

GRP Limited and its Subsidiaries
Management of the Personal Data Protection Policy

1. Purpose of This Policy

- 1.1 The purpose of this policy is to inform you of how GRP Limited and its subsidiaries (the “**GRP Group**”) manages Personal Data (as defined below) which is subject to the Singapore Personal Data Protection Act (No 26 of 2012) (“**the Act**” or “**PDPA**”); and/or laws of the Country of Operation of the subsidiary.

Please take a moment to read this Data Protection Policy so that you know and understand the purposes for which we collect, use and disclose your Personal Data.

By interacting with us, submitting information to us, purchasing or using our products and services offered by us (“**Products and Services**”), you agree and consent to GRP Group (including its related corporations) (collectively, the “**Companies**”) collecting, using and sharing amongst themselves your Personal Data, and disclosing such Personal Data to the Companies’ authorized service providers and relevant third parties in the manner set forth in this Data Protection Policy.

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

GRP Group may from time to time update this Data Protection Policy to ensure that this Data Protection Policy is consistent with our future developments, industry trends and/or any changes in legal or regulatory requirements. Subject to your rights at law, you agree to be bound by the prevailing terms of this Data Protection Policy as updated from time to time on our website www.grp.com.sg. Please check back regularly for updated information on the handling of your Personal Data.

2. Personal Data

- 2.1 This Data Protection Policy, “**Personal Data**” refers to any data, whether true or not, about an individual who can be identified from that data; or from that data and other information to which we have, including data in our records as may be updated from time to time.
- 2.2 Examples of such Personal Data you may have provide to us 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 may have provided us in any forms you may have submitted to us, or via other methods of our interaction with you.

- 2.3 Please note that the Data Protection provisions of the PDPA do not apply to business contact information ("BCI"). BCI is defined in the PDPA as an individual's name, position, name or title, business telephone number, business address, business electronic mail address or business fax number and any other similar information about the individual, not provided by the individual solely for his personal purposes.

3. Collection of Personal Data

- 3.1 Generally, we collect Personal Data in the following ways:

- (a) when you submit any form, including but not limited to application and registration forms or other forms relating to any of our Products or Services;
- (b) when you enter into any agreement or provide other documentation or information in respect of your interactions with us, or when you use our Products or Services;
- (c) when you interact with our staff, including Sales Engineer, for example, via telephone calls (which may be recorded), letters, face-to-face meetings, social media platforms and emails;
- (d) when you use our electronic services, or interact with us via our websites, and apps or use services on our websites;
- (e) when you request that we contact you or request that you be included in an email or other mailing list;
- (f) when you respond to our promotions, initiatives or to any request for additional Personal Data;
- (g) when you submit an employment application or when you provide documents or information including your resume and/or CVs in connection with any appointment as an officer, director, representative or any other position;
- (h) when your images are captured by us via CCTV cameras or face recognition system while you are within our premises, or via photographs or videos taken by us or our representatives when you attend events at our premises;

Version: 1

Date: December 2024

- (i) when you are contacted by, and respond to, our marketing representatives and Sales Engineers;
 - (j) when we receive references from our business partners and third parties, for example, where you have been referred by them with your consent;
 - (k) when we seek information from third parties about you and receive your Personal Data in connection with your relationship with us, including our Products and Services or job applications, for example, from business partners, public agencies, your ex-employer, referral intermediaries and the relevant authorities; and/or
 - (l) when you submit your Personal Data to us for any other reasons.
- 3.2 When you browse our website, you generally do so anonymously but please see the section 6 below on cookies.
- 3.3 If you provide us with any Personal Data relating to a third party (e.g. information of your spouse, children, parents and/or employees), by submitting such information to us, you represent to us that you have obtained the consent of the third party to provide us with their Personal Data for the respective purposes.
- 3.4 You should ensure that all Personal Data submitted to us is complete, accurate, true and correct. Failure on your part to do so may result in our inability to provide you with the Products and Services you have requested, or delays in processing your applications.

