

NYLECT Data Protection Policy

Background of Personal Data Protection Act

The Personal Protection Data Act (PDPA) takes effect in phases starting with the provisions relating to the formation of the Personal Data Protection Commission (PDPC) on 2 January 2013. Provisions relating to the Do-Not-Call Registry came into effect on 2 January 2014 and the main data protection rules on 2 July 2014.

For more information about PDPA, please visit the Personal Data Protection Commission's website at www.pdpc.gov.sg.

Personal Data Protection Policy

The purpose of this document is to inform you of how Nylect Engineering Pte Ltd and its related corporations (herein as "the Company") manage Personal Data which is subject to the Singapore Personal Data Protection Act 2012. Please take a moment to read this Personal Data Protection Policy so that you know and understand the purposes for which we collect, use and disclose your Personal Data.

By interacting with the Company, as well as its representatives, submitting information to us, or signing up for any services offered by us, you agree and consent to us collecting, using, disclosing and sharing amongst themselves your Personal Data, and disclosing such Personal Data to the our authorized service provider and relevant third parties in the manner set forth in this Personal Data Protection Policy.

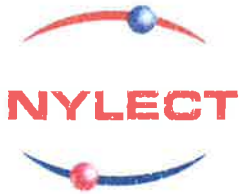
This Personal Data Protection Policy supplements but does not supersede nor replace any other consents you may have previously provided to the Company in respect of your Personal Data, and your consents herein are additional to any rights which any of the companies may have at law to collect, use or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

The Company may from time to time update this Personal Data Policy to ensure that this Personal Data 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 Personal Data Protection Policy as updated from time to time on our website www.nylect.com.

1. Personal Data

1.1. In this Personal 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 or are likely to have access. Examples of such Personal Data you may provide to us include (depending on the nature of your interaction with us)

- (i) Your name, NRIC number, passport number or other identification number, telephone number (s), mailing address, email address and any other information relating to any individuals which you have provided us in any forms you may have submitted to us, via other forms of interaction with you.
- (ii) Information about your use of our website, including cookies and IP address.



- (iii) Your employment history, education background and income levels.
- (iv) Your payment related information, such as your bank account.

2. Collection of Personal Data

2.1. Generally, we collect Personal Data in the following ways:

- (i) When you submit any form, including but not limited to application or other forms relating to any of our services.
- (ii) When you enter into any agreement or provide other documentation or information in respect of your interactions with us, or when you use our services.
- (iii) When you interact with our staff, for example, via telephone calls, letter, fax, face-to-face meetings and emails.
- (iv) When you request that we contact you or request that you be included in an email or other mailing list.
- (v) 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 positions.
- (vi) When your images are captured by us via CCTV cameras while you are within our premises.
- (vii) When we seek information about you and receive your Personal Data in connection with your relationship with us, including for our services or job applications, for example, from business partners, public agencies, your ex-employer, referral intermediaries and the relevant authorities.
- (viii) When you browse our website.
- (ix) When you submit your Personal Data to us for any other reasons.

2.2. If you provide us with any Personal Data relating to 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.

2.3. 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 services you have requested, or delays in providing you with services you have requested, or processing your applicants.



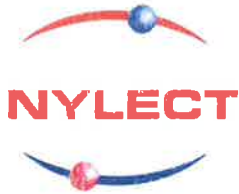
3. Purpose for the Collection, Use and Disclosure of Your Personal Data

3.1. Generally, the Company collects, uses and discloses your Personal Data for the following purposes:

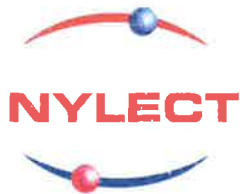
- (i) To communicate with you and respond to your queries, feedback, complaint and requests.
- (ii) To manage and plan administrative and business operations of the Company and to comply with internal policies, reporting requirements and procedures.
- (iii) To facilitate business asset transactions (which may extend to any mergers, acquisitions or asset sales) involving the Company.
- (iv) To match any Personal Data held which relates to you for any of the purposes listed herein.
- (v) To manage the safety and security of our premises and services (including but not limited to carrying out CCTV surveillance).
- (vi) To monitor phone calls and customer-facing interactions for quality assurance, employee training and performance evaluation and identify verification purposes.
- (vii) In connection with any claims, actions or proceedings (including but not limited to draft and review documents, transaction documentation, to obtain legal advice, and to facilitate dispute resolution), and/or to protect and enforce our contractual and legal rights and obligations.
- (viii) To conduct investigations relating to disputes or fraud.
- (ix) To meet or comply with any applicable rules, laws, regulations, codes of practice or guidelines issued by any legal or regulatory bodies which are binding on the Companies (including but not limited to respond to regulatory complaints, to disclose to regulatory bodies and to conduct audit checks, due diligence and investigations).
- (x) Purposes which are reasonably related to the aforesaid.

3.2. In addition, the Companies collects, uses and discloses your Personal Data for the following purposes depending on the nature of our relationship:

- (i) If you are a customer, a prospective customs or a main contractor:
 - (a) To provide customer service and support (including but not limited to customer relationship management, providing you with administrative support, processing your payments and etc.)
 - (b) To administer debt recovery and debt management.



