



**VENTURE CORPORATION LIMITED**

**PERSONAL DATA PROTECTION POLICY**

*Last Updated: 25 May 2018*

**1. Preface**

This policy is intended to help you understand our policies and practices with respect to personal data that is collected, used and disclosed by Venture Corporation Limited and its subsidiaries (collectively, "Venture"). It is also intended to inform you as to how you may seek access to and correction of your personal data as well as how to make an inquiry and, if necessary, make a complaint relating to our handling of that data.

References to "Venture", "we", "us" or "our" in this Policy includes, individually and collectively, all subsidiaries and associated and affiliated entities of the Venture Corporation Limited group of companies that collect, use and/or disclose "personal data", as defined under applicable law.

Venture may have entered into separate agreements with customers, employees and other individuals that contain specific data protection provisions and, in such instances, the terms of those agreements shall prevail over the terms of this Policy.

**2. Venture's Commitment to Privacy**

We respect the privacy of personal data disclosed to us, and are committed to protect your personal data in accordance with applicable laws. We outline below our policy on the collection, use and disclosure of your personal data.

**3. Collection, Use and Disclosure of Personal Data by Venture**

Venture does not collect, use or disclose personal data without your knowledge or consent. The personal data we collect and how we do so will vary based on the reason that we are collecting the data.

***Examples of Personal Data Collection Points***

- (a) Venture collects personal data from applicants when they apply for employment with Venture and from employees during the course of their employment with Venture.
- (b) Visitors of Venture facilities may be asked to provide their personal information for security and tracking purposes if they wish to either access the facilities, and/or tap unto Venture's wireless internet infrastructure.
- (c) Visitors of Venture websites may be asked to provide us with some personal information if you wish to interact with us via our websites or if you wish to obtain specified investor information from Venture's vendors or if you purchase any goods from us.
- (d) Venture's website contains links to other Venture websites that adhere to the same privacy principles. For links to non-Venture entities, Venture would not be responsible for the privacy



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practices or the content of such websites and advise that you read the privacy statements of each website you visit which may collect your personal data.

- (e) At various places on the website, or in the course of obtaining the services provided by Venture, you may be required to provide certain personal data such as your full name, email address, address, country of residence, telephone number and other personal information, in order to access or use certain features or services of the website, or to otherwise obtain our services. For example, personal data may be collected when you request for samples, price lists, quotations and/or sales and product information, provide comments, suggestions or feedback, or when you contact our customer service or helpdesk via email or other channels. You can always choose not to provide your personal data, but you may not be able to access or use certain features or services of the Site, or to obtain certain services from us.
- (f) If you purchase a product or service via Venture's websites, you may be required to provide us with your credit card details. These details will only be used to process your purchase. We will not disclose your credit card details to any third parties for marketing purposes under any circumstances.

### ***Use of Cookies***

All of our websites use a standard technology called "cookies" to collect information about how our websites are used, which may include your personal data. The use of cookies is essential to the operation of our websites. You may opt-out of receiving cookies by disabling cookie support but doing so may prevent our websites from functioning properly and you may not be able to use fully all of the available features and information.

The website also uses cookies/advertising IDs for the purpose of advertising. This enables us to show our advertisements to visitors who are interested in our products, services and solutions on partner websites. Re-targeting technologies use your cookies or advertising IDs and display advertisements based on your past browsing behavior.

### ***Third Party Service Providers***

We usually collect your personal data directly from you but sometimes we may need to collect personal data about you from third parties.

## **4. Accuracy of Data Provided by You**

When providing your personal data to us, please ensure that it is accurate and complete.

If you provide personal data relating to a third party to us, you represent and warrant that the consent of that third party has been obtained for the collection, use and disclosure of the personal data for the purposes listed in this Policy.

## **5. Purpose of Use**



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We will collect, use and disclose personal data relating to you that is reasonably necessary for our business functions and activities. Typical purposes for which we may collect, use and disclose your personal data include without limitation:

- (a) Internal record keeping;
- (b) Review and administration of employment performance, status and contracts by our management team and employees who have an official business need to access your personal data;
- (c) Security and surveillance of our offices and facilities;
- (d) Conducting identity, credit, and conflict checks to prevent and detect fraud and crime;
- (e) to make certain automated decisions, such as profiling your geographical location (eg, Asia, Europe or Americas) in order to direct you and/or your enquiries to the appropriate geographical website and/or resources;
- (f) Performing any functions and activities related to the products and/or services that Venture provides; and/or
- (g) Complying with any obligations, requirements or arrangements for disclosing and using personal data that apply to us or that we are expected to comply with pursuant to any law, guidelines or guidance given or issued by any legal, regulatory, governmental, tax, law enforcement or other authorities, or self-regulatory or industry bodies, within or outside Singapore existing currently and in the future.

The amount of personal data that you provide to us will normally be limited to that which is necessary for the purpose it is collected. Consistent with applicable laws, your personal data will not be used for any purpose other than as stated herein or notified to you.

If we wish to collect, use or disclose your personal data for purposes additional to that stated in this Personal Data Protection Policy, we will inform you of the same. We will only collect, use or disclose your personal data for such additional purposes upon your consent or notification.

Venture has databases in the various countries where it operates. Venture may transfer your personal data within the Venture group or to Venture's service provider located outside of your home country which offers the same or similar level of protection of your personal data that Venture offers. For transfers of personal data outside of Venture group, those are framed by contracts to ensure similar level of protection and security of your personal data.

