

## Privacy Policy

### A. About this policy

1. This Policy has been adopted by Frasers Property Limited ("**Frasers**") with its registered office at 438 Alexandra Road #21-00 Alexandra Point Singapore 119958, including Frasers Property Australia Pty Limited, Frasers Property Industrial Australia Pty Limited, Frasers Property Investments (Holland) B.V. and other organisations related to Frasers (including its subsidiaries) (collectively the "**Frasers Property Group**"), including the hospitality and commercial businesses and properties owned and operated globally by the Frasers Property Group.

2. In this Policy, "we", "us" or "our" refers to Frasers or any organisation within the Frasers Property Group as appropriate. Although this Policy is in common use by the Frasers Property Group, except where applicable laws provide otherwise, each organisation is only responsible to you in relation to its own collection and use of your personal data, and its own actions.

3. We are committed to safeguarding your personal data. This Policy describes how we collect, use, disclose and process your personal data, and applies to personal data we collect about you.

4. This Policy supplements but does not supersede or replace any other consents you may have provided to us, or any other agreements or arrangements that you may have with us, in respect of your personal data.

### B. Amendments to this policy

5. We review and may amend this Policy from time to time to reflect changes in applicable laws or the way we handle personal data. The updated Policy will supersede earlier versions and will apply to personal data provided to us previously. You are encouraged to re-visit our Policy from time to time to keep yourself updated on these changes. Where required under applicable laws, we will inform you before we make an amendment to this Policy. Typically we will do so by putting a banner on our website to inform you of the impending change or by sending you an updated version of this Policy in writing, including electronically where appropriate. A copy of our current Policy is available on request and can also be found at <https://www.frasersproperty.com/privacy-policy>.

## C. What personal data we collect

**6. What is personal data.** “Personal data” means any information relating to an identified or identifiable natural person. Depending on the nature of your interaction with us, the personal data we collect can include:

- Name, address, telephone numbers, email address, identification numbers, driving license and vehicle ownership, occupation, financial or payment information, insurance information, membership or subscription details, images, voice recording; fingerprint, date of birth or age and other information which you have provided us in any form or through interactions with us;
- Information from your use of our websites or other services including IP addresses and browsing or transactional history;
- Behavioural history such as dietary requirements and other preferences which you may express to us as you interact with our products and services;
- Employment and educational background, medical health and physical history, criminal history, ethnic and racial origin, nationality, religion, income levels and other information related to your employment; and
- Any other information of a personal nature which you disclose to us.

**7. Voluntary provision of personal data.** We collect personal data that you voluntarily provide to us. What personal data we collect depends on the purposes of the collection what you have chosen to provide.

- You can choose not to provide us with personal data. However, where your personal data is required for the purpose of proceeding with your request to enter into a contract with us, or to perform our contractual obligations, if you do not provide us with your personal data, we may not be able to proceed with your request or perform our obligations, either in whole or in part – for example, we may not be able to provide you with the products and/or services that you require or process your transaction.
- In addition, if your personal data is required for the purpose of complying with our legal obligations and you do not provide your personal data, it may result in us and/or you being in breach or violation of the applicable laws or regulations.

- If you have provided consent, you also have the right to withdraw your consent by contacting us in accordance with paragraph 33. Your withdrawal of consent will not affect the validity of the processing activities that were carried out before the withdrawal was produced.

**8. Providing personal data belonging to others.** If you provide the personal data of anyone other than yourself (e.g. your emergency contacts, family members, friends and next of kin), you are responsible for informing him/her of the specific purposes for which we are collecting his/her personal data and to ensure that he/she has provided valid consent for your provision of his/her personal data to us. By providing the personal data of anyone other than yourself, you represent that you have valid authority and consent to do so.

**9. Accuracy and completeness of personal data.** It is important that the personal data we hold about you is accurate and up to date. It is your responsibility to ensure that all personal data that you provide is accurate and complete, and to inform us of relevant changes to your personal data.