4. Purposes for the Collection, Use and Disclosure of Your Personal Data

- 4.1 Generally, GRP Group collects, uses, processes and discloses your Personal Data for the following specific purposes on basis of the consent given (where applicable) for:
- (a) transacting with you and providing our Products and Services;
 - (b) responding to your queries, feedback, complaints and requests;
 - (c) managing the administrative and business operations of GRP Group and complying with internal policies, reporting requirements and procedures;
 - (d) facilitating business asset transactions (which may extend to any mergers, acquisitions or asset sales) involving any of the Companies;
 - (e) requesting feedback or participation in surveys, as well as conducting market research and/or analysis for statistical, profiling or other purposes for us to design our Products; understand customer behavior and

preferences and market trends; and to review, develop and improve the quality of our Products and Services;

- (f) monitoring or recording phone calls and customer-facing interactions for quality assurance, employee training and performance evaluation and identity verification purposes;
- (g) matching any Personal Data held which relates to you for any of the purposes listed herein;
- (h) preventing, detecting and investigating crime and analyzing and managing commercial risks;
- (i) managing the safety and security of our premises and services (including but not limited to carrying out CCTV surveillance and conducting security clearances);
- (j) hosting, storing or backing-up your Personal Data, which may be on third party servers or data clouds;
- (k) legal purposes in connection with any claims, actions or proceedings (including but not limited to drafting and reviewing documents, transaction documentation, obtaining legal advice, and facilitating dispute resolution), and/or protecting and enforcing our contractual and legal rights and obligations;
- (l) our legitimate and/or lawful interests pursued by us or third parties appointed by us. When we rely on such a legitimate and/or lawful interest as a basis, we will conduct an assessment and such interests include (but are not limited to) providing Products or Services that you have contracted with us for or have requested from us in, responding to queries that you may have of us, managing or administering the business relationship between you and us;
- (m) conducting investigations relating to disputes, billing or fraud;
- (n) meeting or complying with any applicable rules, laws, regulations, codes of practice or guidelines issued by any legal, statutory or regulatory bodies which are binding on GRP Group (including but not limited to responding to regulatory complaints, disclosing to regulatory bodies, disclosures required in the public interest or emergencies and conducting audit checks, due diligence and investigations which may be carried out by statutory authorities); and/or
- (o) purposes which are reasonably related to the aforesaid.

Version: 1

Date: December 2024

- 4.2 In addition, GRP Group collects, uses and discloses your Personal Data for the following purposes:
- a. If you are a visitor to our office premises:
 - (i) Facilities management (including but not limited to issuing visitor access passes, and recording entries to and exits from our premises);
 - (ii) Providing services and facilities; and/or
 - (iii) Purposes which are reasonably related to the aforesaid.
 - b. If you are an employee, officer or owner of an external service provider or vendor outsourced or prospected by GRP Group:
 - (i) assessing your suitability as an external service provider or vendor for GRP Group;
 - (ii) managing project tenders and quotations, processing orders or managing the supply of goods and services;
 - (iii) managing business operations and product development; and/or
 - (iv) purposes which are reasonably related to the aforesaid.
 - c. If you submit an application to us as a candidate for an employment:
 - (i) conducting interviews;
 - (ii) processing your application (including but not limited to pre-recruitment checks involving your qualifications and facilitating interviews);
 - (iii) providing or obtaining references and for background screening;
 - (iv) assessing your suitability for the position applied for;
 - (v) onboarding successful candidates and facilitating human resource planning and management; and/or
 - (vi) purposes which are reasonably related to the aforesaid.
 - d. If you are shareholder of GRP Group:
 - (i) onboarding or facilitating your appointment as a shareholder, including the verification of your identity and/or the identity of your proxy (as may be applicable);
 - (ii) maintaining statutory registers and to manage the publication and dissemination of shareholder statistics on annual reports, newsletters and circulars; and/or
 - (iii) purposes which are reasonably related to the aforesaid.
- 4.3 Furthermore, where permitted under the Act, GRP Group may also collect, use and disclose your Personal Data for the following “GRP Group Additional Purposes”:

