



PRIVACY POLICY

OVERVIEW

This Privacy Policy outlines how CCK Solutions Private Limited collects, uses, maintains and discloses your Personal Data. CCK Solutions Private Limited safeguards your Personal Data in accordance with the Singapore Personal Data Protection Act (No. 26 of 2012) (“the Act”).

Please take a moment to read this Privacy Policy so that you know and understand the purposes for which we collect, use and disclose your Personal Data. This Privacy Policy supplements but does not supersede nor replace any other consents which 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 or disclose your Personal Data.

For the avoidance of doubt, this Privacy Policy forms a part of the terms and conditions governing your relationship with us and should be read in conjunction with the CCK Solutions Private Limited relevant terms and conditions.

YOUR CONSENT IS IMPORTANT

When you request information or sign up for our products and services, you may be required to provide us with your Personal Data. In doing so, you agree and consent to CCK Solutions Private Limited and its affiliates or related companies (collectively referred to herein as “CCK Solutions Private Limited”, “us”, “we” or “our”) as well as our respective agents, business partners, authorised service providers and relevant third parties collecting, using, disclosing and/or sharing your Personal Data in accordance with this Privacy Policy.

You have the choice, at any time, not to provide your Personal Data or to withdraw your consent to CCK Solutions Private Limited processing your Personal Data. However, do note that failure to provide such Personal Data or a withdrawal of your consent for us to process your Personal Data may result in CCK Solutions Private Limited being unable to provide you with effective and continuous products and services.

If you should withdraw your consent to the processing or handling of your Personal Data in respect of any purpose which we may reasonably consider to be essential in order for us to provide you with the products and/or services requested / applied for, we may not be in a position to continue to provide our products or services to you or administer any contractual relationship which may be in place between us. Furthermore, we shall be entitled to treat such withdrawal as your termination of any account / agreement which you may have with us, without prejudice to any rights and remedies which we may have at law against you.



Notwithstanding the generality of the foregoing and for avoidance of doubt, upon the termination or expiry of your contractual relationship with us (howsoever caused), we may still continue using or disclosing your Personal Data as may be necessary, required, authorised or permitted for compliance with applicable law or as may be requested by the relevant regulatory bodies, government agencies, statutory boards, administrative bodies, authorities or law enforcement agencies to comply with any laws, rules, guidelines and regulations or schemes to which we may be subject, whether situated locally or overseas.

In addition, there may be circumstances under applicable laws where we are permitted to collect, process and disclose your Personal Data without your consent.

WHAT TYPES OF PERSONAL DATA DO WE COLLECT?

In this Privacy Policy, “Personal Data” refers to 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, including data in our records as may be updated from time to time.

Examples of such Personal Data you may provide to us may include (depending on the nature of your interaction with us) your name, NRIC, passport or other identification number, telephone number(s), mailing address, email address and any other information relating to any individuals which you have provided us in any forms you may have submitted to us, or via other forms of interaction with you.

The Personal Data we collect can be either obligatory or voluntary. Obligatory Personal Data are those that we require in order to provide you with our products and services. If you do not provide us with obligatory Personal Data, we would not be able to provide you with our products and services. Voluntary Personal Data are those that are not mandatory in order for us to provide you with our products and services. If you do not provide us with voluntary Personal Data, you can still sign up for our products and services. Obligatory and voluntary Personal Data differ for each products and services and will be indicated in the application forms.

Apart from Personal Data, we may collect other types of information which is not related to an individual and which is anonymous. For example, the number of website visitors and the number of website users using a particular service. In this way, we hope to improve our customer services.

HOW DO WE COLLECT YOUR PERSONAL DATA?

Generally, we obtain your Personal Data in various ways, such as:

- when you submit application forms or other forms relating to any of our



products or services;

- when you use some of our services (including but not limited to websites, apps and any online accounts established with us);
- when you request that we contact you, be included in an email or other mailing list; or when you respond to our request for additional Personal Data, our promotions and other initiatives;
- when you sign up for or use one of the many services we provide or when you register an account at CCK Solutions Private Limited website;
- when you sign up for our seminars, events or webinars;
- when you contact us through various methods such as application forms, emails and letters, telephone calls and conversations you have with our staff in a branch. If you contact us or we contact you using telephone, we may monitor or record the phone call for quality assurance, training and security purposes;
- from our analysis of your transactions (including but not limited to payment history);
- when you participate in customer surveys or when you sign up for any of our competitions or promotions;
- when you submit a job application;
- when we receive references from business partners and third parties, for example, where you have been referred by them;
- when we seek information from third parties about you, for example, from your ex-employer and the relevant authorities; and
- when you submit your Personal Data to us for any other reasons.

