

# **DATA PROTECTION POLICY**

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**1<sup>st</sup> Edition 2014**

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# Data Protection Policy

## ^ **BBR Holdings (Singapore) Limited**

**BBR Holdings (Singapore) Limited** respects the protection of the Personal Data of individuals and values the relationship we have with you. We are committed to accord Personal Data the due level of care as presented in our Personal Data Policy, and consistent with the Personal Data Protection Act 2012 and its regulation(s) (“PDPA”). You will be able to access on this page the Personal Data Policy of BBR Holdings (S) Limited and its subsidiary companies.

Our Personal Data Policies describe the types of Personal Data we may collect from you, how we may use that information, and to whom we may share it with. Our Personal Data Policy also describes the measures we take to protect the security of the information you provide to us, including without limitation through our Website. We also inform you how you can reach us to update your Personal Data, ask questions you may have about our personal data protection practices and provide feedback on our personal data protection practices.

## ^ **BBR Group of Companies**

BBR Holdings (S) Ltd is the parent company of a group of direct and indirect subsidiaries (collectively known as “**BBR Group**”), namely BBR Construction Systems Pte Ltd, BBR Development Pte Ltd, BBR Piling Pte Ltd, BBR Greentech Pte Ltd, Singapore Piling & Civil Engineering Pte Ltd, Singa Development Pte Ltd and Moderna Homes Pte Ltd. BBR Holdings (S) Ltd (“**BBR**” or as appropriate in the context, “**we**”, “**us**” or “**our**”) respect the protection of the Personal Data of individuals and value the relationship we have with you.

This Personal Data Policy (“**Policy**”) describes the types of Personal Data we may collect from you, how we may use that information, and with whom we may share it. Our Policy also describes the measures we take to protect the security of the information you provide to us, [including without limitation through this Website]. We also tell you how you can reach us to update your Personal Data, ask questions you may have about our personal data protection practices and provide feedback on our personal data protection practices.

“**Personal Data**” in this Policy means data that can identify an individual.

### **1. Personal Data that we collect**

The types of Personal Data that we collect about individuals include:

1. Name
2. NRIC number / FIN number / passport number
3. Bank account details
4. Mobile number
5. Vehicle number
6. Personal email address
7. Residential address
8. Residential telephone number

9. Photographs
10. Video and CCTV footage

You may have provided the Personal Data to us personally or authorised other individuals to provide the Personal Data to us and consent (on your behalf) to our collection of your Personal Data from these individuals. These individuals could be your superiors, employees, subordinates, colleagues and your family members.

Where you give us Personal Data about other individuals, you confirm that you are authorised to disclose and consent, on their behalf, to the processing of such Personal Data for the purposes described in the section "Purposes for which we collect and use Personal Data", or other purposes for which your consent has been sought and obtained.

## 2. Purposes for which we collect and use Personal Data

We collect and use the Personal Data that you provide to us for the following purposes:

### If you are a Vendor / Service Provider / Business Partner

- a) To conduct due diligence / background checks that are mandated by legislation or BBR Group's internal policies and practices;
- b) For the purposes of the supply of products and services and support by vendors / service providers / business partners to BBR Group;
- c) To keep vendors / service providers / business partners updated on changes to BBR Group's policies;
- d) To evaluate and to improve BBR Group's products and services;
- e) To evaluate the products and services provided by vendors / service providers / business partners to BBR Group;
- f) Security clearance / entry access into BBR Group's premises and premises of foreign government agencies;
- g) To facilitate attendance at events/functions organised by BBR Group or that BBR Group is involved in;
- h) For purposes that are ancillary to or in furtherance of the above purposes e.g. ancillary to or in furtherance of facilitating attendance at events/functions organised by BBR Group or that BBR Group is involved in, we will use your Personal Data to communicate with you concerning the invitation to the events/functions and inform you of updates on the events/functions and to seek your feedback or comments on your attendance of the events/functions.

### If you are a Customer / Shareholder

- a) To conduct due diligence / background checks that are mandated by legislation or BBR Group's internal policies and practices;
- b) To provide products and services and to communicate with customers as part of providing products and services;
- c) To evaluate BBR Group's products and services and how BBR Group can improve its products and services;
- d) To respond to queries or comments on BBR Group's products and services;
- e) Security clearance / entry access into BBR Group's premises and premises of foreign government agencies;

- f) To communicate with customers on developments on BBR Group's products and services, the business of BBR Group and other corporate events or updates;
- g) To facilitate attendance at events/functions organised by BBR Group or that BBR Group is involved;
- h) For purposes that are ancillary to or in furtherance of the above purposes e.g. ancillary to or in furtherance of facilitating attendance at events/functions organised by BBR Group or that BBR Group is involved in, such as Shareholders Annual General Meeting, new development launches, we will use your Personal Data to communicate with you concerning the invitation to the events/functions and inform you of updates on the events/functions and to seek your feedback or comments on your attendance of the events/functions.

