

YANLORD LAND GROUP LIMITED
PRIVACY POLICY

A. Who We Are?

1. This is the Privacy Policy (“**Privacy Policy**”) of Yanlord Land Group Limited, a Singapore registered public listed company, and each of its subsidiaries (collectively or individually, “**Yanlord**” or “**we**” or “**our**” or “**us**”), save and except O’Connor’s Singapore Pte Ltd which has its own [privacy policy](#).
2. When you interact with us (such as through a transaction) or when we collect your personal data from you directly, our relevant documentation will identify the Yanlord entity (where applicable, including our representatives, service providers and/or agents) that is collecting, using, disclosing and processing your personal data.
3. We own and/or operate websites such as but not limited to <http://www.yanlordland.com> and <https://uel.sg>, and/or any application programs that may be published by, or on behalf of, us (the said websites and application programs may be collectively or individually referred to as the “**Website**”).

B. What Is The Purpose Of This Privacy Policy?

4. The purpose of this Privacy Policy is to inform you and provide you with an understanding of how we collect, use, disclose and deal with personal data about you
 - (1) that you give us; and/or
 - (2) that we receive through third parties; and/or
 - (3) that is in our possession or that comes into our possession, whether now or in the future.

Please read this Privacy Policy carefully.

5. We recognise the importance of the personal data you have entrusted to us and take our responsibilities under Singapore’s Personal Data Protection Act 2012, as amended, modified or supplemented from time to time, including all subsidiary legislation enacted thereunder, whether now or in the future (“**PDPA**”), seriously.
6. The contents of this Privacy Policy may vary from time to time. Any changes to this Privacy Policy will be posted on and can be viewed at our Website. We recommend that you check frequently for the latest version.

C. What Information Do We Collect?

7. “Personal data” is defined under the PDPA to mean data, whether true or not, about an individual who can be identified from that data, or from that data and other information to which the organisation has or is likely to have access (please refer to the PDPA for the latest definition). Yanlord collects information about you when you provide your information to us or when you use our Website or when you interact with us and/or when you enter into a transaction with us. Alternatively, the information may have been in our possession or may have been received by us through third parties. Personal data which we may collect includes (without limitation):

- your name
- your home/correspondence address
- location information of yourself and/or your computer or device
- your contact information (such as email address, mobile number, telephone number, etc.)
- transactional information

- the number on your documents of identity (such as national ID numbers, passport numbers, etc., only if permitted by law)
- your biographical data (such as date of birth, nationality, gender, family background, medical information, education/academic records, employment history, etc.)
- photograph/video image/audio recordings/CCTV footage containing your image and/or voice
- your bank account details or credit card information
- property or type of properties you are interested in, staying, visiting or on leased
- your signature
- your interest in Yanlord's securities
- your purchase (such as product or service details, purchase price, mortgage details, bank loan details, etc.),

and updates on the above personal data as may be provided by you (or collected by us otherwise through other means) from time to time. We will collect, use, disclose and/or process your personal data in compliance with the PDPA.

8. We may also collect and store certain information automatically when you visit the Website, e.g. the internet protocol (IP) address used to connect your computer or device to the internet, connection information such as browser type and version, your operating system and platform, a unique reference number linked to the data you entered, login details, the full URL clickstream to, through and from the Website (including date and time), cookie number and/or your activity on our Website, including the pages you visited or the searches you made.
9. Our Website may contain links to other websites operated by third parties. Do note that even though these links may appear on our Website, we will not be responsible for any consequence once you leave our Website to explore third-party websites. We would urge and advise you to check the privacy practices of these third-party websites carefully before proceeding.
10. We may receive information about you from third parties, e.g. if you have chosen to link your profile on our Website with your profile on those other websites or social media platforms (where such a function is enabled) and/or if you use any websites or social media platforms operated by third parties (e.g. WeChat, Facebook, Instagram, YouTube, LinkedIn, Twitter, Weibo, etc.).

D. Cookies

11. We may use cookies to identify and/or distinguish you from other users on the Website, to improve your experience using the Website and to improve the efficacy of our services or products.
12. A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer or device.
13. You can block or deactivate cookies in your browser settings. By doing so, you may not be able to access certain part(s) of the Website.
14. We may use log-in cookies in order to remember you when you have logged in for a seamless experience.
15. We may use session cookies to track your movements from page to page and in order to store your selected inputs so you are not constantly requested for the same information.

