

Privacy Policy

1. THE PURPOSE OF THIS PRIVACY POLICY

- 1.1 This privacy policy (“Privacy Policy”) is issued by the Davy Group, including its affiliates and related companies, a list of which is set out in Annex A. This Privacy Policy applies to the services provided by the Davy Group.
- 1.2 The Davy Group is committed to protecting your privacy and personal data (as defined in Singapore’s Personal Data Protection Act (“PDPA”). This Privacy Policy sets out:
 - (a) the types of Personal Data we collect, use, disclose and/ or retain;
 - (b) how we collect, use, disclose and/ or retain your Personal Data; and
 - (c) the purpose(s) for which we collect, use, disclose and/ or retain your Personal Data.
- 1.3 The Davy Group reserves the right to amend this Privacy Policy from time to time. We will notify you of any changes to the Privacy Policy by publishing the updated Privacy Policy on our Site at www.davyomega.com. Please check the Site if you would like to receive the latest updated Privacy Policy.
- 1.4 This Personal Data Protection Policy supplements but does not supersede nor replace any other consent which you may have previously provided to us nor does it affect any right that we may have at law in connection with the collection, use, disclosure and/ or retention of your Personal Data.
- 1.5 By using this website, you consent to the collection and use of information as set forth in this privacy policy.

2. WHAT INFORMATION WE COLLECT

2.1

- (a) In this Personal Data Protection Policy, “Personal Data” refers to any data and/or information about you from which you can be identified by, either (a) from that data; or (b) from that data and other information to which we may have legitimate access to.
- (b) Generally, the Personal Data that we may collect, use, disclose and/or process as part of our day-to-day operations or in the ordinary course of our business include,:
 - Full name, personal identification number of individual, mobile/residential telephone number, personal email address and/or residential address;
 - Financial data such as bank account numbers and/or credit card details for payroll purposes if you are an employee;
 - Photograph, video image or voice recordings of individuals;
 - Age or birth date;
 - Personal data of employee’s family members such as next of kin, spouses, children for insurance or emergency contact purposes;

- information about your usage of and interaction with our website and/ or services including computer and connection information, device capability, bandwidth, statistics on page views and traffic to and from our website;
- Cookies, pixel tags, web beacons, IP addresses and navigational data.

(b) For potential job candidates, we may also collect the following types of personal data:

- Educational qualifications;
- Citizenship and work authorization status;
- Employment history

2.2 You have no obligation to provide any of the personal data requested by us. However, if you choose not to provide us with certain personal data, we may not be able to deal with your request, and/or provide you with the services that depend on our ability to collect, use, disclose or process, or which require, your personal data. We also may not be able to respond to your inquiry or instructions without your personal data.

3. HOW WE COLLECT PERSONAL DATA

The Davy Group collects personal data in a number of ways, including but not limited to the following instances:

- When you submit your CV and job application form to us in response to our advertisements in newspapers and websites, or at roadshows or job fairs;
- When you submit your CV and job application form to us through referrals or via recruitment firms;
- When you provide your personal contact information to us when making enquiries, giving feedback etc;
- When you request that we contact you;
- When you submit your Personal Data to us for any other reason;
- When you provide your personal contact information in the visitors' log books when entering our clients' premises etc.

4. PURPOSES FOR COLLECTION, USE, DISCLOSURE AND PROCESSING OF YOUR PERSONAL DATA

4.1 The Davy Group will/may collect, use, disclose and/or process your personal data for one or more of the following purposes ("Purposes"):

- (a) Providing facilities management services;
- (b) Assess competency and fitness of workers in compliance with work safety regulations;
- (c) Hiring of staff;
- (d) To provide training;
- (e) To assist you with enquiries;
- (f) Pay roll processing for staff;
- (g) For supply of manpower;
- (h) Communicating with sub-contractors and agents for the fulfilment of contractual obligations;

