

DATA PROTECTION NOTICE FOR CUSTOMERS

This Data Protection Notice (“**Notice**”) sets out the basis upon which En-Syst Equipment & Services Pte. Ltd., its affiliates and subsidiaries (“**En-Syst Group**”, “**we**”, “**us**” or “**our**”) may collect, use, disclose or otherwise process personal data of our customers and in accordance with the Personal Data Protection Act 2012 (No. 26 of 2012) (the “**PDPA**”). This Notice applies to personal data in our possession or under our control, including personal data in the possession of organisations which we have engaged to collect, use, disclose or process personal data for our purposes.

This Notice 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 we may have at law to collect, use or disclose your personal data.

PERSONAL DATA

1. As used in this Notice:-

“**customer**” means an individual who (a) has contacted us through any means to find out more about any goods or services we provide, or (b) may, or has, entered into a contract with us for the supply of any goods or services by us; and

“**personal data**” means data, whether true or not, about a customer who can be identified: (a) from that data; or (b) from that data and other information to which we have or are likely to have access.

2. Depending on the nature of your interaction with us, some examples of personal data which we may collect from you include your name and identification information such as your NRIC number, contact information such as your address, email address or telephone number, nationality, gender, date of birth, marital status, photographs and other audio-visual information, employment information and financial information such as bank account information.
3. Other terms used in this Notice shall have the meanings given to them in the PDPA (where the context so permits).
4. By submitting your personal data to us, you consent to us collecting, using, disclosing and processing your personal data in accordance with this Notice. We will also take it that all personal data provided by you is accurate and complete, and that none of it is misleading or out of date. You will promptly update us in the event of any change to your personal data. In some circumstances, you may have provided personal data relating to other individuals (such as your spouse, family members or other third party including minors). You represent and warrant that you are authorised to provide their personal data to us and you have obtained their consent to the collection, use, disclosure and processing of their personal data in accordance with this Notice.

COLLECTION, USE AND DISCLOSURE OF PERSONAL DATA

5. We may collect, use and disclose your personal data for any or all of the following purposes:-
 - (a) in the course of or in connection with your provision of services to us;
 - (b) verifying your identity;
 - (c) communicating with you;

- (d) maintaining, managing and improving your relationship with us;
- (e) administering and processing payment or credit transactions;
- (f) managing our administrative and business operations, and maintaining and updating internal record keeping;
- (g) processing and analysing your personal data either individually or collectively with other individuals;
- (h) sharing any of your personal data with auditors for our internal audit and reporting purposes;
- (i) sharing 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;
- (j) sharing any of your personal data with our business partners;
- (k) sharing any of your personal data with financial institutions necessary for the purpose of applying and obtaining credit facility(ies), if necessary;
- (l) for audit, risk management and security purposes;
- (m) for detecting, investigating and preventing fraudulent, prohibited or illegal activities;
- (n) for enabling us to perform our obligations and enforce our rights under any agreements or documents that we are a party to;
- (o) to transfer or assign our rights, interests and obligations under any agreements entered into with us;
- (p) complying with any applicable laws, regulations, court orders, codes of practice, directions, guidelines, circulars or rules, or to assist in law enforcement and investigations conducted by any governmental and/or regulatory authority;
- (q) to enforce or defend our rights and your rights under the applicable laws, legislation and regulations;
- (r) any other purposes for which you have provided the information;
- (s) transmitting to any unaffiliated third parties including our third party service providers and agents, and relevant governmental and/or regulatory authorities, whether in Singapore or abroad, for the aforementioned purposes; and
- (t) any other incidental business purposes related to or in connection with the above.

6. We may disclose your personal data:-

- (a) where such disclosure is required in the course of or in connection with your provision of services to us;

- (b) to third party service providers, agents and other organisations we have engaged to perform any of the functions listed in clause 5 above for us;
 - (c) to agents, contractors, data intermediaries or third party service providers who provide services such as telecommunications, mailing, information technology, payment, payroll, insurance, data processing, training, market research and storage to us;
 - (d) to banks, financial institutions and their respective service providers in connection with any of the above stated purposes;
 - (e) to our professional advisers such as auditors and lawyers in connection with any of the above stated purposes;
 - (f) to authorities, law enforcement agencies, government regulators or statutory boards in connection with any of the above stated purposes;
 - (g) to our affiliates or related corporations and/or other third parties whether situated in or outside Singapore in connection with any of the above stated purposes; and
 - (h) to any other party to whom you authorise us to disclose your personal data to.
7. The purposes listed in the above clauses may continue to apply even in situations where your relationship with us (for example, pursuant to a contract) has been terminated or altered in any way, for a reasonable period thereafter (including, where applicable, a period to enable us to enforce our rights under any contract with you).

