

RAJAH & TANN SINGAPORE LLP DATA PROTECTION POLICY

1 ABOUT RAJAH & TANN'S DATA PROTECTION POLICY

1.1 We at Rajah & Tann Singapore LLP take our responsibilities under Singapore's Personal Data Protection Act 2012, any regulations enacted thereunder, and any guidelines that may be issued from time to time by the Personal Data Protection Commission (collectively, the "PDPA") seriously. We also recognize the importance of the personal data you have entrusted to us and believe that it is our responsibility to properly manage, protect and process your personal data.

1.2 This Data Protection Policy is designed to assist you in understanding how we collect, use, disclose and/or process the personal data you have provided to us, as well as to assist you in making an informed decision before providing us with any of your personal data.

1.3 If you, at any time, wish to:

- send us any queries on this policy or on how we may manage, protect and/or process your personal data;
- withdraw your consent for us to collect, use and/or disclose your personal data; or
- exercise your statutory rights under the PDPA in relation to access or correction of your personal data in our control or possession,

Please do not hesitate to contact our Data Protection Officer (the "DPO") at:

(a) E-mail : dpo@rajahtann.com

Attention it to the 'Data Protection Officer'.

(b) Office address : 9 Battery Road,
#25-01 Straits Trading Building
Singapore 049910.

Attention it to the 'Data Protection Officer'

Please indicate in the subject header what is the nature of your query (e.g. If it is relating to an access request, you may insert the words "PDPA Access Request" in the subject header).

2 INTRODUCTION TO THE PDPA

2.1 "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.

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

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

3.1 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 your personal data, including:

(a) the provision of legal services to you;

(b) complying with or as required by any request or direction of any governmental authority; or responding to requests for information from public agencies, ministries, statutory boards or other similar authorities (including but not limited to the Ministry of Defence, Ministry of Education, Immigration and Checkpoints Authority and Ministry of Health). For the avoidance of doubt, this means that we may/will disclose your personal data to the aforementioned parties upon their request or direction;

(c) conducting research, analysis and development activities (including but not limited to data analytics, surveys and/or profiling) to improve our services and facilities in order to enhance your relationship with us or for your benefit, or to improve any of our services for your benefit;

(d) storing, hosting, backing up (whether for disaster recovery or otherwise) of your personal data, whether within or outside Singapore;

(e) responding to complaints, queries and/or requests;

(f) sending you information about any administrative changes, updates and/or amendments to our policies, terms and conditions;

(g) organising seminars, events or other marketing / promotional activities; and/or

(h) any other purposes which we notify you of at the time of obtaining your consent.

(collectively, the "**Purposes**")

As the purposes for which we may/will collect, use, disclose or process your personal data 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 your consent, unless processing of your personal data without your consent is permitted by the PDPA or by law.

3.2 In order to conduct our business operations more smoothly, we may also 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 above-stated 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.

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

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

4.2 In that regard, we will not disclose your personal data to third parties without first obtaining your consent permitting us to do so. However, please note that we may disclose your personal data to third parties without first obtaining your consent in certain situations. For more information on the exceptions, you are encouraged to peruse the Second, Third and Fourth Schedules of the PDPA which is publicly available at <http://statutes.agc.gov.sg>.

4.3 Where we disclose your personal data to third parties with your consent, we will employ our best efforts to require such third parties to protect your personal data.

5 ADMINISTRATION AND MANAGEMENT OF PERSONAL DATA

5.1 We will take reasonable efforts to ensure that your personal data is accurate and complete, if your personal data is likely to be used by us 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 your personal data that you had initially provided us with. We will not be responsible for relying on inaccurate or incomplete personal data arising from your not updating us of any changes in your personal data that you had initially provided us with.

5.2 We will also put in place reasonable security arrangements to ensure that your personal data is adequately protected and secured. Appropriate security arrangements will be taken to prevent any

unauthorized access, collection, use, disclosure, copying, modification, leakage, loss, damage and/or alteration of your personal data. However, we cannot assume responsibility for any unauthorized use of your personal data by third parties which are wholly attributable to factors beyond our control.

5.3 We will also put in place measures such that your personal data in our possession or under our control is destroyed and/or anonymized 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.

5.4 Where your personal data is to be transferred out of Singapore, we will comply with the PDPA in doing so. In this regard, this includes us obtaining your consent unless an exception under the PDPA or law applies, 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.

6 COMPLAINT PROCESS

6.1 If you have any complaint or grievance regarding about how we are handling your personal data or about how we are complying with the PDPA, we welcome you to contact us with your complaint or grievance.

6.2 Please contact us through one of the methods as outlined above in paragraph 1.3 with your complaint or grievance. For your ease of reference, we set out the same information here:

(a) E-mail : dpo@rajahtann.com

Attention it to the 'Data Protection Officer'.

(b) Office address : 9 Battery Road,

#25-01 Straits Trading Building

Singapore 049910 .

Attention it to the 'Data Protection Officer'

6.3 Where it is an email or a letter through which you are submitting a complaint, your indication at the subject header that it is a PDPA complaint would assist us in attending to your complaint speedily by passing it on to the relevant staff in our organisation to handle. For example, you could insert the subject header as "PDPA Complaint".

6.4 We will certainly strive to deal with any complaint or grievance that you may have speedily and fairly.

7 UPDATES ON DATA PROTECTION POLICY

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

7.2 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 and can be viewed at www.rajahtann.com.

7.3 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 2 July 2014

