

OUB CENTRE LIMITED

PRIVACY POLICY

GENERAL

1. We, OUB Centre Limited, are committed to safeguarding your privacy. We treat all personal data provided by you in strict confidence, and will only use your personal data in the manner set out in this Policy. This Policy applies to all personal data that you provide to us and the personal data we hold about you. This Policy describes how we may collect, use, disclose, process and manage your personal data. **Please DO NOT provide any personal data to us if you do not accept this Policy.**
2. Information provided by organisations or individuals to us for business purposes is not considered personal data. This Policy does not apply to business contact information.

AMENDMENT TO THIS POLICY

3. We may amend this Policy from time to time. The updated Policy will supercede earlier versions and will apply to personal data provided to us previously. The updated Policy will be made available at <http://oubcentre.com.sg/index.html>, <http://www.onerafflesplace.com.sg/index.shtml> and <http://www.onerafflesplace.com.sg/shopping/index.html> . If you do not accept any amendment to the Policy, please contact our Data Protection Officer (see paragraph 21 below).

PERSONAL DATA

- 4.1 **What is personal data.** “Personal data” is data that can be used to identify a natural person. Examples of personal data include name, address, contact details, NRIC, passport number or other identification number, telephone numbers, email address, photograph, video image, personal data of family members, education background, employment history, references and results of employment checks.
- 4.2 **Voluntary provision of personal data.** Your provision of personal data to us is voluntary. However, if you choose not to provide us with the personal data we require, it may not be possible for us to contact you, or provide products or services which you need from us.
- 4.3 **Providing personal data belonging to others.** If you provide the personal data of anyone other than yourself (including your family members), you warrant that you have informed him/her of the purposes for which we are collecting his/her personal data and that he/she has consented to your disclosure of his/her personal data to us for those purposes.
- 4.4 **Accuracy and Completeness or personal data.** You must ensure that all personal data that you provide is true, accurate and complete.

WEBSITE

5. **Anonymous browsing.** Anonymity is maintained when you visit our websites at www.oubcentre.com.sg and www.onerafflesplace.com.sg. Our websites are not configured to gather any information from your computer, unless otherwise you personally and intentionally provide us with your information.
6. **Use of cookies.** We may make use of “cookies” on our websites to store and track information such as the number of users and their frequency of use, profiles of users and their online preferences. Cookies do not capture information which would personally identify you, but the information collected may be used to assist us in analysing the usage of our websites

and to improve your online experience with us. You can disable the cookies by changing the setting on your browser. However, this may affect the functionality of the website.

7. **Links to other websites.** Our websites may contain links to other websites which are not owned or maintained by us. These links are provided only for your convenience. This Policy only applies to our website. When visiting these third party websites, you should read their privacy policies.

COLLECTION OF PERSONAL DATA

8. Generally, we may collect your personal data when you:
 - a. register for any events organized by us or for any services or products we provide;
 - b. register your interest in any properties we develop;
 - c. purchase or lease properties from us;
 - d. respond to our initiatives, lucky draws, contests or promotions;
 - e. perform an online transaction on our website;
 - f. send us an email;
 - g. ask to be included in our mailing list;
 - h. request that we contact you; and/or
 - i. submit your personal data to us for any other reason.

PURPOSES FOR COLLECTION, USE OR DISCLOSURE OF YOUR PERSONAL DATA

9. **Primary purposes.** Our primary purpose in collecting your personal data is to serve you. Generally, we collect, use or disclose your personal data for the following purposes:
 - a. to manage your relationship with us;
 - b. to provide you with the products and services that you have requested;
 - c. to assist you with your enquiries;
 - d. to contact you for feedback after the provision of our products and services; and
 - e. to keep you updated on our events.
10. **Business purposes.** We may also use your personal data for purposes connected or relevant to our business, such as:
 - a. complying with our legal obligations and requirements;
 - b. enforcing obligations owed to us;
 - c. research into the development of new products and services or improvement of our existing products and services;
 - d. accounting, risk management and record keeping;
 - e. carrying out research, planning and statistical analysis; and
 - f. staff training.
11. **Marketing purposes.** If you have consented, we may use your personal data for the purposes of marketing our products and services and those of our strategic partners and business associates which includes our retail tenants at One Raffles Place e.g. informing you of latest activities, special offers and promotions. In order for us to market products and services which are of special interest and relevance to you, we may analyse and rely on your overall interaction with us (such as but not limited to your participation in promotions or events and your interactions with us).
12. **Contacting you.** When using your personal data to contact you for the above purposes, we may contact you via regular mail, fax, e-mail, SMS, telephone or any other means.

