Ark Industries Data Protection Policy

This Data Protection Policy (the "**Policy**") applies to the collection, use and disclosure of an individual customer's Personal Data (hereinafter defined) arising from goods and/or services offered by Ark Industries.

1. General

1.1. This Policy statement provides information on the obligations and policies of Ark Industries in respect of an individual customer's Personal Data. Ark Industries undertakes to use reasonable efforts in applying, where practicable, those principles and the processes set out herein to its operations.

1.2. Ark Industries' officers, management, and members of staff shall use reasonable endeavours to respect the confidentiality of and keep safe any and all Personal Data collected and/or stored and/or disclosed and/or used for, or on behalf of, Ark Industries. Ark Industries shall use reasonable endeavours to ensure that all collection and/or storage and/or disclosure and/or usage of Personal Data by Ark Industries shall be done in an appropriate manner and in accordance with the Act and this Policy.

1.3. By interacting with us, submitting information to us, or signing up for any products or services offered by us, you agree and consent to Ark Industries as well as to its respective representatives and/or agents ("Representatives") (collectively referred to herein as "Ark Industries", "us", "we" or "our") collecting, using, disclosing and sharing amongst themselves your Personal Data, and disclosing such Personal Data to Ark Industries' authorised service providers and relevant third parties in the manner set forth in this Data Protection Policy.

1.4. 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 or disclose your Personal Data.

1.5. For the purposes of this Policy, in line with the provisions under the *Singapore Personal Data Protection Act 2012 (No. 26 of 2012)* (the "**Act**"), "**Personal Data**" shall mean data, whether true or not, about an individual customer who can be identified — from that data; or from that data and other information which an organisation has or is likely to have access. Such Personal Data shall also refer to that which is already in the possession of Ark Industries or that which shall be collected by Ark Industries in future.

2. Contacting the Data Protection Officer

2.1. Where you legitimately request access to and/or correction of Personal Data relating to you, such Personal Data which is in the possession and control of Ark Industries, Ark Industries

shall provide and/or correct that data in a reasonable time and manner in accordance with its standard procedures as stated hereinafter.

2.2. In accordance with the Act, Ark Industries has established a process for receiving and responding to any query or complaint that may arise with respect to the application of this Act. To ensure that Ark Industries receives your complaints and enquiries, please send the same *via* email to the Data Protection Officer, Mr Marc Gan (the "**DPO**") of Ark Industries at the following email address: dpo@ark.sg

2.3. Please note that if your personal data has been provided to us by a third party (e.g. a friend via a referral process), you should contact that individual to make such queries, complaints, and access and correction requests to Ark Industries on your behalf.

2.4. Should you not wish Ark Industries to use your Personal Data for any of the purposes listed in Clauses 3.2 to 3.4, or not to receive promotional materials from Ark Industries, you may opt out by sending a clearly worded email to the DPO via the email address provided in Clause 2.2. Your request shall be processed within a reasonable time.

3. Statement of Practices

Types of Personal Data Collected:

3.1. As part of its day-to-day activity, Ark Industries may collect from you, through various means, including *via* our websites, smart phone applications, marketing events such as road shows, exhibitions and any forms used by Ark Industries from time to time, some or all of the following Personal Data:

- Name (first and surname);
- Postal Address;
- Phone number (including mobile);
- Office number;
- Fax number;
- Email address;
- Bank account/credit card details;
- Gender;
- Personal Data of your emergency contacts;
- IP addresses; and
- Photographs and images.

Cookies

We use cookies on our websites to track website visitorship and experience. Most web browsers are designed to accept cookies. If you do not wish to receive any cookies, you may set your browser to refuse it.

Purpose of Collection of Personal Data

3.2. The above Personal Data mentioned in Clause 3.1 is collected for the purposes of processing your order and the application and registration of your membership; to ascertain if you are eligible for discounts, privileges or benefits or other related purposes; to conduct market research and analysis; for direct marketing through voice calls; text messages; email; direct mail and facsimile messages; for payment and/or credit control purposes; to notify you of any changes to our policies or services which may affect you; to respond to queries and feedback; maintaining and updating your membership details; and informing you of new developments, services, promotions of Ark Industries and other third parties which we are associated with.

Disclosure of Personal Data

3.3. In order to carry out the functions described above, Ark Industries may, from time to time, disclose your Personal Data between Ark Industries' companies.

3.4. Without derogating from any of the above, Ark Industries may also disclose your Personal Data to the following third parties:

- Regulators and law enforcement officials;
- Lawyers;
- Auditors;
- Third party service providers and consultants;
- Credit, debit and charge card companies, banks and other entities processing payment;
- Potential buyers or investors of Ark Industries or any of Ark Industries' companies; and
- Any agent or subcontractor acting on Ark Industries' behalf for the provision of Ark Industries' services.

3.5 Ark Industries may disclose your Personal Data to the abovementioned parties also in the occurrence of any of the following events:

- To the extent that Ark Industries is required to do so by the law;
- In connection with any legal proceedings or prospective legal proceedings;
- To establish, exercise or defend Ark Industries' legal rights;
- To the purchaser (or prospective purchaser) of any business or asset which Ark Industries is (or is contemplating) selling;
- To any person and/or entity for the purpose of processing such information on Ark Industries' behalf;
- To third parties who provide services to Ark Industries or on its behalf;
- To any third party that purchases Ark Industries or Ark Industries' business or any part of Ark Industries or Ark Industries' business;
- With your consent; and

- For the purposes of disaster recovery.

