## Collection and Processing of Personal Data

When you visit our websites, our servers will automatically record your IP address, the website from which you visit us, the web pages you visit and the date and length of your visits.

### 1. Overview and Scope

In this policy, "we", "us", "our" or "Kimen Group" means Kimen Realty Pte Ltd and associated companies that are managed by our group), "you", "your" or "yours" means the persons to whom this policy applies. "Personal Data" has the same meaning as that defined in the Personal Data Protection Act 2012 (the "PDPA").

Your personal data privacy is important to us and we are highly committed in protecting and managing your Personal Data in a responsible manner in line with this Policy.

This Personal Data Privacy Policy sets out the collection, use and disclosure of your Personal Data. "Personal Data" means any data or information, whether true or not, about an individual who can be identified either (a) from that data; or (b) from that data and other information to which Kimen Group is likely to have access to. Personal Data excludes Business Contact Information which means an individual's name, position name or title, business telephone number, business address, business electronic mail address or business fax number and any other similar information about the individual, not provided by the individual solely for his personal purposes.

2. When and what kind of Personal Data do we collect?

We may collect, use and disclose the following data about you:

- a. When you provide Personal Data by filling in online or hardcopy forms when applying for Kimen Group's products (including, but not limited to, residential or commercial properties) and services or feedback (i.e. surveys), asking queries, requests and other submissions;
- b. If and when you contact Kimen Group (i.e. telephone calls, online chat programmes, social media (i.e. Facebook, etc.), website, emails and face to face meetings), we may keep a record of that correspondence;
- c. Details of your visits to Kimen Group's website including, but not limited to, cookies, location data and other communication data, that you access;
- d. When you fill up online and hardcopy job application forms to apply for a job at Kimen Group;
- e. When you enter into any contract with Kimen Group or purchase any products/services from Kimen Group;
- f. If and when you make contact with any of our authorized representatives, agents and partners, we may keep a record of that correspondence;

- g. If and when you participate in any exhibition or event organised by Kimen Group or where Kimen Group is a participant;
- h. If and when you respond to any of Kimen Group's marketing promotions, newsletters and other materials;

We may collect the following kinds of Personal Data through the different channels mentioned above:

email addresses:

- d. Mobile and business telephone numbers;
- e. Educational history and qualifications and related professional license details;
- f. Bank account details, if necessary;
- g. Passport information, if necessary;
- h. Voice, photos and CCTV images/ videos, if applicable;
- i. Central depository account information, if necessary;

Additionally, if you are applying for employment with Kimen Group, Kimen Group will collect the following:

- a. Nationality;
- b. NRIC/FIN/WP numbers, if necessary;
- c. Citizenship;
- d. Marital Status;
- e. Date of Birth;
- f. Gender;
- g. Race;
- h. Next of Kin, family and emergency contact information;
- i. Medical and insurance information, if necessary;
- j. Employment history and professional qualifications, including testimonials and references;
- k. Medical, legal and financial history;

- I. Curriculum Vitae, if any;
- 3. What purposes does Kimen Group Collect, Use and Disclose Personal Data?

We may use the information we collect from you for any of the following purposes:

- a. To perform or carry out Kimen Group's obligations arising from any contracts entered into between you and us;
- b. To enable Kimen Group's subcontractors, third-party agents and service providers, to fulfil obligations/services as stipulated in your contract with Kimen Group;
- c. To handle products and services requests and enquiries from you, our customers or tenants:
- d. For payment administration purposes;
- e. To administer and update your records in our databases; monitoring and maintaining a copy of your record of previous transactions;
- f. To facilitate the delivery, maintenance and enhancement of Kimen Group's products and services for customers, and tenants;
- g. To plan, monitor, and enhance the provision of new products, services, projects, and planning of events for customers, and tenants;
- h. For training and knowledge transfer purposes;
- i. To improve Kimen Group's customer service through your feedback;
- j. To facilitate data analysis and business planning purposes;
- k. To process your enquiries and any and all other ancillary administrative purposes;
- I. For communications, sales and marketing efforts and leads generation and publicity purposes;
- m. For vendor management and communications purposes;
- n. For government, compliance, audit and other regulatory purposes;
- o. For recruitment and evaluation purposes if you apply for a job with Kimen Group, i.e. to determine job suitability, perform reference checks;
- p. To apply for employee work visas at the Ministry of Manpower;
- q. For security, safety surveillance and monitoring purposes;

- r. For internal reporting and/or accounting purposes; and
- s. Purposes incidental to each or all of the above

We may also contact you by any means of communication for which you have given us contact details, including but not limited to via email, telephone numbers, and post, for the purpose of getting your feedback or for providing you with information which we believe could be of interest to you or your organisation.

