

ABOUT THIS PRIVACY POLICY

This Personal Data Protection Policy ("**Policy**") is designed to assist you in understanding how we collect, use, disclose, store and/or process the personal data you have provided us. Please read this Policy carefully to understand our practices and how we handle your personal data. We respect the confidentiality of Personal Data and privacy of individuals and are committed to complying with the Singapore Personal Data Protection Act (Act 26 of 2012) ("**PDPA**").

This Privacy Policy excludes process for personal data related to recruitment, human resources management and ex-employees, please email nyukli@wangz-suntec.com.sg for more info pertaining to these categories. This Policy supplements and does not supersede nor replace any other consents you provided to us previously.

'Personal data' refers to any data or information about you from which you can be identified – for example :

- a) your name, national registration identification number (NRIC), Fin / work pass number, passport number or other identification number, telephone number(s), mailing address, email address, facial image in a photograph (printed & softcopy), and any other information relating to you which you have provided us in any form
- b) information about your use of our websites and services, including cookies, IP addresses
- c) your employment history, education background, and income / salary info.
- d) your payment info such as your bank account or credit card details & credit history.

1. We only collect what is needed

We conduct information audit to determine what information to collect & process and who has the access rights.

We have internal data protection policies and IT security policy for our staff, and build awareness about data protection. For data breach matter, we have a process to notify authorities and other stakeholders that is guided by an internal data breach reporting policy.

We retain your personal data only for so long as we need to do so for legal and business purposes, we have security measures in place to prevent unauthorized access, collection, use, disclosure, copying, modification, disposal or similar risks.

Generally, we process your Personal Data for the specific purposes identified in this Policy based on your consent obtained.

2. Collection of Personal Data

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

- a) when you submit forms relating to any of our products or services, or submit any online queries;
- b) when you register for or use or purchase any of our services / products, including accessing our properties or business centre or registering for your stay at any of our properties;
- c) when you interact with our customer service officers or any of our staff, for example, via face-to-face meetings, business interactions in events and exhibitions, telephone calls, letters, online forms (such as any "Get a quote / Contact Us" forms on our websites), and emails;
- d) when you request that we contact you; or when you ask to be included in an email or other mailing list;
- e) when you respond to our request for additional Personal Data;
- f) when you respond to our promotions or market surveys;
- g) when you submit a job application;
- h) when we receive references from business partners and third parties, where you have been referred by them;
- i) when you submit your Personal Data to us for any other reason; and

3. Use and Disclosure of Personal Data

The personal data collected from you either directly or through our subsidiaries / related companies may be collected, used and disclosed for the following purposes:

- a) to verify your identity, and to manage and administer the account that you may have set up with us.
- b) to facilitate & provide you with the products or services that you have requested;
- c) protect and enforce our contractual and legal rights and obligations;
- d) manage our infrastructure and business operations and comply with internal policies and procedures;
- e) facilitate business asset transactions
- f) respond to your queries, requests and handle disputes, complaints, feedback, claims and conduct / facilitate investigations & proceedings.
- g) help us review, develop, improve, manage the delivery of our products and services,
- h) provide ongoing information about our products and services which may be of interest to you;
- i) prevent, detect and investigate crime / fraud / money-laundering and manage other commercial risks;
- j) to comply with a court order / legal process / statutory and/or regulatory requirements of any governmental authorities
- k) any other purpose permitted by the applicable laws of Singapore, or as may be described to you from time to time at the point of data collection.

In addition, we may use and disclose your Personal Data for the following purposes :

3.1 If you are a prospective tenant or a tenant of any of our properties or prospective user of our services :

- (i) conduct due diligence checks;
- (ii) prepare lease documentation or agreements and any other documents as may be required;
- (iii) perform administration of the lease;
- (iv) perform financial transactions such as rental payments, procurement of services & products;
- (v) communicate with you the changes and updates to our policies, terms & conditions and administrative info;
- (vi) keep track of your purchase records & update our customer profiles & preferences;
- (vii) any other purpose related to any of the above.

3.2 If you are a vendor, a prospective vendor or a contractor:

- (i) evaluate your proposal / quotes;
- (ii) conduct background checks on your company;
- (iii) communicate with your deployed staff who will carry out onsite or remote work & services, and for any emergency incidents;
- (iv) any other purpose related to any of the above.

