

## Personal Data Protection Policy

Choo Chiang Holdings Ltd. (“CCH” and together with its subsidiaries, the “CCH Group”) respects the protection of the Personal Data of individuals and values the relationship we have with you. We are committed to accord Personal Data the due level of care as presented in our Personal Data Policies, and consistent with the Personal Data Protection Act 2012.

Our Personal Data Policies describe the types of Personal Data we may collect from you, how we may use that information, and to whom we may share it with. Our Personal Data Policies also describe the measures we take to protect the security of the information you provide to us, including without limitation through this Website. We also tell you how you can reach us to update your Personal Data, ask questions you may have about our personal data protection practices and provide feedback on our personal data protection practices.

“**Personal Data**” in this Policy means data that can identify an individual.

### 1. Personal Data that we collect

The types of Personal Data that we collect about individuals include:

1. Name
2. NRIC number / FIN number / passport number
3. Bank account details
4. Mobile number
5. Vehicle number
6. Personal email address
7. Residential address
8. Residential telephone number
9. Photographs
10. Video and CCTV footage

You may have provided the Personal Data to us personally or authorised other individuals to provide the Personal Data to us and consent (on your behalf) to our collection of your Personal Data from these individuals. These individuals could be your superiors, employees, subordinates, colleagues and your family members.

Where you give us Personal Data about other individuals, you confirm that you are authorised to disclose and consent, on their behalf, to the processing of such Personal Data for the purposes described in the section “Purposes for which we collect and use Personal Data”, or other purposes for which your consent has been sought and obtained.

## **2. Purposes for which we collect and use Personal Data**

We collect and use the Personal Data that you provide to us for the following purposes:

### If you are a Vendor / Service Provider / Business Partner

- i. To conduct due diligence / background checks that are mandated by legislation or CCH's internal policies and practices
- ii. For the purposes of the supply of products and services and support by vendors / service providers / business partners to CCH
- iii. To keep vendors / service providers / business partners updated on changes to CCH's policies
- iv. To evaluate and to improve CCH Group's products and services
- v. To evaluate the products and services provided by vendors / service providers / business partners to CCH Group
- vi. Security clearance / entry access into CCH Group's premises
- vii. To facilitate attendance at events/functions organised by CCH Group or that CCH Group is involved in
- viii. For purposes that are ancillary to or in furtherance of the above purposes e.g. ancillary to or in furtherance of facilitating attendance at events/functions organised by CCH Group or that CCH Group is involved in, we will use your Personal Data to communicate with you concerning the invitation to the events/functions and inform you of updates on the events/functions and to seek your feedback or comments on your attendance of the events/functions.

### If you are a Customer

- i. To conduct due diligence / background checks that are mandated by legislation or CCH's internal policies and practices
- ii. To provide products and services and to communicate with customers as part of providing products and services
- iii. To evaluate CCH Group's products and services and how CCH Group can improve its products and services
- iv. To respond to queries or comments on CCH Group's products and services
- v. Security clearance / entry access into CCH Group's premises
- vi. To communicate with customers on developments on CCH Group's products and services, the business of CCH Group and other corporate events or updates
- vii. To facilitate attendance at events/functions organised by CCH Group or that CCH Group is involved in
- viii. For purposes that are ancillary to or in furtherance of the above purposes e.g. ancillary to or in furtherance of facilitating attendance at events/functions organised by CCH Group or that CCH Group is involved in, we will use your Personal Data to communicate with you concerning the invitation to the events/functions and inform you of updates on the events/functions and to seek your feedback or comments on your attendance of the events/functions.

### Others

- i. To evaluate applications for employment / job positions within CCH
- ii. To evaluate applications for internships and industrial attachments
- iii. To conduct due diligence/background checks on job applicants
- iv. To communicate with individuals who participate in competitions organised by CCH
- v. To communicate with award nominees and award winners for awards organised by CCH
- vi. To organise and manage events for community and charitable purposes
- vii. Security clearance / entry access into CCH Group's premises
- viii. To facilitate attendance at events/functions organised by CCH Group or that CCH Group is involved in
- ix. For purposes that are ancillary to or in furtherance of the above purposes e.g. ancillary to or in furtherance of facilitating attendance at events/functions organised by CCH Group or that CCH Group is involved in, we will use your Personal Data to communicate with you concerning the invitation to the events/functions and inform you of updates on the events/functions and to seek your feedback or comments on your attendance of the events/functions.

We only collect and use Personal Data for purposes which you have consented to and for which we have been authorised. If we need to use your Personal Data for any purpose which you have not previously consented to, we would seek your consent prior to using your Personal Data for the new purpose.