**10. Minors.** Our services are generally not directed to children and minors, and we do not knowingly collect personal data from children or minors without the consent from their parents. If you are child or minor under 16 years of age (or as otherwise stipulated under Part J of our Policy), please do not use or access our services. If you have to do so, please obtain consent from your parent or guardian before you submit any personal data to us. If you are a parent or guardian of such a person and you have reason to believe this person has provided us with their personal data without your prior consent, please contact us to request the erasure of their personal data or for the person to be unsubscribed from our mailing lists.

D. How we collect personal data

**11. Personal data you provide or we collect as part of our relationship with you.** We use different methods to collect personal data, including the following:

- **Direct interactions.** You may give us your personal data by:

- filling in physical or online forms or by corresponding with us by post, phone, email, chatbot or otherwise;
  - visiting our websites, downloading or using our mobile applications;
  - expressing an interest in, using or purchasing services or products that we own or manage;
  - signing up for our loyalty or other programs, creating an account with us or subscribing to our mailing lists;
  - interacting with our representatives face-to-face, or through telephone, letter, online form, chat, social media, email;
  - sending us requests, enquiries or feedback;
  - making a reservation or checking-in at the hospitality properties that we own or manage;
  - responding to our promotions, market surveys or other initiatives;
  - visiting or making transactions at the retail and commercial establishments that we own or manage;
  - interacting with us at events or functions organised by us or being conducted at our establishments
  - providing us with your image or allowing us to capture your image when you are on properties we own or manage when you attend events or functions organised or conducted by us;
  - submitting an employment internship or secondment application to us or providing documents or information including your resume/CVs in connection with such application; and/or
  - submitting your personal data to us for any other reason.
- **Automated technologies or interactions.** As you interact with our websites, platforms, applications or equivalents, we may automatically collect technical data about your equipment, browsing actions and patterns. We collect this data by using cookies, server logs and other similar technologies. These are required to allow certain functions to perform. Please refer to our [Cookies Declaration](#) for more detail.

- **Closed Circuit Television (CCTV) systems or equivalent devices.** We use CCTV systems and equivalent devices within the properties that we own or manage for safety and security reasons. Where applicable, your separate consent will be obtained.

12. **Personal data provided by others.** Depending on your relationship with us, we may also collect your personal data from third party sources, for example:

- from our business partners, including tenants, investors, airlines, tour operators, travel agencies, reservation systems and third parties providing advertising, marketing, promotional or other services to us;
- from entities or other parties investing or shareholding within the Frasers Property Group;
- from your employers in the course of business or investment transactions with us;
- from your referees, educational institutions or previous employers (if you have applied to us for a job);
- from your family members or friends who provide your personal data to us on your behalf;
- from entities or other parties that you have authorised to disclose information to us; and/or from public agencies or other public sources.

#### E. Why We Process Personal Data

13. The collection, use and disclosure of your personal data is generally for the efficient operation of our businesses. More details of the purposes for which we collect, use and disclose personal data are set out below.

#### 14. Purposes Applying Generally

- Processing your transactions with us and providing products and services to you, including conducting contests, competitions, lucky draws, events and functions in which you have agreed to participate;
- Verifying your identity, managing our relationship with you, and communicating with you, including assisting with your requests, enquiries or feedback;
- Preparing such documentation as may be required to carry out our transactions with you;
- Optimising our operations and the products and services we offer to you through different channels such as providing relevant and personalised content designed to make your user experience smoother and more enjoyable;
- Carrying out surveys, research, data matching and statistical analysis to determine customer or business needs, establish user profiles for service improvement and marketing, and to evaluate and improve our products, operations and services;
- Facilitating business asset transactions;
- Conducting due diligence and managing commercial risks;
- Facilitating administrative purposes, including finance, IT and HR purposes, quality assurance and staff training;
- Detecting, preventing or otherwise addressing security, safety or technical issues in connection with products and services we provide;
- Complying with laws and regulations, internal policies and procedures, including audit, accounting, risk management and record keeping, in which case where available under applicable laws, the processing of your data is necessary for us to comply with our legal obligations;
- Preventing crime, assisting in law enforcement and investigations by relevant authorities, enforcing legal obligations owed to us, or responding to complaints, litigation or investigations concerning us, in which case, where available under

applicable laws, the processing of your data is necessary for us to comply with our legal obligations;

- Managing our business, including disclosing your personal data to third parties who provide services to us such as our service providers and data processors (providing services such as hosting and maintenance services, analysis services, e-mail messaging services, delivery services, handling of payment transactions, marketing, human resources, and professional services), and our consultants and professional advisors (such as accountants, lawyers, auditors).
- Such purposes that may be informed to you when your personal data is collected; and
- Any other reasonable purposes related to the aforesaid.