- (i) For application of work permit passes;
- (j) Carrying out due diligence or other screening activities (including background checks) in accordance with legal or regulatory obligations (whether Singapore or foreign country) applicable to us or our affiliates/associated companies, the requirements or guidelines of governmental authorities (whether Singapore or foreign country) which we determine are applicable to us or our affiliates/associated companies, and/or our risk management procedures that may be required by law (whether Singapore or foreign country) or that may have been put in place by us or our affiliates/associated companies;
- (k) to prevent or investigate any fraud, unlawful activity or omission or misconduct, whether or not there is any suspicion of the aforementioned; dealing with conflict of interests; or dealing with and/or investigating complaints;
- (l) complying with or as required by any applicable law, court order, order of a regulatory body, governmental or regulatory requirements, of any jurisdiction applicable to us or our affiliates/associated companies, including meeting the requirements to make disclosure under the requirements of any law binding on us or our affiliates/associated companies (such as reporting of Covid-related information of our workers to the MOM), and/or for the purposes of any guidelines issued by regulatory or other authorities (whether of Singapore or elsewhere), with which we or our affiliates/associated companies are expected to comply (including submission of referral and placement information to MOM);
- (m) complying with or as required by any request or direction of any governmental authority (whether Singapore or foreign country) which we are expected to comply with; or responding to requests for information from public agencies, ministries, statutory boards or other similar authorities (whether Singapore or foreign country). For the avoidance of doubt, this means that we may/will disclose your personal data to such parties upon their request or direction;
- (n) storing, hosting, backing up (whether for disaster recovery or otherwise) of your personal data, whether within or outside Singapore;
- (o) facilitating, dealing with and/or administering external audit(s) or internal audit(s) of the business of Davy Group or that of its affiliates/related corporations;
- (p) to create reports with respect to our transactions with you, and/or producing statistics and research of such transactions for internal and/or statutory reporting and/or record-keeping requirements;
- (q) maintaining and developing our business systems and infrastructure including testing and upgrading of these systems;
- (r) dealing with and/or facilitating a business asset transaction or a potential business asset transaction, where such transaction involves the Davy Group as a participant or involves only a related corporation or affiliated company of Davy Group as a participant or involves Davy Group and/or any one or more of Davy Group's related corporations or affiliated companies as participant(s), and there may be other third party organisations who are participants in such transaction. "business asset transaction" means the purchase, sale, lease, merger or amalgamation or any other acquisition, disposal or financing of an organisation or a portion of an organisation or of any of the business or assets of an organization.

5. HOW YOUR PERSONAL DATA IS STORED, HANDLED AND MANAGED

- 5.1 The Davy Group takes great care to protect your privacy. In this regard, we will take reasonable steps to ensure that your personal data is kept confidential and secure, and take reasonable appropriate technical and organizational measures to protect your personal data from unlawful or accidental destruction, accidental loss, unauthorized collection, use, disclosure, access, copying, modification, leakage, damage, alteration or other unlawful forms of processing.
- 5.2 Where we transfer information from our servers to our mainframe computers, we use all reasonable endeavours to ensure that this is done securely. Access to our mainframe computers is protected by firewall security systems where required, relative to the risk of the information stored. In addition, the Site carries an Internet Detection System to monitor potential privacy and security threats.
- 5.3 Any information stored in documents or on our systems is protected from unauthorised access by the use of a number of security procedures including user passwords.
- 5.4 Please be aware that the transmission of data over the internet is never completely secure, and while we aim to use our best efforts to secure and protect the information, we cannot guarantee the security of any information that is provided or transmitted to us by you. Any such provision of information is at your own risk.
- 5.5 We will also put in place measures such that your personal data in our possession or under our control is destroyed and/or anonymized as soon as it is reasonable to assume that (i) the purpose for which that personal data was collected is no longer being served by the retention of such personal data; and (ii) retention is no longer necessary for any legal or business purposes.

6. WHEN WE DISCLOSE YOUR PERSONAL DATA

- 6.1 The Davy Group may/will need to disclose your personal data to third party organisations including to its affiliates, and those organisations may be located (and your personal data may be disclosed) overseas and outside of Singapore, for one or more of the above Purposes, as such third parties, would be processing your personal data for one or more of the above Purposes. In this regard, you hereby acknowledge, agree and consent that we are permitted to disclose your personal data to such third parties (whether located within or outside Singapore) for one or more of the above Purposes and for the said third parties to subsequently collect, use, disclose and/or process your personal data for one or more of the above Purposes. These disclosures are made subject to suitable protection for privacy and confidentiality being in place.
- 6.2 The third party organisations to which we would usually disclose your information include:
 - suppliers, agents and other third parties with whom we have commercial relationships, for business and related purposes including but not limited to those which provide administrative or other services to us such as mailing houses, call centres, telecommunication companies, logistics companies, information technology companies and data centres;
 - our professional advisers, for example, our auditors and lawyers, as well as our insurers;
 - government, regulatory or other organisations to whom we are required to disclose your personal data by law;

- any actual or proposed assignee or transferee of the business of Davy Group or its Affiliates, or a merged entity in the event Davy Group or any of its affiliates is merged to create the said merged entity;
- third parties to whom disclosure Davy Group is for one or more of the Purposes and such third parties would in turn be collecting and processing your personal data for one or more of the Purposes;
- purchaser or successor entity in connection with the sale of Davy Group or a related body corporate, or a business unit owned by Davy Group or a related body corporate, or the sale of substantially all of the assets of Davy Group or a related body corporate;
- Where your personal data is to be transferred out of Singapore, we will comply with the requirements of applicable local data protection law (i.e. the PDPA) in doing so. In this regard, this includes taking appropriate steps to ascertain that the foreign recipient organisation of the personal data is bound by legally enforceable obligations to provide to the transferred personal data a standard of protection that is at least comparable to the protection under the PDPA.

