

**HIN LEONG TRADING (PTE) LTD**  
**DATA PROTECTION POLICY**

The purpose of this Data Protection Policy (the "Policy") is to inform you of how HIN LEONG TRADING (PTE) LTD manages personal data in accordance with the Singapore Personal Data Protection Act 2012 ("the Act"). Please take a moment to read this Data Protection Policy so that you know and understand the purposes for which we collect, use or disclose your personal data.

By interacting with us, submitting information to us, or by your continued employment with us, you agree and consent to HIN LEONG TRADING (PTE) LTD and any member of the HIN LEONG GROUP (including its head office, branches, related corporations and business units) (collectively, the "Companies"), as well as their respective agents (collectively referred to herein as "HIN LEONG", "us", "we" or "our") collecting, using, disclosing and sharing amongst themselves your Personal Data, and disclosing such Personal Data to the Companies' authorized service providers and relevant third parties in the manner set forth under this Data Protection Policy.

This Data Protection Policy supplements but does not supersede nor replace any other consents that you may have previously provided to HIN LEONG in respect of your Personal Data, and your consents herein are additional to any rights which to any of the Companies may have by law to collect, use or disclose your personal data.

HIN LEONG may from time to time update this Data Protection Policy to ensure that this Policy is consistent with our future developments, industry trends and/or any changes to applicable legal or regulatory requirements. Subject to your rights by law, you agree to be bound by the prevailing terms of the Data Protection Policy as updated from time to time on our websites. Please check regularly for updated information on the handling of your Personal Data.

This Data Protection Policy was last updated on 2 July 2014.

For the avoidance of doubt, this Data Protection Policy forms part of the terms and conditions governing your relationship with us ("**Terms and Conditions**") and should be read in conjunction with our General Terms and Conditions.

**1. Your Personal Data**

- 1.1 In this Data Protection Policy, "Personal Data" refers to any data, whether true or not, about an individual who can be identified, directly or indirectly, (a) from that data; or (b) from that data and other information to which we have or are likely to have access, including data in our records as may be updated from time to time.
- 1.2 Examples of such Personal Data you may provide to us include (depending on the nature of your interaction with us) your name, NRIC, passport or other identification number, telephone number(s), mailing address, email address and any other information relating to any individuals which you have provided us in any forms you may have submitted to us, or via other forms of interaction with you.

## 2. **Collection of Personal Data**

2.1 Generally, we collect Personal Data in the following ways:

- (a) when you submit forms or applications to us;
- (b) when you register for or use any of our services on websites owned or operated by us;
- (c) when you submit queries or requests to us;
- (d) when you submit a complaint or provide feedback;
- (e) when you respond to our request for additional Personal Data;
- (f) when you ask to be included in an email or other mailing list;
- (g) when you respond to our initiatives; and
- (h) when you submit your Personal Data to us for any other reasons.

2.2 When you visit or browse our website, you generally do so anonymously. However, please see the section 4 below on cookies.

2.3 If you provide us with any Personal Data relating to a third party (e.g. information of your dependent, spouse, children and/or parents, employees and/or authorised representatives), by submitting such information to us, you represent to us that you have obtained the consent of that third party to you providing us with their Personal Data for the respective purposes.

2.4 You should ensure that all Personal Data submitted to us is complete, accurate, true and correct. Failure on your part to do so may result in our inability to fulfil your requests and/or applications.

## 3. **IP Address**

3.1 An IP address is a number that is automatically assigned to your computer when you signed up with an Internet Service Provider.

3.2 When you visit our website, your IP address is automatically logged in our server. We use your IP address to help diagnose problems with our server, and to administer our website. From your IP address, we may identify the general geographic area from which the IP-Address you are using to access our website has been issued. However, we will not be able to pinpoint the exact geographic location from which you are accessing our website. Generally, we do not link your IP address to anything that can enable us to identify you unless it is required by applicable laws and regulations.

#### 4. **Information on Cookies**

- 4.1 A cookie is an element of data that a website can send to your browser, which may then store it on your system. We use cookies in some of our pages to store visitors' preferences and record session information.
- 4.2 The information that we collect is then used to ensure a more personalised service level for our users. You can adjust settings on your browser so that you will be notified when you receive a cookie. Should you wish to disable the cookies associated with these technologies, you may do so by changing the setting on your browser.
- 4.3 Please refer to your browser documentation to check if cookies have been enabled on your computer or to request not to receive cookies.

