

## Privacy Policy for Singapore Residents

We are committed to according Personal Data the due level of care as presented in our Personal Data Policies, and consistent with the Personal Data Protection Act 2012 of Singapore (“PDPA”).

CMIC HOLDINGS Co., Ltd. (“CHD”), located in Tokyo, Japan is the parent company of CMIC ASIA-PACIFIC, PTE. LTD. (“CAP” or as appropriate in the context, “we”, “us” or “our”) and CHD together with CAP and other subsidiaries and affiliates worldwide form the CMIC Group. All member entities of CMIC Group respect the protection of the Personal Data of individuals and value the relationship we have with you.

This Personal Data Protection Policy (“Policy”) describes the types of Personal Data we may collect from you, how we may use that information, and with whom we may share it. Our Policy also describes the measures we take to protect the security of the information you provide to us, including without limitation through this website. We also tell you how you can reach us to update your Personal Data, ask questions you may have about our personal data protection practices and provide feedback on our personal data protection practices.

“Personal Data” in this Policy means data, whether true or not, about you where you can be identified either (a) from that data; or (b) from that data and other information to which we have or are likely to have access.

### ***1. Personal Data that we collect***

The types of Personal Data that we collect about individuals include:

- Name
- NRIC number/FIN number/passport number
- Bank account details
- Mobile number
- Personal email address
- Residential address
- Residential telephone number

- Photographs
- Video and CCTV footage

You may have provided the Personal Data to us personally or authorized other individuals to provide the Personal Data to us and consent (on your behalf) to our collection of your Personal Data from these individuals. These individuals could be your superiors, employees, subordinates, colleagues and your family members.

Where you give us Personal Data about other individuals, you confirm that you are authorized to disclose and consent, on their behalf, to the processing of such Personal Data for the purposes described in Section 2, or other purposes for which your consent has been sought and obtained.

## ***2. Purposes for which we collect and use Personal Data***

We collect and use the Personal Data that you provide to us for the following purposes:

If you are a Vendor/Service Provider/Business Partner

- To conduct due diligence/background checks that are mandated by legislation or CAP's internal policies and practices;
- For the purposes of the supply of products and services and support by vendors/service providers/business partners to CAP;
- To keep vendors/service providers/business partners updated on changes to CAP's policies;
- To evaluate and to improve CAP's products and services;
- To evaluate the products and services provided by vendors/service providers/business partners to CAP; and
- Security clearance/entry access into CAP's premises

If you are a Clinical Trial Subject:

- Considering and/or processing your application to be a participant in the clinical trial ("Study") and/or assessing your suitability as a candidate for or participant in the Study;
- The Study;

- The advancement and/or betterment of medical science, medical knowledge, medical diagnosis, medical treatments and/or medical cures;
- Facilitating, processing, dealing with, administering, managing and/or maintaining your participation in the Study and your relationship with any of us, including, but not limited to, all matters related to and/or arising from the Study and/or your participation in the Study, treatments on you, medical investigations conducted on you, management of your appointments, sending notifications to you related to the Study and/or your participation in the Study, securing instructions on treatment choices, handling payments (if relevant), dealing with your claims, disbursements and other inconvenience fees (if relevant) incurred as a result of your participation (this includes the settlement of claims and any necessary investigations relating to the claims), the carrying out of necessary activities for the purposes of the Study such as but not limited to tracking your progress in the Study, tracking your medical records and study files, tracking your clinical symptoms, testing tissue and tumor samples provided by you (we may send specimens to internal and external business units for laboratory experiments), dealing with, determining and/or recording your progress or results;
- Facilitating, conducting, dealing with, administering, managing and/or maintaining the Study such as but not limited to analysis of the Study progress, findings or results, linking lab analysis results to clinical findings;
- Dealing with your health and safety needs or matters including but not limited to at our absolute discretion notifying you of a product or drug recall;
- Facilitating, administering and/or dealing with future research projects and related research studies arising from the Study or that is related to any of the subject matters in the Study;
- Facilitating, administering, managing and/or dealing with any grants, subsidies or sponsorships, whether provided by any government body or any other organization (including private sector) that is for the Study, related to the Study or relevant to your participation in the Study;
- Conducting and/or managing treatment(s) and/or examination(s) carried out or to be carried out on you;
- Facilitating and/or managing your proper diagnosis and appropriate treatment including, but not limited to, identifying treatment risks, monitoring appropriateness of medication usage, specimen testing and reporting and recording your infection data;
- Administering and/or ensuring the safety of any and each of our staff, agents and representatives when conducting the Study and/or when interacting, liaising with and/or

handling you or samples from your body including but not limited to your blood samples;