- (c) To create and maintain profiles of our customers in our system database.
- (d) Purpose which are reasonably related to the aforesaid.
- (ii) If you are a vendor, a prospective vendor or a sub-contractor:
 - (a) To evaluate your proposal and to conduct background check on you.
 - (b) To manage project tenders and quotation, to process orders or to manage the supply of goods and services.
 - (c) To communicate with you deployed staff, after award of contract, who are in our properties to carry out work or services, any for any emergency or/and security concerns.
 - (d) To process and payment of vendor invoices and bills.
 - (e) To create and maintain profiles of our services providers and vendors in our system database.
 - (f) Purposes which are reasonably related to the aforesaid.
- (iii) If you are a tenant, a prospective tenant or a property agent:
 - (a) To conduct appropriate due diligence checks.
 - (b) To perform administration of the lease and/or license including the verification of your identity, preparation of lease and/or license documentation.
 - (c) To perform delivery of correspondences or notices as may be required under the lease or license agreement.
 - (d) To perform financial transactions such as rental payments.
 - (e) To create and maintain profiles of our tenants in our system database.
 - (f) To contact you in the event of an emergency.
 - (g) To manage referrals and payment of commission.
 - (h) Purposes which are reasonably related to the aforesaid.
- (iv) If you submit an application to us as a candidate for employment:
 - (a) To process your application including pre-recruitment checks.



- (b) To provide or to obtain references for background screening/vetting.
- (c) To collect information about your suitability for the position applied for.
- (d) To onboard successful candidates and to facilitate human resources planning and management (including but not limited to prepare letters of employment, name cards and building access passes).
- (e) Purposes which are reasonably related to the aforesaid.
- (v) If you are an existing employee of the Company:
 - (a) To provide remuneration and staff benefits (including employee leave and insurance), to review salaries and bonuses, staff appraisals and evaluation, as well as to recognize individuals for their services.
 - (b) To administrate the employment relationship, its management and termination, including manpower, logistics management, work permit, s pass, employment pass or visa applications, to provide employee relocation support, to process expense claims, tax clearance and payment for provident funds, to facilitate overseas travel arrangement and reservist management.
 - (c) To organize training and staff development programs.
 - (d) To provide you with tools and/or facilities to enable or facilitate the performance of your duties.
 - (e) To communicate with you as required by the Company to comply with its policies and processes, including for business continuity and emergency contact lists.
 - (f) To conduct analytical, surveys and research for human resource planning and management, and for us to review, develop, optimize and improve work-related practices, environment and productivity.
 - (g) To ensure the administrative and business operations of the Group function in a secure, efficient and effective manner.
 - (h) To generate incident reports and to handle complaints.
 - (i) To administer cessation processes.
 - (j) Purposes which are reasonably related to the aforesaid.



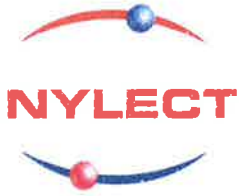
- (vi) If you are a board member, corporate officer, company secretary or shareholder of the Group:
- (a) To onboard or to facilitate your appointment.
 - (b) To maintain statutory registers and to manage the publication of shareholder and director statistics on annual reports and circulars.
 - (c) To facilitate the execution of duties and administrative matters (including but not limited to issue new share certificates, to organize meetings, to pass resolutions, and to approve, executive and to sign contracts).
 - (d) To administer remuneration, compensation and benefits.
 - (e) Purpose which are reasonably related to the aforesaid.

3.3. Your Personal Data will be protect and kept confidential, but subject to the provisions of any applicable law, your Personal Data may, depending on the services concerned, be disclosed to the following third parties:

- (i) Other divisions or entities within Nylect Group.
- (ii) Agents, contractors, third party service providers and specialist advisers to the Company who have been contracted to provide the Company with operational and services.
- (iii) Any third parties business partners who offered services whether in conjunction with the Company or not.
- (iv) Insurers or insurance investigators providers.
- (v) Relevant government regulatory or authority or law enforcement agency to comply with any laws or rules and regulations imposed by any governmental authority.
- (vi) Any other party as may be consented to by you, as specified by that individual or the in applicable contract.

4. Keeping Your Personal Data Accurate and Up-To-Date

4.1. We endeavor to ensure all Personal Data we have about you is accurate and up-to-date. We understand that this information changes frequently with changes of address and other personal circumstances. We encourage you to contact us as soon as possible to enable us to update any Personal Data we have about you. Incomplete or outdated Personal Data may result in our inability to provide you with services you have requested.



5. Use of Cookies

- 5.1. 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 recognize a return visitors as a unique users including, without limitation, to monitor information relating to how a visitor arrives at our 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).
- 5.2. Cookies are small text files store in your computer or other electronic devices which allow us to remember you. The cookies laced by our server are readable only by us, and cookies cannot access, read or modify any other data on an electronic devise.

6. Data Security

- 6.1. We will take reasonable efforts to protect your 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 for example no harmful code will enter our website (for example viruses, bugs, torjan horses, spyware or adware). You should be aware of the risks associated with using websites.
- 6.2. While we strive to protect your Personal Data, we cannot ensure the security of the information you transmit to us through the use of electronic services, and we urge you to take every precaution to protect your Personal Data when you use such platforms.

7. Withdrawal of Consent, Access and Correction of Your Personal Data

7.1. If you

- (i) have questions or feedback relating to your Personal Data or our Data Protecting Policy;
- (ii) would like to withdraw your consent to any use of your Personal Data as set out in this Data Protection Policy.
- (iii) would like to obtain access and make corrections to your Personal Data records,

7.2. Please contact us as follows:

- (i) Call 6759 6888
- (ii) Email: admin.sin@nylect.com
- (iii) Address: 1 Woodlands Sector 1, Nylect Industrial Building, Singapore 738309