



2 October 2014

## **Personal Data Protection Policy**

### **Your personal data is important to Far East Organization**

Your personal data is important to us and it is our policy to respect the confidentiality of information and the privacy of individuals. This Policy outlines how we manage the personal data we hold in compliance with the Personal Data Protection Act in Singapore (the "Act") and applies to all divisions and organizations in the Far East Organization stable of companies (collectively, "FEO", "we", "us" or "our") further details of which are available at our website [www.fareast.com.sg](http://www.fareast.com.sg). We also comply with local data protection and privacy laws in our operations out of Singapore.

### **What types of personal data do we collect?**

We may collect and hold personal data of persons/entities including but not limited to:

- customers;
- job applicants and employees;
- shareholders;
- service providers; and
- other people who we may come into contact.

Examples of such personal data include biodata, contact details, account information and your preferences, queries, requests and feedback.

### **How do we collect your personal data?**

The ways in which we may collect your personal data include (but are not limited to) collecting directly or indirectly from you or your authorized representatives in the course of:

- you signing up for alerts or newsletters;
- you visiting our websites, showflats, etc;
- you purchasing or leasing a property from us;
- you making a reservation or staying in properties which we own or operate;
- you dining in our food and beverage outlets;
- you applying for a job with us;
- you participating in our marketing or promotional events;
- you using our products or services;
- you contacting us with your queries, requests or feedback;
- our conducting or completing of transactions;
- our conducting market research or surveys;
- our conducting interviews.

## **What kind of purposes do we collect your personal data for?**

In general, we may use your personal data for the following purposes:

- conducting and completing transactions (e.g. processing orders and payments; providing products or services that have been requested);
- managing your reservation in any of our hotels or serviced residences or dining in our food and beverage outlets or staying in properties that we own or operate;
- providing customer service (e.g. responding to queries and requests; informing you about service status and product updates; sending you alerts and newsletters);
- conducting market research and improving customer service (e.g. conducting market research or surveys; performing market analysis; managing and enhancing our products and services; developing new products);
- conducting marketing promotions (e.g. sending of alerts, newsletters, marketing materials and invitations from us wholly or through affiliation with third parties; offering promotions and loyalty programs);
- complying with applicable laws, regulations and other requirements (e.g. providing assistance to law enforcement agencies, regulatory authorities and other governmental agencies; performing internal audits);
- maintaining investor relations (e.g. sending of alerts, newsletters, publications, marketing materials and invitations from us wholly or through affiliation with third parties);
- performing evaluations (e.g. assessing suitability of employees)

FEO may decide to buy or sell assets which form part of or relate to its business or a division or organization within FEO. In any such transaction, personal data will usually be one of the transferred assets and will be disclosed to the purchaser. In most cases, if you do not provide information about yourself which FEO has requested, FEO may not be able to provide you with the relevant product or service.

## **How do we use and/or disclose your personal data?**

We will only use, disclose and/or transfer your personal data for the purposes you have been notified of and consented to or which are permitted under applicable laws and regulations.

We will not sell, rent or give away personal data to third parties for commercial purposes without your consent.

## **Who do we share your personal data with?**

Depending on the product or service concerned, personal data may be disclosed or transferred to:

- other divisions or organizations within FEO;
- our joint venture/ alliance partners;
- our service providers and specialist advisers/institutions who have been contracted to provide administrative, financial, legal, accounting, information technology, research or other services;
- other insurers, credit providers, courts, tribunals, law enforcement agencies, regulatory authorities and other governmental agencies as agreed or authorized by law;
- credit reporting or reference agencies or insurance investigators;
- anyone authorized by an individual, as specified by that individual or the contract.

Where personal data is disclosed or transferred to organizations outside of FEO who handle or obtain personal data as service providers to FEO, we require such organizations to acknowledge the confidentiality of such personal data, undertake to respect any individual's right to privacy and comply with the Act and this Policy and use such personal data only for our purposes and otherwise follow our reasonable directions with respect to this data.

