



VEM motors Asia Pte Ltd – Data Protection

VEM motors Asia Pte Ltd (“VEM Asia” or as appropriate in the context, “we”, “us” or “our”) respect the protection of the Personal Data of individuals and value the relationship we have with you.

This Personal Data Policy (“**Policy**”) describes the types of Personal Data we may collect from you, how we may use that information, and with whom we may share it. Our Policy also describes the measures we take to protect the security of the information you provide to us, including without limitation through this Website. We also tell you how you can reach us to update your Personal Data, ask questions you may have about our personal data protection practices and provide feedback on our personal data protection practices.

“**Personal Data**” in this Policy means data that can identify an individual.

1. Personal Data that we collect

The types of Personal Data that we collect about individuals include:

- i. Name
- ii. NRIC number / FIN number / passport number
- iii. Bank account details
- iv. Mobile number
- v. Vehicle number
- vi. Personal email address
- vii. Residential address
- viii. Residential telephone number
- ix. Photographs
- x. Video and CCTV footage

You may have provided the Personal Data to us personally or authorised other individuals to provide the Personal Data to us and consent (on your behalf) to our collection of your Personal Data from these individuals. These individuals could be your superiors, employees, subordinates, colleagues and your family members.

Where you give us Personal Data about other individuals, you confirm that you are authorised to disclose and consent, on their behalf, to the processing of such Personal Data for the purposes described in the section “Purposes for which we collect and use Personal Data”, or other purposes for which your consent has been sought and obtained.

2. Purposes for which we collect and use Personal Data

We collect and use the Personal Data that you provide to us for the following purposes:

If you are a Vendor / Service Provider / Business Partner

- i. To conduct due diligence / background checks that are mandated by legislation or VEM Asia’s internal policies and practices
- ii. For the purposes of the supply of products and services and support by vendors / service providers / business partners to VEM Asia.
- iii. To keep vendors / service providers / business partners updated on changes to VEM Asia’s policies
- iv. To evaluate and to improve VEM Asia’s products and services
- v. To evaluate the products and services provided by vendors / service providers / business partners to VEM Asia
- vi. Security clearance / entry access into VEM Asia’s premises and premises of foreign government agencies
- vii. To facilitate attendance at events/functions organised by VEM Asia.



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- viii. For purposes that are ancillary to or in furtherance of the above purposes e.g. ancillary to or in furtherance of facilitating attendance at events/functions organised by VEM Asia, we will use your Personal Data to communicate with you concerning the invitation to the events/functions and inform you of updates on the events/functions and to seek your feedback or comments on your attendance of the events/functions

If you are a Customer

- i. To conduct due diligence / background checks that are mandated by legislation or VEM Asia's internal policies and practices
- ii. To provide products and services and to communicate with customers as part of providing products and services
- iii. To evaluate VEM Asia's products and services and how VEM Asia can improve its products and services
- iv. To respond to queries or comments on VEM Asia's products and services
- v. Security clearance / entry access into VEM Asia's premises and premises of foreign government agencies
- vi. To communicate with customers on developments on VEM Asia's products and services, the business of VEM Asia and other corporate events or updates
- vii. To facilitate attendance at events/functions organised by VEM Asia
- viii. For purposes that are ancillary to or in furtherance of the above purposes e.g. ancillary to or in furtherance of facilitating attendance at events/functions organised by VEM Asia, we will use your Personal Data to communicate with you concerning the invitation to the events/functions and inform you of updates on the events/functions and to seek your feedback or comments on your attendance of the events/functions

We only collect and use Personal Data for purposes which you have consented to and for which we have been authorised. If we need to use your Personal Data for any purpose which you have not previously consented to, we would seek your consent prior to using your Personal Data for the new purpose.

3. Disclosure, sharing and transfer of Personal Data

VEM Asia does not sell or rent Personal Data that we collect from individuals, including our website visitors. In the course of or in connection with providing our products and services to our customers, we disclose, share and transfer Personal Data to the following parties for the following purposes:

- i. To our customers/vendors/subcontractors/consultants/business partners for tender purposes.
- ii. To our agents and sub-contractors for the purposes of providing products and services to our customers on our behalf.
- iii. To our business partners for the purposes of providing products and services to our customers;
- iv. To government and non-government authorities, agencies and/or regulators as required under law or under directions or orders from the government and non-government authorities, agencies and/or regulators for security, regulatory approvals or permits.
- v. To other VEM Group entities for the purpose of responding to questions, concerns, comments or feedback on our products or services or our business, or to share knowledge on issues such as industry developments, VEM Asia's business, market outlook, corporate events and other products and services of the VEM Group that may be of interest to your company, organisation or business.
- vi. To other VEM Group entities to facilitate the provision of products and services to our customers where the project or engagement involves other VEM Group entities
- vii. To event organisers and service providers to facilitate the planning of events / functions that VEM Group organises or is involved in

