

**YOMA STRATEGIC HOLDINGS LTD.  
(COMPANY REGISTRATION NO. 196200185E)  
PERSONAL DATA POLICY STATEMENT**

**1. INTRODUCTION**

- 1.1. In line with our aim to comply with the requirements of the Personal Data Protection Act (**No. 26 of 2012**) ("PDPA") and to maintaining the highest standards of confidentiality with respect to the personal data collected, used or disclosed by us, this document sets out the Personal Data Policy of Yoma Strategic Holdings Ltd.
- 1.2. By interacting with us, accessing our websites, submitting information to us (whether through our websites or otherwise), or signing up for any products or services offered by us, you agree and consent to us (including our related corporations, affiliates and business units) (collectively, the "Group"), as well as our respective agents (collectively referred to herein as "Yoma", "us", "we" or "our") collecting, using, disclosing and sharing amongst ourselves your Personal Data, and disclosing such Personal Data to the Group's authorised service providers and relevant third parties in the manner set forth in this Personal Data Policy.
- 1.3. Nothing in this Personal Data Policy is intended to derogate from any terms and conditions governing your relationship with us and this Personal Data Policy forms a part of such terms and conditions.

**2. What is Personal Data?**

- 2.1. Personal Data is personal information, whether true or not and whether in electronic or other form, about an individual who can be identified :
  - 2.1.1. From that data; or
  - 2.1.2. From that data and other information to which we have access to or are likely to have access to.
- 2.2. Examples of Personal Data are your name, address, NRIC number or FIN number, photograph or video image, telephone numbers and email addresses.
- 2.3. We will do our best to ensure that your personal data is accurate. However, we do encourage you to provide us with an update of any particulars of your personal data that have changed as soon as possible.

### **3. When is Personal Data collected from you?**

3.1 Generally, we collect your personal data in the following ways:

- (i) when you submit forms relating to any of our products or services;
- (ii) when you register for or use any of our services on websites owned or operated by us or when you register as a member of websites owned and/or operated by us, or use services on such websites, or participate in any of our social media offerings (such as through our Facebook pages);
- (iii) when you interact with our customer service and marketing officers, including during face-to-face meetings or by way of telephone conversations;
- (iv) when you use our services;
- (v) when you request that we contact you;
- (vi) when you are contacted by, and respond to, our marketing representatives and agents;
- (vii) when you respond to our request for additional personal data;
- (viii) when you subscribe or ask to be included in our email or other mailing lists;
- (ix) when you respond to our promotions and other initiatives;
- (x) when you participate in promotional activities at any of our showrooms or sales galleries or outlets;
- (xi) when you respond to our market surveys;
- (xii) when you submit a job application to our Group;
- (xiii) when you enter into an agreement with us, including options to purchase, sale and purchase agreements, leasing agreements, tenancy agreements, licensing agreements, or any other short term occupation agreements or letters of offers;
- (xiv) when we receive references from business partners and third parties, for example, where you have been referred by them;
- (xv) when your images are captured by us via CCTV cameras while you are within our premises or photographs or videos taken by us or our representatives when you attend events hosted by us; and
- (xvi) when you submit your personal data to us for any other reason.

3.2 When you browse our websites, you generally do so anonymously but please see section 5 on the "Use of Cookies" and section 6 on the "IP Address".

3.3 If you provide us with any Personal Data relating to a third party (e.g. information of your spouse, children, parents, and/or employees), including where you have named them as a co-purchaser or tenant or licensee or as a member of your immediate or extended family, or where you refer a third party to us for the purposes of us offering our products and/or services to that third party, by submitting such information to us, you represent to us that you have obtained the consent of the third party for you providing us with their Personal Data for the purposes set out below.

#### 4. What is the information collected or used for?

4.1 Our business is to understand and meet your needs and provide you with the services that you require. To do this effectively we need to collect a range of Personal Data about you.

4.2 In general, we collect, use and disclose your Personal Data for the following purposes:

- (i) to provide you with the products or services that have been requested;
- (ii) to help us profile, review, develop, manage and enhance our products and services, including by analysing future customer needs;
- (iii) to communicate with you and respond to your queries, requests and complaints;
- (iv) to provide ongoing information about our products and services which may be relevant to you;
- (v) to protect and enforce our contractual and legal rights and obligations;
- (vi) to prevent, detect and investigate crime, including fraud and money-laundering, and to analyze and manage other commercial risks;
- (vii) to manage our business operations and to comply with internal policies and procedures;
- (viii) to facilitate any proposed or actual business transactions;
- (ix) to facilitate any proposed or actual business assignment, transfer, participation or sub-participation of any of our rights and obligations in respect of your relationship with us;
- (x) to comply with any applicable rules, laws and regulations, codes of practice or guidelines or to assist in law enforcement and investigations by relevant authorities; and
- (xi) purposes which are reasonably related to the aforesaid.

