

Personal Data Protection Policy

Purpose:

This Privacy Policy sets out how the Mega Fortris Group collects, stores and handles personal data (as set out below) of individuals in accordance with the Personal Data Protection Act 2010 (“**PDPA**”) and Personal Data Protection Act 2012 of Singapore (“**Singapore PDPA**”).

This Policy explains:

- the type of personal data we collect;
- how we collect personal data;
- how we use personal data;
- the parties that we disclose the personal data to; and
- the choices we offer, including how to access and update personal data.

Personal Data We May Collect from You:

We may collect the following personal data about you:

- personal information to establish your identity and background such as your full name, passport or identity card number, and nationality;
- information gathered from surveillance of our premises such as CCTV footage;
- contact information such as billing address, delivery address, premises address, telephone number, mobile phone number, fax number and email address;
- financial and payment data such as bank account number and name of beneficiary];
- sales data such as product information with individualised serial numbers, purchase history, transaction records and payment details (where applicable);
- recording of your photograph during any of our corporate events or third party open day;
- designation, function or post when you commence a business relationship with us; and
- resume or CVs when you apply for a job with us.

For general web browsing although no personal data is revealed to us, certain technical and statistical information is available to us via our internet service provider such as cookies, your IP address, the time, date and duration of your visit. You are not obliged to accept cookies.

How We Collect Your Personal Data

We may collect personal data either from you, from your authorized representatives, from third parties, or from publicly available sources which may include (but are not limited to):

- customer interactions such as when you contact us in person, by a phone call or by email (for example when you contact us for any enquiries, complaints, comments or feedback, we may keep record of those correspondences);
- when you participate in any surveys or questionnaires done internally or via an appointed third party;
- when you commence a business relationship with us;
- when you attend any of our corporate events, marketing campaigns or third party open day;
- when you visit or browse our websites;
- when you apply for a job with us;
- when you interact with us via social media or interactive applications including but not limited to Facebook, Twitter, and Instagram; and
- from such other sources where you have given your consent for the disclosure of personal data relating to you, and/or where otherwise lawfully permitted.

Use of Personal Data Collected

You agree that we may use your personal data where permitted by applicable law and for the following purposes:

- to verify your identity;
- to carry out your instructions or to respond to any enquiries, complaints, comments or feedback that you have submit to us;

- to ensure the safety and security of our premises;
- to compile information for analysis and in reports for relevant regulatory authorities;
- to transfer or assign our rights, interests and obligations under any of your agreements with us;
- to update, consolidate and improve the accuracy of our records;
- to produce data, reports and statistics which have been anonymised or aggregated in a manner that does not identify you as an individual;
- to conduct research for analytical purposes including but not limited to data mining and analysis of your transactions with us;
- to enhance our customer service and to provide you with a better experience when dealing with us;
- to further develop and improve our products and/or services;
- to conduct surveys, questionnaires, and provide you with information from us or which we feel may interest you, where you have consented to be contacted for such purposes;
- to comply with any legal or regulatory obligations under the applicable laws, regulations, guidelines or industry codes that applies to us;
- to provide training for our staff;
- to conduct marketing and information technology activities (for example, market research); and
- for any other purposes that is required or permitted by any law, regulations, guidelines and/or relevant regulatory authorities.

With Whom We Share Your Personal Data

We may be required or need to disclose information about you to the following third parties:

- federal, state or local government(s), statutory or other quasi-government or regulatory authorities;
- law enforcement agencies;
- government agencies;
- service providers, inter alia, logistics and payment gateways (limited to data necessary for the Mega Fortris Group's business operations);
- other parties in respect of whom you have given your express or implied consent;
- any credit reporting agencies; and/or
- in the event of default, any debt collection agencies.

We may be required to disclose your Personal Data to third parties in the following situations:

- when such disclosure is required for the performance of obligations in the course of or in connection with our provision of the products and/or services requested by you;
- protect and defend our rights and/or property; and/or
- act under exigent circumstances to protect the personal safety of our customers.

Your Rights to Access and Correct Your Personal Data

You have the right to access and correct your personal data held by us. Where you wish to have access to your personal data in our possession, or where you are of the opinion that such personal data held by us is inaccurate, incomplete, misleading or not up-to-date, you may make a request to the relevant Data Protection Officer at the contact details below to (a) request access to a copy of the Personal Data which we hold about you or information about the ways in which we use or disclose your personal data; or (b) make correction request to correct or update any of your personal data which we hold about you.

Please provide us with your name, address and phone / account number and provide brief details of the information you would like a copy of in any such request. Please note that we may charge a processing fee permitted under the PDPA and/or SG PDPA to help us defray administration costs. If so, we will inform you of the fee before processing your request.

We will respond to your request as soon as reasonably possible. In general, our response will be within thirty (30) business days. Should we not be able to respond to your request within thirty (30) days after receiving your request, we will inform you in writing within thirty (30) days of the time by which we will be able to respond to your request.

