

Privacy Policy

A. Who We Are?

1. This is the Privacy Policy ("**Policy**" or "**Privacy Policy**") of Yanlord Land Group Limited, a Singapore registered public listed company, and each of its subsidiaries ("**Yanlord**" or "**we**" or "**our**" or "**us**"). When you interact with us (such as through a transaction) or when we collect your personal data from you directly, our relevant documentation will notify you of the Yanlord entity that is collecting and processing your personal data.
2. We own and/or operate website(s) such as but not limited to <http://www.yanlordland.com/> and/or any mobile apps that may be published by us (the said website and mobile apps may be collectively or individually referred to as the "**Website**").

B. What Is The Purpose Of This Policy?

3. The purpose of this Privacy Policy is to inform you and provide you with an understanding of how we handle, collect, use, disclose and deal with personal data about you that you give us, that we receive through third parties, that is in our possession or that comes into our possession, whether now or in the future. Please read this Privacy Policy carefully.
4. We take our responsibilities under Singapore's Personal Data Protection Act ("**PDPA**") seriously. We recognise the importance of the personal data you have entrusted to us and believe that it is our responsibility to properly manage, protect and process your personal data.
5. The contents of this Privacy Policy may change over time so please check back frequently. Any changes to this Privacy Policy will be posted on and can be viewed at our Website.

C. What Information Do We Collect?

6. "Personal data" is defined under the PDPA to mean data, whether true or not, about an individual who can be identified from that data, or from that data and other information to which an organisation has or is likely to have access. Yanlord collects information about you when you provide your information to us, when you use our Website, when you interact with us and/or when you enter into a transaction with us, or that is in our possession (as may be updated from time to time) or comes into our possession which are received through third parties. Personal data which we may collect include:

- Name
- Home/Correspondence Address
- Location Information of yourself and/or your computer or device
- Contact Information
- Transactional Information
- Identification number (such as National ID, Passport Numbers, etc.) (pursuant to the Personal Data Protection Commission's Advisory Guidelines On The Personal Data Protection Act For NRIC And Other National Identification Numbers)
- Photograph/video image/audio recordings
- Bank Account Number
- The property or type of properties you are interested in
- Signature
- Your purchase

We will collect your personal data in accordance with the PDPA.

7. We may also collect and store certain information automatically when you visit the Website. Examples include the internet protocol (IP) address used to connect your computer or device to the internet, connection information such as browser type and version, your operating system and platform, a unique reference number linked to the data you enter on our system, login details, the full URL clickstream to, through and from the Website (including date and time), cookie number and/or your activity on our Website, including the pages you visited, the searches you made.
8. We may receive information about you from third parties if you use any websites or social media platforms operated by third parties (for example, Facebook, Instagram, Twitter etc.) and, if such functionality is available, you have chosen to link your profile on our Website with your profile on those other websites or social media platforms.

D. Cookies

9. We may use cookies to identify you from other users on the Website.
10. A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer or device.
11. You can block or deactivate cookies in your browser settings.
12. We use log-in cookies in order to remember you when you have logged in for a seamless experience.
13. We may use session cookies to track your movements from page to page and in order to store your selected inputs so you are not constantly asked for the same information.
14. Our Website may use Google Analytics which is one of the most widespread and trusted analytics solutions on the web for helping us to understand how you use the Website and ways that we can improve your experience. These cookies may track things such as how long you spend on the Website and the pages that you visit so we can continue to produce engaging content.
15. By continuing to use the Website, you are agreeing to the use of cookies on the Website as outlined above. However, please note that we have no control over the cookies used by third parties.
16. For further information on types of cookies and how they work, please visit www.allaboutcookies.org.

E. The Purposes for Which We Collect, Use and/or Disclose Your Personal Data

17. Yanlord will/may collect, use, disclose and/or process your personal data for one or more of the following purposes:
 - (a) processing and dealing with your interest in any property development or property project ("**Project**") which we and/or our partners are selling or marketing, whether now or in the future, and contacting you on matters relating to your interest in a Project;
 - (b) considering and/or processing your application for purchase of one or more units in a Project ("**Purchase**");
 - (c) facilitating, processing, dealing with, administering and/or managing a Purchase by you;

