

## Privacy Policy ("Policy")

### Introduction

CPC Construction Pte. Ltd. (collectively "CPC", "we", "us" or "our") is committed to complying with Singapore Personal Data Protection Act (PDPA) 2012 ("PDPA 2012") and to protecting all our stakeholders' personal data, included but not limited to our Employees, Clients, Partners, Consultants, Contractors, Third-Parties Service Providers, Job-Seekers and anyone who have any kind of business dealings with us.

The following Policy outlines how we manage the Personal Data we hold and in compliance with the PDPA. For more information about PDPA, please visit the Personal Data Protection Commission's website at <http://www.pdpc.gov.sg>.

This Policy applies to all business units and departments across CPC and sets out how we collect, use or disclose Personal Data from you or that you have provided to us through email, fax or otherwise.

By submitting your Personal Data information to us, providing your services (included job application), engaging our services or otherwise interacting with us, you agree and consent to us collecting, using and disclosing your Personal Data in accordance with the terms of this Policy.

This Policy supplements but does not supersede nor replace any other consents you may have previously provided to us in respect of your Personal Data, and your consents herein are additional to any rights which we may have at law to collect, use and disclose your Personal Data.

The PDPA defines "Personal Data" as any 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 we have or are likely to have access. Example of Personal Data include your name, NRIC or FIN number, passport number, contact number (residential and mobile), email address, mailing address, photograph, video image, country, profession, job position, industry, payment information and any other information relating to individuals which you have provided us in any form you may have submitted to us.

### **1. How we collect your personal data**

1.1 We may collect your personal data in various ways including but not limited to the followings:

- In the course of you engaging our products or services;
- In the course of we engaging your products or services;
- you are providing documentation or information to us;
- when you submit a feedback form or other forms relating to our capabilities and services;
- when you submit an application form for employment opportunities or CV to us through referrals, recruitment firms, fax, email etc or in the course of conducting interviews;
- when you interact with CPC's officers, for example, via telephone calls, letters, face-to-face meetings and emails;
- when you contact us or request that we contact you;
- CCTV recordings or photos, videos taken by us or our representatives while you are within or outside our premises;

- from publicly available information systems or reporting agencies regardless whether in connection with our contract with you;
- when you submit your personal data to us for any other reasons not mentioned above.

- 1.1.1 If you or your authorised personnel have given us your Persona Data as per Policy 1.1 above, you are deemed to have provided your consent to us to the collection, use and disclosure of your personal data for those purpose.
- 1.2 If you provide third party Personal Data (e.g. information of your family members, friends, business partners etc) to us and by doing so, you confirm, represent and warrant that you have obtained their respective consents to the collection, use and disclosure of their Personal Data for the purposes set out in this Policy.

## 2. Purpose of Collection and Use of Personal Data

The purpose(s) for collecting and use of your Personal Data is set out below:

- (a) to facilitate any business transaction with you;
- (b) to evaluate, administer, process background check, verify your credentials, qualifications and obtain references of your job application;
- (c) to organize staff learning and development programs, benefits and payroll processing, overseas traveling for leisure or business if you are an existing employee with us or CPC's invitees;
- (d) to handle claims and disputes, conduct and facilitate investigations and proceedings, and to protect and enforce our contractual and legal rights and obligations;
- (e) to verify your identity and/or conduct background checks;
- (f) to communicate or interact with you more effectively and to handle and respond either to your queries, complaints or requests;
- (g) to comply with applicable laws and regulations, rules, codes of practice or guidelines, or to assist in law enforcement by relevant authorities from time to time;
- (h) to manage the security of our premises, facilities and technology infrastructure, including carrying out CCTV surveillance and conducting security clearances;
- (i) records your entry to or exit from our/our client's premises, project sites, workers' dormitory etc. for security purposes;
- (j) assess competency and fitness of workers information in compliance with work safety regulations;
- (k) for any other purposes that we have obtained consent from you or which permitted under the laws of any jurisdiction and/or
- (l) any other purpose not relating to any of the above.

## 3. Disclosing of Personal Data

- 3.1 CPC does not sell or otherwise use, process, record, hold, store, share and disclose ("Process") your Personal Information that we have collected from you, except as described in this Policy or otherwise disclosed to you at the time the Personal Information is collected.
- 3.2 We may need to disclose your Personal Information from time to time for
- (a) tendering of projects;
  - (b) with authorised third parties who perform services on our behalf.
- We do not authorise the authorised third parties to use or disclose your Personal Information except as necessary to perform certain services on our behalf or comply with legal requirements.