### **6. Disclosure to Third Parties**

We receive services from external service providers located around the world, and your personal data may be provided to them for this purpose. We may also disclose your personal data to third parties for the purposes listed above. Third parties to whom we disclose your personal data may include:



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- (a) Any agent, contractor or third party service provider who provides operational or administrative services to Venture, such as telecommunications, cleaning, security, training, computer or IT support, payment or securities clearing;
- (b) Our professional advisers which include, but are not limited to, auditors, lawyers, and consultants;
- (c) Credit reference agencies;
- (d) Any person to whom disclosure of personal data is necessary in order for us to validly effect, manage, administer and/or enforce any services or transactions requested or authorised by you;
- (e) Any person to whom we are under an obligation or otherwise required to make disclosure under the requirements of any applicable law, guidelines or guidance given or issued by any legal, regulatory, governmental, tax, law enforcement or other authorities, self-regulatory or industry bodies or industry recognised bodies; and/or
- (f) Any other party whom you authorise us to disclose your personal data to.

Apart from the third parties mentioned above, unless we are obliged or permitted by applicable laws to do so, your personal data will not be disclosed to third parties without your consent.

In the event that we transfer your personal data outside of our organization, we shall take all reasonable steps to ensure that it is provided with a comparable standard of protection. However, Venture does not provide any warranty or take any responsibility of any misuse undertaken by third parties in respect of your personal data.

### **7. Security and Retention**

Venture will safeguard the privacy of your personal data. We store personal data in a combination of secure computer storage facilities and paper based files and protect personal data in our possession or under our control by making reasonable physical, technical, administrative and procedural security arrangements to prevent unauthorised access, collection, use, disclosure, copying, modification, disposal or similar risks.

Venture will require vendors or organisations who handle your personal data on our behalf to adhere to the confidentiality and respect your privacy and comply with the applicable laws. We will also require these vendors or organisations to use your personal data only for the same purposes and follow our reasonable directions with regards to such information.

Where we no longer require any personal data that we collect or the purpose for collection, use or disclosure no longer serves Venture's business or legal purpose, such personal data would be destroyed or the particulars or information which may identify you would be removed.



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### **8. Accuracy and Updates to Your Personal Data**

We will take all reasonable steps to ensure that the personal data in our possession or under our control is accurate and up-to-date at the point of collection and at regular intervals afterwards. If any personal data of an individual is inaccurate or incomplete, Venture will take all reasonable steps to correct or update such information upon notification by you. If there is any change in your personal data, you should inform us as soon as possible and in any event within any relevant prescribed period to enable us to update our data.

We will take all practicable steps to ensure that personal data is kept only for as long as the purpose for which it was collected is being served or as otherwise necessary for legal or business purposes.

### **9. Access and Correction**

You have the right to request and obtain access to certain personal data that is in our possession or under our control and to have personal data relating to you which is inaccurate corrected in certain circumstances. Upon written request to our Personal Data Protection Officer and under supervision of a Venture Human Resources Department representative or such other representative, Venture will allow you to review your personal data being held by Venture, including information relevant to the use and disclosure of your personal data. However, under certain limited circumstances, Venture may not be able to provide you access to all of your personal data where such refusal is permitted or required by applicable law or regulation. Venture reserves the right to charge a reasonable fee for access to your personal data.

If you subscribe to any service provided by Venture through this website or otherwise, and you wish to terminate that subscription and have all personally identifiable information about you removed from any list Venture or our vendors maintain, please contact Venture by sending email to our Personal Data Protection Officer informing us of your request. We will promptly make every reasonable effort to remove all personally identifiable information about you from our records.

### **10. Withdrawing Consent**

You may at any time withdraw any consent given in respect of the collection, use or disclosure of your personal data by giving prior written notice in the form of a formal written request addressed to our Personal Data Protection Officer in writing (contact details below). Please allow Venture a reasonable period of time to cease the collection, usage and disclosure of your personal data after you have submitted your withdrawal request. Please note that once consent is withdrawn, Venture will not collect, use and disclose your personal data, which may result in Venture being unable to fulfil certain services to you.

### **11. Your Rights and Choices**

Based on the laws of some countries, you have a number of legal rights in relation to the personal information that we hold about you, and you can exercise your rights by contacting us via email at [dataprotection@venture.com.sg](mailto:dataprotection@venture.com.sg).



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These rights include :

- (a) The right to obtain information regarding the processing of your personal data and access to the personal data which we hold about you. Please note that there may be circumstances when we are entitled to refuse requests for legitimate business reasons.
- (b) The right to rectify or erase your personal data. No justification is required should you wish to exercise your right of objection with regard to marketing. However, please note that there may be circumstances where you ask us to erase your personal data but we are legally entitled to retain it.
- (c) The right to object to the processing of your personal data for legitimate reasons. Please note that there may be circumstances where you object to our processing of your personal data but we are legally entitled to refuse that request.
- (d) Withdrawing your consent, although in certain circumstances it may be lawful for us to continue processing without your consent if we have another legitimate reason (other than consent) for doing so.
- (e) We can, on request, tell you which data protection authority is relevant to the processing of your personal information.

### 12. Transfers of Personal Data Overseas

In situations where we transfer your personal data overseas, we will take steps to ensure that the overseas recipient is required to have in place appropriate levels of protection necessary to maintain the security and integrity of your personal data and that any transferred personal data is processed in accordance with all applicable laws.

### 13. Complaints

If you believe that we have not complied with our obligations under the applicable privacy or personal data protection laws and regulations in relation to your personal data, please contact our Personal Data Protection Officer in writing (contact details below).

### 14. Contact Us

If you have any questions or concerns relating to Venture's policies relating to the Personal Data Protection, please contact our Personal Data Protection Officer by email or by post:

**Email address:** [dataprotection@venture.com.sg](mailto:dataprotection@venture.com.sg)

**Postal address:** 5006 Ang Mo Kio Ave 5 #05-01/12 TECHplace II Singapore 569873

We regularly review and update our Personal Data Protection Policy. Please check this page regularly to keep up-to-date with our Personal Data Protection Policy.