16. Our Website may use Google Analytics which is one of the most widespread and trusted analytics solutions on the web for helping us to understand how you use the Website. These cookies may track data such as how long you spend on the Website and the pages that you visit so we can continue to produce engaging content.
17. By continuing to use the Website, you are agreeing to the use of cookies on the Website as outlined above. However, please note that we have no control over and will not be responsible for how the cookies are used by third parties.
18. For further information on types of cookies and how they work, please visit www.allaboutcookies.org.

E. The Purposes for Which We Collect, Use and/or Disclose Your Personal Data

19. Yanlord will/may collect, use, disclose and/or process your personal data for one or more of the following purposes:
 - (a) processing and dealing with your interest in any property development or property project ("**Project**") which we and/or our partners are selling, marketing, offering, organising, involved in and/or promoting, whether now or in the future, and contacting you on matters relating to your interest in a Project;
 - (b) considering and/or processing your application for purchase of our products or services, for instance, purchase of property unit(s) in a Project from us ("**Purchase**");
 - (c) facilitating, processing, dealing with, administering and/or managing a Purchase by you;
 - (d) administering, facilitating, managing, processing and/or dealing with the transfer of ownership of the unit(s) to you upon the completion of the Purchase;
 - (e) administering, facilitating, managing, processing and/or dealing with your use of, administration of and/or dealings in (including your leasing out the same to third party(ies)), any of our products or services;
 - (f) processing, managing and/or dealing with your transaction (or any forms of interaction, including responding to our initiatives) with us;
 - (g) facilitating, processing, dealing with, administering and/or managing the Purchase and/or your use of the property after the Purchase has been completed, including (without limitation) conveyancing/financing matters pertaining to your property, key collection arrangement, estate matters, defects rectification, dealing with the Management Corporation Strata Title ("**MCST**") and the managing agent(s) for the property. For the purpose(s) herein, our rights are extended to disclosure to the MCST and the managing agent(s)), etc.;
 - (h) dealing in any matters relating to the services and/or products which you are entitled to under your contract(s);
 - (i) providing ongoing information about our products and services which may be relevant to you;
 - (j) verifying, administering, managing or, where applicable, maintaining records of your personal data (such as for club memberships or resident's identification purpose);
 - (k) providing you with the services and/or products that have been requested;

- (l) responding/handling your feedback, request, interest or complaint;
- (m) administering, facilitating, processing and/or dealing in any matters relating to your use of the Website;
- (n) monitoring, processing and/or tracking your use of the Website in order to provide you with a seamless experience, facilitating or administering your use of the Website, and/or to assist us in improving your experience in using the Website;
- (o) administering, facilitating, processing and/or dealing in any transactions or activities carried out by you (whether on the Website or otherwise);
- (p) carrying out your instructions or responding to any enquiry given by (or purported to be given by) you or on your behalf;
- (q) processing your application, such as employment or job application, and where applicable, facilitating, processing, dealing with, administering, managing, maintaining and/or terminating your employment relationship with us;
- (r) contacting you or communicating with you via voice/video call, teletext message (text, sound or visual message) and/or fax message, email and/or postal mail for one or more of the Purposes stated herein. You acknowledge and agree that such communication by us could be by way of the mailing (whether through electronic or other means) of correspondence, documents or notices to you, which could involve disclosure of certain personal data about you to bring about delivery of the same (e.g. disclosure of your personal data on the external cover of envelopes/mail packages);
- (s) carrying out due diligence or other screening activities and/or analysing and managing commercial risks (including background checks, anti-money laundering checks, know your client checks) in accordance with legal or regulatory obligations (whether of Singapore or other jurisdictions) applicable to us or any Yanlord entity, the requirements or guidelines of governmental authorities (whether of Singapore or other jurisdictions) which we determine are applicable to us or any Yanlord entity, and/or our or any Yanlord entities' risk management procedures that may be required by law (whether of Singapore or other jurisdictions) or that may have been put in place by us or any Yanlord entities (for the avoidance of doubt, 'Yanlord entity' or 'Yanlord entities' refers to any Yanlord entity around the world);
- (t) to prevent or investigate any fraud, unlawful activity or omission or misconduct, whether or not there is any suspicion of the aforementioned, regardless that such prevention or investigation involves us and/or is done by us or any Yanlord entities; dealing with conflict of interests and/or interested person transactions; or dealing with and/or investigating complaints; carrying out fraud detection and/or credit risk control in relation to your Purchase or intended Purchase;
- (u) complying with any law, governmental or regulatory requirements of any jurisdiction applicable to us or our affiliates/associated companies (whether of Singapore or other jurisdictions);
- (v) responding to requests for information and/or directions from public agencies, ministries, statutory boards or other similar authorities (whether of Singapore or other jurisdictions). For the avoidance of doubt, this means that we may/will disclose your personal data to the aforementioned parties upon their request or direction;

