- (f) when you request that we contact you, be included in an email or other mailing list; or when you respond to our request for additional Personal Data, our promotions and other initiatives;
  - (g) when you are contacted by, and respond to, our marketing representatives and agents and other service providers;
  - (h) 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;
  - (i) when you apply for season parking on our properties;
  - (j) when we seek information about you and receive your Personal Data from third parties 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 and the relevant authorities;
  - (k) when you respond to our request for Personal Data in case of fire drills or any emergency;
  - (l) when your images are captured by us via CCTV cameras while you are within our premises or photographs or videos taken by us or our representatives when you attend events hosted by us; and/or
  - (m) when you submit your Personal Data to us for any other reason.
- 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, including your email address unless you provide such information 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 products and services you have requested.

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

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

- (a) verifying your identity;
- (b) responding to, processing and handling your complaints, queries, requests, feedback and suggestions;
- (c) managing the administrative and business operations of the Companies and complying with internal policies and procedures;
- (d) facilitating business asset transactions (which may extend to any mergers, acquisitions or asset sales) involving any of the Companies;
- (e) matching any Personal Data held which relates to you for any of the purposes listed herein;
- (f) 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;

- (g) preventing, detecting and investigating crime, including fraud and money-laundering, 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) managing and preparing reports on incidents and accidents;
- (j) project management;
- (k) providing media announcements and responses;
- (l) processing your insurance claims for incidents occurring on our properties;
- (m) organising promotional events;
- (n) 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;
- (o) complying with any applicable rules, laws and regulations, codes of practice or guidelines or to assist in law enforcement and investigations by relevant authorities; and/or
- (p) any other purpose relating to any of the above.

These purposes may also apply even if you do not have any contractual relationship with us.

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

- (a) If you are an existing or prospective tenant, appointed representative (including but not limited to a power of attorney) or employee of a tenant of our properties:
  - (i) evaluating your needs and providing recommendations to you as to the type of services suited to your needs;
  - (ii) assessing and processing any applications or requests made by you for services offered by OGW;
  - (iii) marketing properties (including but not limited to facilitating viewings and negotiations);
  - (iv) facilitating the leasing and (including but not limited to liaising with lawyers, preparing tenancy agreements,);
  - (v) administration in relation to the leasing of properties (including but not limited to handing and taking over of properties and processing of payments);
  - (vi) facilitating the continuation or termination of the leasing relationship (including but not limited to maintenance of tenant records and processing tenancy renewals);
  - (vii) 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 OGW (including but not limited to disclosures to regulatory bodies, conducting audit checks, surveillance and investigation, or customer due diligence);
  - (viii) archival management (including but not limited to warehouse storage and retrievals);

- (ix) enforcement of repayment obligations and arrears managements (including but not limited providing notification of outstanding rent and preparation of legal documents);
  - (x) submission of tax return; and/or
  - (xi) any other purpose relating to any of the above.
- (b) If you are an employee, officer or owner of an existing or prospective external service provider, vendor, consultant or contractor outsourced by OGW:
- (i) managing pre-qualification of vendor database;
  - (ii) procuring, awarding and managing project tenders;
  - (iii) managing the outsourcing relationship and the supply of goods and services;
  - (iv) managing business continuity arrangements;
  - (v) processing and payment of vendor invoices;
  - (vi) managing project developments;
  - (vii) rendering building maintenance and housekeeping;
  - (viii) any other purpose relating to any of the above.
- (c) If you submit an application to us as a candidate for an employment or representative position:
- (i) conducting interviews;
  - (ii) processing your application which includes pre-recruitment checks involving your qualifications and facilitating interviews;
  - (iii) providing or obtaining employee references and for background screening;
  - (iv) assessing your suitability for the position applied for;
  - (v) processing staff referrals; and/or
  - (vi) any other purposes relating to any of the above.
- (d) If you are an existing employee of OGW:
- (i) providing remuneration, reviewing salaries and bonuses, conducting salary benchmarking reviews, staff appraisals and evaluation, as well as recognising individuals for their services and conferring awards;
  - (ii) staff orientation and entry processing;
  - (iii) administrative and support processes relating to your employment, including its management and termination, as well as staff benefits, including travel, manpower, business continuity and logistics management or support, processing expense claims, loan, credit cards and medical insurance applications, leave administration, training, learning and talent development, and planning and organising corporate events;

