

### **Personal Data Protection Policy**

LadyS group of companies ("LadyS") take the privacy and protection of your Personal Data very seriously. In our companies and on this website, this Personal Data Protection Policy sets out the guidelines on how we comply with the Singapore <u>Personal Data Protection Act 2012</u> ("PDPA") and the amendments issued to it. For other general terms of service, please refer to <a href="https://ladys.asia/terms-of-business">https://ladys.asia/terms-of-business</a>.

#### Information collected on our website

Personal data is collected by us when you visit our website <a href="www.LadyS.asia">www.LadyS.asia</a>. This includes monitoring the use of this website via the use of cookies or other related devices. This information is for the purpose of maintaining and improving our website and does not include personally identifiable information ("PII"), which may identify you individually. This applies to all visitors to this website and its related pages.

#### 1. Personal Data

Under the PDPA, Personal Data refers to any data and/or information about an individual who can be identified either:

- 1. from that data: or
- 2. from that data and other information to which LadyS have or is likely to have legitimate access.

As you interact with LadyS, examples of Personal Data collected include but are not limited to:

- 1. your name, gender, date of birth, nationality, country/city of birth, NRIC, passport or other identification number, contact number(s), residential address, mailing address, email address and any other information relating to you which you have provided, in any forms you may have submitted, and/or from interaction with you
- 2. information on payments and billings details such as your bank account number;
- information from your usage and interaction with our website and/or services including computer and connection information, device capability, bandwidth, statistics on page views and traffic to and from our website.

#### 2. Collection of Personal Data

LadyS may collect personal data when you:

- 1. contact us with a query;
- 2. visit our website;
- 3. during other interactions with us including but not limited to, telephone calls, letters, face-to-face meetings, online forms or emails;
- 4. when you purchase or request to purchase our products or services;
- 5. when we receive references from business partners and third parties, where you have been referred by them;
- 6. when you visit our premises, during which CCTV recordings, photos, videos and other media may be collected; and
- 7. when you submit your Personal Data to us for other specific reasons.



Any submission of your personal data is voluntary. If you provide LadyS with any Personal Data belonging to a third party, you have the responsibility for obtaining the consent for the use and transfer of data to LadyS.

### 3. Use of Information

We may collect, use, disclose and/or retain your Personal Data for the following purposes:

- 1. for administrative and human resource matters, including but not limited to access to our premises and computer systems, or recruitment and employment matters;
- 2. to process or receive payment for your employment, services rendered or any other purchases to or from LadyS;
- 3. to improve our services to you, such as resolving complaints and handling requests, enquiries and feedback;
- 4. to meet legal and regulatory requirements;
- 5. to ensure the safety and security of our properties and systems, including the use of CCTV surveillance, conducting security clearance and issuance of visitor passes;
- 6. to process insurance claims and payments arising from various policies; and
- 7. to meet obligations of conducting our business with you, such as tendering and securing of contracts.

To ensure smooth operations of our business activities, we may also be disclosing the personal data you have provided to us to our third-party service providers, agents and/or our affiliates or related corporations, and/or other third parties whether situated in Singapore or outside of Singapore, for the above-stated Purposes. Such parties comply, at a minimum, to equivalent data privacy standards.

In the event that LadyS requires your Personal Data for purposes other than stated above, or which are permitted or required under local laws and regulations, we shall reasonably endeavor to contact you in advance to obtain your consent.

### 4. Withdrawal of Consent

Any consent provided for the collection, use and disclosure of Personal Data will remain valid until such time it is being withdrawn by you in writing. If you wish to withdraw your consent, you may submit your request in writing or via email to our Data Protection Officer at the contact details provided below.

Upon receiving your request, we may require approximately 10 working days to process it. We will notify you of the consequences of us acceding to the same, including any legal consequences which may affect your rights and liabilities to us. Please note that there may be a financial cost incurred to effect the withdrawal of consent, which you will be notified of.

Withdrawal of consent may result in consequences such as LadyS no longer be in a position to continue, administer or fulfill any contractual relationship in place.

## 5. Protecting your information



The security of your Personal Data is of great importance to us and we take precautions to ensure that the information you have provided is protected against unauthorised or unintended use, access or disclosure.

However, we cannot be held responsible for unauthorised or unintended use, access, disclosure or loss that is beyond our control including but not limited to cyberattacks such as hacking, spyware and viruses.

#### 6. Retention of Personal Data

Personal Data are retained for as long as it is necessary to fulfil the purposes for which they were collected, or as required or permitted by applicable laws.

LadyS will cease to retain your Personal Data or remove the means by which the data can be associated with you, as soon as it is reasonable to assume that such retention no longer serves the purposes for which the personal data were collected, and are no longer necessary for legal or business purposes.

We will ensure that Personal Data that no longer has any business or legal use is destroyed or disposed of in a secure manner. This applies to both paper documents and electronic data stored in databases.

## 7. Sharing your information

We may share your information with:

- 1. Business partners, customers and other stakeholders;
- 2. Industry regulators and other government organisations, as required by local laws and regulations;
- 3. Financial institutions such as banks for payments; and
- 4. Our professional advisors and consultants such as lawyers and auditors.

Where possible, we encrypt, anonymise and/or aggregate the information before sharing it. Anonymising means stripping the information of PII. Aggregating means presenting the information in groups or segments e.g. age groups.

## 8. Accuracy of Personal Data

You should ensure that all Personal Data submitted to us is complete, accurate, true and correct. It is your responsibility to inform LadyS if there are any updates to your Personal Data or if you realise that you have submitted incorrect data.

# 9. Data Protection Officer ("DPO")

If you have concerns or further queries about your Personal Data, you may contact the following person:

#### **Data Protection Officer**



Email : <u>solutions@LadyS.asia</u>

Address : 138 Robinson Road, #02-26, Singapore 068906

We treat all correspondence seriously. All queries or complaints are treated as highly sensitive and confidential.

We may amend or modify this Policy from time to time. We remain committed to safeguarding your information and being open about our data protection practices. For general information about PDPA, please visit the Personal Data Protection Commission's website at <a href="http://www.pdpc.gov.sg">http://www.pdpc.gov.sg</a>.