- Product, service or treatment development including to identify and establish ways to improve or deliver more appropriate products, services or treatments;
- Carrying out your instructions or responding to any enquiry given by (or purported to be given by) you or on your behalf;
- Dealing with and/or investigating complaints;
- Dealing with and/or managing insurance and/or reinsurance related matters arising from or related to the Study, your participation in the Study and/or you;
- Contacting you or communicating with you via various modes of communication such as phone/voice call, text message and/or fax message, email and/or postal mail for the purposes of administering, dealing with and/or managing the Study or your participation in the Study, such as but not limited to communicating information to you related to the Study, meeting or attendance dates, etc. You acknowledge and agree that such communication by us could be by way of the mailing of correspondence, documents or notices to you, which could involve disclosure of certain personal data about you to bring about delivery of the same as well as on the external cover of envelopes/mail packages;
- Notifying, communicating and/or facilitating communication with you or your nominated contacts in an emergency, such as but not limited to medical emergency;
- Carrying out due diligence or other screening activities (including security and background checks) in accordance with legal or regulatory obligations or either of our risk management procedures that may be required by law or that may have been put in place by any of us;
- To prevent or investigate any fraud, unlawful activity or omission or misconduct, whether relating to the Study, your participation in the Study, or any other matter arising from the Study or your participation thereof, and whether or not there is any suspicion of the aforementioned;
- Dealing with conflict of interests;
- Complying with or as required by any applicable law, governmental or regulatory requirements of any relevant jurisdiction, including meeting the requirements to make disclosure under the requirements of any law binding on any of us and for the purposes of any guidelines issued by regulatory or other authorities, whether in Singapore or elsewhere, with which any of us is expected to comply;
- Complying with or as required by any request or direction of any governmental authority; or responding to requests for information from hospitals, embassies, public agencies, ministries,

statutory boards or other similar authorities (including but not limited to Singapore's (and/or any other country's relevant government authority of which any of us would reasonably need to deal with or be liaising with as part of our business operations or business compliance) Ministry of Defense, Ministry of Education, Immigration and Checkpoints Authority, Ministry of Health, Ministry of Home Affairs, Ministry of Manpower, Ministry of Foreign Affairs, Ministry of Social & Family Development and Central Provident Fund Board). Without prejudice to the generality of the foregoing, this includes reporting to Singapore's Ministry of Health for policy formulation, and the aforementioned includes that any of us may/will disclose your personal data to the aforementioned parties upon their request or direction;

- Dealing with immigration related matters where you are a non-Singaporean. In this regard, this includes but is not limited to disclosing to the relevant government authorities details about you for immigration related matters;
- Complying with applicable law in administering and managing your relationship with any of us;
- Dealing with, handling and/or conducting disciplinary, security and quality assurance processes, matters and/or arrangements;
- Performing internal administrative, operational and technology tasks to facilitate, administer or manage your participation in the Study and/or your relationship with us;
- Facilitating, dealing with and/or administering external audit(s) or internal audit(s) of the business(es), transactions, processes, policies, practices and/or systems of any of us, including audit(s) of the Study;
- Record-keeping purposes and producing statistics and research for internal and/or statutory reporting and/or record-keeping requirements; performing CMIC, the Institution and/or the Sponsor's policy/process reviews; and/or any of our parent company's reporting purposes;
- Conducting research, analysis, surveys, data analytics and/or profiling as part of or related to the Study or your participation in the Study including producing reports based on such research, analyses, surveys, analytics and/or profiling;
- Storage, hosting, back-up and/or disaster recovery, of your personal data;
- Conducting reviews, reporting and examining case studies, incidents, issues encountered so as to understand, minimize and avoid risks, service failures or hazards;
- Carrying out and/or performing each of our obligations in our respective contract(s) with the other Party that is related to the Study;

