

MEISEI International Pte Ltd Personal Data Protection Statement and Consent to Use Personal Data

1. Introduction

- 1.1. MEISEI International Pte Ltd ("MEISEI") recognises the importance of safeguarding personal data when dealing with information relating to its job applicants, visitors, contractors and employees, and therefore is committed to fully implementing and complying with the provisions of the Personal Data Protection Act (the "Act"). The MEISEI's Personal Data Protection Statement set out here explains the procedures and systems in place to comply with the Act (the "Statement"), in respect of personal data as defined under the Act.

2. Application

- 2.1. As used in this Statement:
 - 2.1.1. "contractor" means any individual who contracts with a principal to supply labour or to carry out the whole or any part of any work undertaken by the principal in the course of or for the purposes of the principal's trade or business
 - 2.1.2. "employee" means an individual who has entered into or works under a contract of service with MEISEI
 - 2.1.3. "job applicant" means an individual who is seeking to enter into or work under a contract of service with MEISEI, also known as job seeker
 - 2.1.4. "visitor" means an individual who have entered our premises for business (other than a patient), duty (accompanying a patient) or the like; and may include engagement with MEISEI over various communication channel modalities for general and intentional queries or feedback or access our website and attend our events.
 - 2.1.5. "personal data" means data, whether true or not, about a customer who can be identified: (a) from that data; or (b) from that data and other information to which we have or are likely to have access

3. Personal data collected

- 3.1. Depending on the nature of your interaction with us (see Article 2), some examples of personal data which we may collect from you, not exhaustive, may include name, national identification numbers such as NRIC, contact information such as residential address, email address or telephone number, nationality, personal and medical history, photographs and other audio-visual information, employment/training information and financial information such as credit card numbers, debit card numbers or bank account information.
- 3.2. We endeavour to collect only what is necessary for the purpose of its intended collection.

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

- 4.1. The collection, use and disclosure of your personal data, which will be obtained directly from you, or information we obtain because of our interaction with you, may include but is not limited to the following purposes, within or outside of Singapore:
 - 4.1.1. *For verification of your identity and the accuracy of your personal details and other information provided*
 - 4.1.2. *To respond to your enquiries, provide you advice and services to ensure continuity of service.*

- 4.1.3. *For reporting and sharing of information within MEISEI including job applicant's information.*
- 4.1.4. *When you access our website or attend our events.*
- 4.1.5. *For assessing and evaluating your suitability for employment in any current or prospective position within MEISEI.*
- 4.1.6. *To enter into, manage or terminate an employment relationship when you work for MEISEI.*
- 4.1.7. *To facilitate any proposed or confirmed merger, acquisition or business asset transaction involving any part of our organisation, or corporate restructuring process*
- 4.1.8. *To facilitate our compliance with any laws, customs and regulations which may be applicable to us*
- 4.1.9. *For such other purposes as may reasonably be appropriate in the circumstances of the collection of personal data.*
- 4.1.10. *Where consent for the collection, use or disclosure cannot be obtained, and is of vital interest to the individual, matters affecting the public, or of legitimate interest to MEISEI, or any other provisions in the PDPA, we shall collect, use or disclose personal data pursuant to exceptions under the PDPA First and Second Schedules of the PDPA Act 2012, or as required/authorised under any other written law.*
 - 4.1.10.1. *In line with the legitimate interests' exception, we will collect, use or disclose your personal data for the following purposes:*
 - 4.1.10.1.1. *Fraud detection and prevention;*
 - 4.1.10.1.2. *Detection and prevention of misuse of services;*
 - 4.1.10.1.3. *Network analysis to prevent fraud and financial crime, and perform credit analysis; and*
 - 4.1.10.1.4. *Collection and use of personal data on company-issued devices to prevent data loss.*
- 4.2. *Without a complete and accurate record of your information provided by you voluntarily, it will affect our capacity to accomplish the purposes stated above.*
- 4.3. *Any submission of personal data to MEISEI on behalf of another individual by you, MEISEI deems that you have notified the individual of the purpose and have received their consent before your submission.*
- 4.4. *MEISEI will not use the personal data for any purpose other than that for which it was collected. Should MEISEI require any personal data in its possession to be used for a purpose other than those for which consent was originally given, fresh consent will be sought to use the data for that new purpose.*
- 4.5. *All personal data collected by MEISEI shall only be accessible by designated parties on a need-to-know basis to serve the purpose for which the data was collected. Such parties shall always observe strict confidentiality.*
- 4.6. *While processing personal data for the above purposes, MEISEI may disclose such personal data to third parties within or outside Singapore. These third parties include:*
 - 4.6.1. *governmental organisations or authorities to whom the MEISEI is required by law to disclose the data;*
 - 4.6.2. *individuals who are legally entitled to the data;*
 - 4.6.3. *third parties who require the data in order to process and operate programs in which an individual intends to participate;*
 - 4.6.4. *third parties who provide the MEISEI with data processing, administration, health, insurance, or legal services, or other professional or management services; and*

- 4.6.5. such other persons as may reasonably be appropriate in the circumstances of the collection of personal data.
- 4.7. Disclosure to third parties outside Singapore shall only be to organisations that are required or undertake to process the data with a comparable level of data protection as that required under Singapore law.