- (w) handling disputes and/or conducting and/or facilitating investigations and proceedings;
- (x) enforcing, fulfilling and/or protecting your or our contractual and legal rights and obligations;
- (y) facilitating any proposed or actual business assignment or transfer or participation;
- (z) conducting research, analysis and development activities (including but not limited to data analytics, surveys and/or profiling) to improve our products or services and facilities in order to enhance any continued interaction between you and us in relation to the Website, a Project or any future Project type which you have indicated your interest to us, or your Purchase; or to improve any of our products, services or Projects, whether now or in the future. Without limiting the generality of the foregoing, we may/will in this regard send you surveys or request a face-to-face interview survey, by way of email or postal mail;
- (aa) managing and planning our administrative, infrastructure and business operations and complying with our internal policies, reporting requirements and procedures;
- (bb) facilitating any proposed or actual business transactions (which may extend to any reorganisation, merger, acquisition or sale) involving Yanlord;
- (cc) where you have provided your consent to us we may/would be providing you with marketing, advertising and promotional information, materials and/or documents relating to property projects, property developments, products, services and/or events (including property projects, property developments, products, services and/or events of third-party organisations with which we may collaborate with), whether for existing or future;
- (dd) storing, hosting and/or backing up (whether for disaster recovery or otherwise) of your personal data, whether within or outside Singapore;
- (ee) the conduct of training or training purpose, so as to develop or improve our products or services and/or our staff's and agents' services and/or service quality. Without limiting the generality of the foregoing, such training may involve collection, use, disclosure and/or processing of your personal data including your feedback or comments or reviews;
- (ff) to facilitate and/or ensure the safety and security of our premises, our customers, our staff and/or visitors to our premises; to deal with, handle and/or conduct disciplinary, security, crime prevention and/or quality assurance processes, matters and/or arrangements. Without prejudice to the generality of the aforesaid, we wish to bring to your attention that there are or there may be surveillance cameras installed throughout our premises, our offices and/or venue of our events, for security, crime prevention, safety and training reasons and you acknowledge that your image and/or voice will be captured by such cameras and processed by us consequently;
- (gg) creating reports with respect to potential purchasers' interest in a Project or purchases made by purchasers in a Project including your Purchase;
- (hh) facilitating the planning and organising of promotional events and roadshows or your participation to these events and roadshows;

- (ii) facilitating, dealing with and/or administering external audit(s) or internal audit(s) of the business of Yanlord and/or of its affiliates/related corporations, Purchase(s), and/or transactions related to any Project;
- (jj) dealing with and/or facilitating a business asset transaction or a potential business asset transaction, where such transaction involves Yanlord as a participant or involves only a related corporation or affiliated company of Yanlord as a participant or involves Yanlord and/or any one or more of Yanlord's related corporations or affiliated companies as participant(s), and there may be other third-party organisations who are participants in such transaction. "**business asset transaction**" is defined in the PDPA and includes the purchase, sale, lease, merger or amalgamation or any other acquisition, disposal or financing of an organisation or a portion of an organisation or of any of the business or assets of an organisation (please check the PDPA for the latest definition);
- (kk) record-keeping purposes and producing statistics and research for internal and/or statutory reporting and/or record-keeping requirements, of Yanlord or of its affiliates/associated companies/related corporations;
- (ll) Yanlord, Yanlord Group Companies' or Yanlord's parent corporation's reporting purposes including but not limited to reporting on Yanlord's business performance ("**Yanlord Group Companies**" means Yanlord, its affiliates, related corporations and associated companies globally);
- (mm) anonymisation of your personal data. In this regard, you acknowledge that personal data that has been anonymised is no longer personal data and the requirements of applicable local data protection law (i.e. the PDPA) would no longer apply to such anonymised data; and
- (nn) to deal with the or as part of a bankruptcy, winding up, reorganisation, restructuring, insolvency, receivership or an assignment for the benefit of creditors, of Yanlord.

(the abovementioned purposes shall be collectively referred to as the "**Purposes**").