- (d) administering, facilitating, managing, processing and/or dealing with your ownership of unit(s) in a Project;
- (e) administering, facilitating, managing, processing and/or dealing with your use of, administration of and/or dealings in (including your leasing out the same to third party(ies)), the Purchase unit(s);
- (f) processing your transaction with us;
- (g) facilitating, processing, dealing with, administering and/or managing the Purchase and/or your use of the property after the Purchase has been completed, including but not limited to handling conveyancing / financing matters pertaining to your property, key collection arrangement, estate matters, defects rectification, dealing with the MCST (Management Corporation Strata Title) and the managing agent(s) for the property (this includes us disclosing your personal data to the MCST and the managing agent(s)), etc.;
- (h) dealing in any matters relating to the services and/or products which you are entitled to under your contract(s) with us including performing the contract(s);
- (i) administering, facilitating, processing and/or dealing in any matters relating to your use of the Website;
- (j) monitoring, processing and/or tracking your use of the Website in order to provide you with a seamless experience, facilitating or administering your use of the Website, and/or to assist us in improving your experience in using the Website;
- (k) administering, facilitating, processing and/or dealing in any transactions or activities carried out by you on the Website;
- (l) carrying out your instructions or responding to any enquiry given by (or purported to be given by) you or on your behalf;
- (m) contacting you or communicating with you via phone/voice call, text message and/or fax message, email and/or postal mail for one or more of the Purposes stated herein. You acknowledge and agree that such communication by us could be by way of the mailing of correspondence, documents or notices to you, which could involve disclosure of certain personal data about you to bring about delivery of the same as well as on the external cover of envelopes/mail packages;
- (n) carrying out due diligence or other screening activities (including background checks, anti-money laundering checks, know your client checks) in accordance with legal or regulatory obligations applicable to us (whether Singapore or other countries), the requirements or guidelines of governmental authorities which we determine are applicable to us (whether Singapore or other countries), and/or our risk management procedures that may be required by law (whether Singapore or other countries) or that may have been put in place by us;
- (o) to prevent or investigate any fraud, unlawful activity or omission or misconduct, whether or not there is any suspicion of the aforementioned; dealing with conflict of interests; or dealing with and/or investigating complaints;

- (p) complying with or as required by any applicable law, governmental or regulatory requirements of any jurisdiction applicable to us or our affiliates/associated companies, including meeting the requirements to make disclosure under the requirements of any law binding on us or our affiliates/associated companies, and/or for the purposes of any guidelines issued by regulatory or other authorities (whether of Singapore or other countries), with which we or our affiliates/associated companies are expected to comply;
- (q) complying with or as required by any request or direction of any governmental authority (whether Singapore or other countries) which we are expected to comply with; or responding to requests for information from public agencies, ministries, statutory boards or other similar authorities. For the avoidance of doubt, this means that we may/will disclose your personal data to the aforementioned parties upon their request or direction;
- (r) conducting research, analysis and development activities (including but not limited to data analytics, surveys and / or profiling) to improve our services and facilities in order to enhance any continued interaction between yourself and us connected or in relation to the Website, a Project or any future Project type which you have indicated to us your interest in, or your Purchase; or to improve any of our products, services or Projects, whether now or in the future. Without limiting the generality of the foregoing, we may/will in this regard send you surveys or request a face to face interview survey, by way of email or postal mail;
- (s) for marketing purpose and in this regard, we would be providing you with marketing, advertising and promotional information, materials and/or documents relating to Projects, products, contests, services and/or events (including Projects, products, services and/or events of third party organisations with which we may collaborate with) that we (including our affiliates/related corporations) or such third party organisations may be selling, marketing, offering, organising, involved in or promoting, whether such Projects, products, services and/or events exist now or are created in the future,:
 - (i) by way of postal mail, electronic transmission to your email address(es), and/or through other modes of communication that is not the 3 DNC Modes (as defined below) in compliance with PDPA. You may opt out of this or withdraw from this at any time by sending an email to our Data Protection Officer at data.protection@yanlord.com.sg. For the avoidance of doubt, unlike (ii) below, the application of or your acceptance of or your consent to, this Privacy Policy, constitutes your consent to this subparagraph (i);
 - (ii) if you have separately expressly consented to one or more of the following 3 DNC Modes, by way of the 3 modes of communications of voice calls, text messages or faxes ("**3 DNC Modes**") to your Singapore telephone number, in compliance with the requirements of the PDPA; and/or
 - (iii) Notwithstanding (ii) above, regardless that you have not separately provided express consent as aforementioned in (ii) above, Yanlord reserves its right to send a specified fax message (as defined in Singapore's Personal Data Protection (Exemption from Section 43) Order 2013) ("**Exemption Order**") and/or a specified text message (as defined in the Exemption Order) (i.e. a marketing fax message or marketing text message) to your Singapore telephone number, if:

