

## Wing Tai Singapore Privacy Policy

### Privacy Policy for Wing Tai Holdings Limited

We at Wing Tai Holdings Limited and our affiliates (collectively referred to as "**Wing Tai Group**") take our responsibilities under Singapore's Personal Data Protection Act 2012 (the "**PDPA**") seriously. We also recognise the importance of the personal data you have entrusted to us and believe that it is our responsibility to properly manage, protect and process your personal data.

This Data Protection Policy ("**Policy**") is designed to assist you in understanding how we collect, use, disclose and/or process the personal data you have provided to us, as well as to assist you in making an informed decision before providing us with any of your personal data.

This Policy 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.

If you, at any time, have any query on this policy or any other query in relation to how we may manage, protect and/or process your personal data, please do not hesitate to contact our Data Protection Officer (the "**DPO**") at:

Corporate: [dpo-corporate@wingtaiasia.com.sg](mailto:dpo-corporate@wingtaiasia.com.sg)  
Property: [dpo-property@wingtaiasia.com.sg](mailto:dpo-property@wingtaiasia.com.sg)  
Retail/Digital: [dpo-retail-digital@wingtaiasia.com.sg](mailto:dpo-retail-digital@wingtaiasia.com.sg)

## 1 Introduction to the PDPA

1.1 Personal Data is defined under the PDPA to mean data, whether true or not, about an individual who can be identified from that data, or from that data and other information to which an organisation has or is likely to have access. Common examples of personal data could include names, identification numbers (where necessary), contact information, medical records, photographs and video images.

1.2 We will collect your personal data in accordance with the PDPA. We will notify you of the purposes for which your personal data may be collected, used, disclosed and/or processed, as well as obtain your consent for the collection, use, disclosure and/or processing of your personal data for the intended purposes, unless an exception under the law permits us to collect and/or process your personal data without your consent.

## 2 Purposes for Collection, Use, Disclosure and Processing of Personal Data

### 2.1.A Personal Data Collected by Wing Tai Group's Corporate Services Division

The personal data which we collect from you may be collected, used, disclosed and/or processed for various purposes, depending on the circumstances for which we may/will need to process your personal data, including:

- (a) processing and/or responding to any enquiries or complaints made by you;
- (b) processing, administering and/or managing your interest in any employment opportunities and/or job positions in Wing Tai Group;
- (c) processing and/or responding to any queries made by you in relation to investment opportunities with Wing Tai Group;
- (d) forwarding your personal data to the various departments and/or business units within Wing Tai Group in order for such departments and/or business units to contact you and follow up on any enquiries, indication of interests and/or complaints made by you; and

(e) any other purposes which we notify you of at the time of obtaining your consent.

#### 2.1.B Personal Data Collected by Wing Tai Group's Property Division

The personal data which we collect from you (the "**Applicant**" being either the purchaser, tenant, resident, potential customer and/or visitor) may be collected, used, disclosed and/or processed for various purposes in relation to your interests in one (or more) of our property projects (the "**Project**"), depending on the circumstances for which we may/will need to process your personal data, including:

(a) processing, administering and/or managing the Applicant's interest in purchasing or leasing the Project, or in products, services and future events, as well as future launches and promotions of Wing Tai Group;

(b) contacting the Applicant on matters relating to the Applicant's interests in purchasing or leasing the Project, or in products, services and future events, as well as future launches and promotions of Wing Tai Group;

(c) processing and collection of the Applicant's payment in relation to the Project, including but without limitation to the processing of the Applicant's personal data by Wing Tai Group as well as its associated banks and legal advisors;

(d) executing the handing over of the purchased or leased property / apartment / accommodation in serviced apartment to the Applicant;

(e) contacting and following up with the Applicant during the defects liability period of purchased apartment, including but without limitation to the processing of the Applicant's personal data by Wing Tai Group, as well as its associated contractors and suppliers;

(f) collecting of any applicable fees in relation to the purchased or leased property / apartment / accommodation in serviced apartment;

(g) granting access to the Applicant to the Project and for health reasons such as contact tracing in the event of outbreak of infectious diseases;

(h) contacting the Applicant on matters relating to the Applicant's purchased or leased property / apartment / accommodation in serviced apartment, including but without limitation to house-keeping, obtaining feedback, building management and maintenance matters, repair and renovations works, fire drills, parking and security matters, insurance claims and measures in response to emergencies;

(i) conducting customer satisfaction surveys and customer profile analysis;

(j) inviting the Applicant to attend any corporate, arts and/or charity events and/or festive celebrations, sending wishes and/or gifts to the Applicant on birthdays and anniversaries;

(k) complying with all applicable laws, regulations and guidelines;

(l) carrying out due diligence or other screening activities (including background and verification checks) in accordance with legal or regulatory obligations or risk management procedures that may be required by law or that may have been put in place by Wing Tai Group;

(m) carrying out the Applicant's instructions or responding to any enquiries, feedback or requests made by the Applicant;

(n) processing and sending to the Applicant marketing, advertising and promotional information on products, future events, launches and promotions of Wing Tai Group via postal mail and/or electronic mail;

(o) if so consented by the Applicant, sending the Applicant marketing, advertising and promotional information about other products/services that Wing Tai Group may be offering and which Wing Tai Group believes may be of interest or benefit to the Applicant using any or all of the communication methods which the Applicant has provided Wing Tai Group including voice call/phone call, SMS / MMS / WhatsApp (text messages) and/or fax;

(p) cross-sharing of the Applicant's personal data within Wing Tai Group, which may be located outside of Singapore, for reporting purpose and purposes as stated in (n) and (o); and

(q) any other purpose which we notify you of at the time of obtaining your consent.