- (a) invitations to exhibitions, seminars and similar events, and organizing promotions and corporate social responsibility projects;
- (b) providing additional Product and Services and benefits to you, including promotions, loyalty and reward programs;
- (c) matching Personal Data with other data collected for other purposes and from other sources (including third parties) in connection with the provision, marketing or offering of Products and Services, whether by GRP Group or other third parties;
- (d) administering contests and competitions and marketing campaigns;
- (e) communicating to advertisements and promotions involving details of our Products and Services, special offers and rewards, either to our customers generally, or which we have identified may be of interest to you (including but not limited to upselling, cross selling and telemarketing);
- (f) conducting market research, understanding and analyzing customer behavior, location, preferences and demographics for us to offer you products and services as well as special offers and marketing programs which may be relevant to your preferences and profile; and/or
- (g) purposes which are reasonably related to the aforesaid.

In addition, where permitted under the Act and subject to the provisions of any applicable law, your Personal Data may be disclosed for GRP Group Additional Purposes, to the vendors or other third-party service providers in connection with promotions and services offered by GRP Group.

- 4.4 In relation to particular products and 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.
- 4.5 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.
- 4.6 Please be aware that once we receive confirmation that you wish to withdraw your consent for marketing or promotional materials/communication, it may take up to 30 working days for your withdrawal to be reflected in our systems. Therefore, you may still receive marketing or promotional materials/communication during this period of time. 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 the products and services that you have requested from GRP Group.

5. Disclosure of Personal Data

5.1 GRP Group will take commercially reasonable steps to protect your Personal Data against unauthorized disclosure. Subject to the provisions of any applicable law, your Personal data may be disclosed, for the purposes listed above (where applicable), to the following entities or parties, whether they are located overseas or in Singapore.

- (a) GRP Group's related corporations and employees; to provide products and services to you, address your questions and requests in relation to your interactions with us as well as our products and services, to maintain and operate our business and/or services;
- (b) Companies providing services relating to medical screening, insurance and consultancy to GRP Group;
- (c) Companies providing architectural, engineering and construction services to GRP Group;
- (d) Companies supplying products and services to GRP Group;
- (e) Real estate management agents;
- (f) Agents, contractors or third-party service providers who provide operational services to GRP Group, such as courier services, customer service, telecommunications, information technology, payment, printing, billing, payroll, processing, technical services, training, market research, call center, security and other services to GRP Group;
- (g) Vendors or third-party service providers in connection with marketing promotions and services offered by GRP Group;
- (h) Any business partner, investor, assignee or transferee (actual or prospective) to facilitate business asset transactions (which may extend to any merger, acquisition or asset sale) involving any of the Companies;
- (i) Collection and repossession agencies in relation to the enforcement of repayment obligations for debts;
- (j) External banks, credit card companies and their respective service providers;

- (k) Share registrars;
- (l) Companies which provide corporate secretarial, depository, clearing and book-entry settlement services;
- (m) Our professional advisers such as consultants, auditors and lawyers;
- (n) Foreign embassies in relation to facilitating overseas travel arrangements;
- (o) Relevant government ministries, regulators, statutory boards or authorities or law enforcement agencies to comply with any laws, rules, guidelines and regulations or schemes imposed by any governmental authority; and/or
- (p) Any other party to whom you authorize us to disclose your Personal Data to.

5.2 Please note that the disclosures referred to above may be subject to additional legal requirements under applicable law, if we do disclose your Personal Data, we will only do so to the extent necessary, proportionate and legally permitted.

6. Use of Cookies

6.1 When you interact with us on our websites, we automatically receive and record information on our server logs from your browser. We may employ cookies in order for our server to recognise a return visitor as an unique user including without limitation, monitoring information relating to how a visitor arrives at the website, what kind of browser a visitor is on, what operating system a visitor is using, a visitor's IP address, and a visitor's click stream information and time stamp (for example, which pages they have viewed, the time the pages were accessed and the time spent per web page).

6.2 Cookies are small text files stored in your computing or other electronic devices which allow us to remember you. The cookies placed by our server are readable only by us. Cookies are not programs and therefore cannot access, read or modify any other data on an electronic device. All web-browsers offer the option to refuse any cookie, and if you refuse any cookie then we do not gather any information on that visitor.

