

Personal Data Protection Policy

Protection of your Personal Data is important to us. This Personal Data Protection Policy (this “**Policy**”) outlines how we manage the Personal Data we hold. This Policy applies to SwanCity (Singapore) Investment Pte Ltd and/or its related corporations and affiliates (referred to hereunder as “**SwanCity**”, the “**SwanCity Group**”, “**we**”, “**us**” or “**our**”) collectively or singularly as the context requires.

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**”) and other applicable data protection laws. Please read this Policy so that you know and understand the purposes for which we collect, use and disclose your Personal Data.

You agree and consent to us, collecting, using, storing, processing, disclosing and sharing amongst ourselves your Personal Data as data controllers, and disclosing such Personal Data to our authorised service providers and relevant third parties as data controllers and/or data processors as appropriate in the manner set forth in this Policy. By accessing and using any websites of the SwanCity Group, interacting with us, or providing your data to us, and subject to your rights at law, you accept and agree to these terms and conditions without any limitation or qualification.

Please note that depending on the jurisdiction in which your Personal Data is being collected, used, disclosed or processed by us, different country-specific addenda may apply. If your Personal Data has been collected, used or disclosed by us in a particular country, you should check the terms of the country-specific addenda to see if there is a country-specific addendum applicable to you and the collection, use, disclosure and processing of your Personal Data. The terms set out in the addenda are in addition to the terms set out in this Policy and form a part of this Policy.

This 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 any member of the SwanCity Group may have at law to collect, use or disclose your Personal Data. This Policy does not affect any rights which we may have at law in connection with the collection, use or disclosure of your Personal Data.

For the avoidance of doubt, nothing in this Policy establishes any joint and several liability on the part of the SwanCity Group members.

1. Your Personal Data

1.1. “**Personal Data**” refers to any data or information about you from which 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. Examples of such Personal Data which you may provide us include (depending on the nature of your interaction with us):

1.1.1. your name, NRIC number, passport number or other identification number, telephone number(s), mailing address, email address and any other information relating to you which you have provided us in any form you may have submitted to us, or in other forms of interaction with you;

- 1.1.2. information about your use of our websites and services, including cookies, IP addresses, subscription account details and membership details;
- 1.1.3. your employment history, education background, and income levels; and
- 1.1.4. your payment related information, such as your bank account or credit card information, and your credit history.

2. Collection of Personal Data

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

- 2.1.1. when you submit forms relating to any of our products or services, or submit any online queries;
- 2.1.2. when you register for or use any of our services on websites owned or operated by us or when you register as a member of websites owned and/or operated by us;
- 2.1.3. when you interact with any of our staff, for example, via face-to-face meetings, telephone calls, letters, online forms (such as any "Contact Us" forms on our websites), reservation chat, social media platforms and emails;
- 2.1.4. when you use or purchase our services or products;
- 2.1.5. when you establish any online accounts with us;
- 2.1.6. when you request that we contact you;
- 2.1.7. when you respond to our request for additional Personal Data;
- 2.1.8. when you ask to be included in an email or other mailing list;
- 2.1.9. when you respond to our promotions and other initiatives;
- 2.1.10. when you respond to our market surveys;
- 2.1.11. when you submit a job application or a scholarship application;
- 2.1.12. when we receive references from business partners and third parties, for example, where you have been referred by them;
- 2.1.13. when you submit your Personal Data to us for any other reason; and
- 2.1.14. when you browse our website.

2.2. We may monitor or record phone calls and customer-facing interactions for quality assurance, employee training and performance evaluation, identity verification purposes,

feedback, respond to your queries and requests and resolve complaints and other related purposes.

- 2.3. If you provide Personal Data of a third party (e.g. information of your dependant, spouse, children and/or parents) to us, you represent and warrant that the consent of that third party has been obtained for the collection, use and disclosure of the Personal Data for the purposes set out above.

3. Use and Disclosure of Personal Data

- 3.1. Our business is to understand and meet your needs and provide you with the products and services that you require. To do this effectively, we need to collect a range of Personal Data about you.

- 3.2. In general, we use and disclose your Personal Data for the following purposes:

- 3.2.1. to provide you with the products or services that have been requested;
- 3.2.2. to help us review, develop, improve, manage the delivery of and enhance our products and services, including analysing future customer needs, conducting market research and data analytics;
- 3.2.3. to communicate with you and respond to your queries, requests and complaints;
- 3.2.4. to provide ongoing information about our products and services which may be of interest to you;
- 3.2.5. to handle disputes and conduct and facilitate investigations and proceedings;
- 3.2.6. to protect and enforce our contractual and legal rights and obligations;
- 3.2.7. to prevent, detect and investigate crime, including fraud and money-laundering, and to analyze and manage other commercial risks;
- 3.2.8. to manage our infrastructure and business operations and to comply with internal policies and procedures;
- 3.2.9. to facilitate business asset transactions (which may extend to any merger, acquisition or asset sale) involving any SwanCity Group entity; and
- 3.2.10. 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.

