

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)

The Data Controller is the company Marcolin Singapore Pte. Ltd., with registered office in Unit 04-04, Tower 1, Marina Bay Financial Centre, 8 Marina Boulevard Singapore, 018981 (hereinafter for the sake of brevity "the Company" or the "Data Controller").

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

Generic personal data (contact details, name and surname, role, email address) of the Client/Supplier/client's personnel are collected and processed for pre-contractual purposes, for the performance of the contract and for administrative-accounting-tax related obligations linked to invoicing. Email addresses may also be used for the transmission of commercial information related to the scope of the contract only after express consent is obtained from the Client/Supplier/client's personnel.

The legal basis for the processing of the data is therefore that of fulfilling contractual and legal obligations as well as that of sending commercial information by email, the Data Controller's legitimate interest as of Part 3 of Schedule 1 of 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 Group companies.

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). Data for the transmission of commercial communications will be used until the data subject withdraws consent or until the purpose is no longer necessary, whichever is the earlier.

6. Transmission of Data

The transmission of data is necessary for the performance of the contract and for legal purposes. Data subjects will be informed that non-transmission of data will make it impossible to fulfil the purposes indicated above, and that it would be difficult for the Company to provide goods/services to the data subject without consent from the individual. Processing for the transmission of commercial communications is optional and the data subject can object to such processing.

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

The data subject has the right to request access to his or her personal data, correction of the data, to object to the processing and to exercise the right to data portability at any time.

The data subject also has the right to obtain the data without impediment from the Data Controller, in a structured format of common use and readable by an automatic device to transmit it to another data controller

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

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 .