### **3. Disclosure, sharing and transfer of Personal Data**

CCH does not sell or rent Personal Data that we collect from individuals, including our website visitors. In the course of or in connection with providing our products and services to our customers, we disclose, share and transfer Personal Data to the following parties for the following purposes:

- i. To our customers/vendors/subcontractors/consultants/business partners for tender purposes.
- ii. To our business partners for the purposes of providing products and services to our customers.
- iii. To government and non-government authorities, agencies and/or regulators as required under law or under directions or orders from the government and non-government authorities, agencies and/or regulators for security, regulatory approvals or permits.
- iv. To other CCH Group entities for the purpose of responding to questions, concerns, comments or feedback on our products or services or our business, or to share knowledge on issues such as industry developments, CCH's business, market outlook, corporate events and other products and services of the CCH Group that may be of interest to your company, organisation or business.

- v. To other CCH Group entities to facilitate the provision of products and services to our customers where the project or engagement involves other CCH Group entities.
- vi. To event organisers and service providers to facilitate the planning of events / functions that CCH Group organises or is involved in.

We also disclose and transfer Personal Data to the following parties for the purposes of managing, operating, administering and running our business and for our business and legal purposes:

- i. To other CCH Group entities for security purposes
- ii. To other CCH Group entities for purposes of evaluating our products and services and our business as a group
- iii. Financial institutions for purposes of payments and transactions related to CCH's provision of products and services or related to products and services provided to CCH by our vendors / service providers / consultants
- iv. To our service providers (who may be located outside Singapore) that have been retained to perform services on our behalf or on behalf of CCH Group entities, including:
  - a. Service providers who provide IT and outsourcing services such as data storage, electronic mail services, deployment of management operations for information technology and HR outsourcing services;
  - b. Professional, financial and legal advisors, tax advisors, auditors, insurers and insurance brokers;
  - c. Vendors, service providers and consultants that have been engaged to help manage, operate, administer and run CCH's operations and business process or provide services to facilitate our provision of our products and services; and
  - d. External contractors to provide consultancy and evaluative services to CCH and for CCH's products and services, or organise events for CCH.
- v. For job applicants, your Personal Data may be shared with other entities in the CCH Group if CCH takes the view that you may be suitable or eligible for another job position within the CCH Group, unless you inform us otherwise (please refer to Section 9). The Personal Data will be used in a confidential manner to help CCH Group monitor their recruitment processes.

CCH requires that the parties to whom we transfer Personal Data and our service providers implement adequate levels of protection in order to protect Personal Data. We also require that these parties only process Personal Data strictly for purposes for which we engage them for and consistent with the purposes that we have described in the section "Purposes for which we collect and use Personal Data" or with other purposes for which consent has been sought and obtained.

In addition, we would disclose Personal Data in the following circumstances:

- i. we are required to do so by law or by the listing rules of Singapore Exchange Limited;
- ii. in response to a request from law enforcement authorities or other government officials;
- iii. to comply with a court order or direction from a government agency or regulatory authority ordering the disclosure of the Personal Data; and
- iv. where the disclosure is necessary for investigations or legal proceedings.

#### **4. Withdrawal of Consent**

Vendor / Service Provider / Business Partner / Customers / Others are able to withdraw their consent to CCH continued use and disclosure of Personal Data as prescribed in this Policy at any time. Such withdrawal should be made formally in writing to the Data Protection Officer (“DPO”) of CCH.

If consent is withdrawn by an employee, CCH may need to discontinue his/her employment with the company. If consent is withdrawn by a customer, CCH may no longer be able to provide the requested products or services and our relationship with the customer may have to be terminated.

#### **5. Access to Personal Data**

##### Data Access and Correction

Individual may make a request to access his/her Personal Data which is in CCH possession or control.

The individual should contact the DPO.

CCH will need enough information from the individual in order to ascertain the identity as well as the nature of the request, so as to be able to deal with the request. CCH reserve the right, or may, charge a reasonable fee of any data access request.

For a request to access Personal Data, the DPO have sufficient information from the individual to deal with the request, CCH will seek to provide the individual with the relevant Personal Data within 30 days. Where CCH is unable to respond within the said 30 days, the DPO will notify the soonest possible time within which CCH can provide the individual with the information requested.

Employees who wish to access their Personal Data should contact the DPO. Potential employees who were subsequently not employed by CCH or former employees of CCH should contact the DPO too.

CCH may not be able to provide access to all of the Personal Data that they hold about an individual. For example, CCH Group may not provide access to Personal Data if such provision could reveal Personal Data about another individual, if such information is subject to legal privilege or if provision will be contrary to national interest or where such refusal is permitted under the PDPA.

## **6. Accuracy and correction of Personal Data**

CCH takes reasonable measures to ensure that the Personal Data we collect about individuals are accurate and complete. For this reason, if there is any change or update in Personal Data, we would like to know about these changes or updates. If there is a change or an update in your Personal Data or if there is a need to correct any Personal Data of yours that we have, please write to us and provide us with the following details:

- Your name and an email address or mailing address at which we can contact you.
- The nature of our relationship with you.
- The Personal Data for which there has been a change, update or correction.

You may send your requests to our DPO at the contact details listed in Section 9 below.

We will endeavour to acknowledge the receipt of your request as soon as we can. As it is important to us that the Personal Data that we have about you is accurate and complete, it may be necessary for us to request for supporting documentation from you. We will contact you if we require supporting documentation from you.

