

GUOCOLAND LIMITED - POLICY ON PERSONAL DATA

1. The Singapore Personal Data Protection Act 2012 (“Act”) governs the collection, use and disclosure of Personal Data. This Policy on Personal Data (“Policy”) is being provided to existing and prospective individuals and entities (“Relevant Persons”) dealing with GuocoLand Limited and its related companies, which include, its holding companies, its subsidiaries, and Special Purpose Vehicle development companies (collectively, the “Companies”, and each, a "Company"), as well as their respective representatives or agents (collectively, referred to herein as "GLL") from whom Personal Data have been and/or may in the future be collected.
2. Relevant Persons have in the past and may or will in the future be required to provide Personal Data to GLL in connection with and/or in the course of their dealings with GLL. Personal Data on the Relevant Persons may also be acquired by GLL from publicly available sources and from within GLL.
3. In this Policy, “Personal Data” refers to any data, whether true or not, about individuals who can be identified (a) from that data; or (b) from that data and other information which GLL may have access to, including data in GLL’s records as may be updated from time to time.
4. Examples of such Personal Data which may be collected from Relevant Persons include his/her name, NRIC, passport or other identification number, telephone number(s), mailing address, email address, employer’s details, financial position, family members and any other information relating to the Relevant Persons which may have been provided to or collected by GLL via any forms the Relevant Persons may have submitted to GLL, or via other forms of interaction with the Relevant Persons.
5. By interacting with, submitting information to, or signing up for any products or services offered by the Companies, you, as a Relevant Person, agree and consent to GLL collecting, using, disclosing and sharing amongst themselves your Personal Data, and disclosing such Personal Data to GLL’s authorised service providers and relevant third parties in the manner and for any of the purposes set forth in this Policy. In addition, this Policy will also provide you more information on the basis upon which GLL collect, use and/or disclose your Personal Data without your consent, where permitted by applicable law.

Purposes for the Collection, Use and Disclosure of Personal Data

6. A Relevant Person's Personal Data may be collected, used or disclosed by GLL for the following purposes:
 - a. carrying out its instructions, providing services (whether by any of the Companies or a selected third party) and responding to enquiries, feedback, customer service requests, suggestions and/or complaints by that Relevant Person or made on its behalf;
 - b. maintaining records of its instructions and/or orders received, including managing and preparing reports on any incidents and/or accidents;
 - c. managing the administrative and business operations of the Companies and complying with internal policies and procedures;
 - d. creating, administering and updating that Relevant Person's account on any GLL's application and/or platform;
 - e. performing internal operations necessary to provide any GLL's application and/or platform, including troubleshooting software bugs and operational problems, conducting data analysis, testing and research, monitoring and analysing usage and activity trends;
 - f. protecting the security or integrity of any GLL's application and/or platform and any facilities or equipment used to make such application and/or platform available;
 - g. facilitating business asset transactions (which may extend to any mergers, acquisitions or asset sales) involving any of GLL;
 - h. monitoring or recording the phone call for quality assurance, training and security purposes;
 - i. matching any Personal Data held which relates to Relevant Persons for any of the purposes listed herein;
 - j. researching, designing, launching, promoting and marketing financial and other facilities, services and products of the Companies and third parties (including but not limited to the exchange of non-