#### **15. Marketing, Promotional, Loyalty and Publicity Purposes:**

- If you sign up to our customer loyalty program, create an account on our applications or platform, or sign up to our mailing lists, we will collect, use and disclose your personal data for the purposes of processing your application, maintaining your account or profile with us, verifying your identity, processing transactions, providing goods and services, communicating with you, and improving our interactions with you.
- If you have given your consent, for example, by signing up to our customer loyalty program or our mailing lists, we may collect, use and disclose your personal data for the purposes of marketing our products and services and those of our partners and business associates, e.g., informing you of our latest activities, special offers, and promotions. For us to market products and services which are of special interest and relevance to you, we may analyse and rely on your overall interaction with us (such as but not limited to your participation in promotions or events and your interactions with us); and
- If you have given your consent, we may additionally collect, use and disclose your personal data for our promotional and publicity purposes, eg, by identifying and announcing your name as a contest winner.

## **16. Hospitality Purposes:**

- If you make a reservation or stay at the hospitality properties that we own or manage, we may collect, use and disclose your personal data to (a) assist you in making arrangements that you have requested, such as arranging for tours, airport transfers, restaurant reservations etc; (b) send you pre-stay communications, post-stay communications and satisfaction surveys; (c) invite you to join our customer loyalty programs or subscribe to our mailing lists; and (d) evaluate your preferences to improve and customise your experience for current and future reservations and stays at our hospitality properties.

## **17. Job Application and Employment Purposes:**

- If you make a job application, we may collect, use and disclose your personal data to facilitate and process your employment application, including considering you for other opportunities within the Frasers Property Group.
- If you are successful in the job application, we may collect, use and disclose your personal data to facilitate and manage your employment with us, including onboarding, providing you with tools and services required for your role, communicating with you, enforcing our policies and processes with you, conducting staff training and development, staff appraisal, providing benefits and payroll processing.
- We may also use the personal data to enhance our job application and employment processes through research and analysis.

## **18. Investor and Shareholder Purposes**

- If you are an investor or shareholder of organisations within the Frasers Property Group, we may use your personal data to (a) send you information about us; (b) manage investor / shareholder relations; and (c) comply with regulatory requirements.

**19. Legal basis for processing.** In addition to collecting, using, disclosing and processing your personal data with your consent or for performance of a contract entered with you, where available under applicable laws we may also do so to support our legitimate business interests (provided that this does not override your interests or rights). To this extent, we rely on legitimate interests to provide services and manage our relationship with you and to facilitate internal business administrative purposes. Where required under



applicable laws, we have conducted legitimate interest assessments to ensure your rights are not overridden by our interests.

**20. Use permitted under applicable laws.** We may also collect, use, disclose and process your personal data, without your consent, where this is required or permitted by law. In this respect, where available under applicable laws, we may justify this processing on our legitimate interests or because it is necessary to comply with a legal obligation.

**21. Contacting you.** When we contact or send you information for the purposes described at Part E above, we may do so by post, e-mail, SMS, telephone or such other means provided by you. If you do not wish to receive any communication or information from us or wish to restrict the manner by which we may contact or send you information, you may contact us in accordance with paragraph 33. If after subscribing to a mailing list you no longer wish to receive communication or information from us through that list, you may also click on the unsubscribe button typically found at the bottom of the communication we send to you.

#### F. Who We Share Personal Data With

**22. Disclosure to Frasers Property Group.** We may disclose or share your personal data with organisations within the Frasers Property Group for the purposes described at Part E above.