5. Withdrawal of consent

- 5.1. Should you wish to withdraw or limit your consent to the MEISEI's collection, use and disclosure of your personal data, please write in with full particulars to our Data Protection Officer ("DPO") using the contact details provided below.
- 5.2. Upon receipt of your written request to withdraw your consent, we may require reasonable time (depending on the complexity of the request and its impact on our relationship with you) for your request to be processed and for us to notify you of the consequences of us acceding to the same, including any legal consequences which may affect your rights and liabilities to us. In general, we shall seek to process your request within ten (10) business days of receiving it.
- 5.3. Whilst we respect your decision to withdraw your consent, please note that depending on the nature and scope of your request, we may not be in a position to continue providing our goods or services to you and we shall, in such circumstances, notify you before completing the processing of your request. Should you decide to cancel your withdrawal of consent, please inform us by writing to our Data Protection Officer ("DPO") using the contact details provided below.
- 5.4. Please note that withdrawing consent does not affect our right to continue to collect, use and disclose personal data where such collection, use and disclose without consent is permitted or required under applicable laws.

6. Confidentiality

- 6.1. Any personal data collected by MEISEI shall be accessible by employee(s) of MEISEI to serve the purpose for which the data was collected. Such employee(s) shall always observe strict confidentiality.
- 6.2. In the event personal data is disclosed to third parties (such as contractors), such third parties will be required to sign an agreement requiring them to always observe confidentiality and to use the personal data only for the purpose for which it was disclosed to them.

7. Data Protection Officer (DPO)

- 7.1. The MEISEI has designated a DPO to deal with day-to-day data protection matters and complaints, encourage good data handling practices and ensure that MEISEI complies with the Act and implements the Policy. If you have any questions, complaints or concerns, please contact the DPO using the contact details provided below.

8. Accuracy

- 8.1. The MEISEI endeavours to take all reasonable steps to ensure that personal data in its possession or under its control is accurate, up-to-date, and complete. If there is any error or omission in the personal data you have provided to MEISEI, please write in to our DPO with

the necessary details for correction of your data. If any personal data you have provided to MEISEI becomes inaccurate, please contact our DPO to update your data.

9. Access and Correction

- 9.1. Should you wish to access or correct any personal data collected by MEISEI or understand how such data has been used or disclosed, please write in to our DPO with your request.
- 9.2. In general, our response will be within thirty (30) business days, after verification of your identity. Kindly note that MEISEI reserves the right to charge a reasonable administrative fee for responding to any such requests. If so, we will inform you of the fee before processing your request.

10. Retention

- 10.1. MEISEI will retain personal data for as long as it is necessary to serve the purpose for which it has been collected. Once the data in MEISEI's possession is no longer necessary to serve the purpose for which it was collected, or required for legal or business purposes, the data will be destroyed or anonymised in a secure manner.

11. Protection

- 11.1. MEISEI endeavours to maintain all personal data in its possession or under its control securely.
- 11.2. Meisei has subscribed to AC360 Shield Premium, DataSecure Standard and Armour Standard packages. These include email security to protect against spam, malware, phishing and impersonation; endpoint security with data encryption and Antivirus supported by Managed Detection and Response (MDR); server security with device encryption and Antivirus with Extended Detection and Response (XDR); 24/7 device monitoring with regular patching of Microsoft and third-party applications; secure backup services covering M365 emails, SharePoint, Teams and OneDrive; security awareness training; and dark web monitoring. Together, these controls ensure data is encrypted, systems are monitored, threats are detected early, and compliance obligations are met.
- 11.3. You should be aware, however, that no method of transmission over the Internet or method of electronic storage is completely secure. While security cannot be guaranteed, we strive to protect the security of your information and are constantly reviewing and enhancing our information security measures.

12. Transfer

- 12.1. We generally do not transfer any personal data in our possession to any parties outside Singapore except as specified in this Policy. Any outside party to which MEISEI intends to transfer data in its possession, we will obtain your consent for the transfer to be made and we will take steps to ensure that your personal data continues to receive a standard of protection that is at least comparable to that provided under the PDPA.

13. Complaints

- 13.1. If an individual feels that their data have been erroneously or improperly handled by MEISEI, the individual may lodge a complaint in writing with the DPO. Once a complaint has been received, the DPO will acknowledge receipt of the same in writing and will contact the relevant departments to investigate the complaint.
- 13.2. The outcome of the investigation will be communicated by the DPO to the complainant in writing, notifying the individual of the outcome.

14. Enquiries

- 14.1. MEISEI is committed to protecting the personal data of its (name all the data subjects). For enquiries about MEISEI's Policy, please write to the DPO at the following address:

14.1.1. Data Protection Officer

dpo@meisei.com.sg

15. Cookie/Tracking Technology

- 15.1. This website may use cookie and tracking technology depending on the features offered. Cookie and tracking technology are useful for gathering personal data such as browser type and operating system, tracking the number of visitors to the website, and understanding how visitors use the website. Cookies can also help customise the website for visitors. Personal data cannot be collected via cookies and other tracking technology, however, if you previously provided personally identifiable information, cookies may be tied to such information. Aggregate cookie and tracking information may be shared with third parties.

16. Updating the Policy

- 16.1. This Notice applies in conjunction with any other notices, contractual clauses and consent clauses that apply in relation to the collection, use and disclosure of your personal data by us.
- 16.2. This Policy may be updated from time to time to take account of changes in policy, technology, and/or to ensure compliance with any legislative changes.

End.