#### 2.1.C Personal Data Collected by Wing Tai Group's Retail Division

The personal data which we collect from you (the "**Customer**") may be collected, used, disclosed and/or processed for various purposes vis-a-vis your relationship with us, depending on the circumstances for which we may/will need to process your personal data, including:

(a) processing, administering and/or managing the Customer's membership with us;

(b) contacting the Customer on matters relating to the Customer's membership with us;

(c) enrolling the Customer in contests, lucky draws and similar promotions, and administering these activities. Some of these activities have additional terms and conditions, which could contain additional information about how Wing Tai Group uses and discloses the Customer's personal data, so Wing Tai Group suggests that the Customer read these carefully;

(d) conducting customer satisfaction surveys and collecting feedback from the Customer;

(e) carrying out the Customer's instruction or responding to any enquiries and requests made by the Customer;

(f) processing and sending to the Customer marketing, advertising and promotional information on products, future events, launches and promotions of Wing Tai Group via postal mail and/or electronic mail;

(g) if consented to by the Customer, sending the Customer marketing, advertising and promotional information about other products / services that Wing Tai Group may be offering and which Wing Tai Group believes may be of interest or benefit to the Customer using any or all of the communication methods which the Customer has provided Wing Tai Group including voice call / phone call, SMS / MMS / WhatsApp (text messages) and/or fax; and

(h) any other purposes which we notify you of at the time of obtaining your consent.

2.2 The various purposes enumerated at paragraph(s) **2.1.A**, **2.1B** and **2.1C** above are collectively referred to as the "Purposes".

2.3 As the purposes for which we may/will collect, use, disclose or process your personal data depend on the circumstances at hand, such purpose may not appear above. However, we will notify you of such other purpose at the time of obtaining your consent, unless processing of your personal data without your consent is permitted by the PDPA or by law.

2.4 In order to conduct our business operations more smoothly, we may also be disclosing the personal data you have provided to us to our third party service providers, agents and/or our affiliates or related corporations, and/or other third parties whether sited in Singapore or outside of Singapore, for one or more of the above-stated Purposes. Such third party service providers, agents and/or affiliates or related corporations and/or other third parties would be processing your personal data either on our behalf or otherwise, for one or more of the above-stated Purposes. For the transfer of personal data out of Singapore, please see paragraph **6.4** below.

### **3 Specific Issues for The Disclosure of Personal Data to Third Parties**

3.1 We respect the confidentiality of the personal data you have provided to us.

3.2 In that regard, we will not disclose your personal data to third parties without first obtaining your consent permitting us to do so. However, please note that we may disclose your personal data to third parties without first obtaining your consent in certain situations, including, without limitation, the following:

- (a) cases in which disclosure is necessary to perform the obligations in connection with the provision of services requested by you;
- (b) cases in which the disclosure is required or authorised based on the applicable laws and/or regulations;
- (c) cases in which the purpose of such disclosure is clearly in your interests, and if consent cannot be obtained in a timely way;
- (d) cases in which the disclosure is necessary to respond to an emergency that threatens the life, health or safety of yourself or another individual;
- (e) cases in which the disclosure is necessary for any investigation or proceedings;
- (f) cases in which the personal data is disclosed to any officer of a prescribed law enforcement agency, upon production of written authorisation signed by the head or director of that law enforcement agency or a person of a similar rank, certifying that the personal data is necessary for the purposes of the functions or duties of the officer;
- (g) cases in which the disclosure is to a public agency and such disclosure is necessary in the public interest; and/or
- (h) cases in which the disclosure without your consent is permitted by the PDPA or by law.

3.3 The instances listed above at paragraph **3.2** are not intended to be exhaustive. For more information on the exceptions, you are encouraged to peruse the First and Second Schedules of the PDPA which is publicly available at <https://sso.agc.gov.sg/Act/PDPA2012>.

3.4 Where we disclose your personal data to third parties with your consent, we will employ our best efforts to require such third parties to protect your personal data.

### **4 Request for Access and/or Correction of Personal Data**

4.1 You may request to access and/or correct the personal data currently in our possession or control by submitting a written request to us via email to the relevant DPO. We will need enough information from you in order to ascertain your identity as well as the nature of your request, so as to be able to deal with your request.