- Contact tracing where any of us is of the view that it is reasonably required including where if you are exposed to a certain infectious disease;
- Facilitating, applying, administering and/or managing intellectual property protection for intellectual property or inventions that arise from the Study including but not limited to patents filing and registration;
- Responding to and/or dealing with legal process, pursuing legal rights and remedies, defending litigation or claims and managing any complaints or claims; and
- Dealing with and/or facilitating a business asset transaction or a potential business asset transaction, where such transaction involves any of us as a participant or involves only a related corporation or affiliated company of any of us as a participant or involves any of us (referred to here as the “Party”) and/or any one or more of the Party’s related corporations or affiliated companies as participant(s), and there may be other third party organizations who are participants in such transaction. The phrase “business asset transaction” means the purchase, sale, lease, merger or amalgamation or any other acquisition, disposal or financing of an organization or a portion of an organization or of any of the business or assets of an organization.

#### Others

- Facilitating, processing, dealing with, administering, managing, maintaining and/or terminating your employment relationship with us, including but not limited to secondments with or transfer to affiliates, related corporations or associated companies, secondments with third party organizations who are/may be our business partners, suppliers or customers, dealing with and/or recording your achievements or progress, dealing with your application for loans or any benefits or schemes that may be provided by us (whether now or in the future) and thereafter administering and managing the same, determining your suitability for promotion, awards or any other benefits that may be provided by us, training programs (whether conducted by us or by third parties) including determining your suitability for the same and which may require us to disclose your personal data to the providers of such training programs, dealing with insurance checks, benefits and/or claims (whether for yourself or for your family members depending on what we provide), dealing with medical checks, benefits and/or claims (whether for yourself or for your family members depending on what we provide), payroll administration, performance appraisal, personal and career

development; monitoring, analyzing and/or managing your performance, performance targets and/or transactions carried out for CAP, dealing with training and development including administering programs and plans with respect thereto, job assessment, compensation, planning and organization, dealing with applications for security clearance at sites where such clearances are needed, including sites where CAP conducts its business or sites where CAP is to perform a contract for a third party;

- Marketing your capabilities and services to potential clients or customers of CAP;
- Dealing with and/or administering employment benefits;
- Dealing with conflict of interests;
- Supporting, dealing with and/or administering your health needs, medical needs, safety and welfare requirements (all of which may or may not be provided by us at our absolute discretion);
- Facilitating, administering, processing, dealing with and/or managing your application for and/or involvement in any events, seminars, and/or your interest or participation in any events, seminars, and/or other opportunities that we may (at our discretion) make available to employees;
- Dealing with, monitoring, administering and/or managing your use of infrastructure, equipment or facilities that may be provided by us including but not limited to provision of IT (information technology) equipment and services, recreation facilities and benefits, that may (at our discretion) be provided by us or any third party whom we may engage in that regard. Without prejudice to the generality of the aforesaid, this includes monitoring your emails and contents thereof (whether personal or business related) that are sent or received through our infrastructure, equipment or facilities as well as your Internet usage/browsing;
- Carrying out your instructions (which we reserve our rights as to whether to act upon or not) or responding to any enquiry given by (or purported to be given by) you or on your behalf;
- Contacting you or communicating with you via phone/voice call, text message and/or fax message, email and/or postal mail for the purposes of administering and/or managing your employment relationship with us such as but not limited to communicating with you for administrative matters, sending you correspondence (including, but not limited to, mailing you a cheque for salary that may be due to you, post termination of your employment). You acknowledge and agree that such communication by us could be by way of the mailing of correspondence, documents or notices to you, which could involve disclosure of certain personal data about you to bring about delivery of the same as well as on the external cover

of envelopes/mail packages;