#### 5. **Purposes for the Collection, Use and Disclosure of Your Personal Data**

- 5.1 **Generally**, HIN LEONG collects, uses and discloses your Personal Data for the following purposes:
- (a) responding to your queries and requests;
  - (b) processing your instructions;
  - (c) managing the administrative and business operations of HIN LEONG and complying with internal policies and procedures;
  - (d) facilitating business asset transactions (which may extend to any mergers, acquisitions or asset sales) ;
  - (e) verification of identity;
  - (f) matching any Personal Data held which relates to you for any of the purposes listed herein;
  - (g) resolving complaints and handling requests and enquiries;
  - (h) maintaining safety and security of our premises (including but not limited to CCTV surveillance and conducting security clearances);
  - (i) managing ad hoc projects and initiatives;
  - (j) generating reports and analytics;
  - (k) meeting or complying with any applicable rules, laws and regulations, codes of practice or guidelines issued by any legal or regulatory bodies which are binding on HIN LEONG (including but not limited to disclosures to regulatory bodies, conducting audit checks, surveillance and investigation);
  - (l) legal purposes (including but not limited to drafting and reviewing documents, obtaining legal advice and facilitating dispute resolution); and
  - (m) any other purpose relating to any of the above.

5.2 **In addition**, HIN LEONG collects, uses and discloses your Personal Data for the following purposes depending on the nature of our relationship with you:

- (a) If you are a customer, HIN LEONG collects, uses and discloses your Personal Data for the following purposes:
  - (i) conduct due diligence or background checks to assess your application for any of our products and services and verifying your financial standing through credit checks;
  - (ii) opening or continuation of accounts and establishing or providing services and facilitating the continuation or termination of the relationship (including but not limited to customer onboarding, account maintenance, account closure and archiving of documents);
  - (iii) facilitating the daily operation of services and after sales support;
  - (iv) providing customer servicing e.g. customer satisfaction services;
  - (v) reviewing customer portfolios and ensuring the ongoing credit worthiness of customers;
  - (vi) providing you with the products and services which you have requested (including but not limited to the evaluation of credit risks and enforcement of repayment obligations);
  - (vii) security clearance or entry access into Hin Leong's premises; and
  - (viii) any other purpose relating to any of the above.
  
- (b) If you are the owner, chairman, director, employee or mandatee of an organisation that is a customer, HIN LEONG collects, uses and discloses your Personal Data for the following purposes:
  - (i) conduct due diligence or background checks to assess your application for any of our products and services and verifying your financial standing through credit checks;
  - (ii) opening or continuation of accounts and establishing or providing services and facilitating the continuation or termination of the relationship (including but not limited to customer onboarding, account maintenance, account closure and archiving documents);
  - (iii) facilitating the daily operation of services, after sales support and credit facilities;
  - (iv) providing customer servicing e.g. customer satisfaction services;
  - (v) reviewing customer portfolios ensuring the ongoing credit worthiness of customers;

- (vi) managing and settlement of trades (including but not limited to seeking approval for credit, confirmation of trades and conducting risk assessments);
  - (vii) networking to maintain customer relationship;
  - (viii) providing you with the products and services which you have requested for example, processing transactions (including but not limited to the evaluation of credit risks and enforcement of repayment obligations);
  - (ix) security clearance or entry access into Hin Leong's premises; and
  - (x) any other purpose relating to any of the above.
- (c) If you are a counterparty to a transaction or a contractual agreement, HIN LEONG collects, uses and discloses your Personal Data for the following purposes:
- (i) drafting and reviewing of contracts and agreements; and
  - (ii) any other purpose relating to any of the above.
- (d) If you are an employee or owner of a vendor / external service provider /business partner of HIN LEONG, HIN LEONG collects, uses and discloses your Personal Data for the following purposes:
- (i) conduct due diligence or background checks to verify your financial standing through credit checks;
  - (ii) managing and evaluating project tenders;
  - (iii) processing and payment of invoices;
  - (iv) security clearance or entry access into Hin Leong's premises; and
  - (v) any other purpose relating to any of the above.
- (e) If you submit an application to us as a candidate for an employment or representative position, HIN LEONG collects, uses and discloses your Personal Data for the following purposes:
- (i) conducting interviews;
  - (ii) processing your application (including pre recruitment checks involving your qualifications);
  - (iii) providing or obtaining employee references and for background screening;
  - (iv) processing employment pass applications, visa applications and offer of employment;
  - (v) evaluating and assessing your suitability for the position applied for; and
  - (vi) security clearance or entry access into Hin Leong's premises; and

- (vii) any other purpose relating to any of the above.
- (f) If you are a dependent of an existing employee of HIN LEONG, HIN LEONG collects, uses and discloses your Personal Data for the following purposes:
  - (i) applying for dependent passes;
  - (ii) applying for long term social visit passes; and
  - (iii) any other purpose relating to any of the above.