#### If you are an Employee / Others

- a) To evaluate applications for employment / job positions within BBR Group;
- b) To evaluate applications for scholarships and to award scholarships to eligible parties;
- c) To evaluate applications for internships and industrial attachments;
- d) To conduct due diligence/background checks on job applicants;
- e) To communicate with individuals who participate in competitions organised by BBR Group;
- f) To communicate with award nominees and award winners for awards organised by BBR Group;
- g) To organise and manage events for community and charitable purposes;
- h) Security clearance / entry access into BBR Group's premises;
- i) To facilitate attendance at events/functions organised by BBR Group or that BBR Group is involved in;
- j) For purposes that are ancillary to or in furtherance of the above purposes e.g. ancillary to or in furtherance of facilitating attendance at events/functions organised by BBR Group or that BBR Group is involved in, we will use your Personal Data to communicate with you concerning the invitation to the events/functions and inform you of updates on the events/functions and to seek your feedback or comments on your attendance of the events/functions.

We only collect and use Personal Data for purposes which you have consented to and for which we have been authorised. If we need to use your Personal Data for any purpose which you have not previously consented to, we would seek your consent prior to using your Personal Data for the new purpose.

### **3. Disclosure, sharing and transfer of Personal Data**

BBR does not sell or rent Personal Data that we collect from individuals, [including our website visitors]. In the course of or in connection with providing our products and services to our customers, we disclose, share and transfer Personal Data to the following parties for the following purposes:

- a) To our customers/vendors/subcontractors/consultants/business partners for tender purposes;
- b) To our agents and sub-contractors for the purposes of providing products and services to our customers on our behalf;

- c) To our business partners for the purposes of providing products and services to our customers;
- d) To government and non-government authorities, agencies and/or regulators as required under law or under directions or orders from the government and non-government authorities, agencies and/or regulators for security, regulatory approvals or permits;
- e) To other BBR Group entities for the purpose of responding to questions, concerns, comments or feedback on our products or services or our business, or to share knowledge on issues such as industry developments, BBR's business, market outlook, corporate events and other products and services of the BBR Group that may be of interest to your company, organisation or business;
- f) To other BBR Group entities to facilitate the provision of products and services to our customers where the project or engagement involves other BBR Group entities;
- g) To event organisers and service providers to facilitate the planning of events / functions that BBR Group organises or is involved in.

We also disclose and transfer Personal Data to the following parties for the purposes of managing, operating, administering and running our business and for our business and legal purposes:

- a) To other BBR Group entities for security purposes;
- b) To other BBR Group entities for purposes of evaluating our products and services and our business as a group;
- c) Financial institutions for purposes of payments and transactions related to BBR's provision of products and services or related to products and services provided to BBR by our vendors / service providers / consultants
- d) To our service providers (who may be located outside Singapore) that have been retained to perform services on our behalf or on behalf of BBR Group entities, including:
  - i. Service providers who provide IT and outsourcing services such as data storage, electronic mail services, deployment of management operations for information technology and HR outsourcing services;
  - ii. Professional, financial and legal advisors, tax advisors, auditors, insurers and insurance brokers;
  - iii. Vendors, service providers and consultants that have been engaged to help manage, operate, administer and run BBR's operations and business process or provide services to facilitate our provision of our products and services; and
  - iv. External contractors to provide consultancy and evaluative services to BBR and for BBR's products and services, or organise events for BBR.
- e) For job applicants, your Personal Data may be shared with other entities in the BBR Group if BBR takes the view that you may be suitable or eligible for another job position within the BBR Group, unless you inform us otherwise (please refer to Section 6). The Personal Data will be used in a confidential manner to help BBR Group monitor their recruitment processes.

BBR requires that the parties to whom we transfer Personal Data and our service providers implement adequate levels of protection in order to protect Personal Data. We also require that these parties only process Personal Data strictly for purposes for which we engage them

for and consistent with the purposes that we have described in the section “Purposes for which we collect and use Personal Data” or with other purposes for which consent has been sought and obtained.

In addition, we would disclose Personal Data in the following circumstances:

- a) we are required to do so by law or by the listing rules of Singapore Exchange Limited;
- b) in response to a request from law enforcement authorities or other government officials;
- c) to comply with a court order or direction from a government agency or regulatory authority ordering the disclosure of the Personal Data; and
- d) where the disclosure is necessary for investigations or legal proceedings.