- 3.3. In addition, we may use and disclose your Personal Data for the following purposes, depending on the nature of our relationship with you:

- 3.3.1. to communicate with you of changes and development to our policies, terms and conditions and other administrative information, including for the purposes of servicing you in relation to products and services offered to you;
 - 3.3.2. to resolve complaints and handle requests and enquiries;
 - 3.3.3. to conduct market research for statistical, profiling and statistical analysis for the improvement of services provided to you; and
 - 3.3.4. to process your Personal Data in relation to any of the purposes stated above.
- 3.4. If you download or use any of our mobile applications (apps):
 - 3.4.1. to process your application for subscription services if they are provided in the apps;
 - 3.4.2. to maintain your account with us;
 - 3.4.3. to verify and process your personal particulars and process payment requests in relation to provision of goods and services connected to the app;
 - 3.4.4. to provide you with the goods and services which you have signed up for;
 - 3.4.5. to communicate with you changes and development to our policies, terms and conditions and other administrative information, including for the purposes of servicing you in relation to products and services offered to you;
 - 3.4.6. to resolve complaints and handling requests and enquiries;
 - 3.4.7. to conduct market research for statistical, profiling and statistical analysis for the improvement of services provided to you; and
 - 3.4.8. to process your Personal Data in relation to any of the purposes stated above.
- 3.5. If you are a prospective tenant or a tenant:
 - 3.5.1. to conduct appropriate due diligence checks;
 - 3.5.2. to prepare lease and/or licence documentation and any other documents as may be required;
 - 3.5.3. to perform administration of the lease and/or licence;
 - 3.5.4. to perform financial transactions such as rental payments;
 - 3.5.5. to communicate with you changes and development to our policies, terms and conditions and other administrative information; and

- 3.5.6. any other purpose directly relating to any of the above.
- 3.6. If you want to buy property from us or have indicated an interest in purchasing property from us:
 - 3.6.1. to conduct due diligence checks;
 - 3.6.2. to prepare sale documentation and any other documents as may be required;
 - 3.6.3. to perform administration of the sale including handing over of possession of property and attending to defects rectification;
 - 3.6.4. to perform financial transactions such as progress payments for the sale;
 - 3.6.5. to communicate with you changes and development to our policies, terms and conditions and other administrative information;
 - 3.6.6. to comply with any relevant legal or regulatory obligations; and
 - 3.6.7. any other purpose related to any of the above.
- 3.7. If you are a vendor, a prospective vendor or a contractor:
 - 3.7.1. to evaluate your proposal and to conduct background checks on you;
 - 3.7.2. to communicate with your deployed staff, after award of contract, who are in our properties to carry out work or services, and for any emergency or/and security concerns; and
 - 3.7.3. any other purpose directly relating to any of the above.
- 3.8. If you submit an application to us as a candidate for employment:
 - 3.8.1. to process your application including pre-recruitment checks;
 - 3.8.2. to provide or to obtain references for background screening/vetting;
 - 3.8.3. to collect information about your suitability for the position applied for;
 - 3.8.4. to organise training and staff development programs;
 - 3.8.5. to assess your performance;
 - 3.8.6. to administer benefits and payroll processing;
 - 3.8.7. to provide you with tools to facilitate or as required for you to do your job;

- 3.8.8. to communicate with you to comply with our policies and processes, including for business continuity purposes; and
 - 3.8.9. any other purposes relating to the aforesaid.
- 3.9. The above purposes are not exhaustive, and depending on the nature of your relationship with us, we may collect, use and disclose your Personal Data for additional purposes which you will be notified of, in accordance with applicable terms and conditions.
- 3.10. When you apply for or hold a co-brand product which is offered jointly by us and our co-brand partner(s), we may also collect, use and disclose your Personal Data for the purpose of sharing your Personal Data with the co-brand partners for offering, marketing and promoting to you any products, services, offers or events which the co-brand partner thinks may be of interest to you.
- 3.11. Where you have provided us with specific consents, we may also use and disclose your Personal Data for the following purposes:
 - 3.11.1. providing services and extending benefits to you, including sending you industry market updates, newsletters and other information on our products, services, offers or promotions which may be of interest to you;
 - 3.11.2. 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 us or third parties; and
 - 3.11.3. conducting market research to understand and determine customer locations, preferences and demographics for us to develop special offers, promotional and/or marketing programmes.
- 3.12. In relation to particular products or services or in your interactions with us, we may also notify or 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.
- 3.13. Your Personal Data will be protected and kept confidential, but subject to the provisions of any applicable law, your Personal Data may, depending on the products or services concerned, be disclosed to the following third parties:
 - 3.13.1. other divisions or entities within the SwanCity Group;
 - 3.13.2. our joint venture/ alliance partners;
 - 3.13.3. our agents, contractors, third party service providers and specialist advisers who have been contracted to provide us with administrative, financial, research, operational or other services, such as telecommunications, information technology, payment, payroll, processing, training, market research, storage and archival;

