



AETOS Personal Data Protection Policy

1 INTRODUCTION & POLICY OVERVIEW

1.1 We at AETOS respect and recognise the importance of securing personal data entrusted to us, and are committed to properly manage, protect and process your personal data.

1.2 This Personal Data Protection Policy applies to AETOS Holdings Pte. Ltd. and all of its subsidiary companies. This Policy outlines AETOS' procedures on the protection of personal data of individuals under the company's custody. It contains important information about how and why AETOS collects, uses and discloses personal data of individuals. This policy takes into consideration the Personal Data Protection Act 2012 ("**PDPA**") and all applicable PDPA advisory guidelines.

1.3 This Policy supplements but does not in any way supersede nor replace any other consents you may have previously provided to us, and your consents are additional to any rights which we may have at law to collect, use, disclose and manage your Personal Data.

2 TYPES OF PERSONAL DATA

2.1 "Personal Data" is defined under the PDPA as "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 the organisation has or is likely to have access." It includes but is not limited to:

- a) Personal Particulars (Name, NRIC/FIN no., gender, date of birth, passport or other personal identification numbers, images, photographs, videos, closed circuit television (CCTV) footage, voice recordings);
- b) Personal Contact Information (Address, phone number, email address);
- c) Financial Information (Credit or debit card information, including the name of cardholder, card number, billing address and expiry date);
- d) Education and Professional information (for job applications and training courses);
- e) Health information (Medical records); and
- f) Technical information (IP address, device IDs, vehicle numbers).

3 PURPOSE OF COLLECTION, USE, DISCLOSURE AND PROCESSING OF DATA

3.1 AETOS will collect your personal data in accordance with the PDPA, and it will be collected directly from you or your authorised representatives (i.e. persons who have been validly identified as being authorised by you through our security procedures) in the following ways:

- a) when submitting forms relating to or purchase or use of any of our products or services;
- b) when interacting with customer service officers, including via telephone calls, face-to-face meetings and emails;
- c) when providing information prior to entering our buildings or premises;



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- d) when requesting that we contact you or be included in an email or other mailing list;
- e) when responding to our promotions or other incentives
- f) when responding to our request for other additional Personal Data;
- g) when responding to our surveys;
- h) when submitting a job application either through the website, job fairs or walk-in interviews;
- i) when signing on for work or using any corporate digital resources;
- j) when submitting your Personal Data to us for any other reasons; and
- k) when browsing our website. We do not capture any data that allows us to identify you individually, unless you provide such information. However, we do use cookies on our website.

3.2 AETOS 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 process your personal data without your consent.

3.2.1 **Clients** - The purposes for which we may collect, use and disclose clients' personal data include, but are not limited to any of the following:

- a) to confirm and verify the client's identity
- b) to assess application(s)/inquiry(ies) for our products and services;
- c) to notify clients about the benefits and updates about our products and services;
- d) to process personal data as part of access control duties on our client's behalf, as the appointed Agency relating to the provision of security services;
- e) to provide administrative and/or operational services;
- f) to collect fees, charges and expenses for services and products provided;
- g) to process credit notes and refunds;
- h) to conduct research for analytical and/or statistical assessments;
- i) to respond to service-related complaints and generally to resolve disputes; and/or
- j) to provide to relevant regulatory authorities and for any other purpose that is required or permitted by any laws, regulations, code of practices and guidelines (including but not limited to responding to regulatory complaints, disclosing to regulatory bodies and conducting audit checks, due diligence and investigations)

3.2.2 **Employees** – The purposes for which we may collect, use and disclose employees' (including potential employees') personal data include, but are not limited to any of the following:

- a) to administer and maintain personnel records (including related medical, childcare, maternity leave, and information about physical and mental health);



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- b) to undertake performance appraisal and review;
- c) to facilitate the making and payment of salary, claims and/or reimbursements, and other remuneration/benefits, including payments by cheque, bank transfers or other means;
- d) to provide and administer benefits (including any applicable insurance and/or employee share option plan);
- e) to provide references and information where necessary, to governmental and quasi-governmental bodies, including, the Inland Revenue and the Central Provident Fund Board;
- f) to conduct recruitment activities, including assessing candidate's suitability for the job and pre-employment checks and screening such as with authorities or credit agencies;
- g) to handle internal disciplinary investigation matters and legal proceedings;
- h) to arrange key installation visits and work-related travel, including arrangement of flights, accommodation and visas, when necessary;
- i) to open, maintain and operate bank accounts and the carrying out of treasury operations;
- j) to prepare financial reports and disclosure of the relevant books, documents, records and information to the auditors, where necessary;
- k) to post employees' photos and name on the various communication platforms, including but not limited to the electronic noticeboard, intranet, website and social media pages;
- l) to conduct workforce development, training and certification; and/or
- m) other purposes as may be required by any laws, regulations and guidelines.