- financial information with selected business partners and developing marketing lists for exchange with selected business partners) and monitoring the provision, operation and use of such services or products;
- k. provision of reference (status enquiries);
 - l. verification of identity;
 - m. carrying out credit and other status checks and debt collection and assisting other institutions to do so;
 - n. assessing ongoing credit-worthiness of Relevant Persons;
 - o. processing payments to selected business partners and/or service providers;
 - p. operating internal controls including determining amounts owed to or by Relevant Persons, payment to or collection of such amounts from Relevant Persons and from any persons providing security for Relevant Persons' obligations and enforcing any charge or other security granted by or for Relevant Persons;
 - q. performing treasury functions;
 - r. the enforcement of Relevant Persons' obligations, including without limitation the collection of amounts outstanding from Relevant Persons and those providing security for Relevant Persons' obligations;
 - s. assessing and analysing any insurance claim and assisting other insurance companies to conduct claims checks;
 - t. organising promotional events;
 - u. providing media announcements and responses;
 - v. forwarding publicity materials or other information to Relevant Persons from GLL and charitable organisations from time to time;
 - w. preventing, detecting and investigating crime, including fraud and money-laundering, and analyzing and managing commercial risks;
 - x. meeting any legal, governmental or regulatory requirements in Singapore or any other applicable jurisdiction, including disclosure or notification requirements;
 - y. assisting any person who is acquiring or participating in any contractual arrangements between GLL and the Relevant Person to evaluate the transaction for such acquisition or participation;
 - z. human resource applications; and
 - aa. any other incidental and associated purposes relating to or reasonably necessary for any of the above.
7. In addition, where permitted under the Act, GLL may also collect, use and disclose a Relevant Person's Personal Data as follows:
- a. providing services, products and benefits, including 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, whether by GLL or other third parties;
 - c. administering contests and competitions;
 - d. sending details of products, services, special offers and rewards, either to the Companies' customers generally, or which GLL has identified may be of interest to specific Relevant Persons;
 - e. requesting for feedback, conducting market research, surveys and/or analysis, understanding and determining customer location, preferences and demographics for GLL to review, develop and improve products and services (including for statistical, profiling or other purposes to improve user experiences), and also develop special offers and marketing programmes; and
 - f. enabling features that personalise any GLL's application and/or platform, such as lists of the specific Relevant Person's favourite restaurants and previous orders
8. GLL may retain Personal Data for so long as the Personal Data is necessary for the purposes in that the Personal Data was collected. GLL will take reasonable steps to destroy any Personal Data that is no longer necessary for the aforementioned purposes.
9. If you have provided your Singapore telephone number(s) and have indicated that you consent to receiving marketing or promotional information via your Singapore telephone number(s), then from time to time, GLL may contact you using such Singapore telephone number(s) (including via voice calls, text,

fax or other means) with information about products and services (including discounts and special offers) offered by the Companies.

10. In relation to particular products or services or in interactions with us, GLL may also have specifically notified you of other purposes for which GLL collects, uses or discloses Personal Data. If so, GLL may collect, use and disclose such Personal Data for these additional purposes as well.

Disclosure of Personal Data

11. GLL will take reasonable steps to protect Personal Data against unauthorised disclosure. Subject to the provisions of any applicable law, Personal Data of Relevant Persons may be disclosed for the purposes above (where applicable) to the following:
 - a. any person under a duty of confidentiality to GLL or to any member of the Companies;
 - b. any company or department within the Companies (whether such company or department operates in Singapore or elsewhere);
 - c. any relevant agent, contractor or third party service provider who provides administrative, telecommunications, computer, payment, securities clearing, management, audit, insurance, professional or other services to GLL;
 - d. any business partner providing goods and/or services through any GLL's application and/or platform;
 - e. any banking, financial or other institution with which the Relevant Person has or proposes to have dealings;
 - f. any credit reference agency and in default debt collection agencies or similar provider of debt collection or credit information services to the Companies;
 - g. lawyers, auditors, tax advisors, investment banks, and other professional advisors;
 - h. any insurance company and any association or federation of insurance companies (whether or not based in Singapore);
 - i. any person or corporation to whom any one of the Companies transfers or proposes to transfer its interests and/or obligations in respect of that Relevant Person or any product or service provided to that Relevant Person;
 - j. any nominee, trustee, co-trustee, centralised securities depository or registrar, custodian, insurance company, estate agent, solicitor or other person who is involved with the provision of services or products by GLL to that Relevant Person; or
 - k. any person by whom any one of the Companies is required by applicable legal, governmental or regulatory requirements to make disclosure;
 - l. any other party to whom Relevant Persons have authorised GLL to disclose their personal data to;

or to any other person reasonably requiring the same in order for GLL to carry out the purposes permitted in paragraphs 6 to 10 above.

12. GLL may disclose Personal Data to any or all of the parties stated above and may do so notwithstanding the recipient's place of business is outside Singapore, or that such information following disclosure will be collected, held, processed or used by such recipient in whole or in part outside Singapore.

Deemed consent

13. In addition to the matters set forth above, subject to and in accordance with applicable law, you shall be deemed to have consented to GLL collecting, using, disclosing and sharing amongst themselves your Personal Data, and disclosing such Personal Data to GLL's authorised service providers and relevant third parties:

Deemed Consent by Conduct

- a. where in response to a request for your Personal Data in connection with identified purposes, you voluntarily provide such Personal Data to GLL for such purpose(s) and it is reasonable that you would voluntarily provide such Personal Data;

Deemed Consent by Contractual Necessity

- b. where the collection, use or disclosure of your Personal Data is reasonably necessary for the conclusion and/or performance of a contract:
 - (i) between you and GLL, where you provide Personal Data to GLL with a view to entering into such contract with GLL;
 - (ii) between you and GLL, where you provide Personal Data to GLL pursuant to such contract with GLL;
 - (iii) between GLL and any other organisation, where such contract is entered into at your request or pursuant to a contract between you and GLL; and/or
 - (iv) between GLL and any other organisation, where a reasonable person would consider such conclusion or performance (as the case may be) to be in your interest.

