

STRAITS TIMES CO-OPERATIVE MEMBER PERSONAL DATA POLICY

Your Personal Data is important to us. The purpose of this policy (“Personal Data Policy”) is to inform you of how Straits Times Co-operative Limited manages the personal data of its employees in accordance with the Singapore Personal Data Protection Act 2012 (“the Act”). Please take a moment to read this Personal Data Policy so that you know and understand the purposes for which we collect, use and disclose your Personal Data.

By your interacting with us, submitting information to us, or through your continuing membership with us, you agree and consent to Straits Times Co-operative Limited, its related corporations and affiliates (collectively referred to herein as “ST Coop”, “us”, “we” or “our”) collecting, using, disclosing and sharing amongst themselves your Personal Data, and disclosing such Personal Data to ST Coop’s authorised service providers and relevant third parties in the manner set forth in this Personal Data Policy.

This Personal Data Policy supplements but does not supersede or replace any other consents which you may have previously provided to ST Coop in respect of your Personal Data nor does it affect any rights which ST Coop may have at law in connection with the collection, use or disclosure of your Personal Data. ST Coop may from time to time update this Personal Data Policy to ensure that this Personal Data 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 Personal Data Policy as updated from time to time on ST Coop Employee Data Privacy Policy.

For the avoidance of doubt, this Personal Data Policy forms a part of the terms and conditions governing your employment relationship with us (“**Terms and Conditions**”) and should be read in conjunction with those Terms and Conditions.

1. Personal Data

1.1 In this Personal Data 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.

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, photographs, shareholding details, credit status 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 us.

2. Collection of Personal Data

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

- (a) when you submit forms or applications to us;
- (b) when you submit your resumes and/or CVs to us;
- (c) when you submit queries, requests, complaints or feedback to us;
- (d) when your images are captured by us via CCTV cameras while you are within our premises or photographs or videos taken by us or our representatives when you attend events hosted by us;
- (e) when you respond to our request for additional Personal Data;
- (f) when you ask to be included in an email or other mailing list;

- (g) when a recruitment agency refers your resume to us;
 - (h) when you respond to our initiatives;
 - (i) when you browse our intranet or other websites; and
 - (j) when you submit your Personal Data to us for any other reasons.
- 2.2 If you provide us with any Personal Data relating to a third party (e.g. information of your dependent, spouse, children and/or parents), by submitting such information to us, you represent to us that you have obtained the consent of that third party to you providing us with their Personal Data for the relevant purposes contained in this Personal Data Policy.
- 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 fulfil your requests and/or applications.
3. **Purposes for the Collection, Use and Disclosure of Your Personal Data**
- 3.1 **Generally**, ST Coop collects, uses and discloses your Personal Data for the following purposes:
- (a) verifying your identity;
 - (b) responding to your queries, feedback, complaints and requests;
 - (c) conducting due diligence and background checks on you as an employee;
 - (d) facilitating your enrolment as an employee including applying for work permits and employment passes;
 - (e) providing remuneration and processing payroll as well as reviewing salary, bonuses, incentives, allowances and payments and administering and processing benefits, claims, compensation and benefits (including but not limited to processing expense claims, medical / health insurance and security bond applications);
 - (f) conducting evaluation and staff appraisals to determine your continuing suitability, eligibility or qualification for your job and considering you for promotion, training, secondment, transfer or succession planning;
 - (g) manpower and logistical management (including but not limited to procuring office supplies, issuing premise access security passes and car park arrangements, tax compliance, granting you the necessary access rights to various websites and online services, making travel arrangements whether local or overseas and leave administration);
 - (h) providing you with tools to facilitate or as required for you to do your job including granting and managing your access rights to ST Coop's IT systems and monitoring your use of the same to ensure your ongoing compliance with ST Coop's internal policies;
 - (i) managing ST Coop's relationship with its business partners and other organisations;
 - (j) recognising and awarding individuals who have delivered service excellence;
 - (k) administering the activities of any trade union which you may be a member of;

