

PERSONAL DATA POLICY

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The purpose of this document ("**Policy**") is to inform you of how Athena Best Financial (Singapore) Pte. Limited ("**Athena Best Singapore**") handles personal data which is subject to the Personal Data Protection Act 2012 of Singapore ("**PDPA**").

By interacting with us, using our website, submitting information to us, or engaging our services, you agree and consent to Athena Best Singapore (including its affiliates) (collectively, "**the Company**", "**us**", "**we**" or "**our**") collecting, using, sharing, and disclosing your Personal Data, as well as to us disclosing such Personal Data to our service providers and third parties appointed by us on your behalf, in the manner and for any of the purposes set forth in this Policy. In addition, this Policy will also provide you with more information on the bases upon which we may lawfully collect, use and/or disclose your Personal Data without your consent, where permitted by applicable law.

This Policy supplements but does not supersede nor replace any other consents you may have previously provided to us nor does it affect any rights which we may have at law in connection with the collection, use or disclosure of your Personal Data, and any consents you may have provided in connection with this Policy are cumulative and additional to any rights which we may have under applicable law to handle or process your Personal Data.

We may from time-to-time update or modify this Policy by posting the updates on our website at www.athenabest.com.sg. To the maximum extent permissible under applicable law, you agree to be bound by the prevailing terms of this Policy as so updated from time to time. Hence, please check back regularly for updated information on the handling of your Personal Data.

1 YOUR PERSONAL DATA

- 1.1 In this Policy, "**Personal Data**" refers to any data, whether true or not, about an individual 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.
- 1.2 Examples of such Personal Data which you may provide to us include (depending on the nature of your interaction with us):
 - a) your name, NRIC, passport or other identification number, telephone number(s), mailing address, email address and any other information relating to you which you have provided us in any forms you may have submitted to us, or in other forms of interaction with you;
 - b) information about your use of our website and services, including cookies, IP address and membership details, but only to the extent that we may identify you from such information;
 - c) your employment history, education background, and income levels; and
 - d) information about your usage of and interaction with our website and/or services including computer and connection information, device capability, bandwidth, statistics on page views, and traffic to and from our website.
- 1.3 To the maximum extent permitted under applicable law, we may anonymise your Personal Data so that it no longer identifies you, in which case we shall be entitled to retain, use, disclose, and/or process such anonymised data without restriction, including for business product

related reviews.

- 1.4 For the avoidance of doubt, in the event that the applicable law (including without limitation the PDPA) permits us to collect, use, disclose and/or process your Personal Data without your consent, such permission shall continue to apply.

2 HOW WE COLLECT PERSONAL DATA

2.1 Generally, we may collect Personal Data in various ways including:

- a) in the course of your engaging our services, or your providing documentation or information to us;
- b) when you communicate or interact with us via telephone calls (which may be recorded), letters, fax, face-to-face meetings, our website, email or other modes of contact;
- c) CCTV recordings while you are within our premises;
- d) when you attend a seminar or other event organized by us;
- e) photographs or videos taken by us or our employees when you attend events hosted by us;
- f) when you submit an employment application or provide documents or information such as your resume, from recruitment agencies and employment references;
- g) from public information sources, search services and other third parties; and
- h) when you submit your Personal Data to us for any other reason.

2.2 If you provide us with any Personal Data relating to a third party, by submitting such information to us, you represent and warrant to us that you have obtained the consent of such third party to you providing us with their Personal Data, and for the further collection, use, disclosure and/or processing by us of their Personal Data, for the purposes contemplated hereunder, and that such consents have not been withdrawn.

2.3 You shall 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/or services which you have requested.

3 PURPOSES FOR WHICH WE COLLECT, USE AND DISCLOSE PERSONAL DATA

3.1 Generally, the purposes for which we collect, use and disclose your Personal Data include:

- a) to provide our services;
- b) to respond to, process and handle your queries, feedback and suggestions;