6.3 Should you wish to disable the cookies associated with this technology, you may do so by changing the setting on your browser. However, you may not be able to use certain services or enter certain part(s) of our website.

7. Do Not Call (“DNC”) Registry

7.1 If you have provided us with your Singapore telephone number(s) and have indicated that you consent to receiving marketing or other promotional information via Singapore telephone number(s), or where we are permitted to do so under the PDPA, then from time to time, we may contact you using such Singapore telephone number(s) (including via voice calls, text, fax or other means) you have provided to us with information about our Products, Services and other marketing or promotional materials/communication even if these telephone number(s) are registered with the DNC Registry.

8. Data Security

8.1 GRP Group will take reasonable efforts to protect Personal Data in our possession or our control by making reasonable security arrangements to prevent unauthorized access, collection, use, disclosure, copying, modification, disposal or similar risks. However, we cannot completely guarantee the security of any Personal Data we may have collected from or about you, or that no harmful code will enter our website (for example viruses, bugs, trojan horses, spyware). You should be aware of the risks associated with using websites.

8.2 While we strive to protect your Personal Data, we cannot ensure the security of the information you transmit to us via the Internet or use of our mobile services and we urge you to take every precaution to protect your Personal Data when you are on the Internet or use such platforms.

8.3 If applicable, we undertake to keep your username and password secure and confidential and shall not disclose or permit it to be disclosed to any unauthorized person, and you should inform us as soon as reasonably practicable if you know or suspect that someone else knows your username and password or believe the confidentiality of your username and password has been lost, stolen or compromised in any way or that actual or possible unauthorized transactions have taken place. We are not liable for any damages resulting from any security breaches, on unauthorized and/or fraudulent use of your username and password.

9. Data Transfer and Data Retention

9.1 If the transfer of your Personal Data within our group of companies is necessary, we will take reasonable steps to ensure that your Personal Data transmitted outside of your country of residence remains adequately protected to a standard similar to that afforded by the PDPA. In addition, we will ensure that such transfers comply with the requirements of the applicable data protection laws.

9.2 All Personal Data is retained for as long as it is necessary for the purposes it has been collected. Any third-party who manages our Personal Data are required to ensure that the Personal Data is disposed in accordance to the retention period as may be agreed in their respective engagement contract(s).

10. Contacting Us – Withdrawal of Consent, Access and Correction of your Personal Data

10.1 If you:

- (a) have any questions or feedback relating to your Personal Data or our Data Protection Policy;
- (b) would like to withdraw your consent to any use of your Personal Data as set out in this Data Protection Policy;
- (c) would like to obtain access and make corrections to your Personal Data records, you can approach us via the following channels:

* Call: (65) 6513 9733

* Email: susu@grp.com.sg

* Write to our Data Protection Officer at:

Data Protection Officer
GRP Limited
9 Raffles Place
Republic Plaza, #21-05
Singapore 048619

10.2 Please note that if your Personal Data has been provided to us by a third party (e.g. referrer or your company), you should contact that organization or individual to make such queries, complaints and make access and correction requests to GRP Group on your behalf.

10.3 If you withdraw your consent to any or all use of your Personal Data, depending on the nature of your request, GRP Group may not be in a position to continue to provide its Products and Services to you, administer any contractual relationship in place, which in turn may also result in the termination of any agreements with GRP Group, and you being in breach of your contractual obligations or undertakings. GRP Group's legal rights and remedies in such event are expressly reserved.

11. **Links to Third-Party Website(s)**

- 11.1 Our Companies' website may contain links to other third-party operated websites, operated by third-parties over which we have no control over. We are not responsible for the privacy and/or data protection practices of such third-party operated websites that are linked to our website. Once you have left our website by clicking a relevant link, your use of that third-party website will be governed by the privacy or data protection of that particular website.

12. **Governing Law**

- 12.1 This Data Protection Policy and your use of this website shall be governed in all respects by the laws of Singapore and/or the laws of the country of Operation of the GRP subsidiary
-