

PRIVACY NOTICE - ESPECIALLY FOR SINGAPORE

1. Singapore Personal Data Protection Act

Our standard privacy notice is currently based on the General Data Protection Regulation (“GDPR”). Where relevant, this privacy notice under the Singapore Personal Data Protection Act will continue to apply to all personal data that is collected, used, disclosed or otherwise processed in Singapore under the Personal Data Protection Act 2012 (“PDPA”), including personal data to do with and/or handled by **(a)** Singapore incorporated companies, **(b)** branch offices of foreign companies that are registered in Singapore, **(c)** Singapore nationals, wherever situated in the world, **(d)** foreign nationals resident in Singapore, and/or **(e)** personal data originating from Singapore. We also set out certain specific obligations under the PDPA below, which apply to personal data that is collected, used, disclosed or otherwise processed in Singapore.

For these cases, we have appointed as Data Protection Officer for Singapore:

Lyn Boxall

Director, Lyn Boxall LLC

50 Raffles Place, #37-00 Singapore Land Tower

Singapore 048623

E-mail: lyn@lynboxall.com

Phone: +65 6829 7031

2. Personal Data

- a)** Under the PDPA, “personal data” means data, whether true or not, about an individual 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.
- b)** 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
- First name
 - Last name
 - Business contact details
 - License plate
 - Location data (GPS position)
 - Pseudonymous identification number ("alias")
- c)** Other terms used in this privacy notice shall have the meanings given to them in the PDPA (where the context so permits).

3. Collection, use and disclosure of personal data

- a)** We generally do not collect your personal data unless (a) it is provided to us voluntarily by you directly or via a third party who has been duly authorised by you to disclose your personal data to us, or (b) collection and use of personal data without consent is permitted or required by the PDPA or other laws. We shall seek your consent before collecting any additional personal data and before using your personal data for a purpose which has not been notified to you (except where permitted or authorised by law).
- b)** We may collect and use your personal data for any or all of the following purposes:
- (1) performing obligations in the course of or in connection with our provision of the goods and/or services requested by you;
 - (2) verifying your identity;

- (3) responding to, handling, and processing queries, requests, applications, complaints, and feedback from you;
 - (4) managing your relationship with us;
 - (5) sending you marketing information about our goods or services including notifying you of our marketing events, initiatives and other promotions;
 - (6) complying with any applicable laws, regulations, codes of practice, guidelines, or rules, or to assist in law enforcement and investigations conducted by any governmental and/or regulatory authority;
 - (7) any other purposes for which you have provided the information;
 - (8) 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
 - (9) any other incidental business purposes related to or in connection with the above.
- c)** We may disclose your personal data:
- (1) where such disclosure is required for performing obligations in the course of or in connection with our provision of the goods or services requested by you;
 - (2) to third party service providers, agents and other organisations we have engaged to perform any of the functions listed in paragraph 3.b) above for us; or
 - (3) to our affiliates at Transporeon and our affiliated businesses outside of the European Union or the European Economic Area.
- d)** The purposes listed in the above paragraphs 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).

4. Withdrawing your consent

- a)** The consent that you provide for the collection, use and disclosure of your personal data will remain valid until such time it is being 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 our Data Protection Officer at the contact details provided above.
- b)** 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 your request within ten to thirty (10-30) business days of receiving it.
- c)** Whilst we respect your decision to withdraw your consent, please note that depending on the nature and scope of your request, we may not be in a position to continue providing our goods or services to you and we shall, in such circumstances, notify you before completing the processing of your request. Should you decide to cancel your withdrawal of consent, please inform us in writing or via email to our Data Protection Officer at the contact details provided above.
- d)** Please note that withdrawing consent does not affect our right to continue to collect, use and disclose personal data where such collection, use and disclose without consent is permitted or required under applicable laws.

5. Access to and correction of personal data

- a)** 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 about you, you may submit your request in writing or via email to our Data Protection Officer at the contact details provided above.

- b)** 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.
- c)** 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).

6. Protection of personal data

- a)** 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 such as up-to-date antivirus protection, encryption and the use of privacy filters 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 and agents only on a need-to-know basis.
- b)** You should be aware, however, that no method of transmission over the Internet or method of electronic storage is completely secure. While security cannot be guaranteed, we strive to protect the security of your information and are constantly reviewing and enhancing our information security measures.

7. Accuracy of personal data

We generally rely on personal data provided by you (or your authorised representative). 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 our Data Protection Officer in writing or via email at the contact details provided above.

8. Transfers of personal data outside of Singapore

- a)** Your personal data may be transferred out of Singapore for the purposes described in this Privacy Notice. In particular, your personal data may be stored in external servers that are located out of Singapore, or may be transferred out of Singapore where it is necessary to share your personal data with and between our related corporations and business units, and third party service providers.
- b)** We are committed to protecting your personal data when it is transferred out of Singapore. Where your personal data is transferred out of Singapore, we will take reasonable steps to ensure that your personal data continues to receive a standard of protection that is at least comparable to that provided under the PDPA. For example, we may enter into contracts or impose binding corporate rules with the recipients of your personal data to protect your personal data in a manner that is compliant with all applicable laws. You may obtain further information in this regard by contacting our Data Protection Officer in writing or via email at the contact details provided above.