

TENANTS AND PROSPECTIVE TENANTS DATA PROTECTION NOTICE
(ONE BISHOPSGATE PLAZA)

Last updated: 16 August 2021

1. SCOPE OF APPLICATION

- 1.1 This data protection notice ("**Notice**") is to inform you of how UOL Developments (UK) Limited ("**UDUK**"), and its appointed marketing and/or sales agents (each acting as data controller), UDUK's ultimate parent company UOL Group Limited and related corporations (collectively, the "**Group**") manages Personal Data (as defined below) which is subject to the Singapore Personal Data Protection Act 2012 ("**PDPA**") EU General Data Protection Regulation (2016/679) (the "**GDPR**") and the UK Data Protection Act 2018 (the "**DPA**"). Please take a moment to read this Notice so that you know and understand the purposes for which we collect, use and disclose your Personal Data.
- 1.2 By interacting with us, submitting information to us, purchasing or leasing any properties or interest therein at our property developments, or purchasing or using any products and services offered by us, you acknowledge that the Group, as well as its representatives and/or agents (collectively referred to herein as "**UOL**", "**us**", "**we**" or "**our**") will be collecting, using, disclosing and sharing amongst themselves your Personal Data, and disclosing such Personal Data to the Companies' authorised service providers and relevant third parties in the manner set forth in this Notice.
- 1.3 This Notice supplements but does not supersede nor replace any consents you may have previously provided to us in respect of your Personal Data, and this notice is additional to any rights which any of the Companies may have at law to collect, use or disclose your Personal Data.
- 1.4 We may from time to time update this Notice to ensure that this Notice is consistent with our future processing of your Personal Data and/or any changes in legal or regulatory requirements.
- 1.5 Subject to your rights at law, you agree to be bound by the prevailing terms of the Notice as updated from time to time on our corporate website or as provided to you. If significant changes are made to this Notice, we may send an email or a letter with the update. Any Personal Data held will be governed by our most recent version of this Notice.

2. PERSONAL DATA

- 2.1 In this Notice, "**Personal Data**" means any information relating to an identified or identifiable natural person; an identifiable natural person is one who can be identified, directly or indirectly, by reference to Personal Data (including, but not limited to names, identification numbers and online identifiers). It does not include data where the identity has been removed (anonymous data). There are "special categories" of more sensitive types of Personal Data which are given a higher level of protection under the Data Protection Laws.
- 2.2 Examples of 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, bank account and payment details 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 you.

3. COLLECTION AND PROCESSING OF PERSONAL DATA

3.1 Generally, we collect and process your Personal Data in the following ways:

- (a) when you submit any form, including but not limited to application and registration forms or other forms relating to any of our property developments, products or services;
- (b) when you enter into any agreement or provide other documentation or information in respect of your interactions with us, or when you use our products and services;
- (c) when you interact with our staff, including customer service officers, for example, via telephone calls (which may be recorded), letters, face-to-face meetings, social media platforms and emails;
- (d) when you use our electronic services, or interact with us via our websites or use services on our websites;
- (e) when you request that we contact you or request that you be included in an email or other mailing list;
- (f) when you respond to our promotions, initiatives or to any request for additional Personal Data;
- (g) when your images are captured by us via CCTV cameras while you are within our premises, or via photographs or videos taken by us or our representatives when you attend events at our premises;
- (h) when you are contacted by, and respond to, our marketing representatives and customer service officers;
- (i) when we seek information about you and receive your Personal Data in connection with your relationship with us, including for our products and services; for example, from business partners and referral intermediaries and/or
- (j) when you submit your Personal Data to us for any other reasons.

3.2 If you provide us with any Personal Data relating to a third party (e.g. information of your spouse, children, parents, and/or employees), by submitting such information to us, you represent to us that you have made the third party aware that you are providing their Personal Data to us for the respective purposes.

3.3 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 provide you with the products and services you have requested, or delays in processing any application or request you make to us.

4. CATEGORIES OF PERSONAL DATA WE COLLECT

4.1 We process the following categories of personal data:

- (a) Personal details, such as your name and surname, age, gender, date of birth, copies of ID documents, address, email address, telephone number, photo and video data, bank account details;
- (b) Such other categories that we will inform you in writing from time to time and see your express and informed consent.