WITHDRAWING YOUR CONSENT

8. The consent that you provide for the collection, use and disclosure of your personal data will remain valid until such time it is withdrawn by you in writing. You may withdraw consent and request us to stop using and/or disclosing your personal data for any or all of the purposes listed above by submitting your request in writing or via email to any of our Data Protection Officers at the contact details provided below.
9. Upon receipt of your written request to withdraw your consent, we may require reasonable time (depending on the complexity of the request and its impact on our relationship with you) for your request to be processed and for us to notify you of the consequences of us acceding to the same, including any legal consequences which may affect your rights and liabilities to us. In general, we shall seek to process and effect your request within ten (10) business days of receiving it.
10. Whilst we respect your decision to withdraw your consent, please note that depending on the nature and extent of your request, we may not be in a position to continue our contractual relationship with you and we shall, in such circumstances, notify you before completing the processing of your request. Such withdrawal may result in the termination of any agreement with us, and you being in breach of your contractual obligations or undertakings. Our legal rights and remedies in such event are expressly reserved.
11. Should you decide to cancel your withdrawal of consent, please inform us in writing in the manner described in clause 8 above.

12. Please note that withdrawing consent does not affect our right to continue to collect, use and disclose personal data where such collection, use and disclosure without consent is permitted or required under applicable laws.

ACCESS TO AND CORRECTION OF PERSONAL DATA

13. If you wish to make (a) an access request for access to a copy of the personal data which we hold about you or information about the ways in which we use or disclose your personal data or (b) a correction request to correct or update any of your personal data which we hold, you may submit your request in writing or via email to any of our Data Protection Officers at the contact details provided below.
14. Please note that a reasonable fee may be charged for an access request. Please note that we will only process your request after you have agreed to the payment of the fee. In certain cases, we may also require a deposit from you before we process the access request.
15. We will respond to your access request as soon as reasonably possible. Should we not be able to respond to your access request within thirty (30) days after receiving your access request, we will inform you in writing within such 30-day period 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).

PROTECTION OF PERSONAL DATA

16. To safeguard your personal data from unauthorised access, collection, use, disclosure, copying, modification, disposal or similar risks, we have introduced appropriate administrative, physical and technical measures to secure all storage and transmission of personal data by us, and disclosing personal data both internally and to our authorised third party service providers, agents, affiliates, related corporations and/or other third parties only on a need-to-know basis.
17. You should be aware, however, that no method of transmission over the Internet or method of electronic storage is completely secure. We shall not assume responsibility for any unauthorised use of your personal data by third parties which are wholly attributable to factors beyond our control. While security cannot be guaranteed, we strive to protect the security of your information.

ACCURACY OF PERSONAL DATA

18. You understand that we are reliant on you (or your authorised representative) to provide us with accurate and complete personal data and with updates if there are any changes to your personal data. In order to ensure that your personal data is current, complete and accurate, please update us if there are changes to your personal data by informing any of our Data Protection Officers in writing or via email at the contact details provided below. We will not be responsible for relying on or using any inaccurate or incomplete personal data where you have provided with such personal data and/or have failed to update us of any changes in your personal data.

RETENTION OF PERSONAL DATA

19. We may retain your personal data for as long as it is necessary to fulfill the purposes for which they were collected, or as required or permitted by applicable laws.

20. We will cease our retention of your personal data, or remove the means by which the data can be associated with you, as soon as it is reasonable to assume that such retention no longer serves the purposes for which the personal data was collected, and is no longer necessary for legal or business purposes.

TRANSFERS OF PERSONAL DATA OUTSIDE OF SINGAPORE

21. Your personal data may be transferred to, stored, used and processed in countries outside of Singapore in accordance with the provisions of this Notice.

DATA PROTECTION OFFICER

22. You may contact any of our Data Protection Officers if you have any enquiries or feedback on our personal data protection policies and procedures; or if you wish to make any request, in the following manner:-

Name: Mr. Reginald Toh

Tel: +65 6861 2448

Email: reginaldtoh@ensyst.com.sg

EFFECT OF NOTICE AND CHANGES TO NOTICE

23. This Notice applies in conjunction with any other policies, notices, contractual clauses and consent clauses that apply in relation to the collection, use and disclosure of your personal data by us.
24. We reserve the right to revise this Notice at our absolute discretion from time to time without any prior notice. You may determine if any such revision has taken place by referring to the date on which this Notice was last updated. Your continued provision of services to us constitute your acknowledgement and acceptance of, and agreement to, such changes.

GOVERNING LAW

25. This Notice shall be governed by Singapore law.

Effective date: 1 January 2019

Last updated: -