

SG HSR PRIVACY POLICY

1. Introduction and scope

- 1.1 This policy (“**Policy**”) sets out our privacy practices for collection, use and disclosure of Personal Data. Such Personal Data may be stored on any systems maintained, operated and/or deployed by us directly or through trusted third party service provider(s).
- 1.2 This Policy is available on our website at the following link: <http://www.sghsr.com.sg> (“**Site**”) and may be updated from time to time and posted on the Site without prior notice.
- 1.3 This Policy is to be read with but does not override or replace other notices or consent that have been previously given or contractual provisions in connection with Personal Data. Consent given under this Policy confers additional rights to us.

2. Definitions

- a) “**Data Protection Laws**” refers to the Personal Data Protection Act 2012, the subsidiary legislations and/or directives and the applicable amendments.
- b) “**Data Protection Officer**” refers to the data protection officer for the time being appointed by us.
- c) “**Personal Data**” refers to any data, whether true or not, about an individual who can be identified (i) from that data or (ii) from that data and other information to which we have or likely to have access.

3. Collection, use, disclosure and processing of Information

3.1 Generally, we may collect Personal Data through various ways including:-

- a) job applications, engagement of our services, procurement (such as tender, expression of interest), inquiries, requests, feedback and/or other interactions you may have with us (such as through the use of our website);
- b) closed circuit television (“CCTV”) or other surveillance devices installed at our premises;
- c) other sources such as public information sources, fraud prevention agencies, business directories, credit reference agencies and/or other third parties; and
- d) when you submit Personal Data to us for any other reason.

You represent to us and you are to ensure that the Personal Data you submit to us is complete and accurate.

3.2 We will keep the Personal Data in our possession and control confidential and use and/or disclose such Personal Data for legitimate purposes including:-

- a) performing any obligations and/or supplying services for which the Personal Data is collected;
- b) performing evaluation of any job application, proposal, quotation, response to call for tender or expression of interest or other evaluative purposes;
- c) verifying and authenticating identity, processing payments and managing our administrative and business operations (including processing, storage, monitoring and backup data, trouble shooting and data analysis);
- d) managing the security of our facilities, systems and premises, carrying out surveillance and quality assurance and obtaining security clearance;
- e) responding to, handling and processing queries, requests, applications, complaints and feedback;
- f) managing any disputes and providing assistance to law enforcements, investigations, the judiciary and other government agencies;
- g) carrying out internal audit and corporate compliance and managing other compliance matters; and/or
- h) any other incidental purposes related to or in connection with the above.

3.3 For the purposes set out in this Policy, we may share the Personal Data with:-

- a) our current or future affiliates, entities, parent company, subsidiaries and/or partners including business partners, prospective investors, shareholders, directors, employees, agents, financial institutions, insurers and advisors;
- b) any unaffiliated third parties including any third party service providers and any governmental or regulatory authorities whether in Singapore or abroad; and
- c) any person to whom disclosure is permitted or is required by an order of court, governmental or regulatory authority and/or applicable laws.

3.4 In addition, we may use aggregated data and/or anonymised information for our operational purposes.

3.5 You may request to access or correct your Personal Data by sending your request in writing to the Data Protection Officer at the e-mail address as shown below. We may seek further information or request for documentation from you to process or respond to such request. We may also charge a reasonable fee for processing such request.

4 Consent

4.1 By interacting with us, using our website, submitting the Personal Data to us, or engaging our services, you consent to our collection, use and disclosure of your Personal Data as stated in this Policy. You also represent that you are of age and are capable of giving valid consent.

- 4.2 If you provide the Personal Data of a third party to us, you represent to us and you must ensure that you have notified such third party of the terms of this Policy and obtained his/her consent.
- 4.3 You may request for withdrawal of consent provided to us by sending the request in writing to the Data Protection Officer at the e-mail address as shown below. Where consent is withdrawn, we may not be able to continue to perform the obligation or provide the services for which the Personal Data is collected.

5 Confidentiality and security

- 5.1 We will take reasonable measures to ensure the confidentiality and security of the Personal Data within our control and possession and to protect it from loss, misuse, unauthorised access, disclosure, alteration or destruction.
- 5.2 We will take reasonable steps to destroy or de-identify Personal Data that we no longer require for the purposes set out in this Policy including our business and compliance purposes.
- 5.3 Where transfer of Personal Data to countries outside Singapore is required, we will take reasonable steps to seek comparable level of protection to maintain the confidentiality and security of the Personal Data.

6 Links from other websites

For user's convenience, the Site may contain hyperlinks to other websites or applications, which you may access at your own risks. If you intend to use such hyperlinks, we would encourage you to consult the data protection policies and practices for such websites before gaining access through such links.

7 Contact

For any feedback or other matters relating to Personal Data or inquiries relating to this Policy, you may contact the Data Protection Officer at dpo@sghsr.com.sg.

8 Governing Law

The Policy is governed by the laws of Singapore and in case of any dispute relating to this Policy, all parties will submit to the exclusive jurisdiction of the Singapore Courts.