

PRIVACY POLICY

Data Protection Policy

Your privacy is important to us. The purpose of this Privacy Policy is to inform you of how Novena Square Investments Ltd manages personal data in accordance with the Personal Data Protection Act 2012 (“the Act”). Please take a moment to read this Privacy 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 or signing up for any promotions or services offered by us, you agree and consent to Novena Square Investments Ltd, its related corporations and affiliates, (collectively referred to herein as "NSI", "us", "we" or "our"), as well as our respective representatives collecting, using, disclosing and sharing amongst themselves your Personal Data, and disclosing such Personal Data to NSI's authorised service providers and relevant third parties in the manner set forth in this Privacy Policy.

This Privacy Policy supplements but does not supersede nor replace any other consents you may have previously provided to NSI nor does it affect any rights which NSI may have at law in connection with the collection, use or disclosure of your Personal Data. NSI may from time to time update this Privacy Policy to ensure that this Privacy 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 the Privacy Policy as updated from time to time on our websites. Please check regularly for updated information on the handling of your Personal Data.

For avoidance of doubt, this Privacy Policy forms a part of any for the Terms and Conditions that are found on the website. In the event of any conflict, inconsistency or conflict between this Privacy Policy and the Website Conditions, the Privacy Policy shall prevail. All defined terms contained in the Website Conditions shall apply to this Privacy Policy unless otherwise specifically stated.

1. Personal Data

1.1 In this Data Protection 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, including data in our records as may be updated from time to time.

1.2 Examples of such Personal Data you may 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 have provided us in any forms you may have submitted to us, or via other forms of interaction with you.

2. Collection of Personal Data

2.1 Generally, NSI collect Personal Data in the following ways:

- a) when you submit forms relating to any of our products or services
- b) when you register for or use any of our services on websites owned or operated by us
- c) when you interact with our customer service officers
- d) when you use some of our services, e.g. our lucky draw redemption, booking sessions
- e) when you sign up our Newsletter or ask to be included in an email or any other mailing list
- f) when you request that we contact you
- g) when you are contacted by, and respond to, our marketing collateral and promotions
- h) when you respond to our request for additional Personal Data
- i) when you enter tenancy agreements with us

- j) when we receive references from business partners and third parties, for example, where you have been referred by them
- k) when you submit your Personal Data to us for any other reason

2.2 When you browse our website, you generally do so anonymously but please see the section below on cookies. We do not, at our website, automatically collect Personal Data unless you provide such information or login with your account credentials.

2.3 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.

2.4 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.

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

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

- a) Transacting with you and providing our products and services
- b) Responding to your queries, feedback, complaints and requests
- c) Verifying your identity
- d) Managing the administrative and business operations of NSI and complying with internal policies, reporting requirements and procedures
- 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 behaviour, preferences and market trends, and to review, develop and improve the quality of our products and services
- f) matching any Personal Data held which relates to you for any of the purposes listed herein
- g) preventing, detecting and investigating crime and analysing and managing commercial risks
- h) managing the safety and security of our premises and services (including but not limited to carrying out CCTV surveillance and conducting security clearances)
- i) monitoring or recording phone calls and customer-facing interactions for quality assurance, employee training and performance evaluation and identity verification purposes
- j) 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
- k) conducting investigations relating to disputes, billing or fraud
- l) meeting or complying with any applicable rules, laws, regulations, codes of practice or guidelines issued by any legal or regulatory bodies which are binding on NSI (including but not limited to responding to regulatory complaints, disclosing to regulatory bodies and conducting audit checks, due diligence and investigations); and/or
- m) purposes which are reasonably related to the aforesaid.

3.2 In addition, NSI may collect, use and disclose your Personal Data for the following purposes, depending on the nature of our relationship with you:

If you download or use Velocity app:

- i) Where the app includes app subscription services, to process your application for these services



- ii) To maintain your account with us and to ensure your access of the app is within the scope of your subscription
- iii) To verify and process your personal particulars and payments in relation to provision of goods and services connected to the app
- iv) To provide you with the goods and services which you signed up for and to push articles to you which may be relevant to you
- v) Communicating with you to inform you of changes and development of NSI policies, terms and conditions and other administrative information, including for the purpose of servicing you in relation to products and services offered to you
- vi) Resolving complaints and handling requests and enquiries
- vii) Conducting market research for statistical, profiling and statistical analysis for the improvement of services provided to you, and
- viii) The processing of your Personal Data in relation to any of the purposes stated above

3.3 In addition, where permitted under the Act, NSI may also collect, use and disclose your Personal Data for the following purposes (which we may describe in our documents and agreements as "Additional Purposes" for the handling of Personal Data):