4.3 In addition, we may collect, use and disclose your Personal Data for the following purposes, depending on the nature of our relationship with you:

- (i) **If you want to buy property from us or have indicated an interest in purchasing property from us:**
  - (a) to administer the sale process including the verification of your identity, preparation of documentation, other relevant documentation and applications as may be required for any purchase or sale or sub-sale of the property;
  - (b) to coordinate property and/or show flat viewings;
  - (c) to update your contact details and business records to facilitate follow-ups on outstanding arrears;
  - (d) to deliver correspondences or notices as may be required under the sales documentation; and
  - (e) any other purpose directly related to any of the above;

- (ii) **If you are a contractor or an employee thereof:**
  - (a) to manage the outsourcing relationship;
  - (b) to conduct background checks and due diligence;
  - (c) to contact you for emergency purposes;
  - (d) to process any payments of invoices and claims including payments to any accounts payable;
  - (e) to ensure the security of our premises; and
  - (f) any other purpose directly relating to any of the above;
  
- (iii) **If you submit an application to us as a candidate for employment:**
  - (a) to process your application including pre-recruitment checks;
  - (b) to provide or obtain employee references or other references where relevant for background screening/vetting;
  - (c) to collect information about your suitability for the position applied for;
  - (d) to organise training and staff development programs;
  - (e) to assess your performance;
  - (f) to administer benefits and payroll processing;
  - (g) to provide you with tools to facilitate or as required for you to do your job;
  - (h) to communicate with you as required by us to comply with its policies and processes, including for business continuity purposes; and
  - (i) any other purposes relating to the aforesaid.

4.4 For all of the purposes mentioned above, you should ensure that all Personal Data submitted to us is complete, accurate, true and correct. Failure on your part to do so may result in our inability to provide you with products and services you have requested.

4.5 In relation to particular products or services or in your interactions with us, we may also have specifically notified you of other purposes for which we collect, use or disclose your Personal Data. If so, then we will collect, use and disclose your Personal Data for these additional purposes as well, unless we have specifically notified you otherwise.

4.6 Your Personal Data will be protected and kept confidential, but subject to the provisions of any applicable law, this Personal Data may, depending on the product or service concerned and for the purposes listed above (where applicable), be disclosed to the following parties:

- (i) other divisions or organisations within the Group, our affiliates and associated companies;
- (ii) agents, contractors, third party service providers and specialist advisers to us who have been contracted to provide us with administrative, operational or other goods and services, such as telecommunications, information technology, payment, payroll, processing, training, market research, storage, or archival;
- (iii) any third party business partners who offer goods and services or sponsor contests or other promotional programs, whether in conjunction with us or not;

- (iv) insurers, credit providers, courts, tribunals and regulatory authorities as agreed or authorised by law;
- (v) any business partner, investor, assignee or transferee (actual or prospective) to facilitate business transactions (which may extend to any reorganization, merger, acquisition or sale) involving us;
- (vi) our professional advisors such as our auditors and lawyers;
- (vii) relevant government, statutory or regulatory authority (including securities exchange) or law enforcement agency in order to comply with any laws or rules and regulations imposed by such authority or any order, notice, directive or judgment of any court, tribunal, arbitration or mediation body;
- (viii) anyone to whom we assign or transfer or may assign or transfer any of our rights and duties;
- (ix) any other party as may be consented to by you, as specified by that individual or the contract.

## **5. Is your consent required and can it be withdrawn?**

- 5.1. We will endeavour to obtain your consent to collect and use your Personal Data prior to or at the time we collect it. However, in certain situations you will be deemed to have consented to the provision of your personal data, e.g. where you provide your Personal Data voluntarily.
- 5.2. You may at any time give us reasonable written notice of the withdrawal of your consent to collect, use or disclose your Personal Data. Once we receive the notice of withdrawal of your consent, we will inform you of the consequences of your withdrawing consent.
- 5.3. The withdrawal of your consent will mean that the Company may have to restrict or refuse your participation in sales and marketing activities and promotions organized or provided by the Company or our affiliates. You will be informed of any such consequences.