We may have to withhold access to your personal data in certain situations, for example when we are unable to confirm your identity, where information requested for is of a confidential commercial nature or in the event we receive repeated requests for the same information. We may also be unable to make

a correction requested by you. In such cases, we will notify you in writing of the reasons for not being able to accede to your request (except where we are not required to do so under the PDPA).

How Long We Will Keep Your Personal Data

We will retain your personal data in compliance with this Policy and/or the terms and conditions of your agreement(s) with us, (i) for such period as may be necessary to fulfil the purposes for which it was collected, as well as to protect our interests and/or our customers as may be deemed necessary, where otherwise required by the law and/or where required by our relevant policies; or (ii) for a maximum of seven (7) years after the date of the customer's last transaction with us, whichever is shorter.

We will take all reasonable steps to destroy, delete your personal data or remove the means your personal data can be associated with you as soon as it is reasonable to assume that such retention no longer serves the purposes for which your personal data was collected, and it is no longer necessary (for legal or business purposes) to do so.

How We Protect and Safeguard Your Personal Data

We endeavour to take all reasonable steps to protect your personal data and keep your personal data secured.

To safeguard your personal data from unauthorised access, collection, use, disclosure, copying, modification, disposal or similar risks, we have introduced appropriate administrative, physical and technical measures such as minimised collection of personal data, encryption of data, data anonymisation, up-to-date antivirus protection, and regular patching of operating system and other software.

Please note that no method of transmission over the Internet or method of electronic storage is completely secure. While security cannot be guaranteed, we strive to protect the security of your information and are constantly reviewing and enhancing our information security measures.

Transfer of Your Personal Data

We may transfer your personal data:

- to our head office is based in Malaysia, for consolidated reporting and analysis;
- for customers who are located in jurisdictions in which we do not have a sales office, to other offices in our group including Australia, New Zealand, United Kingdom, Denmark, Hungary, France, Netherlands, United Arab Emirates, Hong Kong, United States of America;
- to third-party service providers such as logistics or payment gateways located in Malaysia;

If there is an additional need to transfer your personal data outside of Singapore, we will obtain your consent for the transfer to be made and will take steps to ensure that your personal data continues to receive a standard of protection that is at least comparable to that provided under the SG PDPA.

Your Consent

By submitting your personal data, you represent to us that the information provided is accurate and complete, and you consent to our collection and/or processing of your personal data as set out in this Policy.

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 personal data to us, you confirm to us that you have (i) obtained the consent of the third party to provide us with their personal data or are otherwise entitled to provide their personal data to us, and (ii) informed them to read this Policy at our website at www.megafortris.com or available upon request to our Data Protection Officer at the contact details below.

If you do not consent to our collection and/or processing of your personal data for the purposes set out in this Policy, we may not be able to provide our products and/or services to you or to consider you for employment opportunities.

Withdrawing your Consent

The consent that you provide for the collection, use and disclosure of your personal data will remain valid until such time it is being withdrawn by you in writing. You may withdraw consent and request us to stop collecting, using and/or disclosing your personal data for any or all of the purposes listed above by submitting your request in writing or via email to the relevant Data Protection Officer at the contact details provided below.

Upon receipt of your written request to withdraw your consent, we may require reasonable time (depending on the complexity of the request and its impact on our relationship with you) for your request to be processed and for us to notify you of the consequences of us acceding to the same, including any legal consequences which may affect your rights and liabilities to us. In general, we shall seek to process your request within ten (10) business days of receiving it.

Whilst we respect your decision to withdraw your consent, please note that depending on the nature and scope of your request, we may not be in a position to continue providing our products and/or services to you and we shall, in such circumstances, notify you before completing the processing of your request. Should you decide to cancel your withdrawal of consent, please inform us in writing or via email to the relevant Data Protection Officer at the contact details provided below.

Please note that withdrawing consent does not affect our right to continue to collect, use and disclose personal data where such collection, use and disclose without consent is permitted or required under applicable laws.

Revisions to this Policy

We may revise this Policy from time to time without prior notice. If we change our Policy, we will publish the amended version and the updated version shall apply and supersede any and all previous versions. You may access the latest version of this Policy at our website at www.megafortris.com or upon request to our Data Protection Officers the contact details below.

Your continued use of our goods and/or services constitutes your acknowledgment and acceptance of any changes to the Policy.

Contact Us

Should you have any queries, concerns or complaints in relation to this Policy, or if you wish to access and correct your personal data, kindly contact us at the following details:

Mega Fortris (Singapore) Pte Ltd

Address: 11 Woodlands Close, #04-12, Woodlands 11, Singapore 737853

Telephone: 6296 1118

Email: mfs@megafortris.com

Attention: Data Protection Officer