5. PURPOSES FOR THE COLLECTION, USE AND DISCLOSURE OF YOUR PERSONAL DATA AND THE LAWFUL BASIS

5.1 **Generally**, UOL collects, uses and discloses your Personal Data for the following purposes:

PURPOSE	LEGAL BASIS
(a) transacting with you and providing our products and services;	<p>Necessary for the performance of a contract between you and UOL, or to take steps at your request prior to entering into a contract;</p> <p>Necessary for UOL's legitimate interests in conducting our business;</p>
(b) responding to your queries, feedback, complaints and requests;	<p>Necessary for the performance of a contract between you and UOL, or to take steps at your request prior to entering into a contract;</p> <p>Necessary for UOL's legitimate interests in conducting our business;</p>
(c) verifying your identity;	<p>Necessary for the performance of a contract between you and UOL, or to take steps at your request prior to entering into a contract;</p> <p>Necessary for UOL's legitimate interests in conducting our business;</p>
(d) managing the administrative and business operations of UOL and complying with internal policies, reporting requirements and procedures;	<p>Necessary for the performance of a contract between you and UOL, or to take steps at your request prior to entering into a contract;</p> <p>Necessary for UOL's legitimate interests in conducting our business;</p> <p>Necessary to ensure compliance with our legal obligations;</p>
(e) facilitating business asset transactions (which may extend to any mergers, acquisitions or asset sales) involving any of the Companies;	<p>Necessary for UOL's legitimate interests in conducting our business;</p>
(f) requesting feedback or participation in surveys, as well as conducting market research and/or analysis for statistical, profiling or other purposes for us to design our products, understand customer behaviour, preferences and market trends, and to review, develop and improve the quality of our products and services;	<p>Necessary for UOL's legitimate interests in conducting our business;</p>

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| (g) | matching any Personal Data held which relates to you for any of the purposes listed herein; | Necessary for UOL's legitimate interests in conducting our business; |
| (h) | preventing, detecting and investigating crime and analysing and managing commercial risks; | Necessary for UOL's legitimate interests in conducting our business;

Necessary to ensure compliance with our legal obligations; |
| (i) | managing the safety and security of our premises and services (including but not limited to carrying out CCTV surveillance and conducting security clearances); | Necessary for UOL's legitimate interests in conducting our business;

Necessary to ensure compliance with our legal obligations; |
| (j) | monitoring or recording phone calls and customer-facing interactions for quality assurance, employee training and performance evaluation and identity verification purposes; | Necessary for UOL's legitimate interests in conducting our business; |
| (k) | in connection with any claims, actions or proceedings (including but not limited to drafting and reviewing documents, transaction documentation, obtaining legal advice, and facilitating dispute resolution), and/or protecting and enforcing our contractual and legal rights and obligations; | Necessary for UOL's legitimate interests in conducting our business; |
| (l) | conducting investigations relating to disputes, billing or fraud; | Necessary for UOL's legitimate interests in conducting our business;

Necessary to ensure compliance with our legal obligations; |
| (m) | meeting or complying with any applicable rules, laws, regulations, codes of practice or guidelines issued by any legal or regulatory bodies which are binding on UOL (including but not limited to responding to regulatory complaints, disclosing to regulatory bodies and conducting audit checks, due diligence and investigations); and/or | Necessary for UOL's legitimate interests in conducting our business;

Necessary to ensure compliance with our legal obligations; |
| (n) | purposes which are reasonably related to the aforesaid. | Necessary for UOL's legitimate interests in conducting our business. |

5.2 **In addition**, UOL collects, uses and discloses your Personal Data for the following purposes:

- (a) If you are an owner or tenant, or an employee, business partner, director or representative of an organisation that is an owner or tenant of any of our properties, whether existing or prospective:

PURPOSE**LEGAL BASIS**

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| (i) | facilitating and administrating the sale or lease of our properties; (including but not limited to customer relationship management, processing and confirming your purchase or tenancy, providing you with administrative support, processing your payments and administering rewards and benefits); | Necessary for the performance of a contract between you and UOL, or to take steps at your request prior to entering into a contract;

Necessary for UOL's legitimate interests in conducting our business; |
| (ii) | providing services and facilities; | Necessary for the performance of a contract between you and UOL, or to take steps at your request prior to entering into a contract;