In addition, where personal data is transferred overseas and we may need to process or deal with your personal data outside Singapore, we will ensure that such transfer is in compliance with the Act and this Policy or is permitted under applicable data protection and privacy laws and regulations.

### **How do we manage, protect and store your personal data?**

We have appointed Data Protection Officers (“DPOs”) from each of our business units to oversee our management of personal data in accordance with the Act.

We regard breaches of your privacy very seriously and we have implemented measures to secure and protect your information, such as training our employees who handle your personal data to respect the confidentiality of such personal data and your privacy, storing personal data in a combination of secure computer storage facilities and paper based files and other records, taking steps to protect the personal data we hold from misuse, loss, unauthorised access, modification or disclosure.

However, you will appreciate that it is not for us to perfectly secure your personal data from cyber attacks, such as hacking, spyware and viruses. Accordingly, you will not hold us liable for any unauthorized disclosure, loss or destruction of your personal data arising from such risks.

The Act also requires us not to store personal data longer than necessary. We will cease to retain your personal data when we no longer require such personal data for the purposes we originally notified you of or for any business or legal needs.

### **How do we keep personal data accurate and up-to-date and how to exercise your right to correct the personal data we hold of you?**

We endeavour to ensure that the personal data we hold about you is accurate and up-to-date. We realize that such personal data changes frequently with changes of address and other personal circumstances. We encourage you to contact us as soon as possible in order to update any personal data it holds about you. Please complete the Personal Data Correction Form and send to the DPO of the Business Unit you have been dealing with. Our contact details are set out below. We may require you to verify your identity.

### **How to exercise your right to access the personal data we hold of you?**

To make a request to access the personal data we hold about you, please contact the DPO of the Business Unit you have been dealing with in writing using the Request to Access Personal Data Form. We will require you to verify your identity and to specify what data you require. We may charge a fee to cover the cost of verifying the application and locating, retrieving, reviewing and copying any material requested. If the data sought is extensive, we will advise the likely cost in advance and can help to refine your request if required.

### **How to exercise your right to withdraw your consent?**

To make a request to withdraw your consent previously given, please contact the DPO of the Business Unit you have been dealing with in writing.

### **What if you have a complaint?**

If you consider that any action of FEO breaches the Act or this Policy, you can make a complaint to the Coordinating DPO by completing the Complaint Form. We will endeavour to act promptly in response to a complaint.

### **How to contact us?**

You can contact the DPOs in FEO stated in this link – [DPO Contact List](#).

### **Updates to this Policy**

This Policy will be reviewed from time to time to take account of new laws and technology, changes to our operations and practices and the changing business environment. This Policy was last updated on 2 October 2014. If you are unsure whether you are reading the most current version, please contact us.

### Personal Data Correction

I am requesting to correct the following personal data that I have previously submitted to [*insert business unit*]:

<u>New Update</u>	<u>Previously used</u>
Name:	Name:
Singapore Telephone Number(s):	Singapore Telephone Number(s):
Address:	Address:
Email Address:	Email Address:
Any Other Information:	Any Other Information:

Notice:

1. Please ensure accuracy when providing us with the information requested in this form. The personal data submitted by you to us in this form is necessary for processing your request, and any inaccuracies, errors or omissions in the personal data submitted may result in delays in processing the request and/or our inability to process your request.
  2. Your Personal Data Correction request will be subject to approval following our receipt and approval of this completed form. We will endeavour to provide our response within the statutory period (subject to such extensions as may be permitted).
  3. We reserve the right to refuse to process the Personal Data Correction Form in accordance with Section 22 and Sixth Schedule of the PDPA.
  4. We may have disclosed the personal data to be corrected herein to other organizations within the preceding year and we may disseminate your corrections herein to these other organizations. If you wish to restrict the organizations to which we may make such disclosures, please identify the organizations to whom we may share these corrections:
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**Confirmation**

I confirm that this request relates to my own personal data. I declare that the information provided in and with this request are true in every respect, and agree that such information may be collected, used and disclosed by the Far East Organization stable of companies (further details of which are available at our website [www.fareast.com.sg](http://www.fareast.com.sg)) for the purpose of processing this request and/or in accordance with its data protection policy.