## **6. Do Not Call ('DNC') Provisions**

- 6.1 If you have provided us with your Singapore telephone number(s) and have indicated that you consent to receiving marketing or other promotional information via your Singapore telephone number(s), then from time to time, we may contact you using such Singapore telephone number(s) (including via voice calls, text, fax or other means) with information about our products, services (including discounts and special offers), and other event invitations even if these telephone number(s) are registered with the DNC Registry. You may however advise in writing should you wish not to be contacted by us at your telephone number(s) for such purposes.

## **7. Use of Cookies**

- 7.1 When you interact with us on our websites, we automatically receive and record information on our server logs from your browser. When you visit our websites, we may assign one or more cookies to your computer. A cookie is a small encrypted text file placed in the 'Cookies' folder on your computer's hard disk, and may be used to collect information and statistics relating to your access to our websites, including information on how you arrive at our websites, what kind of browser you are on, what operating system you are currently using, your IP address, and your click stream information and time stamp (for example, which pages you have viewed, the time the pages were accessed and the time spent per web page on our websites). The cookie will provide a unique identifier to your computer and each time you visit our websites from the same computer, our server will recognise a return visitor and allow us to increase the functionality of our websites on your computer.
- 7.2 The cookies placed by our server are readable only by us, and cookies cannot access, read or modify any other data on your computer.
- 7.3 Most browsers automatically accept cookies, but cookies can be enabled or disabled by modifying the settings in your browser. To find out how to do this, and for more information on cookies, please visit <http://cookiepedia.co.uk/how-to-manage-cookies>. To find out how to disable Flash cookies at Adobe.com, please visit <http://www.adobe.com/products/flashplayer/security> for details. If you choose not to allow us to place a cookie on your computer, you may be restricted from some services offered on our websites, and some of the interactive features on our websites may be similarly restricted or be rendered inoperable.

## **8. IP Address**

- 8.1 An IP address is a number that is automatically assigned to your computer when you sign up with an Internet Service Provider.
- 8.2 When you visit our website, your IP address is automatically logged in our server. We use your IP address to help analyse trends, administer the website, and track users' movements. From your IP address, we may identify the general geographic area from which you are accessing our website. However, we will not be able to pinpoint the exact geographic location from which you are accessing our website. Generally we do not link your IP address to anything that can enable us to identify you unless it is required by applicable laws and regulations.

**9. Third-Party Sites**

9.1 Our websites may contain links to other websites operated by third parties, such as our business partners. We have no control over, and are not responsible for the privacy practices of websites operated by third parties that are linked to our websites. We encourage you to learn about the privacy policies of such third party websites. Once you have left our website, you should check the applicable privacy policy of the third party website to determine how they will handle any information they collect from you.

**10. Do you ever transfer my personal data out of Singapore?**

10.1 Generally, the Company does not transfer your personal data out of Singapore. However, we may be required to transfer some of your personal data outside Singapore to our Myanmar sales office to facilitate sales, marketing, promotions and the sale and purchase of our developments. For example, where you would like to be notified of our other product launches or developments in Myanmar.

10.2 In these limited circumstances, the Company will take steps to ensure that your personal data is protected by the recipients.

**10. Who can I contact about my personal data or this policy?**

10.1. If you have any queries or doubts about the policies set out in this statement or about your personal data that we obtain, maintain, process, use and disclose, or if you would like to access or correct your personal data, please contact:

Yoma Strategic Holdings Ltd.  
#32-00 Singapore 079120  
Tel : 6223 2262

10.2 To enable us to process your request efficiently, please forward us your name and your email or correspondence address so that we can forward you a Request Form for your completion and return to us for our processing.

10.3 Please note that if your Personal Data has been provided to us by a third party, you should request such third party to make such queries, complaints, and access and correction requests to us on your behalf.

10.4 If you withdraw your consent to any or all use of your Personal Data in our possession, depending on the nature of your request, we may not be in a position to continue to provide its products or services to you. Your withdrawal of consent may accordingly constitute a repudiatory breach of your obligations under the agreements which you may have with us, which may result in the termination by us of the same. Our legal rights and remedies in such event are expressly reserved.

11. **Governing Law**

11.1 This Personal Data Policy shall be governed in all respects by the laws of Singapore.