20. Yanlord may/will need to disclose your personal data to third parties, whether located within or outside Singapore, for one or more of the Purposes, as such third parties, would be processing your personal data for one or more of the above Purposes. In this regard, you hereby acknowledge, agree and consent that we may/are permitted to disclose your personal data to such third parties (whether located within or outside Singapore) for one or more of the Purposes and for the said third parties to subsequently collect, use, disclose and/or process your personal data for one or more of the Purposes. Without limiting the generality of the foregoing or of paragraph 19, such third parties include:

- (a) the MCST and managing agent(s) for the Project in question where you have made the Purchase;
- (b) third-party organisations which we partner with for developing a Project including the Project where you have made the Purchase or applied to make a Purchase;
- (c) our associated or affiliated organisations or related corporations;
- (d) any of our agents, contractors or third-party service providers that process or will be processing your personal data on our behalf including but not limited to those which provide administrative or other services to us such as property

agents, managing agents of Projects which you have made a Purchase, mailing houses, telecommunication companies, information technology companies, financial institutions, data centres and etc.;

- (e) our professional advisers including (without limitation) lawyers and the advisers including (without limitation) lawyers appointed by you to act for you in a Purchase;
 - (f) third parties to whom disclosure by Yanlord is for one or more of the Purposes and such third parties would in turn be collecting and processing your personal data for one or more of the Purposes; and
 - (g) any government authorities and/or agencies, whether of Singapore or another country.
21. We may share your information with any member of our group (which means our subsidiaries, our ultimate holding company and its subsidiaries), which may be based in countries other than Singapore, from time to time for one or more of the Purposes, in accordance with the requirements prescribed under and subject to such conditions set out in PDPA.
22. You have the right to withdraw your consent given hereunder, whether wholly or partially. However, your withdrawal of consent could result in certain legal consequences arising from such withdrawal. In this regard, depending on the extent of your withdrawal of consent for us to process your personal data, it may mean that we will not be able to properly execute and/or process the transaction with you for instance, your Purchase or the Purchase contract with you may have to be terminated, etc.. Should you wish to withdraw your consent in part or whole, please send an email to our Data Protection Officer at data.protection@yanlord.com.sg and provide details of your withdrawal. Please note that withdrawing consent does not affect our right to continue to collect, use and disclose your personal data where such collection, use and disclosure without consent is permitted or required under applicable laws.
23. We may collect, use, disclose or process your personal data for other purposes that do not appear above. However, we will notify you of such other purpose at the time of obtaining your consent, unless processing of your personal data without your consent is permitted by the PDPA or by law.
24. We may/will also be collecting from sources other than yourself, personal data about you, for one or more of the above Purposes, and thereafter using, disclosing and/or processing such personal data for one or more of the above Purposes. We may combine information we receive from other sources with information you give to us and information we collect about you. We may use this information and the combined information for the Purposes set out above (depending on the types of information we receive).
25. We shall take reasonable steps to ensure that any personal data we collect, use and/or disclose is accurate and complete, if your personal data is likely to be used by us to make a decision that affects you, or disclosed to another organisation. However, it is important that you advise us of any changes to your personal data or if there are any errors in the personal data we hold about you. We will not be responsible for relying on inaccurate or incomplete personal data arising from you or your failure to inform us of any changes in your personal data that you had initially provided us with.

F. Notification of Reliance on Legitimate Interests Exception to Process Personal Data Without Consent

26. Yanlord may rely on the legitimate interests exception under the PDPA to collect, use or disclose your personal data without your consent, for the purpose of detecting and/or preventing:

- (a) fraud;
- (b) an illegal activity; and/or
- (c) the misuse of services provided by or to be provided by Yanlord,

on the basis that such collection, use or disclosure is for the legitimate interests of Yanlord or some other organisation, and that such legitimate interests outweigh any adverse effect (if any) on you.

27. Should Yanlord rely on this exception, Yanlord may/will need to disclose your personal data that is being processed in reliance on such exception, to third parties, whether located within or outside Singapore, for the purposes stated in paragraph **26** above, and such third parties, would be processing your personal data for the purposes stated in paragraph **26** above.

28. Should you have any queries regarding Yanlord's reliance on this legitimate interests exception, please contact our Data Protection Officer at data.protection@yanlord.com.sg.