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

<b>For official use</b>	
Received by:	Date:
Processed by:	Date:

## **Request to Access Personal Data**

I am making a request to access my personal data which is in the possession of or under the control of [insert business unit]. I have been notified that I may be required to pay a fee to [insert business unit] in order to enable [insert business unit] to process my request.

Please state specific details of the information you require and any relevant dates:

Details of information requested:

Date/time period of records:

Where, how and by whom the data was collected:

### **Notice:**

1. Non-payment of the administrative fee and/or non-receipt of your payment of the administrative fee may result in our inability to process your request.
2. Please ensure that you have provided us with all the details requested for in this form. The personal data submitted by you to us in this form is necessary for processing your request, and any inaccuracies, errors or omissions in the personal data submitted may result in delays in processing the request and/or our inability to process your request.
3. Once you have provided us all the requisite information needed to consider your request, your request will be subject to approval. We will endeavour to provide our response within the statutory period (subject to such extensions as may be permitted). In accordance with Section 21 and the Fifth Schedule of the PDPA, we may refuse to grant your request. Certain records may take more time to retrieve, in which case we will provide you periodic updates on the status of your request.
4. Any information provided to you is on a confidential basis and for your personal reference only, and you will seek our written consent for any other use.

**Confirmation**

I confirm that this request relates to my own personal data. I declare that the information provided in and with this request are true in every respect, and agree that such information may be collected, used and disclosed by the Far East Organization stable of companies (further details of which are available at our website [www.fareast.com.sg](http://www.fareast.com.sg)) for the purpose of processing this request and/or in accordance with its data protection policy.

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

<b>For official use</b>	
Received by:	Date:
Processed by:	Date:



## Complaint Form

If you wish to lodge a complaint with **[insert business unit]** in relation to its handling of your personal data, please provide us with the following information:

1. Who do you want to complain about?

Please give us the details of the person you have been in contact with.

Business Unit:

Contact name:

Address:

Postcode:

Telephone:

Email:

Website:

2. Your relationship with the business unit

Please tell us the nature of your relationship with the business unit, for example client, customer etc.

3. What is your complaint?

Explain why you think **[insert business unit]** has not complied with the requirements of the Personal Data Protection Act (Act 26 of 2012) ("PDPA").

4. Supporting evidence

Please select the documents(s) you will be sending to us:

- Evidence of the personal data (if any) which you think has not been handled in accordance with the PDPA;
- Details about how the personal data has not been handled in accordance with the PDPA;
- Copies or a record of any communication between yourself and **[insert business unit]** relating to the complaint.

5. When did you become aware of the problem?

Please tell us the date and circumstances when you became aware of the problem.

6. Your contact details

Name	
Contact Number(s)	
Email Address	

Address	
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Person to contact about this complaint (if different from above):

Name	
Contact Number(s)	
Email Address	
Address	

If you are filling in this form on behalf of the complainant, please send us any documentation proving you have the authority to act on behalf of the complainant.

7. Declaration

Please read the following statements and tick the relevant box to confirm your consent:

- I have included all the necessary documents to support my complaint.
- I understand that during any necessary investigations, **[insert business unit]** may need to share the details I have provided in order to investigate. I have indicated any supporting documents that I do not want **[insert business unit]** to share.
- The information I have provided in this complaint is true, complete and accurate, to the best of my knowledge.
- I have read and agree to this declaration.

8. Sending your complaint to us

Please send your complaint to the Co-ordinating DPO at [coorddpo@fareast.com.sg](mailto:coorddpo@fareast.com.sg)

Signature:

Date:

**Notice:**

The information submitted by you to us in this form is necessary for processing your complaint and any inaccuracies, errors or omissions in the personal data submitted may result in delays in processing the request and/or our inability to process your request.