- Facilitating communication with you or your nominated contacts in an emergency, such as but not limited to medical emergency, flood etc.;
- Managing, facilitating and dealing with CAP's infrastructure and/or business operation's needs, including disclosure and processing necessary for us to conduct our business, such as but not limited to application for and/or administering corporate loans, responding to third party requests for your personal data pursuant to contractual requirement, AML (anti money laundering checks), IT outsourcing. In this regard and for the avoidance of doubt, we will/may disclose your personal data to third parties for such purposes set out in this sub-paragraph. Without limiting the generality of the foregoing, an example would be where you are a cheque signatory for CAP with respect to banking facilities with a bank and we would need to disclose your personal data to the bank to facilitate such facilities;
- Carrying out due diligence or other screening activities (including background checks) in accordance with legal or regulatory obligations or our risk management procedures that may be required by law or that may have been put in place by us;
- To prevent or investigate any fraud, unlawful activity or omission or misconduct, whether relating to your employment relationship or any other matter arising from, dealing with or related to your employment relationship with us, and whether or not there is any suspicion of the aforementioned; and/or investigating any alleged or actual fraud, misconduct or unlawful conduct within CAP and/or CAP's group of companies;
- Complying with or as required by any applicable law, governmental or regulatory requirements of any relevant jurisdiction, as well as rules, guidelines or notices issued by applicable regulatory authorities, including meeting the requirements to make disclosure under the requirements of any law binding on us and for the purposes of any guidelines issued by regulatory or other authorities, whether in Singapore or elsewhere, with which we are expected to comply, and/or complying with CAP's internal policies;
- Facilitating and/or administering tax related requirements, claims, deductions or matters such as but not limited to disclosure of your personal data to the Inland Revenue Authority of Singapore;
- Complying with or as required by any request or direction of any governmental authority; or responding to requests for information from public agencies, ministries, statutory boards or other similar authorities (including but not limited to the Ministry of Manpower, Ministry of Defense, Immigration and Checkpoints Authority and Ministry of Health);



- Dealing with immigration related matters and/or employment pass/permit/license matters. In this regard, this includes but is not limited to disclosing to the relevant government authorities (including Singapore government authorities or foreign government authorities) details about your status for immigration related and/or employment pass/permit/license matters. Without limiting the generality of the aforesaid, in the case where you are a non-Singaporean national coming to Singapore or in the case where you are being sent to work overseas, we may/will need to collect, use and disclose your personal data from/for dealing with/to such government authorities;
- Dealing with, handling and/or conducting disciplinary, security and/or quality assurance processes, matters and/or arrangements. Without prejudice to the generality of the aforesaid, we wish to bring to your attention that there are surveillance cameras installed throughout the premises of our offices for security reasons and you acknowledge that your personal data will be collected by such cameras and processed by us consequently;
- Dealing with and/or investigating complaints and discipline related matters;
- Performing internal administrative, operational and technology tasks to facilitate, administer or manage your employment relationship with us;
- Facilitating, administering, managing and/or dealing with Employee Welfare (defined below) activities. Without prejudice to the generality of the aforesaid, do note that photography and/or videography could be carried out during such activities and your image captured for the purpose of recording your participation in such activities and used, disclosed, processed and published in our corporate videos, materials such as newsletters or other publication created or issued by us, any materials/books recording your participation in such activities, whether for marketing purpose or otherwise, and you agree to the same. You can at any time give us written notice that you do not agree to this by contacting our Data Protection Officer, whose contact details is stated in Section 6. "Employee Welfare" refers to activities, events, products and/or services (such as but not limited to excursions, CSR (corporate social responsibility) activities, engaging consultants to speak on medical topics, staff dinner & dance, staff welfare or incentive tours/trips etc.) which are intended to enhance or enrich your life as an employee with us, to foster community spirit and a positive culture within CAP. For the avoidance of doubt, although CAP has the intention of, it is not under any obligation to provide Employee Welfare to you and efforts in this regard by us is at our absolute discretion;
- Dealing with and/or administering CSR (corporate social responsibility) activities such as recycling, care for the environment, community involvement including visits to old folks

homes or participating in events held by charities;