Necessary for UOL's legitimate interests in conducting our business; |
| (iii) | administering debt recovery and debt management; | Necessary for UOL's legitimate interests in conducting our business; |
| (iv) | maintaining our property developments and remedying defects; | Necessary for UOL's legitimate interests in conducting our business; |
| (v) | managing referrals; | Necessary for UOL's legitimate interests in conducting our business; |
| (vi) | billing and processing of payments for utilities, services and facilities; and/or | Necessary for UOL's legitimate interests in conducting our business; |
| (vii) | sharing your Personal Data with the estate agents and property agents with whom we work; | Necessary for UOL's legitimate interests in conducting our business; |
| (viii) | purposes which are reasonably related to the aforesaid. | Necessary for UOL's legitimate interests in conducting our business. |

(b) If you are a visitor to our properties or office premises:

PURPOSE**LEGAL BASIS**

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| (i) | facilities management (including but not limited to issuing visitor access passes, and recording entries to and exits from our premises); | Necessary for UOL's legitimate interests in conducting our business; |
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| (ii) | providing services and facilities; and/or | Necessary for UOL's legitimate interests in conducting our business; |
| (iii) | purposes which are reasonably related to the aforesaid. | Necessary for UOL's legitimate interests in conducting our business; |

5.3 Furthermore, where permitted under the GDPR, UOL may also collect, use and disclose your Personal Data for the following "**UOL Additional Purposes**":

PURPOSE	LEGAL BASIS
(a) invitations to launches of property developments, exhibitions, seminars and similar events;	Necessary for UOL's legitimate interests in conducting our business;
(b) providing or marketing services, products and benefits to you, including promotions, information on future phases of our property developments, loyalty and reward programmes;	Where you have provided your consent to receiving such communications; Necessary for UOL's legitimate interests in conducting our business;
(c) matching Personal Data with other data collected for other purposes and from other sources (including third parties) in connection with the provision or offering of products and services, whether by UOL or other third parties;	Necessary for UOL's legitimate interests in conducting our business;
(d) administering contests and competitions, and personalising your experience at UOL's touchpoints;	Where you have provided your consent to receiving such communications; Necessary for UOL's legitimate interests in conducting our business;
(e) sending you details of products, services, special offers and rewards, either to our customers generally, or which we have identified may be of interest to you; and/or	Where you have provided your consent to receiving such communications; Necessary for UOL's legitimate interests in conducting our business;
(f) conducting market research, understanding and analysing customer behaviour, location, preferences and demographics for us to offer you products and services as well as special offers and marketing programmes which may be relevant to your preferences and profile.	Necessary for UOL's legitimate interests in conducting our business.

- 5.4 If you have provided your Singapore telephone number(s) and have indicated that you consent to receiving marketing or promotional information via your Singapore telephone number(s) or where we are permitted to do so under the PDPA, then from time to time, UOL may contact you using such Singapore telephone number(s) (including via voice calls, text, fax or other means) with information about our products and services. In relation to particular products and services or in your interactions with us, we may also have specifically notified you of other purposes for which we collect, use or disclose your Personal Data. If so, we will collect, use and disclose your Personal Data for these additional purposes as well, unless we have specifically notified you otherwise.
- 5.5 You have a choice to no longer receive marketing or promotional materials/communication. You may contact us using the contact details found below, or by using the “unsubscribe” option in any emails or texts which we may send.
- 5.6 Please be aware that once we receive confirmation that you wish to withdraw your consent for marketing or promotional materials/communication, it may take up to 30 working days for your withdrawal to be reflected in our systems. Therefore, you may still receive marketing or promotional materials/communication during this period of time. Please note that even if you withdraw your consent for the receipt of marketing or promotional materials, we may still contact you for other purposes in relation to the products and services that you have requested from UOL.

6. DISCLOSURE OF PERSONAL DATA

- 6.1 UOL will take reasonable steps to protect your Personal Data against unauthorised disclosure. Subject to the provisions of any applicable law, your Personal Data may be disclosed, for the purposes listed above (where applicable), to the following entities or parties, whether they are located in the United Kingdom or in Singapore:
- (a) UOL’s related corporations and employees;
 - (b) companies providing services relating insurance to UOL;
 - (c) companies providing architectural, engineering and construction services to UOL;
 - (d) real estate management agents;
 - (e) agents, contractors or third party service providers who provide operational services to UOL, such as courier services, customer service, telecommunications, information technology, payment, printing, billing, payroll, processing, technical services, training, market research, call centre, security, employee recognition or other services to UOL;
 - (f) vendors or third party service providers in connection with marketing promotions and services offered by UOL;
 - (g) any business partner, investor, assignee or transferee (actual or prospective) to facilitate business asset transactions (which may extend to any merger, acquisition or asset sale) involving any of the Companies;
 - (h) external banks, credit card companies and their respective service providers;
 - (i) building and car park management and their respective service providers;
 - (j) companies which provide depository, clearing and book-entry settlement services;
 - (k) our professional advisers such as consultants, auditors and lawyers;

