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## PERSONAL DATA PROTECTION NOTICE

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### 1. Introduction

The Personal Data Protection Act 2012 (No. 26 of 2012) ("the Act") establishes a general data protection law in Singapore to regulate the processing of personal data in commercial transactions, applies to SECOM Smart (Singapore) Pte. Ltd. (UEN: 202016295D) (hereinafter referred to as "our", "us" or "we") as a data user. During your course of dealing with us, we will collect and process your personal data for purposes, including, to communicate with you, provide products and/or services to you, respond to your enquiries or complaints, provide you with information and/or updates on products, services and/or promotions offered by us and selected third parties and other purposes required to operate and maintain our business as set out in this Notice.

### 2. Personal Data

This Notice applies to any individual, co-operative, society, partnership, company and any entity (hereinafter referred to as "you") whose personal data is collected or held by us. If you have provided to us any personal data of other individuals, including your directors, officers and/or employees (hereinafter referred to as "data subjects"), you (i) represent and warrant that you are authorised to provide their personal data to us and you have obtained their consent to the processing (including disclosure and transfer) of their personal data in accordance with this Notice, (ii) will give us a proof of the consent when requested by us, and (iii) shall give a copy of this Notice to the data subjects. References to "you" in this Notice shall include all the data subjects (if any). We will only process your personal data in accordance with the Act, the applicable regulations, guidelines, orders made under the Act and any statutory amendments made of the Act from time to time. If you do not agree with terms in this Notice, we may not be able to provide/continue our products and/or services to you.

### 3. Collection and Processing of Personal Data

Your personal data may be collected from you during your course of dealings with us in any way or manner including pursuant to any transactions and/or communications made from/with us. We may also collect your personal data from a variety of sources, including without limitation, at any events, seminars, road shows, customer satisfaction surveys organised and/or sponsored by us, as well as from publicly available sources. The personal data as provided/furnished by you to us or collected by us from you or through such other sources as may be necessary for the fulfilment of the purposes at the time it was sought or collected, may be processed for the following purposes (collectively referred to as the "Purposes"):

- (a) to communicate with you;
- (b) to maintain and improve customer relationship;
- (c) to assess, process and provide products, services and/or facilities to you;
- (d) to administer and process any payments related to products, services and/or facilities requested by you;
- (e) to establish your identity and background;
- (f) to respond to your enquiries or complaints and resolve any issues and disputes which may arise in connection with any dealings with us;
- (g) to provide you with information and/or updates on our products, services, upcoming promotions offered by us and/or events organised by us and selected third parties from time to time;
- (h) for direct marketing purposes via SMS, phone call, email, fax, mail, social media and/or any other appropriate communication channels;
- (i) to maintain and update internal record keeping;
- (j) for internal administrative purposes;
- (k) to send you seasonal greetings messages from time to time;
- (l) to send you invitation to join our events and promotions and products and services launch events;
- (m) to monitor, review and improve our events and promotions, products and/or services;
- (n) to conduct credit reference checks and establish your credit worthiness, where necessary, in providing you with the products, services and/or facilities;
- (o) to administer and give effect to your commercial transactions with us (such as tender award, contract for service, tenancy agreement);
- (p) to process any payments related to your commercial transactions with us;
- (q) to process and analyse your personal data either individually or collectively with other individuals;
- (r) to conduct market research or surveys, internal marketing analysis, customer profiling activities, analysis of customer patterns and choices, planning and statistical and trend analysis in relation to our products and/or services;
- (s) to share any of your personal data with the auditor for our internal audit and reporting purposes;
- (t) to share any of your personal data pursuant to any agreement or document which you have duly entered with us for purposes of seeking legal and/or financial advice and/or for purposes of commencing legal action;
- (u) to share any of your personal data with our business partners to jointly develop products and/or services or launch marketing campaigns;
- (v) to share any of your personal data with insurance companies necessary for the purpose of applying and obtaining insurance policy(ies), if necessary;
- (w) to share any of your personal data with financial institutions necessary for the purpose of applying and obtaining credit facility(ies), if necessary;
- (x) for audit, risk management and security purposes;

- (y) for detecting, investigating and preventing fraudulent, prohibited or illegal activities;
- (z) for enabling us to perform our obligations and enforce our rights under any agreements or documents that we are a party to;
- (aa) to transfer or assign our rights, interests and obligations under any agreements entered into with us;
- (bb) for meeting any applicable legal or regulatory requirements and making disclosure under the requirements of any applicable law, regulation, direction, court order, subsidiary legislation, guideline, circular or code applicable to us;
- (cc) to enforce or defend our rights and your rights under, and to comply with, our obligations under the applicable laws, legislation and regulations; and/or
- (dd) for other purposes required to operate, maintain and better manage our business and your relationship with us; which we notify you of at the time of obtaining your consent.

Your personal data may also be transferred to a place outside Singapore if the transfer is necessary for the Purposes above.

### 4. Processing of Personal Data

During the course of its dealings with you, we may process your personal data which include, but is not limited to, your name, identity card number, registration number, email address, address and other contact details, including any sensitive personal data, financial information, credit history and etc.

### 5. Disclosure of Personal Data

Your personal data held by us shall be kept confidential. However, your personal data may be disclosed to another member of our group companies (including the holding company, subsidiaries, associated and related companies and their subsidiaries, associated and affiliated companies, both local and international), any third party for the Purposes as set out in this Notice. Such third party may include marketing and research companies, credit and collection agencies, courier services companies, employment agencies, banking and financial institution, strategic marketing partners, technology partners, governmental and regulatory bodies.

### 6. Protection of Personal Data

The security of your personal data is ensured by us as we shall take all physical, technical and organisational measures needed to ensure the security and confidentiality of your personal data. If we disclose any of your personal data to any entities, we will require them to appropriately safeguard the personal data provided to them.

### 7. Retention of Personal Data

Any of your personal data provided to us is retained for as long as the Purposes for which the personal data was collected continues. Your personal data is then destroyed from our records and system in accordance with our retention policy in the event your personal data is no longer required for the said Purposes unless its further retention is required to satisfy a longer retention period to meet our operational, legal, regulatory, tax or accounting requirements.

### 8. Integrity of Personal Data

We aim to keep all your personal data as accurate, complete, not misleading, up-to-date and reliable as possible. Therefore, the accuracy of your personal data depends to a large extent on the information you provide. As such, you:

- (a) warrant and declare that all your personal data submitted or to be submitted to us are accurate, not misleading, updated and complete in all respects and that we are authorised to assume the accuracy and updatedness of the personal data given by you when processing such personal data; and
- (b) promptly update us as and when such personal data provided earlier to us becomes inaccurate, incomplete, misleading, outdated or changes in any way whatsoever.

### 9. Access of Personal Data

You have the right to access your personal data to ensure that the personal data we hold about you is accurate, complete, not misleading and up-to-date. If you wish to exercise such rights and request access and/or correction to your personal data, please contact us at the contact details below:

**Designation of the contact person:** Manager, Central Alarm Solutions (CMS)

**Address:** 81 Toh Guan Road East SECOM Centre #06-01 608606

**Phone no.:** 6389 8300

**Email address:** [cs@secomsmart.com.sg](mailto:cs@secomsmart.com.sg)

### 10. Miscellaneous

- (a) For the purpose of this Notice, terms not defined herein shall have the meanings ascribed to them in the Act.
- (b) We reserve the right to modify, update and/or amend this Notice from time to time with reasonable prior notice to you.

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