By your submission of your Personal Data to us, you consent to the onward disclosure of your Personal Data to these agents or service providers (as set out in no.3 of "What purposes does Kimen Group collect, use and disclose personal data?") and the processing of your Personal Data by these agents or service providers.

We only collect, process, use or disclose such Personal Data, in accordance with this policy. If you are acting as an intermediary, or otherwise on behalf of a third party, or supply us with information regarding a third party, you undertake that you are an authorised representative or agent of such third party and that you have obtained consent from such third party to our collection, processing, use and disclosure of their Personal Data. Because we are collecting the third party's data from you, you undertake to make the third party aware of all matters listed in this policy by referring them to our agencies' website.

# 6. For how long does Kimen Group retain your Personal Data?

We will cease to retain Personal Data, as soon as it is reasonable to assume that the purpose for collection of such personal data is no longer being served by such retention, and such retention is no longer necessary for legal or business purposes.

# 7. Does Kimen Group use cookies to collect and use Personal Data?

When you visit any of Kimen Group's websites, Kimen Group may collect or analyse anonymized information from which individual information will not be identified. The information collected may include your IP address, the website from which you visit us, the number of users and the amount of time you stay on our website, which countries you are from, and what mode of device you are currently using to view our website, as well as domain information that helps us to learn our client's profile, the frequency of viewing. We use this information to improve our website's content and navigation.

Some parts of this website may use cookies, which enable us to track usage patterns, enforce security, and offer you a customized content. A cookie is a small text file that our server places on your computer hard drive as a unique identifier.

Note that our cookies do not have an expiration date and do not collect personally identifiable information. You may disable the use of cookies by selecting the appropriate settings on your browser. This may however result in you being unable to experience the full functionality of our websites.

# 8. How does Kimen Group protect your Personal Data?

The Personal Data that we hold about you may be stored on local servers located at Kimen Group's Singapore office as well as back up hosted on an offsite location in Singapore or overseas. Kimen Group implements a variety of security measures to maintain the safety of your submitted information. All electronic storage and transmission of personal data is secured and stored on managed servers with controlled access and appropriate security technologies.

Although every reasonable effort has been made to ensure that all personal data will be so protected, Kimen Group cannot be responsible for any unauthorised use or misuse of such information and from risks which are inherent in all internet communications.

Your Personal Data will only be disclosed for the express purpose of delivering the product or service requested and shall not be sold or disclosed to any other company for any other reason whatsoever without your consent.

# 9. Links to third party websites from Kimen Group's website

Our websites may contain links to other external websites, such as our business partners. We are not responsible for the privacy policies and practices of these websites taken care of by third parties. We strongly encourage you to check the privacy policy of each website that you visit. Some of these third party websites may have our logo or trademark acknowledged on their website. However, these websites are not operated and maintained by us. Please contact the owner of the respective websites should you have any questions on their privacy policies.

#### 10. Access and Correction of Personal Data

Please contact us via contact@kimengroup.com should you wish to have access to or seek to update, correct or withdraw the consent to collect and use your Personal Data. Your email should identify yourself and state which Personal Data and information about its use and/or disclosure is requested.

We will respond to your request as soon as reasonably possible. Should we not be able to respond to your request within thirty (30) days after receiving your request, we will inform you in writing within thirty (30) days of the time by which we will be able to respond to your request. If we are unable to provide you with any personal data or to make a correction requested by you, we shall generally inform you of the reasons why we are unable to do so (except where we are not required to do so under the PDPA).

## 11. Further Information

If you are concerned about the handling of your Personal Data, wish to be removed from our email subscription or contact lists, or if you have any complaints or queries related to your Personal Data or our Privacy Policy, please contact Kimen Group at contact@kimengroup.com. Please clearly identify yourself and the purpose of your query.

#### 12. Amendments and updates of privacy policy

Kimen Group reserves the right to change this Policy with or without notice from time to time and will make the updated statement available on our website.