- (l) foreign embassies in relation to facilitating overseas travel arrangements;
- (m) relevant government ministries, regulators, statutory boards or authorities or law enforcement agencies to comply with any laws, rules, guidelines and regulations or schemes imposed by any governmental authority; and/or
- (n) any other party to whom you authorise us to disclose your Personal Data.

7. RETENTION OF PERSONAL DATA

7.1 The period for which we will retain personal information will vary depending on the purposes that it was collected for, as well as the requirements of any applicable law or regulation.

7.2 When determining the relevant retention periods, we will take into account factors including:

- (a) our contractual obligations and rights in relation to the information involved;
- (b) legal and regulatory obligation(s) under applicable law to retain information for a certain period of time;
- (c) potential or actual disputes;
- (d) guidelines issued by relevant regulatory bodies; and
- (e) our legitimate interests, where we need to consider retaining personal information to meet any other obligations.

8. DATA SUBJECT RIGHTS

- 8.1 You have the right to know what personal data we process about you and may request a copy. You are also entitled to request to have incorrect personal data about you corrected and you may in some cases ask us to delete your personal data. You can also object to certain personal data about you being processed and request that processing of your personal data be limited.
- 8.2 Please note that the limitation or deletion of your personal data may mean we will be unable to provide the communications and invitations described above. You also have the right to receive your personal data in a machine-readable format and have the data transferred to another party responsible for data processing.
- 8.3 You may also have the right to complain about the use your personal information to the supervisory authority which in Singapore is the Personal Data Protection Commission and in the United Kingdom is the Information Commissioner's Office.

9. INTERNATIONAL TRANSFERS OF PERSONAL DATA

- 9.1 The personal information that we collect from you may be transmitted to third parties in countries outside of your country of residence. When we transfer your data to our related corporations in Singapore or in other jurisdictions, we use an intra-company agreement containing European Commission-approved standard contractual clauses. When we transfer your data to third party service providers outside the Group, we use European Commission-approved standard contractual clauses to safeguard the transfer, unless we transfer personal data to a third party that has implemented Binding Corporate Rules (developed by the European Union Article 29 Working Party) or which uses the EU-U.S. Privacy Shield, in which case we may rely on one of those mechanisms to safeguard the transfer.

10. DATA SECURITY

- 10.1 UOL will take reasonable efforts to protect Personal Data in our possession or our control by making reasonable security arrangements to prevent unauthorised access, collection, use, disclosure, copying, modification, disposal or similar risks. However, we cannot completely guarantee the security of any Personal Data we may have collected from or about you.
- 10.2 We cannot ensure the security of the information you transmit to us via the Internet or use of our mobile services, and we urge you to take every precaution to protect your Personal Data when you use such platforms. We recommend that you change your passwords often, use a combination of letters and numbers, and ensure that you use a secure browser.
- 10.3 If applicable, you undertake to keep your username and password secure and confidential and shall not disclose or permit it to be disclosed to any unauthorised person, and to inform us as soon as reasonably practicable if you know or suspect that someone else knows your username and password or believe the confidentiality of your username and password has been lost, stolen or compromised in any way or that actual or possible unauthorised transactions have taken place. We are not liable for any damages resulting from any security breaches, on unauthorised and/or fraudulent use of your username and password.

11. CONTACTING US REGARDING YOUR PERSONAL DATA

- 11.1 If you:
- (a) have any questions or feedback relating to your Personal Data or this Data Protection Notice; or

(b) would like to request access and/or corrections to your Personal Data records or unsubscribe from our our mailing list,

you can contact us through the contact information under "Contact" at the website: <https://www.1bishopsgateplaza.com/>.

11.2 If you object to any or all use of your Personal Data, depending on the nature of your request, UOL may not be in a position to continue to provide its products and services to you, administer any contractual relationship in place, which in turn may also result in the termination of any agreements with UOL, and your being in breach of your contractual obligations or undertakings. UOL's legal rights and remedies in such event are expressly reserved.