**23. Other disclosure.** We may also disclose your personal data for the purposes described at Part E above or as required or permitted by law, for example:

- our third party vendors and service providers, who are engaged to provide business, support, operational and/ or administrative functions such as auditing, legal, marketing, payment, fulfilment and delivery of orders;
- owners of the properties on behalf of whom we manage or operate businesses such as hotels and service apartments;
- third parties with whom we conduct joint marketing and cross promotions; and
- regulatory authorities, statutory bodies or public agencies, including without limitation to support their investigations.

Do note that when personal data is collected from or disclosed to another data controller such as owners of properties on behalf of whom we manage or operate businesses such as

hotels or service apartments, airlines, tour operators or travel agencies, such data controller will independently determine how it processes your personal data in accordance with its own privacy policies and notices.

**24. Transfers.** The Frasers Property Group operate in many different jurisdictions, including Singapore, Australia, China, Germany, Indonesia, the Philippines, Japan, Malaysia, the Netherlands, Spain, Thailand, United Kingdom and Vietnam. We may transfer your personal data for the purposes described at Part E above:

- amongst ourselves, from the jurisdiction where it is collected to any other jurisdictions that we operate in; and
- to third parties in other jurisdictions such as the United States where necessary, for example, where the external server or service provider we use, or our business partner, is located overseas.

**25. Safeguards.** We will implement adequate measures to safeguard your personal data. A broad description of the measures we take are set out below, but you may obtain further details of these safeguards by contacting us in accordance with paragraph 33.

- Your personal data receives an adequate level of protection regardless of the jurisdiction to which it is transferred. For example (where appropriate and permissible or required by applicable laws) enter into contracts (or impose binding rules) with recipients to protect your personal data in a manner that is consistent with all applicable laws.
- When engaging data processors, we will ensure that they only process your personal data in accordance with our instructions.
- We will also implement adequate security measures to mitigate unauthorised access to personal data processed by us from taking place.

#### G. How We Secure and Retain Personal Data

**26. Vulnerabilities and Unauthorised access.** We will implement adequate security measures to mitigate unauthorised or unintended access. However, we cannot be held responsible for unauthorised or unintended access that is beyond our control. In particular, we do not guarantee that our systems or applications are invulnerable to security breaches, nor do we make any warranty, guarantee, or representation that your use of our

systems or applications is safe and protected from viruses, worms, Trojan horses, and other vulnerabilities. We also do not guarantee the security of data that you choose to send us electronically. Sending such data is entirely at your own risk.

**27. Period of retention.** We keep your personal data only for so long as we need the personal data to fulfil the purposes we collected it for, and to satisfy our business and/or legal purposes where permitted under applicable laws, including audit, accounting or reporting requirements. How long we keep your personal data depends on the nature of the data, for example: we will keep personal data for at least the duration of the limitation period for bringing claims if the personal data may be required to commence or defend legal proceedings. Some information may be retained for longer, for example where we are required to do so by law. Typically, our data retention periods range from 3 to 15 years.

**28. How we destroy personal data.** Where the data retention period specified in paragraph 27 or any applicable laws has expired, we erase or otherwise destroy the relevant personal data in due course. In particular:

- **Tangible records:** paper records will be destroyed by shredding or some means that will render them unreadable.
- **Electronic records:** all electronic records will be securely deleted by technical means to prevent their recovery or restoration.

**29. Anonymised data.** In some circumstances we may anonymise your personal data so that it can no longer be associated with you, in which case we are entitled to retain and use such data without restriction.

#### H. Your rights

**30 .** Depending on the jurisdiction you are in or where we operate, you may enjoy certain rights at law in relation to our collection, use, disclosure and processing of your personal data. Such rights include:

- **Access:** you may ask us if we hold your personal data and, if we do, you can request access to your personal data. This enables you to receive a copy of and information on the personal data we hold about you.

- **Correction/Rectification:** you may request that any incomplete or inaccurate personal data we hold about you is corrected.
- **Erasure:** you may ask us to delete or remove personal data that we hold about you in certain circumstances.
- **Restriction:** you may withdraw consent for our use of your personal data, or ask us to suspend the processing of certain of your personal data, for example if you want us to establish its accuracy.
- **Portability:** you may request the transfer of certain of your personal data to another party under certain conditions.
- **Objection:** where we are processing your personal data you may object to this processing and request we stop using your data for such purpose (for example, you may object to the receipt of marketing communications).