- (1) there is an ongoing relationship between Yanlord and you and the purpose of the message is related to the subject of the ongoing relationship, pursuant to the requirements and conditions of the Exemption Order; or
 - (2) the law permits.
- (t) storing, hosting, backing up (whether for disaster recovery or otherwise) of your personal data, whether within or outside Singapore;
 - (u) the conduct of training or training purpose, so as to develop or improve our products or services and/or our staff's and agents' services and/or service quality. Without limiting the generality of the foregoing, such training may involve collection, use, disclosure or processing of your personal data including your feedback or comments or reviews;
 - (v) to facilitate and/or ensure the safety and security of our premises, our customers, our staff and/or visitors to our premises; to deal with, handle and/or conduct disciplinary, security, crime prevention and/or quality assurance processes, matters and/or arrangements. Without prejudice to the generality of the aforesaid, we wish to bring to your attention that there are or there may be surveillance cameras installed throughout our premises and/or our offices, for security, crime prevention, safety and training reasons and you acknowledge that your personal data will be collected by such cameras and processed by us consequently;
 - (w) creating reports with respect to potential purchasers' interest in a Project or purchases made by purchasers in a Project including your Purchase;
 - (x) facilitating, dealing with and/or administering external audit(s) or internal audit(s) of the business of Yanlord and/or of its affiliates/related corporations, Purchase(s), and/or transactions related to any Project;
 - (y) dealing with and/or facilitating a business asset transaction or a potential business asset transaction, where such transaction involves Yanlord as a participant or involves only a related corporation or affiliated company of Yanlord as a participant or involves Yanlord and/or any one or more of Yanlord's related corporations or affiliated companies as participant(s), and there may be other third party organisations who are participants in such transaction. "**business asset transaction**" means the purchase, sale, lease, merger or amalgamation or any other acquisition, disposal or financing of an organisation or a portion of an organisation or of any of the business or assets of an organisation;
 - (z) record-keeping purposes and producing statistics and research for internal and/or statutory reporting and/or record-keeping requirements, of Yanlord or of its affiliates/associated companies/related corporations;
 - (aa) Yanlord, Yanlord Group Companies' or Yanlord's parent corporation's reporting purposes including but not limited to reporting on Yanlord's business performance ("**Yanlord Group Companies**" means Yanlord, its affiliates, related corporations and associated companies globally);
 - (bb) anonymisation of your personal data. In this regard, you acknowledge that personal data that has been anonymised is no longer personal data and the requirements of applicable local data protection law (i.e. the PDPA) would no longer apply to such anonymised data; and

(cc) to deal with the or as part of a bankruptcy, winding up, reorganisation, restructuring, insolvency, receivership or an assignment for the benefit of creditors, of Yanlord.

(the purposes set out in this paragraph **17** above shall be collectively referred to as the “**Purposes**”).

18. Yanlord may/will need to disclose your personal data to third parties, whether located within or outside Singapore, for one or more of the Purposes, as such third parties, would be processing your personal data for one or more of the above Purposes. In this regard, you hereby acknowledge, agree and consent that we may/are permitted to disclose your personal data to such third parties (whether located within or outside Singapore) for one or more of the Purposes and for the said third parties to subsequently collect, use, disclose and/or process your personal data for one or more of the Purposes. Without limiting the generality of the foregoing or of paragraph **17**, such third parties include:
- (a) the MCST and managing agent(s) for the Project in question where you have made the Purchase;
 - (b) third party organisations which we partner with for developing a Project including the Project where you have made the Purchase or applied to make a Purchase;
 - (c) our associated or affiliated organisations or related corporations;
 - (d) any of our agents, contractors or third party service providers that process or will be processing your personal data on our behalf including but not limited to those which provide administrative or other services to us such as property agents, managing agents of Projects which you have made a Purchase, mailing houses, telecommunication companies, information technology companies and data centres;
 - (e) our lawyers and the lawyers appointed by you to act for you in a Purchase;
 - (f) third parties to whom disclosure by Yanlord is for one or more of the Purposes and such third parties would in turn be collecting and processing your personal data for one or more of the Purposes; and
 - (g) any government authorities and/or agencies, whether of Singapore or another country.
19. We may share your information with any member of our group (which means our subsidiaries, our ultimate holding company and its subsidiaries), which may be based in countries other than Singapore, from time to time for one or more of the Purposes.
20. You have the right to withdraw your consent given hereunder, whether in part or as a whole. However, your withdrawal of consent could result in certain legal consequences arising from such withdrawal. In this regard, depending on the extent of your withdrawal of consent for us to process your personal data, it may mean that we will not be able to properly execute and/or manage the Purchase or the Purchase contract may have to be terminated, etc.. Should you wish to withdraw your consent in part or whole, please send an email to our Data Protection Officer at data.protection@yanlord.com.sg and provide details of your withdrawal.
21. We may collect, use, disclose or process your personal data for other purposes that do not appear above. However, we will notify you of such other purpose at

the time of obtaining your consent, unless processing of your personal data without your consent is permitted by the PDPA or by law.