5.3 In addition, where permitted under the Act, HIN LEONG may also collect, use and disclose your Personal Data as follows:

- (a) conducting analytics of our products and services;
- (b) organising promotional and corporate events;
- (c) sending newsletters;
- (d) sending you details of products, services, special offers and rewards, either to our customers generally, or which we have identified may be of interest to you (including but not limited to cross selling and telemarketing);
- (e) providing services, products and benefits to you;
- (f) leads generation and management;
- (g) providing cross referrals to other members of HIN LEONG; and
- (h) conducting market research, understanding and determining customer location, preferences and demographics for us to review, develop and improve our products, services and also develop marketing programmes.

5.4 In relation to particular products or services or in your interactions with us, we may also have specifically notified you of other purposes for which we collect, use or disclose your Personal Data. If so, we will collect, use and disclose your Personal Data for these additional purposes as well, unless we have specifically notified you otherwise.

## 6. **Disclosure of Personal Data**

6.1 Your Personal Data held by us shall be kept confidential. However, in order to provide you with effective and continuous products and services, and for the purposes listed above (where applicable), your Personal Data may be disclosed to:

- (a) entities within HIN LEONG and our related corporations;
- (b) companies and brokers providing insurance products and services;

- (c) agents, contractors or third party service providers who provide operational services to HIN LEONG, such as courier services, telecommunications, information technology, payment, payroll, processing, training, market research, storage, archival or other services to HIN LEONG;
- (d) any business partner, investor, assignee or transferee (actual or prospective) to facilitate business asset transactions (which may extend to any merger, acquisition or asset sale) involving HIN LEONG;
- (e) our professional advisers such as financial advisors, auditors and lawyers;
- (f) relevant government regulators, statutory boards or authorities or law enforcement agencies to comply with any laws, rules, guidelines and regulations or schemes imposed by any governmental authority such as the Monetary Authority of Singapore, Ministry of Manpower, the Accounting and Corporate Regulatory Authority, and the Insolvency and Public Trustee Office;
- (g) counterparties, billing organisations and their respective banks in relation to payments;
- (h) collection and repossession agencies in relation to the enforcement of repayment obligations;
- (i) credit reporting agencies;
- (j) as permitted under the Terms and Conditions applicable to you or to the organisation that is a customer of HIN LEONG that you are the owner, chairman, director, employee or mandatee ; and
- (k) any other party to whom you authorise us to disclose your Personal Data to.

## 7. **Contacting Us- Withdrawal of Consent, Access and Correction of your Personal Data**

### 7.1 If you:

- (a) have any questions or feedback relating to your Personal Data or our Data Protection Policy;
- (b) would like to withdraw your consent to any use of your Personal Data as set out in this Data Protection Policy; or
- (c) would like to obtain access and make corrections to your Personal Data records, please contact the Data Protection Officer as follows:

Email: [dpo@hinleong.com.sg](mailto:dpo@hinleong.com.sg)

Mail : 37 Tuas Road Singapore 638503

- 7.2 If you withdraw your consent to any or all use of your Personal Data, depending on the nature of your request, HIN LEONG may not be in a position to continue to provide its products or services to you, administer any contractual relationship in place, may be considered a termination by you of any contractual relationship which you may have with HIN LEONG, and your being in breach of your contractual obligations or undertakings, and HIN LEONG's legal rights and remedies in such an event are expressly reserved.
- 7.3 The Company reserves the right to charge an administration fee (representing its costs in administering your request) for supplying such information and to refuse requests which, in its opinion, occur with unreasonable frequency. The Company does not need to respond to an applicant's request if the relevant fees are not paid.
- 7.4 Please note that if your Personal Data has been provided to us by a third party (e.g. The Central Depository Pte Ltd), you should contact that party to make such queries, complaints, and access and correction requests to HIN LEONG on your behalf.
- 7.5 This Data Protection Policy shall be governed in all respects by the laws of Singapore.

----- End of Data Protection Policy -----