7. PROVISION OF THIRD PARTY PERSONAL DATA BY YOU

- 7.1 Should you provide Davy Group with personal data of individual(s) other than yourself, you represent and warrant to Davy Group and you hereby confirm that : (a) prior to disclosing such personal data to us, you would have and had obtained consent from the individuals whose personal data are being disclosed to us, to: (i) permit you to disclose the individuals' personal data to Davy Group for the Purposes; and (ii) permit Davy Group to collect, use, disclose and/or process the individuals' personal data for the Purposes; (b) any personal data of individuals that you disclose to us is accurate; (c) you are validly acting on behalf of such individuals and that you have the authority of such individuals to provide their personal data to Davy Group and for Davy Group to collect, use, disclose and process such personal data for the Purposes; and (d) the terms of this Privacy Policy have been brought to their attention and they are agreeable to the same.

8. ACCESSING AND CORRECTING YOUR PERSONAL DATA OR WITHDRAWING YOUR CONSENT

- 8.1 Davy Group takes reasonable steps to ensure that any personal data we collect, disclose and use is accurate and complete, if your personal data is likely to be used by us to make a decision that affects you, or disclosed to another organisation. However, it is important that you advise us of any changes to your personal data or if there are any errors in the personal data we hold about you. We will not be responsible for relying on inaccurate or incomplete personal data arising from your not updating us of any changes in your personal data that you had initially provided us with.
- 8.2 Subject to certain exceptions allowed by law, everyone who has provided personal data has the right to access or correct that personal data. For security reasons you will be required to put any request for access to or correction of your personal data into writing. You may obtain access to or correction of your own personal data by contacting our Data Protection Officer via the

address below. We will need enough information from you in order to ascertain your identity as well as the nature of your request, to deal with your request.

- 8.3 For a request to correct personal data, once we have sufficient information from you to deal with the request, we will deal with your request in compliance with applicable local data protection law (i.e. the PDPA), including correcting your personal data within the required timeline under local data protection law (30 days in the case of the PDPA). Where we are unable to do so within the said timeline, we will notify you of the soonest practicable time within which we can make the correction. Note that the PDPA exempts certain types of personal data from being subject to your correction request as well as provides for situation(s) when correction need not be made by us despite your request.
- 8.4 You may withdraw your consent for the collection, use and/or disclosure of your personal data in our possession or under our control by submitting your request to the email address set out below. We will process your request within a reasonable time from such a request for withdrawal of consent being made, and will subsequently not collect, use and/or disclose your personal data in the manner stated in your request, unless the law or applicable local data protection law (i.e. the PDPA) allows us to. However, your withdrawal of consent could result in certain legal consequences arising from such withdrawal. In this regard, depending on the extent of your withdrawal of consent for us to process your personal data, it may mean that we may not be able to fulfill the transaction you have entered into with us or continue with your relationship with us, or send you information that you have requested, as examples depending on the circumstances.

9. HOW YOU MAY MAKE A PRIVACY-RELATED COMPLAINT

- 9.1 If you have any concerns about our handling or treatment of your personal data or if you believe that your privacy has been breached, please contact us by writing to our Data Protection Officer at the address below setting out the nature of your complaint.
- 9.2 We will investigate your complaint and endeavour to provide you with our response within a reasonable time of receiving your complaint.

10. HOW TO CONTACT US ABOUT THIS PRIVACY POLICY

- 10.1 If you have any queries relating to our Privacy Policy, or if you wish to request for access to or correction of your personal data or to withdraw your consent, please contact or send your request to us at Data Protection Officer 8 Jurong Town Hall Road #30-04 The JTC Summit Singapore 609434 E-mail: lyannetan@davyomega.com

Annex A

List of Affiliates

1. 3 Oaks Holding Pte Ltd
2. Andrew Cleaning Services Pte Ltd
3. Barrier Fire Line Pte Ltd
4. Calpen Contractors Pte Ltd
5. Cleancoat Services Pte Ltd
6. DC Contractors Pte Ltd
7. Davy International Pte Ltd
8. Davy Omega (SEA) Pte Ltd
9. OneStop Complete Services Pte Ltd