

SSW DATA PRIVACY POLICY

SSW Pte Ltd (hereafter known as SSW) is committed to protecting and respecting your privacy.

The purpose of this document ("Data Privacy Policy") is to inform you of how SSW manages Personal Data (as defined below) which is subject to the Singapore Personal Data Protection Act (No. 26 of 2012) ("the Act"). More information about the PDPA can be found at the website of the Personal Data Protection Commission ("PDPC") at <https://www.pdpc.gov.sg/>.

Please take a moment to read this Data Privacy Policy so that you know and understand the purposes for which we collect, use and disclose your Personal Data.

By interacting with us or submitting information to us or using any of our products and services with us, you agree and consent to SSW as well as its representatives and/or agents (collectively referred to herein as the "Company", "us", "we" or "our") collecting, using, disclosing and sharing amongst themselves your Personal Data, and disclosing such Personal Data to the Company's authorised service providers and relevant third parties in the manner set forth in this Data Privacy Policy.

This Data Privacy Policy supplements but does not supersede nor replace any other consents you may have previously provided to the Company in respect of your Personal Data, and your consents herein are additional to any rights which the Company may have at law to collect, use or disclose your Personal Data.

This Data Privacy Policy was last updated on 01 January 2021.

1. PERSONAL DATA

- 1.1. In this Data Privacy Policy, "Personal Data" refers to any 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, 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 AND PROCESSING 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 submit queries, requests, complaints or feedback to us;
- (c) when your images are captured by us via CCTV cameras while you are within our premises or photographs or videos taken by us or our representatives when you attend events hosted by us;

- (d) when you respond to our request for additional Personal Data;
- (e) when you ask to be included in an email or other mailing list;
- (f) when you respond to our initiatives;
- (g) when you browse our intranet or other websites;
- (h) when you submit your Personal Data to us for any other reasons;
- (i) when you enter into any agreement or provide other documentation or information in respect of your interactions with us, or when you use our services;
- (j) when you interact with our staff, including customer service officers, for example, via telephone calls (which may be recorded), letters, fax, face-to-face meetings, social media platforms and emails;
- (k) when you submit an employment application or when you provide documents or information including your resume and/or CVs in connection with any appointment to any position in the Company;
- (l) when you are contacted by, and respond to, our marketing representatives and customer service officers; and/or
- (m) when you submit your Personal Data to us for any other reasons.

2.2. You can use and browse our website without having to disclose your Personal Data, except as may be necessary to allow us to respond to your requests or in cases where you contact us directly.

2.3. If you provide us with any Personal Data relating to a third party (e.g. information of your spouse, children, parents, and/or employees), 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.

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 provide you with the products and services you have requested, or delays in providing you with products and services you have requested, or processing your applications.

2.5. We will retain control of, and responsibility for, the use of any personal data you disclose to us. Such data shall remain in our possession, or that of data intermediaries acting on our behalf.

3. PURPOSES FOR THE COLLECTION, USE AND DISCLOSURE OF PERSONAL DATA

3.1. All Personal Data and other information collected may be used by the Company individually or collectively and may be combined with other information for the following purposes:

- (a) responding to, processing and handling your enquiries and requests;
 - (b) responding to, processing and handling your job/internship application or your recruitment queries;
 - (c) responding to and taking follow-up actions on feedbacks and complaints;
 - (d) verifying your identity;
 - (e) performing office and operational administrative matters and complying with internal policies and procedures;
 - (f) facilitating business asset transactions (which may extend to any mergers, acquisitions or asset sales);
 - (g) requesting feedback or participation in surveys, as well as conducting market research and/or analysis for statistical, profiling or other purposes for us to design our services, and to review, develop and improve the quality of our products and services;
 - (h) preventing, detecting and investigating crime and analysing and managing commercial risks;
 - (i) managing the safety and security of our premises and services (including but not limited to carrying out CCTV surveillance and conducting security clearances);
 - (j) in connection with any claims, actions or proceedings (including but not limited to drafting and reviewing documents, transaction documentation, obtaining legal advice, and facilitating dispute resolution), and/or protecting and enforcing our contractual and legal rights and obligations;
 - (k) conducting any form of investigations including but not related to those relating to disputes, billing, fraud, offences, prosecutions etc;
 - (l) meeting or complying with any applicable rules, laws, regulations, codes of practice or guidelines issued by any legal or regulatory bodies (including but not limited to responding to regulatory complaints, disclosing to regulatory bodies and conducting audit checks, due diligence and investigations); and/or
 - (m) purposes which are reasonably related to the aforesaid.
- 3.2. In addition, the Company collects, uses and discloses your Personal Data for the following purposes depending on the nature of our relationship:
- (a) If you are an employee, officer or owner of the Company's corporate clients:
 - (i) managing project tenders and quotations, processing orders or managing the supply of goods and services;
 - (ii) creating and maintaining profiles of our corporate clients in our system database;

- (iii) processing payments and invoices;
 - (iv) facilities management (including but not limited to issuing visitor access passes and facilitating security clearance); and/or
 - (v) purposes which are reasonably related to the aforesaid.
- (b) If you submit an application to us as a candidate for employment or an internship:
- (i) conducting interviews;
 - (ii) processing your application (including but not limited to pre-recruitment checks involving your qualifications and facilitating interviews);
 - (iii) obtaining references and for background screening;
 - (iv) assessing your suitability for the position applied for;
 - (v) enrolling successful candidates as our employees and facilitating human resource planning and management (including but not limited to preparing letters of employment, name cards and building access passes); and/or
 - (vi) purposes which are reasonably related to the aforesaid.