4.2 For a request to access personal data, once we have sufficient information from you to deal with the request, we will seek to provide you with the relevant personal data within 30 calendar days. Where we are unable to respond to you within the said 30 calendar days, we will notify you of the soonest possible time within which we can provide you with the information requested. Note that the PDPA exempts certain types of personal data from being subject to your access request.

4.3 For a request to correct personal data, once we have sufficient information from you to deal with the request, we will:

- (a) correct your personal data within 30 calendar days. Where we are unable to do so within the said 30 calendar days, we will notify you of the soonest practicable time within which we can make the correction. Note that the PDPA exempts certain types of personal data from being

subject to your correction request as well as provides for situation(s) when correction need not be made by us despite your request; and

(b) subject to paragraph 4.4, we will send the corrected personal data to every other organisation to which the personal data was disclosed by Wing Tai Group within a year before the date the correction was made, unless that other organisation does not need the corrected personal data for any legal or business purpose.

4.4 Notwithstanding paragraph 4.3(b), we may, if you so consent, send the corrected personal data only to specific organisations to which the personal data was disclosed by us within a year before the date the correction was made.

4.5 We may also be charging you a reasonable fee for the handling and processing of your requests to access your personal data. We will provide you with a written estimate of the fee we will be charging before we proceed with your request. Please note that we are not required to respond to or deal with your access request unless you have agreed to pay the fee.

## **5 Request to Withdraw Consent**

5.1 You may withdraw your consent for the collection, use and/or disclosure of your personal data in our possession or under our control by submitting your request to the relevant DPO.

5.2 We will process your request within 30 calendar days from your request in writing for withdrawal of consent, and will thereafter not collect, use and/or disclose your personal data in the manner stated in your request.

5.3 However, your withdrawal of consent could result in certain legal consequences arising from such withdrawal. In this regard, depending on the extent of your withdrawal of consent for us to process your personal data, it may mean that we will not be able to continue with your existing relationship with us.

## **6 Administration and Management of Personal Data**

6.1 We will take reasonable efforts to ensure that your personal data is accurate and complete, if your personal data is likely to be used by Wing Tai Group to make a decision that affects you or disclosed to another organisation. However, this means that you must also update us of any changes in your personal data that you had initially provided us with. We will not be responsible for relying on inaccurate or incomplete personal data arising from you not updating us of any changes in your personal data that you had initially provided us with.

6.2 We will also put in place reasonable security arrangements to ensure that your personal data is adequately protected and secured. Appropriate security arrangements will be taken to prevent any unauthorised access, collection, use, disclosure, copying, modification, leakage, loss, damage and/or alteration of your personal data. However, we cannot assume responsibility for any unauthorised use of your personal data by third parties, which are wholly attributable to factors beyond our control.

6.3 We will also put in place measures such that your personal data in our possession or under our control is destroyed and/or anonymised 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 the retention of such personal data; and (ii) retention is no longer necessary for any other legal or business purposes.

6.4 Where your personal data is to be transferred out of Singapore, we will comply with the PDPA in doing so. In this regard, this includes us obtaining your consent unless an exception under the PDPA or law applies, and taking appropriate steps to ascertain that the foreign recipient organisation of the personal data is bound by legally enforceable obligations to provide the transferred personal data a standard of protection that is at least comparable to the protection under the PDPA. This may include us entering into an appropriate contract with the foreign recipient organisation dealing with the personal data transfer or permitting the personal data transfer without such a contract if the PDPA or law permits us to.

## **7 Using our Website**

7.1 Our website uses "cookies" which may collect and store your personal data. Cookies are used to improve your user experience on our website.

7.2 Should you wish to deny the use of cookies, please select the appropriate settings of your internet browser. You may continue to use our website but may be limited in the use of our website's features.

## **8 Complaint Process**

8.1 If you have any complaint or grievance about how we are handling your personal data or about how we are complying with the PDPA, you may contact us with your complaint or grievance at:

Corporate: [dpo-corporate@wingtaiasia.com.sg](mailto:dpo-corporate@wingtaiasia.com.sg)  
Property: [dpo-property@wingtaiasia.com.sg](mailto:dpo-property@wingtaiasia.com.sg)  
Retail/Digital: [dpo-retail-digital@wingtaiasia.com.sg](mailto:dpo-retail-digital@wingtaiasia.com.sg)

Attention: Data Protection Officer.

8.2 Where it is an email or a letter through which you are submitting a complaint, your indication at the subject header that it is a PDPA complaint would assist us in attending to your complaint speedily by passing it on to the relevant staff in our organisation to handle. For example, you could label the subject header as "PDPA Complaint".

8.3 We will strive to deal with any complaint or grievance that you may have speedily and fairly.

## **9 Updates on Data Protection Policy**

9.1 As part of our efforts to ensure that we properly manage, protect and process your personal data, we will be reviewing our policies, procedures and processes from time to time.

9.2 We reserve the right to amend the terms of this Policy at our absolute discretion. Any amended Policy will be posted on this website.

9.3 You are encouraged to visit this website from time to time to ensure that you are well informed of our latest policies in relation to personal data protection.

Date of Issue: **30 Jan 2023**

Last Updated: **30 Jan 2023**