- Conducting research, analysis and development activities (including, but not limited to, data analytics, surveys and/or profiling) to improve our infrastructure, welfare, benefits and facilities in order to enhance your employment relationship with us or for your benefit, or for benchmarking or assessing the competitiveness of your remuneration package;
- Responding to and/or dealing with legal process, pursuing legal rights and remedies, defending litigation or claims and managing any complaints or claims;
- Record-keeping purposes and producing statistics and research for internal and/or statutory reporting and/or record-keeping requirements;
- CAP and/or CMIC group companies' or parent company's reporting purposes including but not limited to reporting on salary, performance reviews and achievements;
- Storage, hosting, back-up and/or disaster recovery, of your personal data;
- Carrying out and/or performing CAP's obligations in its contracts with current/potential project partners and/or customers, and/or pitching for contracts/projects with potential project partners and/or customers, including that it may require provision of your personal information to such current or potential project partners and/or customers;
- Processing, facilitating, dealing with and/or making arrangements for your business travels including but not limited to travel visa applications for such travels;
- Dealing with references or reference checks (or opinions) pertaining to you. In this regard, you agree that we may obtain personal data, references or opinions or reference checks, about you, from various sources or third parties without any need for your further consent, to determine your suitability for employment, promotion, continued employment, or termination. You also agree that should any other organization (including its agents such as a recruitment company) in future seek from us information, personal data, a reference, opinion or reference check, about you, and/or details relating to your work performance, with a view to considering hiring you, employing you or engaging your services, that we may disclose your personal data and such requested information, personal data, reference, opinion, or reference check about you to them without any need for your further consent;
- Publicity and promotion with a view to marketing the business of CAP and/or to acquiring customers. In this regard, your personal data will be processed by us for the purpose of conducting publicity and/or the development of promotional materials for use by us, showcasing or marketing your achievements, expertise, skills or qualifications, such as, but not limited to, publication of your image and personal data on public media platforms such as

the newspaper, the Internet, our in-house notice boards, at marketing exhibitions, the radio etc. You hereby authorize CAP to videotape and photograph you and you grant CAP a license to use your name, photograph, video images, personal data, and likeness in CAP's promotional materials (which includes all media platforms including corporate videos). You hereby waive all claims for payment for such use;

- Dealing with and/or facilitating a business asset transaction or a potential business asset transaction, where such transaction involves CAP as a participant or involves only a related corporation or affiliated company of CAP as a participant or involves CAP and/or any one or more of CAP's related corporations or affiliated companies as participant(s), and there may be other third party organizations who are participants in such transaction;
- Facilitating, dealing with and/or administering external audit(s) or internal audit(s) of the business(es), transactions, processes, policies, practices and/or systems of CAP;
- Dealing with and/or facilitating trade union related matters of which you may be a member of or involved in, or which CAP is impacted by or involved in. Without limiting the generality of the aforesaid, in this regard, we may need to disclose your personal data to such trade union for the purpose of the activities or business of such trade union;
- To evaluate applications for employment/job positions within CAP;
- To evaluate applications for internships and industrial attachments;
- To communicate with individuals who participate in the Studies CAP is involved in; and
- Security clearance/entry access into CMIC Group's premises.

We only collect and use Personal Data for purposes which you have consented to and for which we have been authorized. If we need to use your Personal Data for any purpose which you have not previously consented to, we will seek your consent prior to using your Personal Data for the new purpose.

We may require you to provide from time to time, the personal data of other individuals such as your next of kin or dependents, for administering and/or managing your employment relationship with us, such as but not limited to contacting such individuals for emergency purposes, declaration of conflict of interest, processing/administering any corporate group insurance scheme or any other benefit scheme (if any) which we may provide you and/or your family member(s) with. You hereby represent and warrant that where you provide the personal data of such individuals to the organization that you have each of their authority to

provide their personal data to us and that you are validly acting on each of their behalf and have obtained their consent to disclose their personal data to us for the purposes for which we are collecting, using, disclosing and processing their personal data.