If you wish to exercise your rights, you may contact us in accordance with paragraph 33. We may require that you submit certain forms or provide certain information to process your request. Where permitted by law, we may also charge you a fee to process your request.

**31. Limitations.** We may be permitted under applicable laws to refuse a request. For example, we may refuse (a) a request for erasure where the personal data is required for in connection with any claims; or (b) an objection request and continue processing your personal data based on compelling legitimate grounds for the processing.

**32. Complaints.** If you are of the opinion that we have not complied with this Policy or we have infringed applicable data protection laws, we request that you contact us in accordance with paragraph 33 in order that we have an opportunity to make things right. However, you have a right to lodge a complaint with any data protection regulator or authority having jurisdiction over us.

I. Contacting us

33. If you have any feedback or issues in relation to your personal data, or about this Policy, or wish to make a complaint to us, you may contact the applicable Data Protection Officer in your region, as set out below.

- **Singapore:**

[dpo\\_sg@frasersproperty.com](mailto:dpo_sg@frasersproperty.com)

- **Australia:**

[dpo\\_au@frasersproperty.com](mailto:dpo_au@frasersproperty.com)

- **China:**

[dpo\\_chn@frasersproperty.com](mailto:dpo_chn@frasersproperty.com)

- **EU, excluding UK:**

[dpo\\_eu@frasersproperty.com](mailto:dpo_eu@frasersproperty.com)

- **UK:**

[dpo\\_uk@frasersproperty.com](mailto:dpo_uk@frasersproperty.com)

- **All Other Regions:**

[dpo\\_aor@frasersproperty.com](mailto:dpo_aor@frasersproperty.com)

For Data Protection/Privacy matters related to Frasers Property Industrial, please contact the Data Protection Officer at [dpo\\_fpi@frasersproperty.com](mailto:dpo_fpi@frasersproperty.com).

J. Additional Information

34. For additional information on how we process information in specific countries, please see below.

#### Additional Information

In addition to the details of processing set out in the Policy, additional information relevant to the data processing of Frasers Property Group in specific jurisdictions may be found here.

### 1. European (GDPR) Addendum

**Safeguards.** Whenever your data is transferred outside the European Economic Area, we ensure that the third-party recipient of the Personal Data is located on a territory that has been recognised by the European Commission as adequate. In the absence of such recognition, we will only transfer your Personal Data outside the European Economic Area when on the basis of valid mechanisms that are expressly recognised in the applicable data protection laws. For example, we may enter into Standard Contractual Clauses as approved by the European Commission (or enter into Binding Corporate Rules) with recipients to protect your personal data in a manner that is consistent with European laws.

**Privacy Complaints.** The competent supervisory authority is set out in Part VII of the GDPR Privacy Notice [here](#).

### 2. Australia Addendum

**'Personal Data'** should be read as 'personal information' as defined in the *Privacy Act 1988* (Cth) (Privacy Act).

**Safeguards.** Whenever your personal information is transferred outside Australia, we will:

- ensure that the third-party recipient of the personal information is located in a territory that has laws or binding rules that protect the personal information in a way that, overall, is at least substantially similar to the way in which the Australian Privacy Principles at Schedule 1 to the Privacy Act protects such personal information and there are mechanisms available to you to enforce such laws or binding rules; and/or

- take reasonable steps to ensure the overseas recipient does not breach the Australian Privacy Principles.

**Privacy Complaints.** If you have a complaint about our compliance with the Australian Privacy Principles or in relation to how we deal with a request to access or correct your personal information, you may contact us using the details in Part I “Contacting Us” above. We will use reasonable efforts to respond to your complaint within a reasonable time. If we are unable to satisfactorily resolve your privacy concerns, you can contact the Office of the Australian Information Commissioner on their website [www.oaic.gov.au](http://www.oaic.gov.au).

Effective Date

15 June 2023