

IK INABATA SINGAPORE (PTE.)LTD.

Privacy Policy

Inabata Singapore (Pte.) Ltd (hereinafter referred to as "Inabata", "we", "us", "our") is fully aware that the privacy of individuals is of the utmost importance and are committed to ensuring the safety and security of Personal Data (as defined below).

The purpose of this Privacy Policy ("**Privacy Policy**") is to inform you as to how we manage, collect, use and disclose personal data. In Singapore, such activities are subject to the Personal Data Protection Act 2012 of Singapore (the "**PDPA**"). We conduct our business in compliance with the PDPA and have implemented various measures to ensure that any personal data we collect, use and/or disclose remains safe and secure.

1. Collection of Personal Data

In this Privacy Policy, "Personal Data" is any data, whether true or not, about an individual who can be identified from that data, or 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 (hereinafter referred to as "Personal Data").

Inabata will advise the relevant individual in advance of the purpose(s) for which we intend to use when requesting the provision of Personal Data.

Under certain circumstances, telephone calls to us and online meetings may be recorded for the purposes of quality control and training. In such an event, by agreeing to this Policy, you hereby give your consent for the collection, use and disclosure of such Personal Data for the purposes of our records, following up with your enquiry and transaction, and for quality control and training purposes.

As part of our day-to-day activity, we may collect from you, through various means, including via our websites ("**Websites**") and any forms used by us from time to time, some or all of the following Personal Data:

- IP addresses
- Names, email addresses, mailing addresses,
- Emergency contact details
- Reference details for the purpose of background check
- Medical details

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- Family background and details, past employment details, academic history and qualifications, NRIC, FIN, Passport details, date of birth, gender
- Images of you
- Bank account number

By providing us with the emergency contact details and reference details, you represent that you have been given the consent by the respective personnel for us, our representatives and agents to collect, use, disclose and share their Personal Data for the purpose of facilitating your employment related matters.

However, if you contact us or interact with us via our Website, you agree and consent to us, our representatives and agents to collect, use, disclose and share your Personal Data for the purposes of responding to your enquiries and provision of products and services to you.

Protection of Personal Information on Linked Sites

When following the links to other websites contained on our Website, please check each of the linked website's individual policies regarding their handling of any Personal Data. Inabata shall not be held responsible for the handling of Personal Data by our affiliate companies, businesses or individuals linked through our website.

Cookies

Unique identifiers such as cookies (which are small text files stored locally on your computer that help store user preferences and may be HTML files, Flash files, or other technology), web beacons, or clear gifs (which are small pieces of code placed on websites used to collect advertising metrics, such as counting page views, promotion views, or advertising responses), tags and scripts or similar technologies (collectively referred to as "**Tracking Technologies**") are used by us and our marketing, analytics, or other service providers to understand Website usage, track the number of visitors, help customize our content, offerings or advertisements on the Websites. In many Internet browsers, you can choose to delete, disable, turn off, or reject most Tracking Technologies through the "Internet Options" sub-option of the "Tools" menu option of your browser or otherwise as directed by your browser's support feature. Additional information on deleting, disabling, rejecting, or turning off Tracking Technologies may be available through your browser's support feature. Please consult the "Help" section of your browser for more information.

This Policy supplements but does not supersede nor replace any other consents you may have previously provided to us in respect of your Personal

Data, and your consents herein are additional to any rights which we may have at law to collect, use or disclose your Personal Data.

Should you not wish Inabata to use your Personal Data for any of the purposes as advised, you may opt out by sending a clearly worded email to our Data Protection Officer via the email address provided in Article 10. Your request shall be processed within 30 days upon receipt by us. Please note however that this may affect our ability to attend to your needs.