### ***3. Disclosure, sharing, storage and transfer of Personal Data***

CAP does not sell or rent Personal Data that we collect from individuals, including our website visitors. In the course of or in connection with providing our products and services to our customers, we disclose, share and transfer Personal Data to the following parties for the following purposes:

- To our customers/vendors/subcontractors/consultants/business partners for tender purposes;
- To our agents and sub-contractors for the purposes of providing products and services to our customers on our behalf;
- To our business partners for the purposes of providing products and services to our customers;
- To government and non-government authorities, agencies and/or regulators as required under law or under directions or orders from the government and non-government authorities, agencies and/or regulators for security, regulatory approvals or permits;
- To other CMIC Group entities (including entities outside Singapore) for the purpose of responding to questions, concerns, comments or feedback on our products or services or our business, or to share knowledge on issues such as industry developments, CAP's business, market outlook, corporate events and other products and services of the CMIC Group that may be of interest to your company, organization or business; and
- To other CMIC Group entities to facilitate the provision of products and services to our customers where the project or engagement involves other CMIC Group entities.

We also disclose and transfer Personal Data to the following parties for the purposes of managing, operating, administering and running our business and for our business and legal purposes:

- To other CMIC Group entities for security purposes;
- To other CMIC Group entities for purposes of evaluating our products and services and our

business as a group;

- Financial institutions for purposes of payments and transactions related to CAP's provision of products and services or related to products and services provided to CAP by our vendors/service providers/consultants; and
- To our service providers (who may be located outside Singapore) that have been retained to perform services on our behalf or on behalf of CMIC Group entities, including:
  - Service providers who provide IT and outsourcing services such as data storage, electronic mail services, deployment of management operations for information technology and HR outsourcing services;
  - Professional, financial and legal advisors, tax advisors, auditors, insurers and insurance brokers;
  - Vendors, service providers and consultants that have been engaged to help manage, operate, administer and run CAP's operations and business process or provide services to facilitate our provision of our products and services; and
  - Public and governmental/regulatory authorities (including the Central Provident Fund Board), statutory boards, industry associations;
  - External contractors to provide consultancy and evaluative services to CAP and for CAP's products and services, or organize events for CAP.

For job applicants, your Personal Data may be shared with other entities in the CMIC Group if CAP takes the view that you may be suitable or eligible for a job position within the CMIC Group, unless you inform us otherwise (please refer to Section 6). The Personal Data will be used in a confidential manner, in accordance with the PDPA and this Policy to help CMIC Group monitor their recruitment processes.

CAP requires that the parties, to whom we transfer Personal Data and our service providers, implement adequate levels of protection in order to protect Personal Data, both in Singapore and outside Singapore. We also require that these parties only process Personal Data strictly for purposes for which we engage them for and consistent with the purposes that we have described in the Section 2 or with other purposes for which your consent has been sought and obtained.

In addition, we would disclose Personal Data in the following circumstances:

- We are required to do so by law;
- In response to a request from law enforcement authorities or other government officials;
- To comply with a court order or direction from a government agency or regulatory authority ordering the disclosure of the Personal Data; and
- Where the disclosure is necessary for investigations or legal proceedings.

Your personal data may be held or stored locally, regionally or globally, whether in Singapore or out of Singapore.

#### ***4. Protection and Security of Personal Data***

We employ a range of technological and physical security arrangements and maintain safeguards to protect against the accidental or unauthorized access, collection, use, disclosure, copying, modification, disposal, deletion and other similar risks to Personal Data.

#### ***5. Retention of your Personal Data***

CAP only retains Personal Data for as long as the retention is required for the purposes for which we collected the Personal Data, the purposes described in this Policy and for our business and legal purposes. Generally, we do not retain Personal Data for a period of longer than 7 years after the original purposes for which the Personal Data was collected have ceased to be applicable, unless otherwise required by law or other mandatory directions by court or government authorities or for purposes of legal proceedings or other similar proceedings or investigations.

In addition, it is our policy to retain certain personal data of employees when they cease to be employed by us, so long as such personal data is still relevant for the purpose(s) for which it was collected and/or we have a legal or business purpose to keep the same. Without limiting the foregoing, such personal data may be required for any post-employment related activities in relation to a former employee including but not limited to provision of references, processing applications for re-employment, matters relating to retirement benefits and allowing us to fulfil contractual or statutory obligations.

