



DATA PROTECTION POLICY

We at Merimen take our responsibilities under Singapore's Personal Data Protection Act 2012 (the "PDPA") 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 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.

If you, at any time, have any queries on this policy or any other queries in relation to how we may manage, protect and/or process your personal data, please do not hesitate to contact our Data Protection Officer below:

Telephone :

+65 6224 0010

Email :

dataprotectionofficer@merimen.com

Office address:

Merimen Technologies (Singapore) Pte Ltd

Raffles Quay, #18-00, Singapore 048580

Operating hours:

9:00am to 6:00pm, Mondays to Fridays, excluding Public Holidays.

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 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.

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 your personal data. You can see full details of the purposes of collection, use and disclosure of your personal data (collectively, the "Purposes") on the Collection, Use and Disclosure page. 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 in the Collection, Use and Disclosure page. 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.

2.2 In order to conduct our business operations 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.

2.3 Generally all your personal data will be processed in Singapore. In certain situations, we may transfer your personal data to a country outside of Singapore for the above Purposes as may be required on a need to know basis. In such an event, we will ensure that the receiving entities are bound by laws or contractual obligations for the protection of your personal data to a standard comparable to the Singapore PDPA.

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 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, 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 legal 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 PDPA or by law.

3.3 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 Second, Third and Fourth Schedules of the PDPA which is publicly available at <http://statutes.agc.gov.sg>.

3.4 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.



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 under our control by contacting us.

4.2 For a request to access personal data, we will provide you with the relevant personal data 30 calendar days from such a request being made.

4.3 For a request to correct personal data, we will:

- a) correct your personal data as soon as practicable after the request has been made unless we have reasonable grounds not to do so; and
- b) subject to paragraph [4.4], we will send the corrected personal data to every other organisation to which the personal data was disclosed by Merimen within a year before the date the correction was made, unless that other organisation does not need the corrected personal data for any legal or business purpose.

4.4 Notwithstanding paragraph [4.3(b)], we may, if you so consent, send the corrected personal data only to specific organisations to which the personal data was disclosed by us within a year before the date the correction was made.

4.5 We will also be charging you a reasonable fee for the handling and processing of your requests to access your personal data.

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 by contacting us.

5.2 If you withdraw your consent for your personal data to be used for marketing purposes, we will process your request for such withdrawal of consent, and will thereafter cease to use and/or disclose your personal data for marketing purposes within 30 calendar days of your request.

5.3 However, if you request to withdraw your consent for us to use your personal data for your account matters, this will affect our ability to provide you with the products and services that you asked for or have with us. In this regard, it may mean that we will not be able to continue with your existing relationship with us and/or the contract you have with us will have to be terminated.

6. ADMINISTRATION AND MANAGEMENT OF PERSONAL DATA

6.1 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 Merimen 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 if you did not update us of the changes in your personal data.

6.2 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 unauthorised access, collection, use, disclosure, copying, modification, leakage, loss, damage and/or



alteration of your personal data. However, we cannot assume responsibility for any unauthorised use of your personal data by third parties due to factors beyond our control.

6.3 We will also put in place measures such that your personal data 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.

7. COMPLAINT PROCESS

7.1 If you have any complaint or feedback about how we are handling your personal data or complying with the PDPA, please contact our Data Protection Officer at:

Telephone :

+65 6224 0010

Email :

dataprotectionofficer@merimen.com

Office address:

Merimen Technologies (Singapore) Pte Ltd

Raffles Quay, #18-00, Singapore 048580

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7.2 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".

7.3 We will certainly strive to attend to any complaint or grievance that you may have speedily and fairly.

8. UPDATES ON DATA PROTECTION POLICY

8.1 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.

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 and can be viewed at <http://www.merimen.com/sg-pdpa.pdf>.

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.

Reviewed on 1 June 2020