

Globibo DATA PROTECTION POLICY

At Globibo, we take our responsibilities under Local Personal Data Protection Acts very seriously. We also recognise the importance of the personal data you have entrusted to us and are committed to properly manage, protect and process your personal data.

This Data Protection Policy is designed to help you understand how we collect, use, disclose and/or process your personal data as well as to assist you in making an informed decision before providing us with your personal data. If you give us personal data of someone else, please provide them a copy of our policy so that they may understand the manner in which their personal data may be collected, used, disclosed and/or processed by us in connection with dealings with Globibo.

If you have any queries on this policy or in relation to how we may manage, protect and/or process personal data provided to us, please contact our Data Protection Officer (the "DPO") listed on our Web Site.

1 INTRODUCTION TO THE PDPA

1.1 "Personal Data" is defined under the PDPA to mean data, whether true or not, about an individual who can be identified from that data, or from that data and other information to which an organisation has or is likely to have access. Common examples of personal data could include names, identification numbers, contact information, medical records, photographs and video images.

1.2 We will collect personal data provided to us in accordance with the PDPA. We will notify you of the purposes for which personal data may be collected, used, disclosed and/or processed, as well as obtain the necessary consent(s) for the collection, use, disclosure and/or processing of personal data provided to us for the intended purposes, unless an exception under the law permits us to collect, process and/or disclose personal data without consent.

2 PURPOSES FOR COLLECTION, USE, DISCLOSURE AND PROCESSING OF PERSONAL DATA

2.1 The personal data which we collect from you may be collected, used, disclosed and/or processed for various purposes, depending on the circumstances for which we may/will need to process personal data.

2.2 Where you are a corporate entity, such personal data may include information about your directors, officers, employees, beneficial owners, partners, members, authorised signatories, representatives, agents, guarantors, other security providers and other natural persons related to you (collectively all of the foregoing who are natural persons, "Related Persons").

2.3 The purposes for which we have been collecting, using, disclosing and processing your or your Related Person's personal data include:

- a) considering how we can provide you or your Related Person with services;
- b) processing, administering, managing, maintaining and/or operation of the services;
- c) carrying out your or your Related Person's instructions or responding to any enquiry purporting to be given by you or on your behalf;
- d) dealing in any matters relating to the services, facilities and/or your account, (in doing or carrying out the aforesaid, communicating with you or your Related Persons by various modes of communication including but not limited to SMSes, emails, telephone calls, facsimile messages, the mailing of correspondence, statements, invoices, reports or notices to you or your Related Persons, which could involve disclosure of certain personal data about you or your Related Persons to bring about delivery of the same as well as on the external cover of envelopes or mail packages);
- e) to carry out or perform administrative, operational and technology tasks (including technology infrastructure maintenance and support, application maintenance and support, risk management, systems development and testing, business continuity management, quality assurance surveys, and market customer satisfaction research);
- f) complying with any applicable law, governmental or regulatory requirements of any relevant jurisdiction, including meeting the requirements to make disclosure under the requirements of any law binding on us or any of our branches or under and for the purposes of any guidelines issued by regulatory or other authorities with which we or any of our branches are expected to comply. This may include where disclosure and processing is by agreements with government agencies or local revenue authorities, to make inquiries about your or your Related Persons' status;
- g) providing and sending you or your Related Persons marketing materials and/or documents, via any communication to your or your Related Persons' postal or email addresses, or via electronic messages, SMSes, voice calls and/or facsimiles to your or your Related Persons' telephone numbers (based on our records), such messages to these telephone numbers only being sent in accordance with the requirements of the PDPA, relating to the benefits programme, or any other products or services provided, promoted or marketed by us and/or our authorised merchants and agents where you or your Related Persons have separately provided consent to us in relation thereto;
- h) security and/or verification and in this regard, we may put in place measures to achieve the aforesaid such as closed-circuit television (CCTV) systems on our premises, which would capture your or your Related Persons' image and speech when you or your Related Persons are on our premises; audio recordings of your or your Related Persons' instructions or conversations over the telephone or during face to face communications with our staff; and
- i) any other purposes which we notify you of at the time of obtaining your consent. (collectively, the "Purposes")
- j) As the purposes for which we may/will collect, use, disclose or process personal data provided may also depend on the circumstances at hand, such purpose may not appear above. However, we will notify you of such other purpose at the time of obtaining the necessary consent(s), unless processing of personal data without consent is permitted by Policies or by law.

2.4 In order to conduct our business operations more smoothly, we may be disclosing the personal data you have provided to us to our third party service providers, agents and/or our affiliates or related corporations, and/or other third parties whether sited in Singapore or outside of Singapore, for one or more of the abovestated Purposes. Such third party service providers, agents and/or affiliates or related corporations and/or other third parties would be processing your personal data either on our behalf or otherwise, for one or more of the above-stated Purposes.

