



SB REIT MANAGEMENT PTE LTD PERSONAL DATA PROTECTION POLICY

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Contents

1 Overview of Personal Data Protection Act	3
1.1 Key Terms	3
1.2 What is personal data?	4
2 General PDPA Framework	5
2.1 Purpose of Policy	5
3 Handling of Personal Data	5
3.1 Collection, Use and Disclosure of Personal Data.....	5
3.2 Protection of Personal Data	8
3.3 Retention of Personal Data	8
3.4 Accuracy of Personal Data	8
3.5 Transfer of Personal Data.....	9
3.6 Consent Withdrawal, Access, and Correction of Personal Data	9
4 Do Not Call (“DNC”) Registry	10
5 Changes to Policy	10
6 Contact Us.....	10
7 European Economic Area (“EEA”) Addendum	10

1 Overview of Personal Data Protection Act

The Personal Data Protection Act 2012 (“PDPA”, “the Act”) establishes a data protection law in Singapore and the purpose of the Act is to “govern the collection, use and disclosure of personal data by organisations in a manner that recognises both the right of individuals to protect their personal data and the need of organisations to collect, use or disclose personal data for purposes that a reasonable person would consider appropriate in the circumstances”.

The PDPA takes effect in phases starting with the provisions relating to the formation of the PDPC on 2 January 2013. Provisions relating to the DNC Registry came into effect on 2 January 2014 and the main data protection rules on 2 July 2014.

For more information about PDPA, please visit the Personal Data Protection Commission’s website at <http://www.pdpc.gov.sg>.

1.1 Key Terms

Some important terms used in the Act are highlighted below:

- i. Individuals
 - Means a natural person, whether living or deceased
- ii. Personal Data
 - Means data, whether true or not, about an individual who can be identified
- iii. Organisations
 - Means any individual, company, association or body of persons, corporate or unincorporated whether or not formed or recognised under the law of Singapore; or resident, or having an office or a place of business, in Singapore
- iv. Collection, use and disclosure
 - *Collection* refers to any act or set of acts through which an organisation obtains control over or possession of personal data
 - *Use* refers to any act or set of acts by which an organisation employs personal data. A particular use of personal data may occasionally involve collection or disclosure that is necessarily part of the use
 - *Disclosure* refers to any act or set of acts by which an organisation discloses, transfers or otherwise makes available personal data that is under its control or in its possession to any other organisation
- v. Purposes
 - The Act does not define the term “purpose”. However, it refers to the objectives or reasons for collecting the collecting, using or disclosing of personal data.

vi. Reasonableness

- The concept of “Reasonableness” requires the organisation to take the view of the situation from the perspective of an individual and consider what the individual would think as fair.

1.2 What is personal data?

Personal Data refers to data, whether true or not, about an individual, living or deceased¹, who can be identified from that given data; or from that data and other information to which Soilbuild has or is likely to have access. Depending on the nature of interaction with the Company, examples of such Personal Data include name, NRIC or FIN number, passport number, contact number (residential and mobile), email address, mailing address, photograph, video image, country, profession, job position, industry, payment information and any other information relating to the individuals which have provided us in any form. However, the data protection provisions in the PDPA (parts III to VI) does not apply to business contact information. This refers to 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 or her personal purposes.

¹ The PDPA Act shall not apply in respect of —

- (a) data about an individual that is contained in a record that has been in existence for at least 100 years; or
- (b) personal data about a deceased individual, except that the provisions relating to the disclosure of personal data and section 24 (protection of personal data) shall apply in respect of personal data about an individual who has been dead for 10 years or fewer.

2 General PDPA Framework

2.1 Purpose of Policy

The purpose of this Data Protection Policy (“Policy”) is to set out how Soilbuild Group Holdings Ltd. and/or its group of companies, subsidiaries, related companies (including but not limited to SB REIT Management Pte Ltd as the Manager of Soilbuild Business Spare REIT) and joint ventures (individually or collectively referred to as "Soilbuild", the “Group”, "we", "us" or "our"), collectively manage Personal Data (as hereinafter defined) which is subject to the Singapore Personal Data Protection Act 2012. The Policy applies to all business units and departments across Soilbuild and sets out how Personal Data is collected, used or disclosed from you, or that you have provided to us through the Group’s websites or otherwise. This will provide clarity to internal stakeholders on the responsibilities and processes on handling personal data in their day-to-day work. Policies also demonstrate accountability to external parties by informing them on the ways in which the organisation handles personal data.

The Policy is reviewed by the Data Protection Officer on an annual basis, or as and when there are changes in the environment, Act or the Policy, to ensure relevancy and alignment to regulatory development. Any updates or changes to the Policy will be sent to ARC or the Board of Directors for approval, and notified to all existing customers and the general public through an updated Policy made available on our website.