#### 4. Protection and Security of Personal Data

We employ a range of technological and physical security arrangements and maintain safeguards to protect against the accidental or unauthorised access, collection, use, disclosure, copying, modification, disposal, deletion and other similar risks to Personal Data.

#### 5. Retention of your Personal Data

BBR only retains Personal Data for as long as the retention is required for the purposes for which we collected the Personal Data, the purposes described in this Policy and for our business and legal purposes. Generally, we do not retain Personal Data for a period of longer than 7 years after the original purposes for which the Personal Data was collected have ceased to be applicable, unless otherwise required by law, the listing rules of Singapore Exchange Limited or other mandatory directions by court or government authorities or for purposes of legal proceedings or other similar proceedings or investigations.

For unsuccessful job applicants, BBR will retain your Personal Data for no longer than 1 year for the purposes of evaluating your suitability for future job openings within BBR Group, unless you inform us otherwise (please refer to Section 6).

#### 6. How to Contact Us

If you have any questions or comments about this Policy and our policies and practices on our collection, use, disclosure or retention of Personal Data, you may contact our Data Protection Officer:

Email address:	<a href="mailto:dataprotection@bbr.com.sg">dataprotection@bbr.com.sg</a>
Mailing address:	Data Protection Officer BBR Holdings (S) Ltd BBR Building 50 Changi South Street 1 Singapore 486126

If you are a job applicant and wish to inform us that: (i) you do not wish for BBR to share your personal data with other entities in the BBR Group for evaluating your suitability or eligibility for another job position within the BBR Group other than the one you are applying for; or (ii)

you do not wish for BBR to retain your personal data for the purposes of evaluating your suitability for future job openings within BBR Group, please contact:

Email address: [dataprotection@bbr.com.sg](mailto:dataprotection@bbr.com.sg)  
Mailing address: Data Protection Officer  
BBR Holdings (S) Ltd  
BBR Building  
50 Changi South Street 1  
Singapore 486126

## 7. Updating or correcting your Personal Data

BBR takes reasonable measures to ensure that the Personal Data we collect about individuals are accurate and complete. For this reason, if there is any change or update in Personal Data, we would like to know about these changes or updates. If there is a change or an update in your Personal Data or if there is a need to correct any Personal Data of yours that we have, please write to us and provide us with the following details:

- Your name and an email address or mailing address at which we can contact you.
- The nature of our relationship with you.
- The Personal Data for which there has been a change, update or correction.

You may send your requests to our Data Protection Officer at the contact details listed in Section 6 above.

We will endeavour to acknowledge the receipt of your request within 3 working days after the date of receipt of your request if it is sent by e-mail, or within 7 days after the date of receipt of your request if it is sent by post. As it is important to us that the Personal Data that we have about you is accurate and complete, it may be necessary for us to request for supporting documentation from you. We will contact you if we require supporting documentation from you.

There may be circumstances where we will not update or correct Personal Data, including:

1. The Personal Data is opinion data that is kept solely for an evaluative purpose; and
2. The Personal Data is in documents related to a prosecution if all proceedings relating to the prosecution have not been completed.

## 8. Your Requests and Feedback on your Personal Data with us

You may request for information from BBR on what Personal Data of yours we have and how we have used and shared your Personal Data during the last one year before the date of your request. To learn more about how you can request for information from BBR, please refer to our Personal Data Access Request Form. There will be an administrative fee of \$30 for each access request to recover any associated incidental costs of responding to the access request.

You may also choose to withdraw your consent to BBR's use, collection, sharing or processing of your Personal Data at any time. To learn more about how you can withdraw your consent, please see our Consent Withdrawal Form. Please understand that your withdrawal of your



consent to our use of your Personal Data may affect our provision of products and services to you or our business dealings with you, depending on the nature of your relationship with us.

If you have any concerns, feedback or complaints about the use and/or sharing of your Personal Data, we are open to receiving your feedback or complaint. To learn more about how you may submit a complaint about our use and/or sharing of your Personal Data, please see our Feedback and Complaint Notice.

## **9. Updates to this Personal Data Protection Notice**

We may change or update portions of this Policy at any time and without prior notice to you. Please review this Policy from time to time so you are aware of any changes or updates to the notice. We will indicate the effective date of the notice. If you do not agree with any of the changes or updates to the Policy, you have the option of withdrawing your consent to our collection, use, disclosure and processing of your Personal Data (please refer to Section 8 above).