For the avoidance of doubt, such other organisation(s) described under sub-paragraphs (b)(iii)-(iv) above may include recipients of your Personal Data not indicated in this Policy;

Deemed Consent by Notification

- c. in the manner and for any of the purposes set forth in this Policy, as well as any other purpose(s) as we may from time to time notify you, where:
 - (i) we have conducted a prior assessment according to the requirements of applicable law to determine that an adverse effect on you is not likely;
 - (ii) we have taken reasonable steps to bring to your attention:
 - (A) GLL's intention to collect, use and/or disclose the Personal Data (as the case may be) for such purpose(s), which may also include indicating such purpose(s) in this Policy from time to time; and
 - (B) a reasonable period within which, and a reasonable manner by which, you may notify GLL that you do not consent to the proposed collection, use and/or disclosure of Personal Data; and
 - (iii) you do not notify GLL before the expiry of the period described in sub-paragraph (c)(ii) above (or in any event before the expiry of 30 calendar days from the date of our notification) that you do not consent to the proposed collection, use and/or disclosure of your Personal Data for such purpose(s). For the avoidance of doubt, you shall be deemed to be notified of all the purposes set forth in this Policy on the date of each instance of your perusal or loading of this document.

Other Bases for Handling Your Personal Data

14. In addition to and without limiting the consents you have provided to our collection, use and disclosure of your Personal Data for the purposes set out elsewhere in this Policy, where permitted by applicable law, GLL may also in accordance with the requirements thereof also collect, use and/or disclose your Personal Data as further detailed below including without consent, where we meet the requirements of applicable law:

Legitimate Interests

- a. we may collect, use and/or disclose your Personal Data without your consent for the legitimate interests of GLL or another person, including without limitation the purposes described in paragraphs

6 to 10, 13 and 14(b) of this Policy, but not for sending you direct marketing messages unless you have otherwise provided your consent; and

Business Improvement Purposes

- b. we may collect your Personal Data from any of the Companies, we may use your Personal Data, and any of the Companies may disclose your Personal Data to us, for the following purposes (regardless whether you are an existing or prospective customer of any of the Companies):
- (i) improving or enhancing any goods or services provided, or developing new goods or services to be provided, by any of the Companies;
 - (ii) improving or enhancing the methods or processes, or developing new methods or processes, for the operations of any of the Companies;
 - (iii) learning about and understanding the behaviour and preferences of any customer of any of the Companies or another individual in relation to the goods or services provided by any of the Companies; and/or
 - (iv) identifying any goods or services provided by any of the Companies that may be suitable for any customer of any of the Companies or another individual, or personalising or customising any such goods or services for you or another individual.

Access and Correction

- 15. A Relevant Person is entitled to ask whether any Company holds Personal Data about them and to request access to and the correction of any such Personal Data held. A reasonable fee may be charged for processing each data access request.
- 16. Requests for access to or correction of data held by any Company should be addressed to The Data Protection Officer, at pdpa@guocoland.com.
- 17. To help GLL to provide a better service to you, please ensure that your contact details including your home and office addresses, your telephone numbers (including your mobile telephone number), e-mail address and other details registered with us are up to date.

Withdrawal of Consent

- 18. If you, as a Relevant Person, have any questions or feedback relating to your Personal Data or our Policy; or would like to withdraw your consent to any use of your Personal Data as set out in this Policy, please contact the Companies by addressing such requests to The Data Protection Officer, at pdpa@guocoland.com. No fee will be charged for such withdrawal requests.

Operation of this Policy

- 19. This Policy supplements but does not supersede nor replace any other consent provided by the Relevant Persons to GLL in respect of their data, and their consents herein are cumulative and additional to any rights which GLL may have at law to collect, use or disclose such data.
- 20. The provisions of this Policy will form part of the terms and conditions and/or the agreement or arrangements that you have or may enter into with GLL. If any inconsistency is found, the provision of this Policy shall prevail.
- 21. The Companies may from time to time update this Policy to ensure that it is consistent with its future developments, industry trends and/or any changes in legal or regulatory requirements. Subject to the your rights at law, you as a Relevant Person, agree to be bound by the prevailing terms of the Policy as updated from time to time. Please check back regularly for updated information on the handling of your Personal Data.

Governing Law

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

Contact

23. If you have any feedback or enquiries relating to your Personal Data, or if you would like to manage marketing messages that you may receive from us, please contact us at pdpa@guocoland.com