3 Handling of Personal Data

3.1 Collection, Use and Disclosure of Personal Data

Soilbuild will not, collect, use or disclose personal data about you, unless² –

- i. You give, or are deemed to have given, your consent under the PDPA Act to the collection, use or disclosure, as the case may be; or
- ii. The collection, use or disclosure, as the case may be, without your consent is required or authorised under the Act or any other written law

For the purpose of carrying on Soilbuild’s business, you may be requested to provide personal data including, but not limited to, the following, without which it may not be possible to satisfy your request:

- Personal information that can be used to identify an individual, such as full name, date of birth, nationality, gender, race, passport/NRIC numbers;
- Contact information, such as mobile number, email address, residential mailing address;

² Soilbuild may collect personal data without consent or from a source other than the individual, only in the circumstances and subject to any condition in the Second Schedule of the PDPA Act.

- Recruitment information, such as past working experience, past payslips, testimonials and references; and
- User data, including information provided by and individual for rental and payments made for Soilbuild facilities.

Generally, Soilbuild may collect your data directly or indirectly including, but not limited, to the following ways in which you may:

- Register or use any of our services from our websites (including cookies, IP addresses, account registration) and any form of information provided on our online platforms;
- Enter into lease agreements and submissions of required personal data information related to leasing matters;
- Submit information required for due diligence checks on employees, tenants and unitholders;
- Submit information required for our Customer Care Program;
- Submit information required for our Investor Relations Program;
- Purchase or/and engage our products or services through signing of documents and agreements;
- Sign up our mailing lists for email, postal, phone and message alerts, and other forms of marketing channels;
- Enter or respond to our marketing and promotion activities, contests and initiatives;
- Participate in our market research or surveys;
- Participate in our business continuity program and/or emergency evacuation exercises;
- Submit job applications, resume and reference letters;
- Provide personal data when visiting our premises;
- Interact with our representatives or customer service officers during, for example, office, email, phone, letter, face-to-face meeting, submit a comment, recruitments, events, roadshows, exhibitions, conferences, office, product launch etc.;
- Provide information to other organisation (e.g. business directories, credit reference agencies, banks or individuals) which the individual has authorised to provide personal details on his/her behalf;
- Download or use any of our mobile applications;
- When the individual's images are captured by us via CCTV surveillance cameras or via photos and videos taken by us or our representatives when he/her is within our premises;
- Submit Personal data for any other reasons as stated in the various forms used to collect your personal data which may or may not be reflected in this list, for which consent, where applicable, will be obtained from you separately.

Generally, Soilbuild, its group of companies, subsidiaries, joint venture, related companies, appointed third party service providers and contractual outsourced parties, in Singapore and at overseas, may use your personal data to:

- Conduct and complete both online and offline transactions (e.g. signing of sales and purchase agreements, signing of rental agreements, payments etc.);
- Conduct market research and improve customer services (e.g. surveys, performing market analysis, etc.);
- Conduct marketing, advertising, promotion (sending alerts, emails, telemarketing, SMS/WhatsApp marketing etc.);
- Comply with applicable laws, regulations, government authorities and other requirements
- Create and maintain relationship by ways of communication with our stakeholders (e.g. investors, prospect, tenant, occupier, buyer, resident, unitholder, shareholder, employee, candidate, contractor, website user, etc.);
- Assist in the recruitment and selection process, training and development purposes, job evaluation and compensation and benefits initiatives;
- Support security and risk management (e.g. conduct checks against money laundering, terrorism financing, recovery of debts, etc);
- Facilitate management of our facilities, including managing the safety and security of our premises and services (including, but not limited to, issuing visitor passes, operating CCTV surveillance and conducting security clearance, and recording of entrance to and exit from any of our premises);

Soilbuild may disclose your personal data to the following parties:

- Our companies within the Group or related parties, which are related to Soilbuild. In the event if Soilbuild buys or sells companies, divisions or businesses within the organization, the individual's personal data may be one of the assets to be transferred and disclosed to the purchaser
- Professional advisors such as our auditors and lawyers;
- Agents, contractors, third party service providers, specialist advisers and contractual outsourced parties who provide Soilbuild the goods and services to perform business, support, operational and/or administrative functions;
- Any other parties which, in Soilbuild's discretion, is expedient for, in accordance to or in connection with the purposes stated above.

You should ensure that the Personal Data submitted, whether with given consent or not, is true and complete.

If you are providing Personal Data of a third party (e.g. information of the individual's dependent, spouse, children, parents, proxies, unitholders, and/or the individual's company's Authorised Persons, Directors, Beneficial Owners or Contact Persons, etc.) to Soilbuild, you shall be deemed to 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 in this Policy.