3.3 Where permitted under the PDPA, we may collect, use and disclose your Personal Data for the following additional purposes:

- a) analytics and tracking, including the sale of analytical data;
- b) conducting market research and surveys to enable us to understand and determine customer location, preferences and demographics to develop special offers and marketing programmes in relation to AETOS' products and services, and to improve our service delivery and your customer experience at our touchpoints;
- c) providing additional products and services and benefits to you;
- d) matching Personal Data with other data collected for other purposes and from other sources (including third parties) in connection with the provision, marketing or offering of products and services to you;
- e) leads generation and management for marketing AETOS' products and services;
- f) administering contests, competitions and marketing campaigns, and personalising your experience at AETOS' touchpoints;



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- g) communicating to you advertisements involving details of our products and services, special offers and rewards, either to our customers generally, or of which we have identified may be of interest to you;
- h) organising promotional events and corporate social responsibility projects; and
- i) purposes which are reasonably related to the aforesaid.

3.4 AETOS may disclose Personal Data for the purposes indicated above to our employees, third party service providers, advisors, related entities which includes, without limitation, the following persons or entities:

3.4.1 **Employees** – AETOS may disclose employees' personal data to a limited number of AETOS' employees whose job necessitates that they maintain, compile or otherwise have access to employees' personal data. AETOS may also disclose employees' personal data to third parties that AETOS deals with for the purpose of providing our products and services to our customers and generally operating our business.

3.4.2 **Clients** - AETOS may disclose clients' Personal Data (to the extent necessary) to the following third parties:

- a) companies and/or organisations that act as our agents and/or professional advisers;
- b) companies and/or organisations that assist us in delivering part of or all of the products and services rendered to you;
- c) any person notified by the client as authorised to give instructions on his/ her behalf;
- d) any competent authority(ies) and/or regulator(s).

3.4.3 AETOS shall undertake its best endeavours to ensure that these employees, officers, partners and third parties involved in the collection, processing and disclosure of Personal Data will observe and comply to the terms of this Policy.

3.4.4 AETOS also holds the rights to disclose your Personal Data to third parties without your consent in certain situations, including, without limited to the following:

- a) cases in which the disclosure is required or authorised based on the applicable laws and/or regulations;
- b) cases in which the disclosure is necessary to respond to an emergency that threatens the life, health or safety of yourself or another individual;
- c) cases in which the disclosure is necessary for any investigation or legal proceedings;
- d) cases in which the personal data is disclosed to any officer of a prescribed law enforcement agency, upon production of written authorisation certifying that the personal data is necessary for the purposes of the functions or duties of the officer;



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- e) cases in which the disclosure is to a public agency and such disclosure is necessary in the public interest; and/or;
- f) cases where such disclosure without your consent is permitted by the PDPA or by law.

4 ACCESS TO AND CORRECTION OF PERSONAL DATA

4.1 You may request to access and/or correct the Personal Data currently in our possession or under our control by contacting media@aetos.com.sg. Employees who wish to correct or update their personal data should contact the HR Department.

4.2 Upon request, AETOS will provide the individual with access to and/or correct an error or omission in the individual's personal data or other appropriate information, that is in our possession or control in accordance with the requirements of the PDPA.

4.3 For such requests (limited to only your own data), we will provide you with the relevant data within 30 calendar days from such a request being made. We may ask you to verify your identity and request for more information.

4.4 Where we are legally permitted to do so, we may refuse your request and give you reasons for doing so. Where permitted to do so, we may charge an administrative fee for the verification process – including locating, retrieving, reviewing and copying any material as required.

5 ACCURACY OF PERSONAL DATA

5.1 AETOS will take reasonable efforts to ensure that your Personal Data is current, accurate and complete. However, this means that you must also update us of any changes in your personal data that you had initially provided us with. Inaccurate or incomplete personal data may result in our inability to provide you with the requested products and services.

5.2 In certain circumstances, you may need to provide personal information about someone other than yourself (e.g., your referrer or guarantor in relation to your job application). If so, we rely on you to inform these individuals that you are providing their personal information to use, to make sure they consent to you giving us their information and to advise them about where they can find a copy of this Policy. By submitting such information to us, you represent to us that you have obtained the consent of the third party to provide us with their Personal Data for the respective purposes.