G. Provision Of Third-Party Personal Data By You

29. Should you provide us with personal data of any individual other than yourself, you represent, undertake and warrant to us that:

- (a) for any personal data of individuals that you disclose to us or Yanlord Group Companies, you would have prior to disclosing such personal data to us or Yanlord Group Companies obtained consent from the individuals whose personal data are being disclosed, to:
 - (i) permit you to disclose the individuals' personal data to us or Yanlord Group Companies for the Purposes; and
 - (ii) permit Yanlord or Yanlord Group Companies to collect, use, disclose and/or process the individuals' personal data for the Purposes;
- (b) at our request, you will use such form(s) or document(s) provided by us in obtaining such consents from the individuals in question (for the avoidance of doubt, we are under no obligation to you to create any such form(s) or document(s));
- (c) any personal data of individuals that you disclose to Yanlord (or its affiliates, associated companies or related corporations) are accurate and complete; and
- (d) for any personal data of individuals that you disclose to Yanlord (or its affiliates, associated companies or related corporations), that you are validly acting on behalf of such individuals and that you have the authority of such individuals to provide their personal data to Yanlord (or its affiliates, associated companies or related corporations) and for Yanlord (or its affiliates, associated companies or related corporations) to collect, use, disclose and/or process such personal data for the Purposes.

H. How Do We Store Your Personal Data?

30. Security of your personal data is important to us. We have put in place reasonable security arrangements to ensure that your personal data is adequately protected and secured. Appropriate security arrangements will be taken to prevent any unauthorised access, collection, use, disclosure, copying, modification, leakage, loss, damage and/or alteration of your personal data. However, we cannot assume responsibility for any unauthorised use of your personal data by third parties which are wholly attributable to factors beyond our control. We urge you to take every precaution to protect your personal data when you use any third-party platform(s).
31. We have put in place measures such that your personal data in our possession or under our control is destroyed and/or anonymised as soon as it is reasonable to assume that (i) the purpose for which that personal data was collected is no longer being served by the retention of such personal data; and (ii) retention is no longer necessary for any other legal or business purposes.

I. Your Rights

32. You have the right to request that we do not use your personal data for marketing purposes. Please let us know if you wish to withdraw your consent by emailing us at data.protection@yanlord.com.sg with details of your withdrawal request.
33. You have the right to access and/or correct your personal data that in our possession, subject to exceptions under the law. You may exercise this right at any time by emailing us at data.protection@yanlord.com.sg with details of your request. We will need enough information from you in order to ascertain your identity as well as the nature of your request before we process your request. Fees and charges may apply for such requests.
34. For a request to access personal data, once we have sufficient information from you to process the request, we will aim to provide you with the relevant personal data within 30 days. Where we are unable to respond to you within the said 30 days, we will notify you of the soonest possible time within which we can provide you with the information requested. Note that the PDPA exempts certain types of personal data from being subject to your access request.
35. For a request to correct personal data, once we have sufficient information from you to process the request, we will correct your personal data within 30 days. Where we are unable to do so within the said 30 days, we will notify you of the soonest practicable time within which we can make the correction. Note that the PDPA exempts certain types of personal data from being subject to your correction request and also provides for situation(s) when correction(s) need not be made by us despite your request.
36. We will accord you such rights as provided for by the PDPA.

J. Complaint Process

37. If you have any complaint or grievance concerning our management of your personal data or our compliance with the PDPA, we welcome you to contact us with details of your complaint or grievance.
38. Please contact us at data.protection@yanlord.com.sg.

39. Where you are sending an email in which you are submitting a complaint, your indication at the subject header that it is a PDPA complaint would assist us in expediting your complaint by allowing us to direct it to the right personnel in our organisation for handling such matters. For example, you could insert the subject header as “PDPA Complaint”.
40. We will certainly strive to resolve any complaint or grievance that you may have speedily and fairly.

K. General

41. This Privacy Policy is governed by the laws of Singapore.
42. Your consent that is given pursuant to this Privacy Policy is additional to and does not supersede nor replace any other consents that you had provided to Yanlord with regard to processing of your personal data nor does it affect any rights which Yanlord may have at law in connection with the collection, use or disclosure of your personal data.
43. For the avoidance of doubt, in the event that Singapore personal data protection law permits an organisation such as us to collect, use and/or disclose your personal data without your consent, such permission granted by the law shall continue to apply. Further, where Singapore personal data protection law permits us to handle, retain or process your personal data without having to comply with or as exceptions to, the data protection obligations in the PDPA, such rights given to us to do so will continue to prevail, notwithstanding anything stated in this Privacy Policy.
44. If you have any queries on this Privacy Policy or any other queries in relation to how we may manage, protect and/or process your personal data, please do not hesitate to contact our Data Protection Officer, at data.protection@yanlord.com.sg.

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