3.2 Protection of Personal Data

We have disseminated information to our employees on implementing measures to secure and protect information such as training of our employees on handling Personal Data with respect to confidentiality, securing individual's data, taking steps to prevent misuse, loss, unauthorized access, and disclosure.

- To safeguard your Personal Data, we take reasonable care to ensure that the individual's Personal Data is classified, stored and transmitted adequately with appropriate security technologies via communicating data protection policy, controlling authorized access and scheduling regular audits on data protection process.
- However, we are not immune from cyber-attacks such as hacking, spyware, viruses. As such, we will not be liable for any unauthorized loss, destruction, and disclosure of personal data that arise from such cyber-attack risks.
- If an employee is found to have misused another individual's (including Soilbuild Group's employees) personal data, it will be treated as an employee misconduct case and appropriate disciplinary action will be taken (according to Section 12 of Soilbuild Group's HR Policy).

3.3 Retention of Personal Data

Soilbuild will retain your personal data for as long as it is necessary to fulfil the purpose for business or legal purposes, or in accordance with applicable laws. However, the Group or SB REIT Management Pte Ltd will cease to retain its documents containing personal data, or remove the means by which the personal data can be associated with particular individuals, as soon as it is reasonable to assume that –

- i. the purpose for which that personal data was collected is no longer being served by retention of the personal data; and
- ii. retention is no longer necessary for legal or business purposes

3.4 Accuracy of Personal Data

Soilbuild will strive to obtain accurate personal data by means of verifying the collected personal data against identification documents and reliable sources of information (e.g. ACRA).

3.5 Transfer of Personal Data

We have taken steps to ensure that appropriate levels of protection necessary to maintain the security and integrity of your personal data are in place. In addition, any data transferred outside of Singapore, if required, is processed only in accordance with the PDPA and any other applicable law.

3.6 Consent Withdrawal, Access, and Correction of Personal Data

Any individual (including staff) may request to access, update/amend, withdraw his/her consent, and feedback/complain to our use of Personal data by contacting the Data Protection Officer(s) as follows:

Attention: Data Protection Officer

Email: sbreitdpo@soilbuild.com

Please note that a reasonable fee may be charged for an access request. If so, we will inform you of the fee before processing your request.

We will respond to your request as soon as reasonably possible. Should we not be able to respond to your request within

1. ten (10) days for consent withdrawal requests
2. thirty (30) days for access or correction requests

after receiving your request, we will inform you in writing within ten (10) or 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).

On request of an individual, Soilbuild will, as soon as reasonably possible, provide the individual with –

- personal data about the individual that is in the possession or under the control of the organisation; and
- information about the ways in which the personal data referred to in paragraph (a) has been or may have been used or disclosed by the organisation within a year before the date of the request.

However, Soilbuild may not provide an individual with the individual's personal data or other information if the provision of information could reasonably be expected to –

- threaten the safety or physical or mental health of an individual other than the individual who made the request;

- cause immediate or grave harm to the safety or to the physical or mental health of the individual who made the request;
- reveal personal data about another individual;
- reveal the identity of an individual who has provided personal data about another individual and the individual providing the personal data does not consent to the disclosure of his identity; or
- be contrary to the national interest.

4 Do Not Call (“DNC”) Registry

The DNC Registry provisions under the PDPA generally prohibits organizations from sending certain marketing messages to Singapore telephone numbers, including mobile, fixed-line, residential and business numbers, registered with the registry. If you have not given us clear and unambiguous consent, evidenced in written or other accessible form, to the sending of the telemarketing messages to his/her telephone number, Soilbuild will check the relevant DNC Register(s) before sending telemarketing messages. If you have previously provided Soilbuild consent, unless this is withdrawn, the Group may continue to send marketing and promotional messages to your telephone number.

5 Changes to Policy

We reserve the right to modify or change this Policy at any time. The Effective Date, as stated above, indicates the last time this policy was materially revised. Please refer to this page for any changes and updates to our Policy regarding our handling of your personal data.

6 Contact Us

If you have further questions about this Privacy Policy or wish to contact us regarding this policy, please do not hesitate to contact the DPO at sbreitdpo@soilbuild.com.

7 European Economic Area (“EEA”) Addendum

This section of the Policy applies only if you are located in the EEA and supplements the information in this Policy.

We are the controller of personal data only when we collect it and determine the purposes and means of processing that personal data.

Where your personal data is collected, we will obtain your consent for the use, storage and disclosure of your personal data for the purposes listed in this Policy, and any other purposes that will be made known to you at the point of obtaining your consent.

Our business may require us to transfer your personal data to countries outside of the EEA, including to countries that may not provide the same level of data protection as your home country. We take appropriate steps to ensure that recipients of your personal data are bound to duties of confidentiality and we implement measures such as standard contractual clauses for international data transfers issued by the European Commission.