2. Purpose and Limitation of Usage

When using Personal Data, Inabata will limit its usage to the purpose(s) advised in advance. For the avoidance of doubt, we may use and/or disclose Personal Data for:

- (a) to operate the Website and provide our services;
- (b) to respond to your requests and inquiries;
- (c) to contact you and to communicate with you about your use of our services;
- (d) to notify you about important changes to our services, such as updates or revisions to this Privacy Policy, security announcements, or other similar messages;
- (e) to review Website usage and operations and to improve the content and functionality of the Website and our services;
- (f) to provide you with information and materials about our products and services;
- (g) to address problems with the services;
- (h) to protect the security or integrity of our services, and our business, or
- (i) legal, regulatory and other compliance requirements (including providing assistance to law enforcement, judicial, regulatory or other government agencies and statutory bodies);
- (j) for marketing and advertising, and in this regard, to send you by various modes of communication marketing and promotional information and materials relating to products and/or services (including, without limitation, products and/or services of third parties) that we may be

marketing or promoting, whether such products or services exist now or are created in the future;

- (k) handling any reports or complaints received by us;
- (l) other work and business related requirements;
- (m) facilitate employment related matters; or
- (n) any other purposes which we notify you of at the time of obtaining your consent,

(collectively, the “**Purposes**” and each, a “**Purpose**”).

We will not use Personal Data for purposes which we are not permitted to or required under the applicable personal data protection law and regulations.

3. Disclosure to Third Parties

When required to disclose Personal Data to third parties, Inabata will only do so after having first obtained the consent of the individual(s) who provided the Personal Data in question. Provided, however, that this shall not apply in the case where disclosure of Personal Data is required/permitted by applicable laws or has been requested by a governmental authority.

Notwithstanding the foregoing, we may disclose your Personal Data to our affiliates, accounting firms, embassies, service providers, lawyers, credit, debit and charge card companies, banks and other entities processing payment, potential buyers or investors of Inabata, and any suppliers providing goods to Inabata and customers of Inabata for the Purposes or any other purposes advised in advance or otherwise in accordance with the applicable personal data protection laws.

We may also disclose your Personal Data to the abovementioned parties in any of the following events:

- To the extent we are required by law to do so;
- In connection with any legal proceedings or prospective legal proceedings;
- To establish, exercise or defend our legal rights;
- To the purchaser or prospective purchaser of any business or asset which we are selling or contemplated to sell;
- Processing of information on our behalf;
- Employment related matters; and

- Disaster recovery.

In exceptional circumstances, we may also be required to disclose Personal Data where, amongst others, there are grounds to believe that disclosure is necessary to prevent a threat to life or health, or for law enforcement purposes. In some cases, we shall encrypt, anonymize, and aggregate the information before sharing it. Anonymizing means stripping the information of personally identifiable features. Aggregating means presenting the information in groups or segments e.g. age groups.

Transfer of Personal Data Overseas

Your Personal Data may be transferred to, stored or processed outside of Singapore.

We will only transfer your information overseas in accordance with the PDPA and will ensure that overseas organisations we work with observe strict confidentiality and are subject to data protection obligations.

In particular, we will ensure that the overseas organisations we transfer your Personal Data to will provide a standard of protection comparable to the protection under the PDPA.

4. Security Measures

Safeguarding and respecting the confidentiality of Personal Data is important to us. We will use our best efforts to protect Personal Data.

Inabata will undertake reasonable measures to prevent (a) the unauthorized access, collection, use, disclosure, copying, modification or disposal of Personal Data and (b) the loss of any storage medium or device on which the Personal Data is stored.

Regardless of the precautions taken by us or by you, no data transmitted over the Internet or any other public network can be guaranteed to be 100% secure. We cannot ensure or warrant the security of any information you transmit to us and you provide all Personal Data via the Website at your own risk.

To the extent permissible under the applicable laws, we will not be held liable or responsible for any loss, misuse or alteration of Personal Data that may be caused by third parties.

5. Accuracy of Personal Data

We will strive to keep your Personal Data accurate. You will be given the ability to review and update your Personal Data that we have in our possession.

You should ensure that all Personal Data submitted to us is complete, accurate, true and correct. Further, when you provide us with any Personal Data relating to a third party (including your spouse, children, parents and/or employees), you represent and warrant to us that you have obtained the consent of the third party to provide us with their Personal Data unless otherwise provided in the PDPA.