- c) to verify your identity, process payments as well as manage our administrative and business operations (including the processing, storage, monitoring and backup of data);
- d) to manage the security of our premises, facilities and technology infrastructure and comply with internal policies and procedures;
- e) to provide updates and other communications on developments relating to the law and in respect of the Company;
- f) to send administrative email notifications;
- g) to match any Personal Data held which relates to you for any of the purposes listed herein;
- h) to improve our services and communications to you as well as the quality of your interaction with our website;
- i) to prevent, detect and investigate crime and other illegal activities, including fraud and money- laundering, and analyse and manage other commercial risks;
- j) to detect threats to safety and security (including IT and network security);
- k) to prevent misuse of our products and services;
- l) to protect and enforce our contractual and legal rights and obligations;
- m) to conduct audits, reviews and analysis of our internal processes, action planning and manage commercial risks;
- n) to comply with applicable laws and regulations, codes of practice or guidelines, policies, procedures, regulatory requirements (which may extend to know-your-client and related reviews) and directions issued by relevant authorities;
- o) to facilitate business asset transactions (which may extend to any merger, acquisition or asset sale);
- p) the establishment, exercise or defence of any legal or equitable claim; and/or
- q) any other purpose relating to any of the above.

3.2 In addition, and without prejudice to the generality of the foregoing if you are seeking employment or any other appointment with us, the purposes for which we collect, use and disclose your Personal Data include:

- a) to process and assess your application;
- b) to perform background checks, verify your credentials and qualifications as well as obtain employment references; and/or

c) any other purpose relating to any of the above.

3.3 Furthermore, and without prejudice to the generality of the foregoing, and where permitted under applicable law, we may also collect, use, disclose and/or process your Personal Data for any of the following purposes:

- a) providing or marketing services and benefits to you;
- b) matching Personal Data with other data collected for other purposes and from other sources (including third parties) in connection with the customisation, provision or offering of services, marketing or promotions, whether by us or other third parties;
- c) sending you details of products, services, special offers and rewards, either to our customers generally, or which we have identified may be of interest to you; and/or.
- d) conducting research, analysis and development activities (including data analytics, surveys, product and service development and/or profiling), understanding and analysing customer behaviour, location, preferences and demographics for us to offer you services as well as special offers and marketing programmes which may be relevant to your preferences and profile.

3.4 If you have provided us with your Singapore telephone number(s) and have indicated that you consent to receiving marketing or promotional information via your Singapore telephone number(s), then from time to time, we may contact you using such Singapore telephone number(s) (including via voice calls, text, fax or other means) with information about our products and services.

3.5 In relation to particular 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 may collect, use and disclose your Personal Data for these additional purposes as well, unless we have specifically notified you otherwise.

3.6 You may withdraw your consent by contacting us using the contact details set out at paragraph 9 below.

4 DISCLOSURE OF YOUR PERSONAL DATA

4.1 Subject to the provisions of any applicable law, you hereby agree, acknowledge and consent that your Personal Data may be disclosed for any of the purposes listed above in this Policy (as applicable) to the following entities or parties, regardless of whether they are located overseas or in Singapore:

- a) to our affiliates;
- b) to agents, contractors or third-party service providers who provide technology solutions, support, operational or administrative services, such as for our online services, courier services, telecommunications, information technology, payment, training, market research, storage, archival, client support services;

- c) in connection with professional indemnity policies, and to our professional advisers including auditors;
- d) 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);
- e) anyone to whom we transfer or may transfer our rights and duties;
- f) to any relevant authorities, including professional regulatory bodies and/or law enforcement agencies, whether local or overseas;
- g) to the extent necessary to comply with any laws, regulations, rules, directions, guidelines and other similar requirements; and
- h) any other party to whom you authorise us to disclose your Personal Data.

4.2 We may transfer, store, process and/or deal with your personal data outside Singapore. In doing so, we will comply with the PDPA and other applicable data protection and privacy laws.

5 DEEMED CONSENT

In addition to the matters set forth above, subject to and in accordance with applicable law, you shall be deemed to have consented to us collecting, using, disclosing and sharing amongst ourselves your Personal Data, and disclosing such Personal Data to our authorised service providers and relevant third parties:

- a) where in response to a request for your Personal Data in connection with identified purposes, you voluntarily provide such Personal Data to us for such purpose(s);
- b) where the collection, use or disclosure of your Personal Data is reasonably necessary for the conclusion and/or performance of a contract between you and us or any other organisation entered into at your request, which may include recipients of your Personal Data not indicated in this Policy; or
- c) where we have brought to your attention our intention to collect, use or disclose your personal data for identified purposes, and you have not taken any action to opt out within the period specified in our notices. For this purpose, you agree that we may provide you such notices via our website, or via other forms of communication (e.g. SMS or email) based on the contact particulars that we may have of you in our records from time to time.

