



Subject : Data Protection Notice (External Data Protection Policy) – for External Audience

1. INTRODUCTION

This Policy applies to the Koh Brothers Group of Companies (“Koh Brothers”).

We at Koh Brothers respect the privacy and confidentiality of the personal data of our Clients, Partners, Consultants, Contractors, Service Providers, Outsourced Third-Parties and others who have business dealings with us. We are committed to implementing policies, practices and processes to safeguard the collection, use and disclosure of the personal data you provide us, in compliance with the Singapore Personal Data Protection Act (PDPA) 2012.

We have developed this Data Protection Policy to assist you in understanding how we collect, use, disclose, process and retain your personal data with us.

2. HOW WE COLLECT YOUR PERSONAL DATA

The PDPA defines personal data as “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 the organisation has or is likely to have access.”

We collect your personal data in the following ways:

- When you submit your CV and job application form to us in response to our recruitment publicity and advertisements in newspapers and websites, or at roadshows or job fairs
- When you submit your CV and job application form to us through referrals or via recruitment firms
- When you provide your personal contact information to us when making enquiries, giving feedback or lodging complaints
- When you provide your personal particulars to us for the sale/lease transaction of properties developed and marketed by us
- When you provide your personal contact information in the visitors’ or contractors’ log books in entering our/our clients’ premises

3. TYPES OF PERSONAL DATA WE COLLECT ABOUT YOU

The types of personal data we collect about you may include:

- Personal contact information (Name, Address, Phone No., Email address)
- Personal particulars
- Educational and professional qualifications – for job application
- Work experience – for job application

4. HOW WE USE YOUR PERSONAL DATA

We use the personal data we have collected about you for one or more of the following purposes:

- Process job applications and recruitment
- Follow-up on your enquiry, feedback or complaint
- Process applications and registrations
- Billing and payment processing
- Process sale/lease transaction of properties developed and marketed by us
- Provide services for property and facilities management
- Assess competency and fitness of workers in compliance with work safety regulations
- Record your entry to our/our client's premises for security purposes

5. WHO WE DISCLOSE YOUR PERSONAL DATA TO

We disclose some of the personal data we have collected about you to the following parties or organisations outside Koh Brothers:

- Government agencies (HDB) – eligibility and approval to purchase executive condos
- Registration and licensing authorities (e.g. SLA)
- External advisors (e.g. auditors, lawyers)

6. HOW WE MANAGE THE COLLECTION, USE AND DISCLOSURE OF YOUR PERSONAL DATA

6.1. Obtaining Consent

To the fullest extent required by the PDPA, before we collect, use or disclose your personal data, we will notify you of the purpose why we are doing so. We next obtain written confirmation from you on your expressed consent. As far as possible, we will not collect more personal data than necessary for the stated purpose.

Under certain circumstances, we may assume deemed consent from you when you voluntarily provide your personal data for the stated purpose, e.g. when you enter into a Sales & Purchase Agreement in purchasing a property from us.

6.2. Third-Party Consent

If you have a one-on-one meeting with us or do a transaction with us on behalf of another individual, you must first obtain consent from that individual in order for us to collect, use or disclose his/her personal data.

6.3. Withdrawal of Consent

If you wish to withdraw consent, you should give us reasonable advance notice. You have to be aware, though, of the likely consequences of your withdrawal of consent, e.g. without your personal contact information we may not be able to inform you of future services offered by us or our clients.

Your request for withdrawal of consent can take the form of an email or letter to us, or through the “UNSUB” feature in an online service.

7. HOW YOU CAN ACCESS AND MAKE CORRECTION TO YOUR PERSONAL DATA

You may write in to us, based on reasonable grounds, to find out how we have been using or disclosing your personal data. We are obligated under the PDPA to allow you access to your personal data of the past one year, and to make any correction if there is any error or omission. Before we accede to your request, we may need to verify your identity by checking your NRIC or other legal identification document. We will endeavour to fulfill your request within 30 days, with an estimate of the fee for processing the request (if applicable). If we are not able to do so within 30 days, we will notify you of the additional time required.

8. HOW WE ENSURE THE ACCURACY OF YOUR PERSONAL DATA

We will take reasonable precautions and verification checks to ensure that the personal data we have collected from you is reasonably accurate, complete and up-to-date. From time to time, we may do a verification exercise with you to update us on any changes to your personal data.

9. HOW WE PROTECT YOUR PERSONAL DATA

We will take the necessary security arrangements to protect your personal data that is in our possession to prevent unauthorised access, use, disclosure, or similar risks. We will take reasonable and appropriate measures to maintain the confidentiality and integrity of your personal data, and will only share your data with authorised persons on a 'need to know' basis.

External Data Intermediaries who process and maintain your personal data on our behalf will be bound by contractual information security arrangements we have with them.

10. HOW WE RETURN YOUR PERSONAL DATA

We will not retain any of your personal data under our charge when it is no longer necessary for any business or legal purposes. Based on our Document Retention Policy, we will ensure that your personal data that are no longer needed by us will be destroyed or disposed of in a secure manner.

11. HOW WE TRANSFER YOUR PERSONAL DATA

If there is a need for us to transfer your personal data to another country, we will ensure that the standard of data protection in the recipient country is comparable to that of Singapore's PDPA. If this is not so, we will enter into a contractual agreement with the receiving party to accord similar levels of data protection as that in Singapore.

12. HOW WE HANDLE THE DO-NOT-CALL (DNC) PROVISIONS

Before we make any 'cold calls' in telemarketing activities, we will check the National DNC Registry and our internal 'blacklist' before we make the phone call, send text messages or faxes to you, unless you have given us your clear and unambiguous consent.

13. HOW WE HANDLE QUERIES AND COMPLAINTS

If you have any query or feedback regarding this Policy, or any complaint you have relating to how we manage your personal data, you may contact our Data Protection Officer at:

dpo@kohbrothers.com

Any query or complaint should include, at least, the following details:

- Your full name and contact information
- Brief description of your query or complaint

We treat such queries and complaints seriously and will deal with them confidentially and within reasonable time.