To assist in ensuring the accuracy of your Personal Data in our possession, you are required to inform us of any updates of any parts of your Personal Data by sending a clearly worded email to the email address provided at Article 10 below or to our representative whom you are in contact with.

6. Retention of Personal Data

We will only retain Personal Data for only as long as:

- (a) the retention of the Personal Data continues to serve any Purpose; and
- (b) there is a business or legal need.

In the event that retention of Personal Data is no longer necessary for any business or legal purposes or when the purpose for which the Personal Data was collected is no longer being served by the retention of the Personal Data, we will remove, destroy or anonymise the Personal Data.

Notwithstanding the foregoing, we may keep our employees' Personal Data perpetually in order to fulfill government regulations and to facilitate future referencing purposes that may be required from our employees.

7. Access and Correction of Personal Data

If you wish to access the Personal Data that we have relating to you, inquire about the way in which Personal Data relating to you has been used or disclosed by us in the past year, or wish to withdraw your consent to our use of such Personal Data, you may contact our Data Protection Officer (whose contact is set out below) and we will seek to attend to your request as best as we reasonably can. Please note that:

- (a) in order for us to provide any personal data we will need to verify your identity and may request further information about your request. This proof of identity may require you to come down to our office physically, or requiring you to verify your identity in the form of your name, NRIC or

Passport or Fin number. You must therefore keep this information safe as you will be responsible for any action which we will take in response to a request from someone using your details;

- (b) we may refuse access to your Personal Data if it would affect the privacy rights of other persons or if it breaches any confidentiality that attaches to that information;
- (c) we may also refuse your request where we are legally permitted to do so and give you such reasons;
- (d) you should be aware that we may take a reasonable time to process your application for access as we may need to retrieve information from storage and review the information in order to determine what information may be provided; and
- (e) we may have to charge you a reasonable administrative fee for retrieving Personal Data relating to you.

Upon receipt of payment of the required fee under paragraph (a), your request will be processed within 30 days upon receipt of such notice and fees (if applicable) by us.

8. Breach of Personal Data

In the event of a data breach of your Personal Data (“**Breach**”), we will promptly conduct an assessment of whether the Breach is notifiable to the Personal Data Protection Commission (“**PDPC**”) in accordance with the PDPA. If the Breach is notifiable to the PDPC, we will also notify you of the occurrence of the Breach in accordance with the PDPA.

9. Data Portability

If you require us to transmit your Personal Data in our possession to another organization, an administrative fee will be levied and you are required to verify your Personal Data with us. We will process your request within 30 days after receipt of the payment and verification of your Personal Data.

10. Contacting the Data Protection Officer

Inabata has established a process for receiving and responding to any query or complaint that may arise with respect to the application of the Singapore Personal Data Protection Act. To ensure that we receive your complaints and enquiries, please send the same via email to our Data Protection Officer at the following email address:

iks.contact@inabata.com

11. Contacting you

In the event that your telephone number is or will be listed on the Do Not Call Registry, by submitting your telephone number via our website or by you leaving us with your contact number in any mode of communication, you hereby grant us your clear and unambiguous consent to contact you using such contact number in any means including but not limited to voice call, sms, whatsapp, MMS etc.

12. Amendment of Privacy Policy

This Policy and our internal rules relating to safeguarding Personal Data may be amended without notice to better conform to changes to regulations and guidelines issued by the relevant authorities.

13. Governing law

This Policy is governed by and shall be construed in accordance with the laws of Singapore without regard to conflict of laws principles.

14. Miscellaneous

Inabata's website do not target and are not intended to attract children under the age of 18 years old ("**Minor**") and residents of the European Economic Area. Inabata does not knowingly solicit personal information from children under the age of 18 years old and residents of the European Economic Area or send them requests for Personal Data.

If you are a Minor, your parent or legal guardian's consent shall be required to consent to our collection, use and/or disclosure of your Personal Data.