For unsuccessful job applicants, CAP will retain your Personal Data for no longer than 1 year for the purposes of evaluating your suitability for future job openings within CMIC Group, unless you inform us otherwise (please refer to Section 6).

## **6. How to Contact Us**

If you have any questions or comments about this Policy and our policies and practices on our collection, use, disclosure or retention of Personal Data, you may contact our Data Protection Officer:

Email address: [dataprotection@cmicgroup.com](mailto:dataprotection@cmicgroup.com)

Mailing address: Data Protection Officer

CMIC ASIA-PACIFIC, PTE. LTD.

6 Shenton Way #24-08A OUE Downtown2 Singapore 068809

If you are a job applicant and wish to inform us that: (i) you do not wish for CAP to share your personal data with other entities in the CMIC Group for evaluating your suitability or eligibility for another job position within the CMIC Group other than the one you are applying for; or (ii) you do not wish for CAP to retain your personal data for the purposes of evaluating your suitability for future job openings within CMIC Group, please contact:

Email address: [dataprotection@cmicgroup.com](mailto:dataprotection@cmicgroup.com)

Mailing address: Data Protection Officer

CMIC ASIA-PACIFIC, PTE. LTD.

6 Shenton Way #24-08A OUE Downtown2 Singapore 068809

## **7. Updating or correcting your Personal Data**

CAP takes reasonable measures to ensure that the Personal Data we collect about individuals are accurate and complete. For this reason, please ensure that you provide complete and accurate personal data to us and keep us updated on any changes to your personal data. Kindly note that if you do not provide complete and accurate personal information to us as and when it is required, it may have adverse consequences for you as we would be relying on such personal data to make decisions about you. If there is a change

or an update in your Personal Data or if there is a need to correct any Personal Data of yours that we have, please write to us and provide us with the following details:

- Your name and an email address or mailing address at which we can contact you;
- The nature of our relationship with you; and
- The Personal Data for which there has been a change, update or correction.

You may send your requests to our Data Protection Officer at the contact details listed in Section 6.

We will endeavor to acknowledge the receipt of your request within 7 working days after the date of receipt of your request. As it is important to us that the Personal Data that we have about you is accurate and complete, it may be necessary for us to request for supporting documentation from you. We will contact you if we require supporting documentation from you.

There may be circumstances where we will not update or correct Personal Data, including:

- The Personal Data is opinion data that is kept solely for an evaluative purpose; and
- The Personal Data is in documents related to a prosecution if all proceedings relating to the prosecution have not been completed.

## ***8. Your Requests and Feedback on your Personal Data with us***

To the extent that the applicable law allows, you may request for information from CAP on what Personal Data of yours we have and how we have used and shared your Personal Data during the last one year before the date of your request.

You have the right to withdraw your consent given hereunder, whether in part or as a whole. However, your withdrawal of consent could result in certain legal consequences arising from such withdrawal. In this regard, depending on the extent of your withdrawal of consent for us to process your personal data, it may mean that we will not be able to continue with your employment relationship with us, our provision of products and services to you or our business dealings with you, depending on the nature of your relationship with us. Should you



wish to withdraw your consent in part or whole, please send contact our Data Protection Officer, detailed in Section 6, and provide details of your withdrawal.

If you have any concerns, feedback or complaints about the use and/or sharing of your Personal Data, we are open to receiving your feedback or complaint. Please contact our Data Protection Officer, detailed in Section 6, and provide details of your concerns, feedback or complaints.

### ***9. Updates to this Personal Data Protection Notice***

We may change or update portions of this Policy at any time and without prior notice to you. Please review this Policy from time to time so you are aware of any changes or updates to the notice. We will indicate the effective date of the notice. If you do not agree with any of the changes or updates to the Policy, you have the option of withdrawing your consent to our collection, use, disclosure and processing of your Personal Data (please refer to Section 8).

Effective date: 1 October 2015