6 OTHER BASES FOR HANDLING OR PROCESSING YOUR PERSONAL DATA

In addition to and without limiting the consents you have provided to our collection, use and disclosure of your Personal Data for the purposes set out elsewhere in this Policy, where permitted by applicable law, we may also in accordance with the requirements thereof collect, use and/or disclose your Personal Data as further detailed below including without your further consent, where we meet the requirements of applicable law, for example:

- a) for our legitimate interests or the legitimate interests of any other person (but not for sending you direct marketing messages unless you have otherwise provided your consent); or
- b) for improving our products, services, processes or business, understanding customer preferences and personalising experiences and recommendations, based on your Personal Data records with us (regardless whether you are an existing or prospective customer of the Company).

7 KEEPING YOUR PERSONAL DATA ACCURATE AND UP-TO-DATE

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, or delays in providing you with products and services you have requested, or processing any requests and applications you may have made to us.

8 OUR WEBSITE

8.1 We may collect your information when you browse or use our website and platforms. In this regard, please note the following:

- **Your IP Address**

An IP address is a number that is automatically assigned to your computer when you are connected to the Internet.

When you visit our website, your IP address is automatically logged in our server. We may use your IP address to help diagnose problems with our server, and to administer our website. From your IP address, we may be able to identify the general geographic area from which you are accessing our website; however, we may not be able to pinpoint the exact geographic location from which you are accessing our website. Generally, we do not seek to link your IP address to anything that will enable us to identify you unless it is required by applicable laws and regulations.
- **Cookies and related technologies**

A cookie is an element of data that a website can store on your computer. We use cookies and related technologies to distinguish you from other users of our website by storing, generally non-personally identifiable, information (e.g. session information such as the number of times you visit our website and the location from which you are accessing the website). Note that some limited information may be personally identifiable for the purposes of

 - a) managing and customizing your experience on the website/platform;
 - b) analysing trends and improving our site for our users;
 - c) delivering content tailored to your interests and the manner in which you browse our websites and platforms; and
 - d) any other purpose relating to or reasonably necessary for any of the above.

Other information may be anonymized and/or aggregated to produce statistical reports that

enable us to evaluate the use of our website; and to make improvements to, and increase efficiency when you browse our website.

Should you wish to disable the cookies associated with these technologies, you may do so by changing the appropriate settings on your browser. However, your ability to use our website or the functionality thereof may be affected.

Please refer to your browser documentation to check if cookies have been enabled on your computer or for adjusting your browser settings to disable or limit cookies.

If you do not agree to our use of cookies as set out in this Policy, you should delete all cookies associated with our website and disable the storage of cookies by our website by changing the settings on your browser accordingly. However, you may not be able to use certain parts of our website and your user experience may be affected.

- 8.2 Our website may contain links to other sites and resources that are operated or provided by third parties with different privacy practices. We have no control over and do not take any responsibility for these third- party websites and their personal data handling practices, and you are encouraged to review the personal data policies of web sites you choose to visit which are linked from our website.

9 CONTACTING US

WITHDRAWAL OF CONSENT, ACCESS AND CORRECTION OF YOUR PERSONAL DATA

9.1 If you:

- a) have any questions or feedback relating to your Personal Data or our Policy (including without limitation our reliance on legitimate interests);
- b) would like to withdraw your consent to any use of your Personal Data as set out in this Policy; or
- c) would like to obtain access and make corrections to your Personal Data records, please contact our Data Protection Officer, as follows

Name: Fuan Chai Ling

Email: dpo.sg@athenabest.com

**Address: 380 Jalan Besar #11-03/04
ARC 380 Singapore 209000**

9.2 If you withdraw your consent to any or all use of your Personal Data, depending on the nature of your request, we may not be in a position to continue to provide our services to you or administer any contractual relationship in place, which in turn may also result in the termination of any agreements with us, and your being in breach of your contractual obligations or undertakings. Our legal rights and remedies in such event are expressly reserved.

9.3 Without prejudice to the foregoing, by accessing and using our website in any way, you represent and warrant that you have read, understand and consent to the collection, use,

disclosure, and other processing of your personal data as set out above.

10 GOVERNING LAW

This Policy and your use of our website shall be governed in all respects by the laws of Singapore.