

Personal Data Policy

The purpose of this document (“**Policy**”) is to inform you of how we, Joseph Tan Jude Benny LLP collect, use, handle and protect personal data in compliance with the Personal Data Protection Act 2012 of Singapore (“**PDPA**”).

This Policy supplements but does not supersede or replace any previous consent which you may have provided to us in respect of your Personal Data, nor does it affect any rights that we may have at law in connection with the collection, use and/or disclosure of your Personal Data.

We may from time to time update this Policy to ensure that it is in line with any future developments in the business climate and/or changes in the regulatory requirements. Subject to applicable law, you agree to be bound by the prevailing terms of the Policy as updated from time to time on our website <http://www.jtjb.com/contact/>.

1. Personal Data

As defined under the PDPA, personal data shall mean data, whether true or not, about an individual who can be identified from that data, or from that data and other information to which we have or are likely to have access (“**Personal Data**”).

2. Collection of Personal Data

Generally, we may collect Personal Data from you in the following circumstances:

- (a) when you provide any documentation or information to us in the course of your engagement of our services;
- (b) when you submit any form to us;
- (c) when you communicate and interact with our staff via telephone calls, letters, emails, fax, face-to-face meetings and other correspondence;
- (d) when you attend any event organized by us, and photographs or videos are taken of you by us or our representatives;
- (e) when you specifically request that we contact you;
- (f) when you request to be included in an email or any other mailing list maintained by us;
- (g) when you respond to our initiatives or requests for Personal Data;
- (h) when you submit an employment application or when you provide documents or information in connection with any appointment at our firm;
- (i) when you submit your Personal Data to us for any other reason in connection with our ordinary course of business; and
- (j) when you submit your Personal Data to us for any other purposes which we notify you of at the time of obtaining your consent.

3. Purposes for Collection, Use and Disclosure of Personal Data

Generally, we collect, use and disclose your Personal Data for one or more of the following purposes:

- (a) providing our services;

- (b) managing our administrative and business operations;
- (c) responding to, processing and handling your queries, requests, instructions, feedback and suggestions;
- (d) record-keeping;
- (e) complying with internal policies and procedures;
- (f) complying with any rules, regulations, laws, code of practices or guidelines that may be applicable and binding on us;
- (g) verifying your identity for due diligence;
- (h) preventing, detecting and/or investigating any suspicion or act of, fraud, misconduct, unlawful action or omission;
- (i) processing payments;
- (j) facilitating and/or organizing events; and
- (k) for promotional and publicity purposes, including recording or taking photographs of participants/attendees at events organized by or participated by us.

4. Disclosure of Personal Data

In fulfilling one or more of the abovementioned purposes, we may need to disclose your Personal Data to the following third parties:

- (a) technical consultants, experts and foreign law firms assisting with your matter(s);
- (b) auditors and professional advisors;
- (c) third party service providers, agents, contractors who provide operational or administrative services such as courier services, information technology, file management system operators;
- (d) any local or overseas authorities, including but not limited to regulatory bodies, law enforcement agencies, government agencies, statutory boards, ministries;
- (e) any person to whom disclosure is permitted or required by any statutory provision or law;
- (f) any permitted assigns; or
- (g) any other party to whom you may authorize us to disclose your Personal Data.

We will first obtain your consent prior to disclosing your Personal Data to any third party. However, in certain situations covered under the exceptions provided in the Second, Third and Fourth Schedules of the PDPA, we may disclose your Personal Data to third parties without first obtaining your consent. These Schedules are available for public access via the link <http://statutes.agc.gov.sg>.

In the event where your Personal Data is disclosed to third parties with your consent, we will employ best efforts to require such third parties to protect your Personal Data.

In the event where you have engaged us to carry out any work in any jurisdictions outside Singapore, you acknowledge and agree that the transfer of your Personal Data to these jurisdictions may be necessary to give effect to your instructions and that you request and consent to our so transmitting your Personal Data outside Singapore.

Consent

If you:

- (a) voluntarily interact with and submit information to any of our staff for the specified purpose(s);

- (b) engage our services and voluntarily provide your Personal Data for the specified purpose(s);
- (c) use or access our website;
- (d) subscribe to our mailing list;
- (e) enter our premises; or
- (f) attend or participate in any event organized by us,

you will be deemed to agree and consent to our collection, use and/or disclosure of your Personal Data in the manner and for the purposes set forth in this Policy.

Should you provide any Personal Data relating to a third party for any particular purpose, it shall be deemed that you have obtained the relevant consent of the third party to our collection, use and/or disclosure of his or her Personal Data for that particular purpose.

5. Security Measures

We may implement security features to ensure your Personal Data is adequately protected and secured and to prevent the unauthorized release of or access to your Personal Data. Please note, however, that we cannot guarantee the confidentiality of any communication or material transmitted to/from us through our website or by e-mail. As such, we shall not be not responsible for the security of information transmitted via the internet. You can instead contact us by telephone numbers provided on our website as a more private means of communication.

6. Administration and Management of Personal Data

We will take reasonable effort to ensure your personal data is accurate and complete based on the information you have furnished to us. However, you shall update us of any changes in your Personal Data and we shall not be responsible for relying on information initially provided by you which are inaccurate or incomplete arising from subsequent changes of which you have not updated us.

7. Withdrawal of Consent, Access and Correction of Personal Data

If you:

- (a) have any questions or feedback relating to this Policy;
- (b) wish to access, update or amend your Personal Data in our possession or control; or
- (c) wish to withdraw your consent for us to collect, use and/or disclose your Personal Data,

please contact our Data Protection Officer as follows:

Email: dpo@jtjb.com

Office Address: 6 Shenton Way
OUE Downtown 2
#23-08 Singapore 068809

Should you withdraw your consent with regard to any or all of your Personal Data, please note that we may no longer be in a position to continue or carry out the services you have engaged us to perform. Such withdrawal of consent, depending on its extent, may be considered as a termination of any

arrangement and/or agreement you have with us. We hereby expressly reserve our legal rights and remedies in such event.

8. Governing Law

This Policy shall be governed by and construed in accordance with the laws of Singapore. Any dispute arising out of or in connection with the application of this Policy including any dispute regarding its existence, validity or termination, shall be referred to and finally resolved by Singapore courts.