3.3 If you submit an application to us as a candidate for employment:

- (i) process your job application including pre-recruitment checks;
- (ii) provide or to obtain references for background screening;
- (iii) organize training and staff development programmes & assess your performance;
- (iv) administer benefits and payroll processing;
- (v) communicate with you to comply with our company policies and processes,
- (vi) any other purposes related to the aforesaid.

3.4 For existing employees, Wangz's Employee Personal Data Protection Policy is also applicable to you.

3.5 Sharing of Personal Data

For our Business Centre tenants, we may share your personal data with Suntec for Suntec building gantry access, we ensure that the third parties and related companies keep your personal data secure from unauthorized access, collection, use, disclosure, processing or similar risks and retain your personal data only for as long as it's required to achieve the abovementioned Purposes.

4. Accuracy of Personal Data

We have a procedure to ensure that the personal data collected is accurate, up-to-date and complete. This includes updating it / correct on error or omission when you inform us about the changes. Please let us know about any changes by notifying our Data Protection Officer via email nyukli@wangz-suntec.com.sg

5. Transfers of Personal Data

By providing us with your personal data, you understand and agree that your personal data may be transferred **to our servers** which we may choose, in accordance with this Policy.

In situations where we transfer / backup your personal data, we shall take steps to ensure that appropriate levels of protection necessary to maintain the security and integrity of your personal data are in place.

6. Withdrawal of Consent

At any time, you may withdraw your consent to the continued use, disclosure, storing and/or processing of your personal data for any of the Purposes listed above by notifying our Data Protection Officer in writing or via email.

Please note that if you withdraw your consent we may not be able to continue to provide the services to you. Upon receipt of your written request to withdraw your consent, we may require up to 10 working days to process the request, depending on the complexity of the request, we will notify you if there's any legal consequences which may affect your rights and liabilities to us.

7. Access to personal data

At any time, you may request us to provide you with a copy of your personal data in our possession or request to correct any error or omission in the records or enquire about the ways in which your personal data may have been used, disclosed, stored or processed by us for the past year.

- a) In order to facilitate the processing of your request, it's necessary for us to request further information for identity verification. Please also note that an administrative fee may be payable on access requests made.*
- b) If you wish to access, or correct an error or omission in your personal data records, please contact our Data Protection Officer as indicated below. We will respond to your request within a reasonable timeframe, we will inform you via email if we are unable to respond to your request within thirty (30) days from the date the request was submitted.*
- c) In the event that we are unable to provide you with any personal data or to make a correction requested by you, we shall generally inform you of the reasons.*
- d) Depending on the request made, we will only need to provide you with access to the personal data contained in the documents requested, and not the entire documents. In those cases, it may be appropriate for us to simply provide you with confirmation of the personal data that we have on record.*

8. Retention & disposal of Personal Data

Your personal data may be retained for as long as the purpose for which the data was collected continues, or if the retention is required for our business & legal purposes, even when your account with us is already closed. We will cease to retain your personal data once it's no longer required.

9. SECURITY OF YOUR PERSONAL DATA

Your Personal Data will be protected and kept confidential, We have implemented technical & procedural measures to protect your personal data from unauthorized access & modifications, improper use or disclosure, unlawful destruction or accidental loss.

Your personal data is only accessible by those employees who have a business 'need to know'. Proper procedures are in place to deal with any suspected personal data breach, we will notify you & any applicable supervisory authority of an actual or suspected personal data breach where we are required by contract or law to do so.

10. CONTACT US

You may contact our data protection officer if you have any questions about this Privacy Policy or any queries relating to your Personal Data :

By letter:

Data Protection Officer
GLASTECH PTE LTD
7 TEMASEK BOULEVARD
#43-01 SUNTEC TOWER ONE
SINGAPORE 038987

By email:

nyukli@wangz-suntec.com.sg

By phone:

+65 64306688

11. POLICY CHANGES

We reserve the right to amend & update this Privacy Policy from time to time. The amended Privacy Policy will come into effect immediately after the updated policy is posted on our website.