

INFORMATION ON THE PROCESSING¹ OF CLIENTS' AND SUPPLIERS' PERSONAL DATA

Personal Data Protection Act ("PDPA") 2012 of Singapore

The following information is provided on the processing of personal data transmitted to the Company:

1. Data Controller and Data Protection Officer (DC/DPO)

Under the Personal Data Protection Act 2012 (PDPA), **Marcolin Singapore Pte. Ltd.**, with registered office at Unit 04-04, Tower 1, Marina Bay Financial Centre, 8 Marina Boulevard Singapore, 018981 (hereinafter referred to as the "Company"), acts as the organisation responsible for the collection, use and disclosure of personal data.

2. Type of data processed, notification of purposes and legal basis for processing

- i) Common personal data (contact data, first name, surname, function, e-mail) of the customer or supplier for pre-contractual and contractual performance purposes, and for administrative-accounting-fiscal obligations connected with invoicing—The organisation processes such personal data in accordance with the PDPA, including where consent is deemed given for the performance of a contract or to comply with legal obligations.
- ii) Common personal data such as contact data, first name, surname, function, e-mail of the customer/customer personnel, subject to consent, for the purpose of sending marketing communications (i.e. newsletter communications, invitations to events). Such processing is carried out based on the individual's consent, which may be withdrawn at any time.
- iii) Common personal data such as contact data, first name, surname, function, e-mail of the customer/customer personnel for the purpose of sending commercial communications for products or services that are identical or similar to the products/services subject to the contract with the customer (soft spam), survey and update of company services to the customer, unless the customer objects. Such communications will only be sent where the individual has not opted out, and the individual will be provided with a clear and accessible opt-out mechanism in each communication, in accordance with the PDPA, including applicable Do Not Call provisions where relevant.
- iv) Common personal data (contact data, first name, surname, function, e-mail) processed for organisational, administrative and accounting purposes, in accordance with the PDPA, including where consent is deemed given for purposes reasonably necessary for the organisation's operations.
- v) the Customer's personal data (such as first name, surname, e-mail and telephone number) may be processed for the purpose of providing the Multi-Factor Authentication (MFA) service for access to the *mymarcolin* website, for security purposes, by blocking unauthorised access to the Customer's personal account. Such processing is carried out as part of the organisation's obligation to make reasonable security arrangements to protect personal data under the PDPA.

3. Disclosure of data to third parties - Recipients of the data

The Company may disclose the data for the purposes indicated above to: i) subjects in the company entrusted with the processing; ii) subjects outside the company belonging to the following categories: external consultants, service companies (transport, shipment, marketing and IT services, tax and debt collection services), the company's sales network (agents), banks, control and supervisory bodies; iii) other companies of the Marcolin/Vision Service Plan Group, also established in the United States.

Such disclosures are made on a need-to-know basis and in accordance with the PDPA.

Where personal data is transferred to other Group companies outside Singapore, including to entities located in the United States, such transfers will be carried out in accordance with applicable data protection laws, including the GDPR and the PDPA.

¹ Under Section 2(1) of the Personal Data Protection Act ("PDPA") 2012, "processing", in relation to personal data, means the carrying out of any operation or set of operations in relation to the personal data, and includes any of the following: (a) recording; (b) holding; (c) organizing, adaptation or alteration; (d) retrieval; (e) combination; (f) transmission; (g) erasure or destruction.

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Where required, the organisation will implement appropriate safeguards, including Standard Contractual Clauses (SCCs) and transfer assessments where applicable, and will ensure that the recipient is bound by legally enforceable obligations to provide a standard of protection comparable to that required under the PDPA.

Data shall be transferred in the United States to other Group companies (Vision Service Plan is headquartered in California) in accordance with the GDPR and based on appropriate safeguards, such as the adoption of the standard data-protection clauses adopted by the European Commission

4. Data transfer to countries outside Singapore

The data processed could be transferred to countries outside Singapore. If data is transferred, such transfer will be performed in accordance with the requirements prescribed under the PDPA to ensure that the organisation provides a standard of protection to personal data so transferred that is comparable to the protection under the PDPA.

5. Processing methods and data retention times and criteria

The data will be processed in printed and digital format and will be retained for the period necessary for the accomplishment of the purpose(s) indicated above and after fulfilment of such purpose(s), the organisation will cease to retain the personal data or anonymise it as soon as it is reasonable to assume that the purpose is no longer being served and retention is no longer necessary for legal or business purposes.

Specifically:

- i) for the statutory limitation period relating to the retention of contracts and administrative data and/or for the defence of legal claims, where necessary (ten years from the last use and/or limitation interruption event);
- ii) due to the data subject's dissent/opt-out, i.e. until they unsubscribe from marketing communications and up to a maximum of two (2) years from the last consent given or the last expression of interest;
- iii), (iv), (v) for the duration of the contractual relationship and in any case up to a maximum of two (2) years from the last expression of interest.

6. Data Provision

The provision of the data referred to in point 2 shall be considered:

- i) mandatory for the performance of the contractual relationship and for legal purposes. Failure to provide data will make it impossible to pursue the above-mentioned purposes.
- ii) optional for marketing communications, to the extent that the data subject may at any time object to the processing by expressing dissent/opting-out in the dedicated section "Manage Preferences or Unsubscribe", to be found at the bottom of each communication.
- iii) optional for surveys and for the updating of company services and soft spam communications to the customer, as the customer may object to the processing by expressing dissent/opting-out in the dedicated section "Manage Preferences | Unsubscribe", to be found at the bottom of each communication.

7. Data subject's rights, Withdrawal of Consent and Complaint to the Personal Data Protection Commission ("PDPC")

Under the PDPA, individuals have the right to request access to their personal data and information about how it has been used or disclosed, and to request correction of their personal data.

Individuals may also withdraw their consent to the collection, use or disclosure of their personal data at any time, subject to legal or contractual restrictions and reasonable notice.

In any case, the data subject has the right to withdraw his or her consent at any time. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.

In the case of an alleged infringement, the data subject, assumptions existing, also has the right to lodge a complaint with the PDPC.

Data subjects may exercise their rights at any time via:

- registered letter with return receipt addressed to Unit 04-04, Tower 1, Marina Bay Financial Centre, 8 Marina Boulevard Singapore, 018981; e-mail to: infosingapore@marcolin.com

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8. Profiling and automated decision-making processes

The processing is not performed using automated decision-making processes (e.g. profiling).

9. Contacts and questions

Send an email to the address indicated below to receive the complete list of designated representatives appointed for each area and activity and of the Data Controller/to obtain more information about the transfer of data to countries outside Singapore, about the mechanisms and protection of the transfer of data as of Section 26 of the PDPA/to exercise the right to withdraw consent already given/to exercise your rights (access and correction): infosingapore@marcolin.com .