3 SPECIFIC ISSUES FOR THE DISCLOSURE OF PERSONAL DATA TO THIRD PARTIES

3.1 We respect the confidentiality of the personal data you have provided to us.

3.2 In that regard, we will not disclose personal data provided to us to third parties without first obtaining the

relevant consent(s) permitting us to do so. However, please note that we may disclose the personal data you provided to third parties without first obtaining your consent in certain situations, including, without limitation, the following :

- a) cases in which the disclosure is required or authorised based on the applicable laws and/or regulations;
- b) cases in which the purpose of such disclosure is clearly in your interests, and if consent cannot be obtained in a timely way;
- c) cases in which the disclosure is necessary to respond to an emergency that threatens the life, health or safety of yourself or another individual;
- d) cases in which the disclosure is necessary for any investigation or proceedings;
- e) cases in which the personal data is disclosed to any officer of a prescribed law enforcement agency, upon production of written authorisation signed by the head or director of that law enforcement agency or a person of a similar rank, certifying that the personal data is necessary for the purposes of the functions or duties of the officer;
- f) cases in which the disclosure is to a public agency and such disclosure is necessary in the public interest; and/or
- g) where such disclosure without your consent is permitted by the Policies or by law.

The instances listed above at paragraph 3.2 are not intended to be exhaustive. For more information on the exceptions, you are encouraged to peruse the details of the local Personal Data Privacy Policies. Where we disclose personal data you provided to third parties with your consent, we require such third parties to protect the personal data.

4 REQUEST FOR ACCESS AND/OR CORRECTION OF PERSONAL DATA

4.1 You may request to access and/or correct the personal data currently in our possession or control by submitting a written request to us. We will need enough information from you in order to ascertain your identity as well as the nature of your request, so as to be able to process your request.

4.2 For a request to correct personal data, once we have sufficient information from you to process the request, we will correct your personal data within 30 days. Where we are unable to do so within the said 30 days, we will notify you of the soonest practicable time within which we can make the correction. Please note that the Policy Acts exempt certain types of personal data from being subject to your correction request.

4.3 We will also be charging you a service fee for the handling and processing of your requests to access your personal data. We will provide you with a written estimate of the fee we will be charging. Please note that we are not required to respond to or process your access request unless you have agreed to pay the fee.

5 REQUEST TO WITHDRAW CONSENT

5.1 You may withdraw your consent for the collection, use and/or disclosure of your personal data in our possession or under our control.

5.2 We will process your request within 30 days from such a request for withdrawal of consent being made, and will thereafter not collect, use and/or disclose your personal data in the manner stated in your request.

5.3 However, your withdrawal of consent could result in certain legal consequences arising from such withdrawal. In this regard, depending on the extent of your withdrawal of consent for us to process your personal data, it may mean that we will not be able to continue your existing relationship with us.

6 ADMINISTRATION AND MANAGEMENT OF PERSONAL DATA

6.1 We will take reasonable efforts to ensure that the personal data you provided is reflected accurately and completely, if your personal data is likely to be used by ANZ to make a decision that affects you, or disclosed to another organisation. However, this means that you must also update us of any changes in relation to personal data that you had initially provided us with. We will not be responsible for relying on inaccurate or incomplete personal data arising from you not updating us of any changes in the personal data that you had initially provided us with.

6.2 We will also put in place reasonable security arrangements to ensure that the provided personal data is adequately protected and secured. Appropriate security arrangements will be taken to prevent any unauthorised access, collection, use, disclosure, copying, modification, leakage, loss, damage and/or alteration of the personal data provided. However, we cannot assume responsibility for any unauthorised use of such personal data by third parties which are wholly attributable to factors beyond our control.

6.3 We will also put in place measures such that personal data you provided in our possession or under our control is destroyed and/or anonymised as soon as it is reasonable to assume that (i) the purpose for which that personal data was collected is no longer being served by the retention of such personal data; and (ii) retention is no longer necessary for any other legal or business purposes.

6.4 Where personal data you provided is to be transferred out of your country, we will comply with the Personal Data Privacy Act in doing so. In this regard, this includes us obtaining the necessary consent(s) unless an exception under the Acts or laws apply, and taking appropriate steps to ascertain that the foreign recipient organisation of the personal data is bound by legally enforceable obligations to provide to the transferred personal data a standard of protection that is at least comparable to the protection under the Act. This may include us entering into an appropriate contract with the foreign recipient organisation dealing with the personal data transfer or permitting the personal data transfer without such a contract if the PDPA or law permits us to.

7 FEEDBACK PROCESS

7.1 If you have any feedback or questions regarding how we are handling the personal data you have provided, please contact our Data Protection Officer through one of the modes listed on our Web Site:

8 UPDATES ON DATA PROTECTION POLICY

8.1 As part of our efforts to ensure that we properly manage, protect and process personal data provided to us, we will be reviewing our policies, procedures and processes from time to time.

8.2 We reserve the right to amend the terms of this Data Protection Policy at our absolute discretion. Any amended Data Protection Policy will be posted on our website.

8.3 You are encouraged to visit the above website from time to time to ensure that you are well informed of our latest policies in relation to personal data protection.

Last updated on January 2015