- (iv) providing you with tools and/or facilities to enable or facilitate the performance of your duties;
  - (v) managing corporate social responsibility projects;
  - (vi) conducting analytics 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 OGW function in a secure, efficient and effective manner (including but not limited to examining or monitoring any computer software and/or hardware installed within OGW, your work emails and personal digital and storage devices);
  - (viii) in relation to your images, photographs and videos, for purposes including but not limited to the promotion of corporate events, publicity, internal staff communications, security and investigations;
  - (ix) administering cessation processes; and/or
  - (x) any other purposes relating to any of the above.
- (e) If you are a property agent or employee of a property agency, referrer or other intermediary:
- (i) contacting you for the purposes of marketing in relation to available properties;
  - (ii) processing commission remuneration;
  - (iii) managing and facilitating marketing of properties; and/or
  - (iv) any other purpose relating to any of the above.

3.3 In addition, where permitted under the Act, OGW may also collect, use and disclose your Personal Data for the following purposes (which we may describe in our documents and agreements as "Additional Purposes" for the handling of Personal Data):

- (a) providing 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, whether by OGW or other third parties;
- (c) administering contests and competitions, and personalising your experience at OGW's touchpoints;
- (d) 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
- (e) 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.

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, OGW 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 (including discounts and special offers).

3.5 In relation to particular products or 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.

#### 4. **Disclosure of Personal Data**

4.1 OGW 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 provided, for the purposes listed above (where applicable), to the following entities or parties, whether they are located overseas or in Singapore:

- (a) OGW's related corporations;
- (b) managing agents or agencies;
- (c) marketing agents or agencies;
- (d) tax agents or agencies;
- (e) counterparties and their respective banks in relation to fund transfers, payments drawing of cheques, and other transactions;
- (f) third party recipients of bank reference letters;
- (g) companies providing services relating to insurance and loss adjusters;
- (h) agents, contractors or third party service providers who provide operational services to OGW, such as courier services, telecommunications, information technology, payment, payroll, processing, training, market research, storage, archival, printing, customer support investigation services or other services to OGW;
- (i) any business partner, investor, assignee or transferee (actual or prospective) to facilitate business asset transactions (which may extend to any merger, acquisition or any debt or asset sale) involving any of the Companies;
- (j) our professional advisers such as our auditors and lawyers;
- (k) relevant government regulators, government ministries, statutory boards or authorities or law enforcement agencies, whether local or overseas, to comply with any directions, laws, rules, guidelines and regulations or schemes that are issued, administered, or imposed by any of them;
- (l) hotels, travel agents and foreign embassies in relation to overseas travel arrangements for staff;
- (m) medical service providers in relation to staff medical care;
- (n) collection and repossession agencies in relation to the enforcement of repayment obligations for loans; and/or
- (o) 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 OGW 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 when you use 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. **Third-Party Sites**

7.1 Our website may contain links to other websites operated by third parties. We are not responsible for the privacy or data protection practices of websites operated by third parties that are linked to our website. We encourage you to learn about the privacy or data protection policies of such third party websites. Some of these third party websites may be co-branded with our logo or trademark, even though they are not operated or maintained by us. Once you have left our website, you should check the applicable privacy or data protection policy of the third party website to determine how they will handle any information they collect from you.

## 8. **Contacting Us – Feedback, Withdrawal of Consent, Access and Correction of your Personal Data**

8.1 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,

you can approach us via the following channels:

- Email us at [promotions@orchardgateway.sg](mailto:promotions@orchardgateway.sg)
- Call our hotline at +65 6513 4633
- Write in to our Data Protection Officer as follows:

**Data Protection Officer**  
Orchardgateway Private Limited  
277 Orchard Road  
#02-11  
Singapore 238858

- 8.2 Please note that if your Personal Data has been provided to us by a third party (e.g. a referrer), you should contact such party directly to make any queries, feedback, access and correction requests to OGW on your behalf.
- 8.3 If you withdraw your consent to any or all use of your Personal Data, depending on the nature of your request, OGW may not be in a position to continue to provide its products or services to you, administer any contractual relationship in place, may also result in the termination of any agreements with OGW, and your being in breach of your contractual obligations or undertakings, and OGW's legal rights and remedies in such event are expressly reserved.
9. **Governing Law**
- 9.1 This Data Protection Policy and your use of this website shall be governed in all respects by the laws of Singapore.