- 3.13.4. any third party business partners who offer goods and services or sponsor contests or other promotional programmes, whether in conjunction with us or not;
 - 3.13.5. insurers or insurance investigators and credit providers;
 - 3.13.6. the Credit Bureau, or in the event of default or disputes, any debt collection agencies or dispute resolution centres;
 - 3.13.7. 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 the SwanCity Group;
 - 3.13.8. our professional advisors such as our auditors and lawyers;
 - 3.13.9. relevant government regulators or authority or law enforcement agency to comply with any laws or rules and regulations imposed by any governmental authority;
 - 3.13.10. anyone to whom we transfer or may transfer our rights and obligations;
 - 3.13.11. banks, credit card companies and their respective service providers; and
 - 3.13.12. any other party as may be consented to by you, as specified by that individual or in the applicable contract.
- 3.14. In carrying out our business, it may be necessary to share information about you with and between our related corporations and third party service providers. Some of these related corporations and third party service providers may be located in countries outside Singapore that may not afford an adequate protection to personal data or have protections in place which are similar to those in your country of residence. However, we will take reasonable steps to ensure that your Personal Data transmitted outside of your country of residence is adequately protected.
4. Keeping Your Personal Data Accurate and Up-To-Date
- 4.1. We endeavour to ensure that all Personal Data we have about you is accurate and up-to-date. We understand that this information changes frequently with changes of address and other personal circumstances. 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 to provide you with products and services you have requested.
5. Telemarketing Policy

5.1. The obligations under this paragraph relate only to individual users of Singapore telephone numbers for the purpose of compliance with the Do Not Call (“DNC”) provisions under the PDPA (the “DNC Provisions”).

5.2. We aim to comply with the DNC Provisions and your choice to receive promotional and marketing messages as follows:

5.2.1. if you have registered your Singapore telephone number with the relevant Singapore DNC Registry, we will not send you promotional and marketing messages via SMS, fax, calls and other means (as applicable) to your telephone number;

5.2.2. if you have previously consented to our sending you such messages to your Singapore telephone number(s), we will continue to do so until you withdraw such consent, regardless of your DNC nominations;

5.2.3. if you currently have an existing, ongoing relationship with us, depending on the nature of that relationship, we may continue to send you promotional or marketing messages via SMS or fax about products and services which are related to that ongoing relationship notwithstanding your registration with the DNC Registry, unless you opt-out of receiving such messages.

6. Third-Party Sites

6.1. Our website may contain links to other websites operated by third parties, such as our business partners. We are not responsible for the privacy practices of websites operated by third parties that are linked to our website. We encourage you to learn about the privacy policies of such third party websites. Once you have left our website, you should check the applicable privacy policy of the third-party website to determine how they will handle any information they collect from you.

7. Withdrawal of Consent

7.1. You may withdraw your consent given for any or all purposes set out in this Policy in writing by contacting our Data Protection Officers (“DPOs”) in accordance with paragraph 10 below. If you withdraw your consent to any or all purposes and depending on the nature of your request, we may not be in a position to continue to provide our products or services to you. Without prejudice to the foregoing, you agree and acknowledge any withdrawal of your consents in accordance with the terms set out in this Policy will not affect any consent which you may have provided to us in respect of the use of your Singapore telephone number(s) for the receiving of marketing or promotional information.


8. Management and Security

8.1. We have appointed DPOs to oversee our management of your Personal Data in accordance with this Policy and the PDPA. We train our employees who handle your Personal Data to respect the confidentiality of your Personal Data, and we regard breaches of the PDPA very seriously.

9. Third Party Modules

9.1. Our website uses services provided by Amazon Web Services, Inc and Google LLC (such as Google Analytics and Google Tag Manager). By using our website and/or such functionality build into the website, you agree to be bound by and comply with the privacy policies of the foregoing entities available at: <https://aws.amazon.com/privacy/>, <https://www.google.com/policies/privacy/>, and <https://www.google.com/analytics/tag-manager/use-policy/>.

10. How to contact us

10.1. If you have any questions about this Policy or any complaints relating to your Personal Data, or you would like to obtain access and make corrections to your Personal Data records (for which we may charge a fee to cover the cost of verifying the application and locating, retrieving and copying any material requested), please write in to: .

11. Governing Law

11.1. This Privacy Policy and your use of this website shall be governed in all respects by the laws of Singapore.

12. Review of this Policy

12.1. This Policy will be reviewed from time to time by us. We may also from time to time update this Policy to take account of new laws and technology, changes to our operations and practices and the changing business environment. If you are unsure whether you are reading the most current version, please contact us.

12.2. In the event of any inconsistencies between the English version and other translations of this Policy, the English version shall prevail.