- (l) preventing, detecting and investigating crime and managing the safety and security of our premises and services (including but not limited to carrying out CCTV surveillance, voice recordings and conducting security clearances);
- (m) monitoring compliance with internal rules and policies of ST Coop (including taking steps to manage human resources and take investigative or disciplinary action);
- (n) managing and preparing reports on incidents and accidents and managing internal directories and emergency contact lists;
- (o) facilitating training, learning and talent development including employment development schemes such as the granting of study grants and scholarships;
- (p) planning and organising corporate events;
- (q) in order to inform you of ST Coop's policies and to send you information from time to time which you are entitled to receive as an employee of ST Coop;
- (r) administering termination or cessation processes;
- (s) conducting analytics, internal audits and research for human resource planning and management, and for us to review, develop, optimise and improve work-related practices, environment and productivity;
- (t) business continuity management and records management;
- (u) legal purposes (including drafting and reviewing documents, obtaining legal advice and facilitating dispute resolution) and protecting and enforcing our contractual and legal rights and obligations;
- (v) conducting audits, reviews and analysis of our internal processes, action planning and managing commercial risks, including fraud prevention and money-laundering;
- (w) facilitating business asset transactions (which may extend to any mergers, acquisitions and debt or asset sale);
- (x) meeting or complying with any applicable rules, laws, regulations, codes of practice or guidelines issued by any legal or regulatory bodies whether local or overseas which are binding on ST Coop or to assist in law enforcement and investigations by relevant authorities (including but not limited to disclosures to regulatory bodies, conducting audit checks or surveillance and investigation); and/or
- (y) purposes which are reasonably related to the aforesaid.

3.2 ST Coop may, with your consent, also collect, use and disclose your Personal Data for the following purposes:

- (a) to facilitate your participation in corporate social responsibility schemes and programmes including blood donation drives;
- (b) use of your photographs, voice recording and video recording in our annual reports and publications or events, fairs or exhibitions; and/or
- (c) purposes which are reasonably related to the aforesaid.

4. **Disclosure of Personal Data**

4.1 Your Personal Data held by us shall be kept confidential. However, your Personal Data may be disclosed to the following parties in connection with the purposes listed above (where applicable):

- (a) other entities and business units within ST Coop and our related corporations;
- (b) insurance companies and brokers in connection with staff insurance;
- (c) agents, contractors or third party service providers who provide operational services to ST Coop, such as courier services, telecommunications, information technology, advertising, payment, payroll, processing, training, market research, storage, archival, customer support investigation services or other services to ST Coop;
- (d) any business partner, investor, assignee or transferee (actual or prospective) to facilitate business asset transactions (which may extend to any mergers, acquisitions and debt or asset sale);
- (e) local and overseas banks and their respective service providers;
- (f) our professional advisers such as our consultants, auditors and lawyers;
- (g) trade unions;
- (h) business and charity partners in relation to events planning;
- (i) our co-brand and other business partners;
- (j) relevant government regulators, government ministries, statutory boards, embassies, or authorities and/or law enforcement agencies, whether local or overseas, including the Inland Revenue Authority of Singapore, the Central Provident Fund Board, and Ministry of Manpower to comply with any directions, laws, rules, guidelines, regulations or schemes issued or administered by any of them; and/or
- (k) other organisations which may request that we provide them with your personal data for evaluative purposes;
- (l) any other party to whom you authorise us to disclose your Personal Data.

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

5.1 If you:

- (a) have any questions or feedback relating to your Personal Data or our Personal Data Policy;
- (b) would like to withdraw your consent to any use of your Personal Data as set out in this Personal Data Policy; or
- (c) would like to obtain access to or make corrections to your Personal Data records, please contact us as follows:

Name: Ms Chia Hui Eng

Email: tlsche@sph.com.sg

Telephone: 6319 1123

Address: 1000 Toa Payoh North, News Centre, Annexe Level 5, Singapore 318994

- 5.2 If you withdraw your consent to any or all use of your Personal Data, depending on the nature of your request, ST Coop may not be in a position to administer any contractual relationship in place. This may also result in the termination of your employment with ST Coop and your being in breach of your contractual obligations or undertakings. ST Coop's legal rights and remedies in such event are expressly reserved.
- 5.3 Please note that if your Personal Data has been provided to us by a third party (e.g. recruitment agency or a headhunter), you should contact such party directly to make any queries, complaints, and access and correction requests to ST Coop on your behalf.
6. **Governing Law**
- 6.1 This Personal Data Policy shall be governed in all respects by the laws of Singapore.