Optional Provision of Personal Data

3.6 In some instances, you may also be requested to provide certain Personal Data that may be used to further improve Ark Industries' products and services and/or better tailor the type of information presented to you. In most cases, this type of data is optional although, where the requested service is a personalised service, or provision of a product or dependent on your providing all requested data, failure to provide the requested data may prevent Ark Industries from providing the service to you. This type of data includes, but is not limited to:

- Your age;
- Gender;
- Salary range and employment details;
- Education and Profession;
- Hobbies and leisure activities;
- Other related products and services subscribed to; and
- Family and household demographics.

7. Under certain circumstances, telephone calls made to any of Ark Industries' companies to order and/or service hotlines and/or inquiry telephone numbers are recorded for the purposes of quality control, appraisal, as well as staff management and development. In such an event, by agreeing to this Policy, you hereby give your clear and unambiguous consent for the collection, use and disclosure of such Personal Data in accordance to this Policy.

4. Transfer of Personal Data Overseas

Your Personal Data may be processed by Ark Industries, its affiliates, agents and third parties providing services to Ark Industries, in jurisdictions outside of Singapore. In this event Ark Industries will comply with the terms of the Act.

5. Accuracy of Personal Data

Where possible, Ark Industries will validate data provided using generally accepted practices and guidelines. This includes the use of check sum verification on some numeric fields such as account numbers or credit card numbers. In some instances, Ark Industries is able to validate the data provided against pre-existing data held by Ark Industries. In some cases, Ark Industries is required to see original documentation before we may use the Personal Data such as with Personal Identifiers and/or proof of address. To assist in ensuring the accuracy of your Personal Data in the possession of Ark Industries, please inform us of any updates of any parts of your Personal Data by sending a clearly worded email to the DPO at the email address provided at Section 2.2.

6. Protection of Personal Data

Ark Industries uses commercially reasonable physical, managerial, and technical safeguards to preserve the integrity and security of your Personal Data and will not knowingly allow access to this data to anyone outside Ark Industries, other than to you or as described in this Policy. However, Ark Industries cannot ensure or warrant the security of any information you transmit to Ark Industries and you do so entirely at your own risk. In particular, Ark Industries does not warrant that such information may not be accessed, altered, collected, copied, destroyed, disposed of, disclosed or modified by breach of any of Ark Industries' physical, technical, or managerial safeguards.

7. Access and Correction of Personal Data

1. In accordance with Clause 2.1 of this Policy, you have the right to:

a) check whether Ark Industries holds any Personal Data relating to you and, if so, obtain copies of such data; and
b) require Ark Industries to correct any Personal Data relating to you which is inaccurate for the purpose for which it is being used.

7.2 Ark Industries reserves the right to charge a reasonable administrative fee in order to meet your requests under Clause 7.1. Upon payment of the requisite fee, your request shall be processed within a reasonable time.

7.3 If you wish to verify the details you have submitted to Ark Industries or if you wish to check on the manner in which Ark Industries uses and processes your personal data, Ark Industries' security procedures mean that Ark Industries may request proof of identity before we reveal information. This proof of identity will take the form of full details of name, membership number and NRIC or Passport or Fin number.

8. Storage and Retention of Personal Data

Ark Industries will delete, as reasonably possible, or otherwise anonymise any Personal Data in the event that the Personal Data is not required for any reasonable business or legal purposes of Ark Industries and where the Personal Data is deleted from Ark Industries' electronic, manual, and other filing systems in accordance with Ark Industries' internal procedures and/or other agreements.

9. Contacting you

To the extent that any of the communication means which you have provided Ark Industries with (which may include, your telephone number and fax number) is/will be listed on the Do Not Call Registry (the "DNC"), by agreeing to this Policy through your checking the agree box on the contact form page, or by any other means of indication, you hereby grant Ark Industries your clear and unambiguous consent to contact you using all of your communication means you have provided to Ark Industries including using via voice calls, SMS, Whatsapp, MMS, fax or other similar communications applications or methods,

for the purposes as stated above in Paragraph 3.2. This will ensure your continued enjoyment of Ark Industries' promotional rates and services

10. Change Policy

Ark Industries reserve the right to alter any of the clauses contained herein in compliance with local legislation and/or to meet its global policy requirements, and for any other purpose deemed reasonably necessary by Ark Industries. You should look at these terms regularly. If you do not agree to the modified terms, you should inform us as soon as possible of the terms to which you do not consent. Pending such notice, if there is any inconsistency between these terms and the additional terms, the additional terms will prevail to the extent of the inconsistency.

11. Governing Law

This Policy is governed by and shall be construed in accordance with the laws of Singapore. You hereby submit to the non-exclusive jurisdiction of the Singapore courts.

12. Miscellaneous

12.1 This Policy only applies to the collection and use of Personal Data by Ark Industries. It does not cover third party sites to which we provide links, even if such sites are co-branded with our logo. Ark Industries does not share your Personal Data with third party websites. Ark Industries is not responsible for the privacy and conduct practices of these third party websites, so you should read their own privacy policies or data protection policies before disclosure of any Personal Data to these websites.

12.2 Ark Industries will not sell your personal information to any third party without your permission, but we cannot be responsible or held liable for the actions of third party sites which you may have linked or been directed to Ark Industries' website.

12.3 Ark Industries' websites do not target and are not intended to attract children under the age of 18 years old. Ark Industries does not knowingly solicit personal information from children under the age of 18 years old or send them requests for personal data.