4. DISCLOSURE OF PERSONAL DATA

- 4.1. The Company will take reasonable steps to keep confidential and protect your Personal Data against unauthorised disclosure.
- 4.2. You hereby authorize us to transfer or disclose your Personal Data to the following parties in connection with the purposes listed above (where applicable):
- (a) our related corporations and affiliates;
 - (b) recruitment agencies;
 - (c) agents, contractors or third party service providers who provide operational services to the Company, such as courier services, telecommunications, information technology, advertising, payment, payroll, processing, training, market research, storage, archival, customer support investigation services or other services to the Company;
 - (d) any business partner, investor, assignee or transferee (actual or prospective) to facilitate business asset transactions (which may extend to any mergers, acquisitions and debt or asset sale);
 - (e) local and overseas banks and their respective service providers;
 - (f) our professional advisers such as our consultants, auditors and lawyers;
 - (g) trade unions;

- (h) our business partners;
- (i) relevant government regulators, government ministries, statutory boards, embassies, or authorities and/or law enforcement agencies, whether local or overseas, including the Inland Revenue Authority of Singapore, the Central Provident Fund Board, and Ministry of Manpower to comply with any directions, laws, rules, guidelines, regulations or schemes issued or administered by any of them;
- (j) other organisations which may request that we provide them with your Personal Data for evaluative purposes; and/or
- (k) any other party to whom you authorise us to disclose your Personal Data.

5. RETENTION OF PERSONAL DATA

- 5.1. The Company may retain your Personal Data for as long as necessary for the fulfilment of the purposes for which it was collected or to which you have given your consent, except where otherwise provided for by law.

6. USE OF COOKIES, ANALYTICS, WEB BEACONS AND SIMILAR TECHNOLOGIES ON THE WEBSITE

- 6.1. The use of cookies, web beacons, analytics and similar technologies on our website has different functions. They are either necessary for the functioning of our services, help us improve our performance, or serve to provide you with extra functionalities.

- (a) IP Addresses

The IP Address is a unique number assigned to your computer connection by your home or office or employer's Internet Service Provider (ISP). This unique number serves as the ID of your connection when it's accessing the Internet.

- (b) Cookies

Cookies are small, usually randomly encoded, text files that help your browser navigate through a particular website.

- (c) Web Beacons

A web beacon is a clear picture file used to keep track of your navigation through a single website or a series of websites.

You may find out at <https://www.allaboutcookies.org/>.

- 6.2. When you visit or interact with our sites, services, we or our authorized service providers may use cookies, analytics, web beacons, and other similar technologies for collecting and storing information to analyse trends and improve our site for our customers.

- 6.3. The information collected by us or our authorised service providers may recognise a visitor as a unique user and may collect information, including your IP address, operating system and browser type. This is statistical data about our users' browsing actions and patterns.
- 6.4. We may use the terms “cookies” or “similar technologies” interchangeably in our policies to refer to all technologies that we may use to collect or store information in your browser or device or that collect information or assist in identifying you as a unique user in the manner described above.
- 6.5. We use cookies to track your activities on our website and for the purposes described in this Data Privacy Policy, but they will not generally allow us to obtain information of a personal nature such as your name and address. We will only be aware of such information if you provide the information to us or you have set the preferences in your browser to provide this information automatically.
- 6.6. By using our website, apps or platforms, you agree to the use of cookies and other technologies as set out in this Data Privacy Policy. If you do not agree to such use, please either refrain from using the relevant website, app or platform, or adjust your browser settings.
- 6.7. You are always free to disable, control or delete these cookies if your browser so permits. For more information, please review your browser settings or refer to <https://www.allaboutcookies.org/>. However, you should note that if you choose to do this, it may have an impact on the quality of your browsing experience. Please note that changing these settings may limit the functionality of some web pages or prevent them from loading properly.
- 6.8. Our website may, from time to time, contain links to and from other websites operated by third parties, including our business partners. If you follow a link to any of these websites, please note that these third party websites have their own privacy policies and we do not accept any responsibility or liability for these policies. Please check these policies before you submit any Personal Data to these websites.

7. RIGHT TO WITHDRAW CONSENT, REQUEST ACCESS TO, AND CORRECTION OF PERSONAL DATA

- 7.1. You have the right to withdraw consent, request access to, and correction of Personal Data that the Company holds about you in accordance with applicable laws.
- 7.2. If you:
- (a) have any questions or feedback relating to your Personal Data or our Data Privacy Policy;
 - (b) would like to report an incident where there has been a breach of Personal Data;
 - (c) would like to withdraw your consent to any use of your Personal Data as set out in this Data Privacy Policy; and/or
 - (d) would like to obtain access to or make corrections to your Personal Data records,

please contact the Company via email or post at

Email : dpo@ssw.sg
Attention : SSW Data Protection Officer
Address : 102 Pasir Panjang Road
Singapore 118528

7.3. If you withdraw your consent to any or all use of your Personal Data, depending on the nature of your request, the Company may not be in a position to administer any contractual relationship in place. This may also result in the termination of your employment with the Company and your being in breach of your contractual obligations or undertakings. The Company's legal rights and remedies in such event are expressly reserved.

7.4. Please note that if your Personal Data has been provided to us by a third party (e.g. recruitment agency or a headhunter), you should contact such party directly to make any queries, complaints, and access and correction requests to the Company on your behalf.

8. CHANGES TO DATA PRIVACY POLICY

8.1. This Data Privacy Policy may be amended, supplemented, modified and updated from time to time to ensure that it is consistent with our future developments, industry trends and/or any changes in legal or regulatory requirements. Subject to your rights at law, you agree to be bound by the prevailing terms of this Data Privacy Policy as updated from time to time on our website <http://www.sswlogistics.com.sg>. Please check back regularly for any updates.

9. GOVERNING LAW

9.1. This Data Privacy Policy shall be governed in all respects by the laws of Singapore.