PERSONAL DATA WE COLLECT FROM OUR WEBSITES

IP Address

An IP address is a number that is automatically assigned to your computer when you signed up with an Internet Service Provider. When you visit our website, your IP address is automatically logged in our server. We use your IP address to help diagnose problems with our server, and to administer our website. 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.

Information on Cookies

A cookie is an element of data that a website can send to your browser, which may then store it on your system. We use cookies in some of our pages to store visitors' preferences and record session information. The information that we collect is then used to ensure a more personalised service level for our users. You can adjust the settings on your browser so that you will be notified when you receive a cookie, or



to disable the cookies associated with our website. Please refer to your browser documentation to check if cookies have been enabled on your computer or to request not to receive cookies. Please note however that you may not be able to enter certain part(s) of our website, and some of the functions and services may not be able to function without cookies. This may also impact your user experience while on our website.

WHAT IS THE PURPOSE OF PROCESSING YOUR PERSONAL DATA?

Generally, CCK Solutions Private Limited collects, uses and discloses your Personal Data for the following purposes:

- providing a service and/or product to you;
- communicating with you on matters relating to your account relationship with us or your interest in our products and/or services;
- responding to your queries and requests;
- providing seminars, events or webinars to you
- managing the administrative and business operations of CCK Solutions Private Limited and complying with internal policies and procedures;
- matching any Personal Data held which relates to you for any of the purposes listed herein;
- resolving complaints and handling requests and enquiries;
- preventing, detecting and investigating crime, including fraud and money-laundering, and analyzing and managing commercial risks;
- providing media announcements and responses;
- meeting or complying with any applicable laws, regulations, directives, rules, codes of practice or guidelines issued by any legal or regulatory bodies which CCK Solutions Private Limited may be subject, whether local or overseas (including but not limited to disclosures to regulatory bodies, conducting audit checks, surveillance and investigation);
- legal purposes (including but not limited to obtaining legal advice and dispute resolution); and
- purposes which are reasonably related to the aforesaid.

Where permitted under the terms of the agreement which you have entered into with us and as part of the services which we provide to you, we may from time to time and at our discretion also use your contact particulars (including your phone number and email address) to contact you in order to provide you with information and/or updates which you are entitled to receive in accordance with the terms and conditions of our agreement with you on products and services.

If you are an employee of an external service provider of CCK Solutions Private Limited, CCK Solutions Private Limited also collects, uses and discloses your Personal Data for the following purposes:

- issuing building access pass and maintaining building security;
- managing project tenders;



CCK SOLUTIONS PRIVATE LIMITED

Your Compliance Consultancy Kit

- processing and payment of vendor invoices;
- profiling in media activities; and
- any other purpose reasonably related to any of the above.

If you submit an application to us as a candidate for an employment or representative position, CCK Solutions Private Limited also collects, uses and discloses your Personal Data for the following purposes:

- conducting interviews;
- processing your application (including pre-recruitment checks involving your qualifications);
- providing or obtaining employee references and for background screening;
- evaluating and assessing your suitability for the position applied for; and
- any other purposes reasonably related to any of the above.

Where permitted under the Act, CCK Solutions Private Limited may also collect, use and disclose your Personal Data as follows:

- administering products and/or services offered (including but not limited to the maintenance, management and operation of the products and services, communication with clients, and processing of any receipts and/or payments arising under the account relationship);
- providing cross-referrals to its affiliates or related companies;
- conducting analytics with regard to products and services which you might be interested in;
- organising promotional events and corporate social responsibility projects (including but not limited to taking pictures and recording your video/audio feedback and testimony in relation thereto);
- providing services, products and benefits to you, including promotions and reward programmes;
- matching Personal Data with other data collected for other purposes and from other sources (including third parties) in connection with the provision or offering of products and services, by CCK Solutions Private Limited;
- sending you details of products, services, special offers and rewards, either to our customers generally, or which we have identified may be of interest to you; and
- conducting market research, understanding and determining customer location, preferences and demographics for us to review, develop and improve our products, services and also develop special offers and marketing programmes.

If you have provided your Singapore telephone number(s) and have indicated that you consent to receiving marketing or promotional information via your Singapore telephone number(s), then from time to time, CCK Solutions Private Limited may contact you using such Singapore telephone number(s) (including via voice calls, text, fax or other means) with information about our products and services (including discounts and special offers).



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, we will collect, use and disclose your Personal Data for these additional purposes as well, unless we have specifically notified you otherwise.

You have a choice to withdraw your consent for receiving marketing or promotional materials/communication. You may contact us using the contact details found below.

Please be aware that once we receive confirmation that you wish to withdraw your consent for marketing or promotional materials/communication, we will require some time to process your withdrawal request. During this period of time you may still receive marketing or promotional materials/communication. Please note that even if you withdraw your consent for the receipt of marketing or promotional materials, we may still contact you for other purposes in relation to the accounts, facilities or services that you hold or have subscribed to with CCK Solutions Private Limited.