We also disclose and transfer Personal Data to the following parties for the purposes of managing, operating, administering and running our business and for our business and legal purposes:



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- i. To other VEM Group entities for security purposes
- ii. To other VEM Group entities for purposes of evaluating our products and services and our business as a group
- iii. Financial institutions for purposes of payments and transactions related to VEM Asia's provision of products and services or related to products and services provided to VEM Asia by our vendors / service providers / consultants
- iv. To our service providers (who may be located outside Singapore) that have been retained to perform services on our behalf or on behalf of VEM Group entities, including:
 - a. Service providers who provide IT and outsourcing services such as data storage, electronic mail services, deployment of management operations for information technology and HR outsourcing services;
 - b. Professional, financial and legal advisors, tax advisors, auditors, insurers and insurance brokers;
 - c. Vendors, service providers and consultants that have been engaged to help manage, operate, administer and run VEM Asia's operations and business process or provide services to facilitate our provision of our products and services; and
 - d. External contractors to provide consultancy and evaluative services to VEM Asia and for VEM Asia's products and services, or organise events for VEM Asia.

VEM Asia requires that the parties to whom we transfer Personal Data and our service providers implement adequate levels of protection in order to protect Personal Data. We also require that these parties only process Personal Data strictly for purposes for which we engage them for and consistent with the purposes that we have described in the section "Purposes for which we collect and use Personal Data" or with other purposes for which consent has been sought and obtained.

In addition, we would disclose Personal Data in the following circumstances:

- i. in response to a request from law enforcement authorities or other government officials;
- ii. to comply with a court order or direction from a government agency or regulatory authority ordering the disclosure of the Personal Data; and
- iii. where the disclosure is necessary for investigations or legal proceedings.

4. Protection and Security of Personal Data

We employ a range of technological and physical security arrangements and maintain safeguards to protect against the accidental or unauthorised access, collection, use, disclosure, copying, modification, disposal, deletion and other similar risks to Personal Data.

5. Retention of your Personal Data

VEM Asia only retains Personal Data for as long as the retention is required for the purposes for which we collected the Personal Data, the purposes described in this Policy and for our business and legal purposes. Generally, we do not retain Personal Data for a period of longer than 7 years after the original purposes for which the Personal Data was collected have ceased to be applicable, unless otherwise required by law, or other mandatory directions by court or government authorities or for purposes of legal proceedings or other similar proceedings or investigations.

6. How to Contact Us

If you have any questions or comments about this Policy and our policies and practices on our collection, use, disclosure or retention of Personal Data, you may contact our Data Protection Officer:

Email address: tan@vem-group.com

Mailing address: Data Protection Officer
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7. Updating or correcting your Personal Data

VEM Asia takes reasonable measures to ensure that the Personal Data we collect about individuals are accurate and complete. For this reason, if there is any change or update in Personal Data, we would like to know about these changes or updates. If there is a change or an update in your Personal Data or if there is a need to correct any Personal Data of yours that we have, please write to us and provide us with the following details:

- Your name and an email address or mailing address at which we can contact you.
- The nature of our relationship with you.
- The Personal Data for which there has been a change, update or correction.

You may send your requests to our Data Protection Officer at the contact details listed in Section 6 above.

We will endeavour to acknowledge the receipt of your request within 3 working days after the date of receipt of your request if it is sent by e-mail, or within 7 days after the date of receipt of your request if it is sent by post. As it is important to us that the Personal Data that we have about you is accurate and complete, it may be necessary for us to request for supporting documentation from you. We will contact you if we require supporting documentation from you.

There may be circumstances where we will not update or correct Personal Data, including:

- i. The Personal Data is opinion data that is kept solely for an evaluative purpose; and
- ii. The Personal Data is in documents related to a prosecution if all proceedings relating to the prosecution have not been completed.

8. Your Requests and Feedback on your Personal Data with us

You may request for information from VEM Asia on what Personal Data of yours we have and how we have used and shared your Personal Data during the last one year before the date of your request.

You may also choose to withdraw your consent to VEM Asia's use, collection, sharing or processing of your Personal Data at any time. Please understand that your withdrawal of your consent to our use of your Personal Data may affect our provision of products and services to you or our business dealings with you, depending on the nature of your relationship with us.

If you have any concerns, feedback or complaints about the use and/or sharing of your Personal Data, we are open to receiving your feedback or complaint.

9. Updates to this Personal Data Notice

We may change or update portions of this Policy at any time and without prior notice to you. Please review this Policy from time to time so you are aware of any changes or updates to the notice. We will indicate the effective date of the notice. If you do not agree with any of the changes or updates to the Policy, you have the option of withdrawing your consent to our collection, use, disclosure and processing of your Personal Data (please refer to Section 8 above).

Effective date: 1 March 2020



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