- (c) related or affiliates companies of CPC;
- (d) our joint venture or business alliance partners;
- (e) our clients, vendors, sub-contractors and business partners;
- (f) agents, contractors, third party service providers and specialist advisers who provide operational, administrative, financial, research or other services, such as courier services, telecommunications, information technology, payment, payroll, processing, training, event organizing, market research, storage, archival, client support services;
- (g) our professional advisers such as our lawyers and auditors;
- (h) insurers or insurance investigators and credit providers;
- (i) any business partner, investor, assignee or transferee (actual or prospective) to facilitate business asset transactions, including merger, acquisition or asset sale, involving CPC;
- (j) any relevant authorities, including regulatory bodies and/or law enforcement agencies, whether local or overseas;
- (k) to the extent necessary to comply with any laws, regulations, rules, directions, guidelines and other similar requirements;
- (l) anyone to whom we transfer or may transfer our rights and obligations; and
- (m) any other party as may be consented to by you.

3.3 If you engage us or we engage you for any work outside of Singapore or use our/your products and services outside of Singapore, you further acknowledge and agree that your Personal Data may be transferred outside of Singapore for those work, products or services to be provided, and you consent to our so transferring your Personal Data outside Singapore.

3.4 If you are an existing employee with us or with our vendor/sub-contractor/business partner, you further acknowledge and agree that your Personal Data may be transferred outside of Singapore to our overseas clients, related or affiliate companies for purposes of providing our products and services to such clients, and you consent to our so transferring your Personal Data outside Singapore.

3.5 Except for government agencies, statutory boards, local or foreign authorities or any public tenders that we have submitted through GeBiz which we deemed these parties will comply to PDPA 2012 or any applicable laws from time to time, we require that any other parties to whom we disclose Personal Data implement adequate levels of protection in order to protect Personal Data, and to only process Personal Data strictly for our intended purpose.

3.6 We will safeguard the confidentiality of all Personal Data provided (e.g. our employees, workers, clients, vendors, sub-contractors and any third parties not mentioned above), regardless of form or manner in which it had been provided to us. If we retain your Personal Data, it may be through a combination of physical and digital copies and reasonable steps will be taken to ensure that unauthorized access, misuse, modification or disclosure has been made impossible. Where we no longer hold or deem unnecessary to hold your Personal Data for any business or legal purposes, that particular Personal Data will be destroyed or disposed in a secure manner that protects the privacy of personal data.

#### 4. Use of Cookies

As with many other websites, when you visit our corporate website (www.cpc.com.sg), CPC may record anonymous information such as your IP address, time, date, page(s) accessed and operating system etc, if any. Unless you choose to disable them, If you continue to use our website, you will be deemed to have consented to the use of cookies, if any. You can change your browser setting to decline cookies.

**5. Do-No-Call (DNC) Provision**

CPC is complying with all provisions regarding the DNC (Do-Not-Call) Registry under the PDPA 2012. However, we do not make any "cold calls" for telemarketing activities.

**6. Data Protection and Security**

Protecting your Personal Data is a priority. While we will take the necessary steps and security arrangements to protect your personal data from unauthorized access, use or disclosure that you have provided to us, you should know that no method of transmission over the internet or electronic storage is completely secure. We cannot guarantee that we are immune from cyber-attacks such as hacking, spyware and viruses etc. Hence, by providing your personal data to us, you agree that you will not hold us liable for any unauthorized disclosure, loss or destruction of your Personal Data arising from such risks.

**7. Third Parties' Websites**

CPC's website might contain links to other websites operated by third-parties. By clicking the links through our website, you agree that you will not hold us responsible for the privacy practices for websites operated by the third-parties.

**8. Access, Update or Withdrawal of Consent of Your Personal Data**

8.1 You may request to review, access or change your Personal Data by writing to us through registered mail to our registered office address;

8.1.1 We are obliged under the PDPA 2012 to allow you access to your Personal Data of the past one year. However, to accede to your request, we may also need to verify your identity by checking your legal identification document such as NRIC or Passport;

8.1.2 We will endeavour to fulfill your request within 30 days with a reasonable administrative fee for processing the request, if applicable. If so, we will inform you of the fee to be charged to you before we processing your request.

8.1.3 If we are not able to fulfill your request within 30 days, we will notify you the additional time required;

8.2 We seek to ensure the accuracy of your Personal Data provided to us, please update us if there are changes to your personal data by informing us in writing to our registered office address.

8.3 If you wish to withdraw your consent for our use of your Personal Data, you may write in to us by giving us two weeks advance notice through registered mail to our registered office address;

8.3.1 Please note that the withdrawal of consent does not affect our rights to continue to collect, use and disclose personal data where such collection, use and disclose without consent is permitted or required under applicable laws of any jurisdiction or any terms and conditions.

8.4 Our registered office address is as follow:

Attention: Data Protection Officer

CPC Construction Pte. Ltd.

280 Woodlands Industrial Park E5

#09-20 Singapore 757322

**9 Updates of Policy**

- 9.3 This Policy will be reviewed and updated from time to time when there is amendment to the applicable laws, technology or changes to our business operations or environment.
- 9.4 CPC will publish the latest version to CPC's website.