



**HO BEE LAND LIMITED**  
**(Incorporated in the Republic of Singapore)**  
**(Company Registration No. 198702381M)**

## **DATA PROTECTION POLICY STATEMENT**

Your privacy matters, and Ho Bee Land Limited (**HBL**) respects that. We treat personal information with utmost care and adopt strict practices to protect your privacy. The way we carry out this responsibility is defined in our Personal Data Protection Policy and Procedures (**HBL Data Protection Policy**), which describes how HBL subscribes to the principles and requirements of the Personal Data Protection Act 2012 (**PDPA**).

This statement outlines the HBL Data Protection Policy and applies to all HBL entities (**HBL Group**).

### **Notification and Consent**

We will collect your personal data in accordance with the PDPA. We will notify you of the purposes for which your personal data may be collected, used, disclosed and/or processed, as well as obtain your consent for the collection, use, disclosure and/or processing of your personal data for the intended purposes, unless an exception under the law permits us to collect and process your personal data without your consent.

### **What personal data we collect**

Personal data refers to any data, whether true or not, about an individual who can be identified from that data, or from that data and other information to which an organization has or is likely to have access.

Some examples of the personal data which we may collect and share (depending on the nature of your relationship with us) include your personal particulars, contact information, employment details, education background, income level, billing and payment details, and such other information which we may collect with your consent or as permitted or required by law.

Generally, HBL may collect personal data from its customers, employees and other individuals through the following ways:

- receipt or processing of forms relating to enquiry or purchase of our products or services such as sale and purchase, and leasing of properties;
- receipt or processing of forms for visitor registration, car-parking and other facilities management related matters;
- entering into any agreement or contract;
- interaction and communication process by our employees and agents;
- participation at our events and activities;
- collection and processing of market surveys;
- receipt and processing of employment applications;
- receipt of references from business partners and third parties;
- images captured by CCTV cameras installed at our premises;
- photographs or videos taken by us at our events; and
- receipt of personal data for any other reasons.

**Purposes for collection, use, disclosure and processing of personal data**

The personal data which we collect from you may be collected, used, disclosed and/or processed for various purposes, depending on the circumstances for which we may/will need to process your personal data, including:

- considering and/or processing your application/transaction with us such as real estate sale and purchase or leasing transactions;
- carrying out your instructions or responding to any enquiry given by you or on your behalf, including handling requests and complaints;
- marketing and promoting the products and services of HBL Group;
- managing our facilities, properties and business operations;
- managing other real estate related activities and landlord-tenant relations including inspection, hand over process, defects and investigations;
- servicing ongoing business relationship with our customers such as notification of changes, providing information updates and account statements;
- carrying out due diligence or other screening activities, including background checks, and according with legal or regulatory obligations;
- performing financial transactions such as payments for sale and purchase, rentals, car-parking fees, and any other products and services;
- organizing and facilitating participation in our events including administering sponsors, contests, competitions or lucky draws;
- administering investor and shareholder relations and communication such as dissemination of circulars and annual reports, and conducting shareholder meetings.
- conducting research, survey, analysis and development activities to improve our products, services and facilities;
- storing, hosting, backing up (whether for disaster recovery or otherwise) of personal data, whether within or outside Singapore;
- considering and/or processing application for employment, staff training, performance assessment, benefits and payroll processing;
- evaluating our suppliers, vendors or contractors and managing the outsourcing relationship;
- handling disputes and conducting and facilitating investigations and proceedings;
- protecting and enforcing our contractual and legal rights and obligations;

- preventing, detecting and investigating crime, including fraud and money-laundering, and managing other commercial risks;
- facilitating business asset transactions (such as purchase, sale, lease, amalgamation, merger, acquisition or disposal);
- complying with any applicable rules, laws, regulations, codes of practice or guidelines issued by any legal or regulatory body; and
- for any other purposes which we notify you of the time of obtaining your consent.

In order to conduct our business operations more smoothly, we may also be disclosing the personal data you have provided to us to our third party service providers, agents and/or affiliates or related corporations, professional advisors, regulatory authorities, and/or third parties whether sited in Singapore or outside Singapore, for one or more of the above-stated purposes. Any transfer of personal data overseas must be in accordance with the requirements prescribed under the PDPA.

By providing personal data to HBL you are consenting for HBL to collect and use the information provided, and to share such information within the HBL Group and such third parties with which HBL may have relevant service arrangements, for the purpose for which the information was collected or to be used, and any other reasonable ancillary purposes.

If you provide us with any personal data relating to any third party (e.g. information of your dependent, spouse, children and/or employees) for particular purposes, by submitting such information to us, you warrant and represent to us that you have obtained the consent of such third party to provide us with the personal data for the respective purposes.

You should ensure that all personal data submitted to us is complete, accurate, true and correct. Inaccurate or incomplete personal data may affect you or the products or services which you have requested.

### **Protection of personal data**

We endeavor to protect the personal data in our possession or under our control by making reasonable and appropriate security arrangements to prevent unauthorized access, collection, use, disclosure, copying, modification, disposal or similar risks.

### **Retention of personal data**

Your personal data is retained as long as the purpose for which it was collected remains and until it is no longer necessary for any other legal or business purposes.

### **Do Not Call (DNC) provisions**

If you have provided us with your Singapore telephone number(s) and have given us consent to send you marketing messages via your Singapore telephone number(s), we may continue sending you marketing or any other messages (including via voice calls, text message, fax or other modes) even if these telephone number(s) are registered with the DNC Registry. You may however request in writing that we stop contacting you at your telephone number(s) for such purposes.

**Request for access and/or correction of personal data**

You may request to access and/or correct the personal data currently in our possession, or withdraw your consent to our use of your personal data, by submitting your request formally through the contact details indicated below. We will require a formal written request from you to our Data Protection Officer (details below).

HBL may charge you a reasonable fee for providing the access request. HBL reserves the right not to provide access if the request is frivolous or vexatious, or if the burden or expense of providing access would be unreasonable to HBL or disproportionate to your interest.

**Contacting us**

Should you have any enquiry relating to your personal data, or about our data protection policy, or have a complaint or want more information about how HBL manages your data, you may contact our Data Protection Officer at:

- (a) Telephone number : +65 6704 0888
- (b) Email address : [dpo@hobee.com](mailto:dpo@hobee.com)
- (c) Office address : 9 North Buona Vista Drive  
#11-01 The Metropolis Tower 1  
Singapore 138588

**Amendment of policy**

HBL reserves the right to amend the HBL Data Protection Policy and this statement from time to time. While HBL takes reasonable care to ensure that information published about its policy is up-to-date, HBL does not guarantee the accuracy or completeness of such information.