We will update and correct Personal Data found to be inaccurate or incomplete as soon as practicable. Any unresolved differences as to accuracy or completeness of your Personal Data shall be noted in the individual's records.

There may be circumstances where we will not update or correct Personal Data, including:

1. The Personal Data is opinion data that is kept solely for an evaluative purpose; and
2. The Personal Data is in documents related to a prosecution if all proceedings relating to the prosecution have not been completed.

## **7. Protection and Security of Personal Data**

We employ a range of technological and physical security arrangements and maintain safeguards to protect against the accidental or unauthorised access, collection, use, disclosure, copying, modification, disposal, deletion and other similar risks to Personal Data.

## **8. Retention of your Personal Data**

CCH only retains Personal Data for as long as the retention is required for the purposes for which we collected the Personal Data, the purposes described in this Policy and for our business and legal purposes.

## **9. How to Contact Us**

If you have any questions or comments about this Policy and our policies and practices on our collection, use, disclosure or retention of Personal Data, please write to Mr Morland Fu, our DPO at [morland@choochiang.com](mailto:morland@choochiang.com).

If you are a job applicant and wish to inform us that: (i) you do not wish for CCH to share your personal data with other entities in the CCH Group for evaluating your suitability or eligibility for another job position within the CCH Group other than the one you are applying for; or (ii) you do not wish for CCH to retain your personal data for the purposes of evaluating your suitability for future job openings within CCH Group, please write to [hr@choochiang.com](mailto:hr@choochiang.com).

## 10. Complaints Procedures

If an individual has a reason to believe that his/her Personal Data has been misused by CCH, the individual is advised to lodge a complaint with the DPO.

## 11. Data Breaches

Data breaches mandates that any individual who suspects that a theft, breach or exposure of CCH Group protected or sensitive information has occurred must immediately provide a description of what occurred via email to DPO.

- i. Scope and types of data breaches:
  - a. Data breaches within CCH Group
  - b. Data breaches discovered by a data intermediary
  - c. Data breaches involving joint partnerships
- ii. Responsibilities and requirements:
  - a. DPO will investigate all reported thefts, data breaches and exposures to confirm if a theft, breach or exposure has occurred. If a theft, breach or exposure has occurred, the DPO will follow the appropriate procedure in place.
  - b. DPO will assess the impact and scale of the data breach and determine if the breach is notifiable based on PDPA.
  - c. As soon as a theft, data breach or exposure containing CCH Group protected or sensitive information is identified, the process of removing all access to that resource will begin.
  - d. DPO will chair an incident response team to handle the breach or exposure. The team will include, where applicable, member from IT, Finance, Head of Sales (if Customer data is affected), Human Resources, and additional individuals as deemed necessary by the DPO.
- iii. Reporting and notifying:
  - a. Work with the Human Resource department to decide how to communicate the breach to i) internal employees; ii) the Public; and iii) those directly affected parties.



- b. As required by relevant laws and regulations, notification of a breach to Commission is required. CCH Group is required to notify the Commission of all of the information by law.
  - c. If notifies the Commission of the notifiable data breach after the expiry of the period specified in section 26D(1) of the Act (three calendar days), the notification to the Commission must additionally specify the reasons for the late notification and include any supporting evidence.
  - d. The notification by the organisation to the Commission must be in the form and manner specified on the Commission's website at [www.pdpc.gov.sg](http://www.pdpc.gov.sg).
- iv. Post-breach evaluation process:
- To improve personal data handling practices and prevent the recurrence of similar data breaches. This may involve:
- a. A review including a root cause analysis of the data breach (e.g., implement fixes to system errors/bugs to prevent future disclosure of/access to personal data)
  - b. A prevention plan to prevent similar data breaches in future
  - c. To ensure the prevention plan is implemented
  - d. A review of existing policies, procedures and changes to reflect the lessons learnt from the review
  - e. Changes to employee selection and training practices
- v. Enforcement:
- a. Any CCH Group personnel found in violation of this policy may be subject to disciplinary action, up to and including termination of employment.
  - b. Any third-party partner company found in violation may have their network connection terminated and/or our relationship severed; the terms of the same are to be defined in the Agreement memorializing such relationship.

## 12. Online Privacy Policy

Our Online Privacy Policy applies only to our online activities and is valid for visitors to our website <https://www.choochiang.com> with regards to the information that they shared and/or collected in CCH. This is not applicable to any information collected offline or via channels other than this website <https://www.choochiang.com>.



### Log files

CCH follows a standard procedure of using log files. These files log visitors when they visit websites. All hosting companies do this and a part of hosting services' analytics. The information collected by log files include internet protocol (IP) addresses, browser type, Internet Service Provider (ISP), date and time stamp, referring/exit pages, and possibly the number of clicks. These are not linked to any information that is personally identifiable. The purpose of the information is for analysing trends, administering the site, tracking users' movement on the website, and gathering demographic information.

### **13. Governing Law**

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

(Last updated on 1 January 2024)