

## **PRIVACY POLICY**

This privacy policy ("**Privacy Policy**") sets out how Sunningdale Tech Ltd and its related corporations (each a "**Sunningdale Company**" and collectively, the "**Sunningdale Group**") manage your Personal Data (as defined below).

Please take a moment to read this Privacy Policy so that you know and understand the purposes for which we collect, use and disclose your Personal Data.

By interacting with any Sunningdale Company, as well as its representatives and/or agents ("**us**", "**we**" or "**our**" and collectively "the **Group**"), 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 ourselves 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 Privacy Policy.

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

This Privacy Policy may be updated from time to time to ensure that this Privacy Policy is consistent with our future developments 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 Privacy Policy as updated from time to time on our website at <http://sdaletech.com>. Please check the website at <http://sdaletech.com/> regularly for updated information on the handling of your Personal Data.

### **1. Your Personal Data**

- 1.1 In this Privacy Policy, "**Personal Data**" means all data that falls within the definition of personal information, personal data, personally identifiable information or similar language under any applicable law relating to the protection, privacy and security, collection, use or disclosure of sensitive or other personally identification information, including the Singapore Personal Data Protection Act 2012 (collectively, "**Data Protection Laws**").
- 1.2 Examples of such Personal Data which you may provide 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 you (or any other individuals) which you have provided us in any form you may have submitted to us, or in other forms of interaction with you.

### **2. Collection of Personal Data**

- 2.1 Generally, we collect your Personal Data in the following ways:
  - (a) when you provide your Personal Data to us in any forms (which may be in the electronic or physical medium);
  - (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, emails, faxes, face-to-face meetings, social media platforms, or via our website;
  - (d) when you request that we contact you or request that you be included in an email or other mailing or contact list;

- (e) when you respond to our promotions, initiatives or to any request for additional Personal Data;
- (f) 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;
- (g) when your images are captured by us via CCTV cameras while you are within our property and/or premises, or via photographs or videos taken by us or our representatives when you attend our events;
- (h) when you are contacted by, and respond to, our marketing representatives and customer service officers;
- (i) when we receive references from business partners and third parties, for example, where you have been referred by them;
- (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 employee 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 If you provide us with any Personal Data relating to a third party, by submitting such information to us, you represent and warrant that the collection, use and disclosure of that Personal Data to us, as well as the further processing of that Personal Data by us for the purposes set out below, is lawful, and you have obtained the consent of the third party to provide us with their Personal Data for the respective purposes.

2.3 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 in the processing of your applications or requests.

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

3.1 In general, the Group collects, uses and discloses your Personal Data for the following purposes:

- (a) to respond to, process and handle your queries, feedback, complaints and requests;
- (b) to comply with any contractual terms and conditions to which the Group is bound by;
- (c) to manage the safety and security of our premises and services (including but not limited to carrying out CCTV surveillance and conducting security clearances);
- (d) to manage our administrative and business operations and to comply with internal policies and procedures;
- (e) to monitor or recording phone calls and customer-facing interactions for quality;
- (f) to commence, respond to, or act 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);
- (g) to protect and enforce our contractual and legal rights and obligations;

- (h) to handle disputes and conduct and facilitate investigations and proceedings;
- (i) to facilitate corporate transactions (which may extend to any sales of shares or assets, corporate mergers and/or acquisitions) involving any of any Sunningdale Company or other entities;
- (j) to match any Personal Data held which relates to you for any of the purposes listed herein;
- (k) to communicate with you changes and development to our policies, terms and conditions and other administrative information; and/or
- (l) to comply with any applicable rules, laws and regulations, codes of practice or guidelines or to assist in law enforcement and investigations by relevant authorities.

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 of our products or services or the employee, officer, agent or representative of our corporate customer:
  - (i) providing you and/or your organisation with the products or services that you have requested;
  - (ii) providing you and/or your organisation with customer service and support (including but not limited to customer relationship management);
  - (iii) creating and maintaining of profiles of customers and their representatives in our systems databases; and/or
  - (iv) administering debt recovery and debt management.
- (b) if you are an external service provider or vendor, or the officer, agent or representative of the same, outsourced or prospected by the Group:
  - (i) assessing you or 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; and/or
  - (iv) processing and payment of vendor invoices and bills.

3.3 Furthermore, where permitted under the Data Protection Laws, or with your specific consent, the Group may also collect, use and disclose your Personal Data by:

- (a) providing or marketing services, products and benefits to you and/or your organisation, including the administration of 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 and/or your organisation details of upcoming events, 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) sending you and/or your organisation the Group's newsletters, updates or information on the Group or its products and services; 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 and/or your organisation's preferences.
- 3.4 In relation to 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.
- 3.5 You may withdraw your consent for by contacting us using the contact details set out at Paragraph 6 below.

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

- 4.1 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) amongst the Group and its related affiliates (including their respective staff);
  - (b) third party vendors, merchants or service providers to provide the products and services, or in connection with any marketing promotions, and to attend to any queries or matters;
  - (c) 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; in relation thereto;
  - (d) 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, debt recovery, processing, technical services, transportation, training, market research, call centre, security, or other services to the Group;
  - (e) external banks, credit card companies, other financial institutions and their respective service providers;
  - (f) our professional advisers such as consultants, auditors and lawyers;
  - (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 any of any Sunningdale Company;
  - (h) 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
  - (i) any other party to whom you authorise us to disclose your Personal Data to.

## 5. Keeping Your Personal Data Accurate and Up-To-Date

We encourage you to contact us as soon as possible to enable us to update any Personal Data we have about you. Incomplete or outdated Personal Data may result in our inability or delays in processing any requests and applications you may have made to us.

## 6. Contacting Us – Withdrawal of Consent, Access and Correction of your Personal Data

### 6.1 If you:

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

please contact us as follows:

Method	Contact Particulars
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By mail	: 51, Joo Koo Circle, Singapore 629069
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By email	: <a href="mailto:stl-pdp@sdalettech.com">stl-pdp@sdalettech.com</a>
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Data Protection Officer

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

6.3 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, such as, in relation to the products and services that you have requested from the Group. 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.

## 7. Protection of Personal Data

We strive to protect the security of your Personal Data in accordance with Data Protection Laws from unauthorised access, collection, use, disclosure, copying, modification, disposal or similar risks.

## 8. Retention of Personal Data

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 Data Protection Laws.

## 9. Governing Law

This Privacy Policy shall be governed in all respects by the laws of Singapore.

PRIVACY POLICY LAST UPDATED: 28 July 2020