DISCLOSURE OF INFORMATION

13. We will not sell your personal data to third parties.
14. **Consent for disclosure to others.** If you have consented to our disclosure of your personal data to our strategic partners and business associates, we may disclose your personal data to them. They will use your personal data only for the purposes you have consented to.
15. **Disclosure to service providers.** You agree that we may disclose or share your personal data with third parties who provide necessary services to us, such as:
 - a. service providers and data processors working on our behalf and providing services such as hosting and maintenance services, analysis services, e-mail messaging services, delivery services, handling of payment transactions, marketing etc.
 - b. our consultants and professional advisers (such as accountants, lawyers, auditors, managing agents).
16. **Other permitted disclosure.** We may also disclose your personal data as required or permitted by law. We may disclose your personal data to regulatory authorities, statutory bodies or public agencies for the purposes of complying with their respective requirements, policies and directives.

TRANSFER OF PERSONAL DATA OUT OF SINGAPORE

17. **Transfer outside Singapore.** You fully understand and unambiguously consent that we may transfer your personal data to any location outside of Singapore for the purposes set out above.
18. **Protection of your personal data.** If we transfer your personal data to a country or territory outside of Singapore, we will ensure that the recipient of the personal data provides a standard of protection that is comparable to the protection which your personal data enjoys under the laws of Singapore. Where these countries or territories do not have personal data protection laws which are comparable to that in Singapore, we will enter into legally enforceable agreements with the recipients to ensure that they protect your personal data to the same standard as required under the laws of Singapore. Specifically, the recipients will be under legally binding obligations to:
 - a. ensure that the collection, use and/or disclose your personal data would be for the purpose(s) for which you have given consent;
 - b. take steps to ensure accuracy and completeness of your personal data when your personal data is used to make a decision that affects you, or if it is to be disclosed to third parties;
 - c. make security arrangements to protect your personal data; and
 - d. only retain your personal data if necessary for legal and business purposes.

SECURITY

19. While precautions will be taken to ensure that the information you provide is protected against unauthorised or unintended access, we cannot be held responsible for unauthorised or unintended access that is beyond our control.

HOW LONG DO WE KEEP YOUR PERSONAL DATA

20. We keep your personal data only for so long as we need the data for our business and legal purposes.

YOUR RIGHTS

21. **Contact Data Protection Officer.** If you wish to withdraw any consent you have given us at any time, or if you wish to correct or have access to your personal data held by us, or if you do not accept any amendment to this Policy, please contact our Data Protection Officer:

Contact: 6491 9201

Email: DPO@oubc.com.sg

22. **Fee for access.** We may charge you a fee for responding to your request for access to your personal data held by us, or for information about the ways in which we have (or may have) used your personal data in the one-year period preceding your request. If a fee is to be charged, we will inform you of the amount beforehand and respond to your request after payment is received. We will endeavor to respond to your request within 30 days, and if that is not possible, we will inform you of the time by which we will respond to you.
23. **Effect of withdrawal of consent.** In many circumstances, we need to use your personal data in order for us to provide you with products or services which you require. If you do not provide us with the required personal data, or if you withdraw your consent to our use and/or disclosure of your personal data for these purposes, it may not be possible for us to continue to serve you or provide you with the products and services that you require.

GOVERNING LAW

24. This Policy is governed by the laws of Singapore. You consent to submit to the exclusive jurisdiction of the Courts of Singapore in any dispute relating to this Policy.