22. We may/will also be collecting from sources other than yourself, personal data about you, for one or more of the above Purposes, and thereafter using, disclosing and/or processing such personal data for one or more of the above Purposes. We may combine information we receive from other sources with information you give to us and information we collect about you. We may use this information and the combined information for the Purposes set out above (depending on the types of information we receive).
23. We take reasonable steps to ensure that any personal data we collect, use and/or disclose is accurate and complete, if your personal data is likely to be used by us to make a decision that affects you, or disclosed to another organisation. However, it is important that you advise us of any changes to your personal data or if there are any errors in the personal data we hold about you. We will not be responsible for relying on inaccurate or incomplete personal data arising from your not updating us of any changes in your personal data that you had initially provided us with.

F. How Do We Store Data?

24. Security of your personal data is important to us. We will put in place reasonable security arrangements to ensure that your personal data is adequately protected and secured. Appropriate security arrangements will be taken to prevent any unauthorised access, collection, use, disclosure, copying, modification, leakage, loss, damage and/or alteration of your personal data. However, we cannot assume responsibility for any unauthorised use of your personal data by third parties which are wholly attributable to factors beyond our control.
25. We will put in place measures such that your personal data in our possession or under our control is destroyed and/or anonymised as soon as it is reasonable to assume that (i) the purpose for which that personal data was collected is no longer being served by the retention of such personal data; and (ii) retention is no longer necessary for any other legal or business purposes.

G. Rights

26. You have the right to ask us not to use your personal data for marketing purposes. Please let us know if you want to withdraw your consent by emailing us at data.protection@yanlord.com.sg with details of your withdrawal request.
27. You have the right to access and/or correct any personal data that we hold about you, subject to exceptions under the law. This right can be exercised at any time by emailing us at data.protection@yanlord.com.sg with details of your access request. We will need enough information from you in order to ascertain your identity as well as the nature of your request, so as to be able to deal with your request. With respect to your access request, we may charge a fee in order to process it.
28. For a request to access personal data, once we have sufficient information from you to deal with the request, we will seek to provide you with the relevant personal data within 30 days. Where we are unable to respond to you within the said 30 days, we will notify you of the soonest possible time within which we can provide you with the information requested. Note that the PDPA exempts certain types of personal data from being subject to your access request.
29. For a request to correct personal data, once we have sufficient information from you to deal with the request, we will correct your personal data within 30 days. Where we are unable to do so within the said 30 days, we will notify you of the

soonest practicable time within which we can make the correction. Note that the PDPA exempts certain types of personal data from being subject to your correction request as well as provides for situation(s) when correction need not be made by us despite your request.

30. We hold and deal with your personal data in accordance with the PDPA.

H. Complaint Process

31. If you have any complaint or grievance regarding about how we are handling your personal data or about how we are complying with the PDPA, we welcome you to contact us with your complaint or grievance.
32. Please contact us with your complaint or grievance by emailing us at data.protection@yanlord.com.sg.
33. Where you are sending an email in which you are submitting a complaint, your indication at the subject header that it is a PDPA complaint would assist us in attending to your complaint speedily by passing it on to the relevant staff in our organisation to handle. For example, you could insert the subject header as "PDPA Complaint".
34. We will certainly strive to deal with any complaint or grievance that you may have speedily and fairly.

I. General

35. Your consent that is given pursuant to this Privacy Policy is additional to and does not supersede any other consents that you had provided to Yanlord with regard to processing of your personal data.
36. For the avoidance of doubt, in the event that Singapore personal data protection law permits an organisation such as us to collect, use and/or disclose your personal data without your consent, such permission granted by the law shall continue to apply.
37. If you have any queries on this Privacy Policy or any other queries in relation to how we may manage, protect and/or process your personal data, please do not hesitate to contact our Data Protection Officer, at data.protection@yanlord.com.sg.

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