6 WITHDRAWAL OF CONSENT

6.1 Employees or customers are able to withdraw their consent to AETOS' continued use and disclosure of Personal Data as described in this Policy at any time. Such withdrawal should be made formally in writing to the AETOS Data Protection Officer ("DPO"), as stated under Section 11.



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6.2 If you should choose to withdraw your consent to any or all use of your Personal Data, depending on the nature of your request, we may not be in the position to continue providing our products and services to you, and/or administer any contractual relationship in place, which in turn may also result in the termination of agreements between us and your being in breach of your contractual obligations or undertakings.

7 RETENTION AND MANAGEMENT OF PERSONAL DATA

7.1 AETOS will retain employees' and/or clients' Personal Data for the duration of time as required to carry out the purposes for which your Personal Data was collected, for the other purposes as stated within this Policy, for business purposes, and as required by relevant laws. We will not keep personal data for longer than is necessary and will take reasonable steps to destroy and/or anonymise the information.

7.2 AETOS places great importance on ensuring the security of your Personal Data and has implemented stringent measures to ensure that your Personal Data is protected and secured. Appropriate security arrangements are taken to prevent any unauthorised access, collection, use, disclosure, copying, modification, leakage, loss, damage and/or alteration of your personal data. These include limiting access to information to our systems, authentication processes to prevent unauthorised access to information and safeguards to prevent security breaches in our network and database systems. We will also conduct regular reviews on the measures taken when processing and retaining personal data.

7.3 AETOS has appointed Data Protection Officers to oversee our management of your Personal Data in accordance to this Policy and the applicable laws. We train our employees who handle your Personal Data to respect the confidentiality of your Personal Data, failing which they may be subjected to disciplinary action.

7.4 Further, AETOS will impose compliance with data confidentiality requirements (e.g., Non-Disclosure Agreement) on our agents, third party service providers, consultants and professional advisors in our working relationships and/or agreements with these parties. However, we cannot and do not assume any responsibility for any actions or omissions of third parties.

8 TRANSFER OF PERSONAL DATA OUTSIDE OF SINGAPORE

8.1 Under certain circumstances where it is required for your personal data to be transferred to a country or territory outside of Singapore, we will ensure that any transfers will be in accordance with the PDPA so as to ensure the standard of protection of personal data in the territory it is transferred to is comparable to that of the PDPA in Singapore.

9 COOKIES AND GOOGLE ANALYTICS

9.1 This Policy also applies to any Personal Data we collect via our websites. Our websites use cookies to monitor browsing preferences and help us analyse data about webpage traffic



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in order to make website improvements and or statistical analysis purposes. A cookie does not give us access to your computer or any information about you, other than the data that you choose to share with us. Most Internet browsers allow you to turn off cookies. Should you do so, you may not be able to experience all the features of our websites.

9.2 While you are browsing through our website, you may come across a number of links to third party websites. We assume no responsibility for the content and information practices of these third-party websites that you are able to access through ours. When a visitor to our website links to these third-party websites, our privacy practices no longer apply. We encourage you to review each website's privacy policy before disclosing any data.

9.3 Our website uses Google Analytics. For more information about Google analytic cookies, please see Google's help pages and privacy policy:

- a) Google's Privacy Policy;
- b) Google Analytics Help pages – if you wish to opt out, you can download and install a Google Analytics opt-out browser add-on for your web browser.

10 UPDATES TO POLICY

10.1 We reserve the rights to review, modify or amend this Policy and its sub-parts from time to time, to take into account new laws, technological changes, changes to our business operations, practices and industry trends.

10.2 Subject to your rights at law, you agree to be bound by the prevailing terms of our Personal Data Protection Policy as updated on our websites. Please check back regularly for updated information on the handling on your Personal Data.

11 CONTACT US

11.1 If you have any queries or feedback about how we are handling your Personal Data or our Policy; would like to withdraw your consent to any use of your personal data as set out in this Policy; or would like to obtain access and make corrections to your personal data records, please contact our Data Protection Officer at:

Attention: Personal Data Protection Officer

Tel: +65 6773 9868

Email: media@aetos.com.sg

[Please note that if your Personal Data has been provided to us by a third party (e.g. a referrer, a vendor), you should contact that organisation or individual to make such queries, complaints, and access and correction requests to AETOS on your behalf.]