Effective date: **2 July 2014**

### **APPENDICES:**

Form DPP-01: Personal Data Access Request Form

Form DPP-02: Consent Withdrawal Form

Form DPP-03: Change of Personal Data Form (General Public)

Form DPP-04: Feedback & Complaint Notice Form



## FORM DPP-01: PERSONAL DATA ACCESS REQUEST

Upon your request and subject to applicable laws, BBR will provide you with:

- (a) Your personal data that is in our possession or under our control; and
- (b) Information about the ways in which your personal data may have been used or disclosed by us in the past year.
- (c)

*Note: BBR will charge an administrative fee of \$30 for each access request to recover any associated incidental costs responding to the access request.*

### REQUESTOR'S PERSONAL PARTICULARS

<b>Name</b> <i>(As reflected in NRIC)</i>	
<b>Residential Address</b>	
<b>Email Address</b>	
<b>Contact Number</b>	
<b>Relevant BBR entity to which your request relates to</b>	

### NATURE OF REQUEST

*Please tick the most appropriate box (can be more than one).*

- I wish to know about the ways my personal data has been or may have been used or disclosed by BBR within a year before the date of request.
- I wish to access to all of my personal information.
- I wish to access to some of my personal information.  
*Please specify in the box below what personal information you wish to access.*

### DECLARATION

I declare that the information I have provided in this application form is correct, and that I am the person to whom it relates.

\_\_\_\_\_  
(Signature)

\_\_\_\_\_  
(Date)

## FORM DPP-02: CONSENT WITHDRAWAL NOTICE

BBR aims to act in compliance with the requirements of the Personal Data Protection Act (PDPA) and respects your decision to withdraw consent for BBR to collect, use and disclose your personal data.

### YOUR PARTICULARS

Name (Dr/Mr/Miss/Mdm/Ms/Mrs)	
NRIC / Passport No.	

### WITHDRAWAL

(a) Please select the mode(s) from which you wish to withdraw your consent for receiving updates by BBR (*Please tick accordingly*) :

Direct Mail

Email/E-Broadcast

Phone Call

(b) I wish to withdraw consent for (*Please tick accordingly*):

The collection, use, and disclosure of ALL of my particulars for employment purposes

The collection, use and disclosure of SOME of my particulars for employment purposes

Please state: \_\_\_\_\_

The disclosure of my particulars to third parties for event marketing and promotion purposes

Others. Please state: \_\_\_\_\_

 \_\_\_\_\_  
 (Signature)

 \_\_\_\_\_  
 (Date)

**FORM DPP-03: CHANGE OF PERSONAL DATA (For General Public)**

SECTION A: PERSONAL INFORMATION	
<b>Name:</b> <input type="checkbox"/> Mr. <input type="checkbox"/> Mrs. <input type="checkbox"/> Ms. <input type="checkbox"/> Miss <i>(Please underline your surname)</i>	
<b>NRIC No:</b>	
<b>Contact Number</b>	<b>Home:</b>
	<b>Mobile</b>
<b>Office:</b>	
<b>Mailing Address:</b>	
<b>City:</b>	<b>Postal Code:</b>
<b>Email Address:</b>	
SECTION B: CHANGE OF INFORMATION (Fill in ONLY the fields that are applicable)	
<b>Name:</b> <input type="checkbox"/> Mr. <input type="checkbox"/> Mrs. <input type="checkbox"/> Ms. <input type="checkbox"/> Miss <i>(Please underline your surname)</i>	
<b>NRIC No:</b>	
<b>Contact Number</b>	<b>Home:</b>
	<b>Mobile</b>
<b>Office:</b>	
<b>Mailing Address:</b>	
<b>City:</b>	<b>Postal Code:</b>
<b>Email Address:</b>	

*\*\*Please attach the relevant supporting documents to this form.*

I confirm that I am the person as stated. The information provided by me is true and accurate in all respects and by submitting this form, I agree to allow BBR to collect and use all information as contained in the form for all purposes relevant in the context of this form.

\_\_\_\_\_  
(Signature)

\_\_\_\_\_  
(Date)

**For Official Use Only**

Acknowledgement by relevant Department: \_\_\_\_\_

\_\_\_\_\_  
(Signature)

\_\_\_\_\_  
(Date)

## FORM DPP-04: FEEDBACK & COMPLAINT NOTICE

PERSONAL INFORMATION		
<b>Name:</b> <input type="checkbox"/> Mr. <input type="checkbox"/> Mrs. <input type="checkbox"/> Ms. <input type="checkbox"/> Miss <i>(Please underline your surname)</i>		
<b>Contact Number</b>	<b>Home:</b>	<b>Mobile</b>
	<b>Office:</b>	
<b>Email Address:</b>		
<b>Issues Raised:</b>		

\_\_\_\_\_

(Signature)

\_\_\_\_\_

(Date)

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**For Official Use Only**

Acknowledgement by relevant Department: \_\_\_\_\_

\_\_\_\_\_

(Signature)

\_\_\_\_\_

(Date)