- a) Providing services, products and benefits to you, including promotions, loyalty and reward programmes
- b) Matching Personal Data with other data collected for other purposes and from other source in connection with the provision or offering of products and services by NSI
- c) Administering contests, competitions and conducting lucky draws, including, where necessary, in order to announce the results of these contests, competitions and lucky draws and identify and contact the winners, and in order to publicise and conduct marketing strictly related to these contests, competitions and lucky draw
- d) Sending you details of products, services, special offers and rewards, either to our customers generally, or of particular products and services which may be of interest to you and
- e) Conducting market research, understanding and determining customer location, preferences and demographics for us to review, develop and improve our products, services and also develop special offers and marketing programmes

3.4 If you have provided your Singapore telephone number(s) and have indicated that you consent to receiving marketing or promotional information via your Singapore telephone number(s) or where we are permitted to do so under the PDPA, then from time to time, NSI 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 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.

3.6 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 (please refer to 8.1(c))

3.7 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 to the products and services that you have requested from NSI.



4. Disclosure of Personal Data

4.1 NSI will take reasonable steps to protect your Personal Data against unauthorised 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) NSI's related corporations and employees;
- b) companies providing services relating to medical screening and insurance to NSI;
- c) companies providing architectural, engineering and construction services to NSI;
- d) real estate management agents;
- e) agents, contractors or third party service providers who provide operational services to NSI, such as courier services, customer service, telecommunications, information technology, payment, printing, billing, payroll, processing, technical services, training, market research, call centre, security, employee recognition or other services to NSI;
- f) vendors or third party service providers in connection with marketing promotions and services offered by NSI;
- g) 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;
- h) external banks, credit card companies and their respective service providers;
- i) building and car park management and their respective service providers;
- j) share registrars;
- k) companies which provide depository, clearing and book-entry settlement services;
- l) our professional advisers such as consultants, auditors and lawyers;
- m) foreign embassies in relation to facilitating overseas travel arrangements
- n) 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
- o) any other party to whom you authorise us to disclose your Personal Data to

5. Use of Cookies

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 a 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).

5.2 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, and cookies 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 our cookie then we do not gather any information on that visitor.

5.3 Should you wish to disable the cookies associated with these technologies, you may do so by changing the setting on your browser. However, you may not be able to complete / access certain part(s) of our website.

5.4 NSI may use an independent company (the "**Third Party Market Research Company**") to measure and analyse the Internet usage across NSI web sites. NSI uses the Third Party Market Research Company's services to collect the following core information on the usage of our web sites, including:

- a) The number of page views (or page impressions) that occur on Velocity website

- b) The number of unique visitors to Velocity website
- c) How long these unique visitors (on average) spend on Velocity website when they do visit; and
- d) Common entry and exit points in Velocity website

5.5 This information is aggregated by the Third Party Market Research Company and provided to NSI to assist in analysing the usage of NSI web sites.

5.6 Pages on NSI web sites may be coded with software which enables the Third Party Market Research Company to track visitors to our web sites.

6. Third-Party Sites

Our website may contain links to other websites operated by third parties, such as our business partners. We are not responsible for the privacy practices of websites operated by third parties that are linked to our website. We encourage you to learn about the privacy policies of such third party websites. Some of these third party websites may be co-branded with our logo or trademark, even though they are not operated or maintained by us. Once you have left our website, you should check the applicable terms, conditions and policies of the third party website to determine how they will handle any information they collect from you.

7. Data Security

7.1 NSI will take reasonable efforts to protect Personal Data in our possession or our control by making reasonable security arrangements to prevent unauthorised 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, Trojan horses, spyware or adware). You should be aware of the risks associated with using websites.

7.2 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 our mobile services, and we urge you to take every precaution to protect your Personal Data when you use such platforms. We recommend that you change your passwords often, use a combination of letters and numbers, and ensure that you use a secure browser.

7.3 If applicable, you undertake to keep your username and password secure and confidential and shall not disclose or permit it to be disclosed to any unauthorised person, and to 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 unauthorised transactions have taken place. We are not liable for any damages resulting from any security breaches, on unauthorised and/or fraudulent use of your username and password.

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

8.1 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; or
- c) would like to obtain access and make corrections to your Personal Data records, you can approach us via the following channels:



- Call: 6256 3325
- Fax: 6253 7221
- Email: promotions@velocitynovena.com
- Write to our Data Protection Officer at: 238A Thomson Road #10-06 Novena Square Tower A Singapore 307684

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

8.3 If you withdraw your consent to any or all use of your Personal Data, depending on the nature of your request, NSI 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 NSI, and your being in breach of your contractual obligations or undertakings. NSI's legal rights and remedies in such event are expressly reserved.

9. Governing Law

9.1 This Data Protection Policy and your use of this website shall be governed in all respects by the laws of Singapore.

For more details on the Personal Data Protection Act, you can refer <http://www.pdpc.gov.sg/personal-data-protection-act/overview>.

