

DATA PROTECTION NOTICE

This Data Protection Notice ("Notice") sets out the basis which ST ENGINEERING URBAN SOLUTIONS LTD. ("Urban Solutions") may collect, use, disclose or otherwise process personal data of our customers in accordance with the Personal Data Protection Act ("PDPA").

PERSONAL DATA

1 As used in this Notice:

"customer" means an individual who (a) has contacted Urban Solutions through any means to find out more about the services Urban Solutions provides, or (b) may, or has, entered into a contract with Urban Solutions for the supply of any services by Urban Solutions; and

"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 Urban Solutions has or are likely to have access. Depending on the nature of your interaction with us, some examples of personal data which we may collect from you include your name, contact information such as your address, email address or telephone number and credit card information.

2 Other terms used in this Notice shall have the meanings given to them in the PDPA (where the context so permits).

COLLECTION, USE AND DISCLOSURE OF PERSONAL DATA

3 Urban Solutions generally does not collect your personal data unless (a) it is provided to Urban Solutions voluntarily by you directly or via a third party who has been duly authorised by you to disclose your personal data to Urban Solutions (your "authorised representative") after (i) you (or your authorised representative) have been notified of the purposes for which the data is collected, and (ii) you (or your authorised representative) have provided written consent to the collection and usage of your personal data for those purposes, or (b) collection and use of personal data without consent is permitted or required by the PDPA or other laws. Urban Solutions shall seek your consent before collecting any additional personal data and before using your personal

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data for a purpose which has not been notified to you (except where permitted or authorised by law).

- Urban Solutions may collect and use your personal data for any or all of the following purposes:
 - a. performing obligations in the course of or in connection with our provision of carpark payment services requested by you;
 - b. verifying your identity;

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- c. responding to, handling, and processing queries, requests, applications, complaints, and feedback from you;
- d. managing your relationship with us;
- e. processing payment or credit transactions;
- f. complying with any applicable laws, regulations, codes of practice, guidelines, or rules, or to assist in law enforcement and investigations conducted by any governmental and/or regulatory authority;
- g. any other purposes for which you have provided the information;
- h. transmitting to any unaffiliated third parties including our third party service providers and agents, and relevant governmental and/or regulatory authorities, in Singapore, for the aforementioned purposes.
- i. any other incidental business purposes related to or in connection with the above.
- 5 Urban Solutions may disclose your personal data:
 - a. where such disclosure is required for performing obligations in the course of or in connection with our provision of services requested by you; or
 - b. to third party service providers, agents and other organisations Urban Solutions has engaged to perform any of the functions listed in clause 4 above for Urban Solutions.
- 6 The purposes listed in the above clauses may continue to apply even in situations where your relationship with Urban Solutions (for example, pursuant to a contract) has been terminated or altered in any way, for a reasonable period thereafter (including, where applicable, a period to enable Urban Solutions to enforce our rights under any contract with you).

WITHDRAWING YOUR CONSENT



- 7. The consent that you provide for the collection, use and disclosure of your personal data will remain valid until such time it is being withdrawn by you in writing via email to dpo.elect@stengg.com.
- 8. Urban Solutions shall use its reasonable endeavours to process your request within fourteen (14) business days of receiving it.
- 9. Urban Solutions may not be in a position to continue providing our 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 Urban Solutions in writing in the manner described in clause 7 above.
- 10. Please note that withdrawing your consent does not affect Urban Solutions's 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.

ACCESS TO AND CORRECTION OF PERSONAL DATA

- 12 If you wish to make (a) an access request for access to a copy of the personal data which Urban Solutions holds about you or information about the ways in which Urban Solutions uses or discloses your personal data, or (b) a correction request to correct or update any of your personal data which Urban Solutions holds about you, you may submit your request in writing via email to dpo.elect@stengg.com.
- 13 Please note that a reasonable fee may be charged for an access request and Urban Solutions will inform you of the fee before processing your request.
- 14 Urban Solutions will use our best endeavours to respond to your request as soon as reasonably possible. If Urban Solutions is unable to provide you with any personal data or to make a correction requested by you, Urban Solutions will use reasonable endeavours to inform you of the reasons why Urban Solutions are unable to do so (except where Urban Solutions is not required to do so under the PDPA).

PROTECTION OF PERSONAL DATA



- 15 To safeguard your personal data from unauthorised access, collection, use, disclosure, copying, modification, disposal or similar risks, Urban Solutions has introduced appropriate administrative, physical and technical measures such as up-to-date antivirus protection, encryption and the use of privacy filters to secure all storage and transmission of personal data by Urban Solutions, and disclosing personal data both internally and to our authorised third party service providers and agents only on a need-to-know basis.
- 16 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, Urban Solutions will strive to protect the security of your information and are constantly reviewing and enhancing our information security measures.

ACCURACY OF PERSONAL DATA

17 We generally rely on personal data provided by you (or your authorised representative). In order to ensure that your personal data is current, complete and accurate, please update Urban Solutions if there are changes to your personal data by informing our Data Protection Officer in writing or email to dpo.elect@stengg.com.

RETENTION OF PERSONAL DATA

- 18 Urban Solutions may retain your personal data for as long as it is necessary to fulfil the purpose for which it was collected, or as required or permitted by applicable laws.
- 19 Urban Solutions will cease to retain your personal data, or remove the means by which the data can be associated with you, as soon as it is reasonable to assume that such retention no longer serve the purpose for which the personal data was collected, and is no longer necessary for legal or business purposes.

DATA PROTECTION OFFICER

20 You may contact our Data Protection Officer if you have any enquiries or feedback on our personal data protection policies and procedures, or if you wish to make any request by email to <u>dpo.elect@stengg.com</u>.

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EFFECT OF NOTICE AND CHANGES TO NOTICE

- 21 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 Urban Solutions.
- 22 Urban Solutions may revise this Notice from time to time without any prior notice. You may determine if any such revision has taken place by referring to the date on which this Notice was last updated. Your continued use of Urban Solutions services constitutes your acknowledgement and acceptance of such changes.