

Personal Data Protection and Privacy Policy for External Parties

– YKK AP Facade Pte Ltd and YKK AP Singapore Pte Ltd –

YKK AP Facade Pte Ltd and YKK AP Singapore Pte Ltd (collectively, “YAP” or “we”) understands the importance of protecting your personal data.

This Privacy Policy (“**Policy**”) governs the collection, use and disclosure of personal data by YAP, and explains how we collect and handle personal data of individuals and comply with the requirements of the Personal Data Protection Act 2012 of Singapore (“**PDPA**”) and its regulation(s). In this Policy, “personal data” has the same meaning as the PDPA.

1. Observance of Laws and Standards

YAP respects the privacy of individuals and recognizes the need to treat personal data in an appropriate and lawful manner, and is committed to comply with its obligations in this regard, in respect of all personal data it handles.

If you find any part of this Policy that does not follow the PDPA in respect to the personal data about you or others, you should raise the matter with our Data Protection Officer(s) (“**DPO(s)**”) as soon as possible.

2. Collection, Use and Disclosure of Personal Data

Your personal data may be collected by us in several ways including but not limited to the following:-

- (a) when you contact us via any mode of communication including via our social media accounts (if any);
- (b) when you request us to contact you;
- (c) when you submit your personal data to us including submitting such personal data via our social media accounts (if any);
- (d) CCTV recordings in our office;
- (e) personal data collected from any of the companies in the YKK Group; and
- (f) personal data collected from other third parties you submitted your personal data to.

Some examples of personal data YAP may collect include name and identification information, contact information such as address, email address, or telephone number, nationality, gender, date of birth, photographs and other audio-visual information, employment information and financial information. YAP will not collect your NRIC and other national identification numbers unless permitted by the Act or any other applicable laws or regulations.

YAP collects and uses the personal data it obtains for the purposes stated below. We may also disclose your personal data to third parties where necessary for the same stated purposes below.

(I) Customer personal data

- (a) To provide YKK AP Group company products and services and to provide information about new YKK AP Group company products and services.
- (b) To provide after-sales service for YKK AP Group company products, or information about these after-sales services.
- (c) To carry out surveys and analysis of the use of YKK AP Group company products and services to determine, including but not limited to, the level of customer satisfaction in order to develop new products and improve services.
- (d) To deliver or install YKK AP Group company products and services.
- (e) To provide information about event campaigns and lectures being organized by YKK AP Group companies.
- (f) To respond to customers' inquiries.
- (g) To fulfill contractual obligations with customers.
- (h) To arrange business discussions and meetings with customers.
- (i) For general business/management and reporting purposes.
- (j) All other purposes related to the business.

(II) Shareholder personal data

- (a) To exercise the rights or fulfill the duties required by company law.
- (b) To implement policies that apply to the relationship between the company and the shareholders.
- (c) To manage the shareholders' information as required by law.

(II) R&D partners, and individuals with who YKK Group employees have exchanged business cards with, personal data

- (a) To carry out job-related communication with associates.
- (b) To fulfill contractual obligations with business partners.
- (c) To inform associates about business meetings and discussions.
- (d) To carry out communications needed for product and technological collaborative research and development with associates.

(III) Job applicant's personal data

- (a) To communicate job selection information.
- (b) To assess the suitability of the job applicant to the position applied.
- (c) To determine conflict of interest between job applicant and Company.
- (d) To verify the identity of the job applicant and the accuracy of your personal details and other information provided to us (whether by you or by a third party).
- (e) For general business/management and reporting purposes.

(IV) Employees of YKK Group Companies

- (a) For general business/management and reporting purposes including but not limited to the following purposes:-

- (i) compliance;
- (ii) internal audit;
- (iii) corporate governance; and
- (iv) employees satisfaction or engagement.

(V) Employees of YAP's Sub-contractors

- (a) To fulfill YAP's and/or the main contractor's reporting, regulatory and/or legal obligations to the relevant authorities.

(VI) Individuals that Contact Us

- (a) To respond to individual's request, question, feedback, or for the purpose stated at the time of submitting such personal data to us.

(VII) Visitors to Our Office Premises

- (a) For security purposes such as to verify the identity of the visitor of our office.

By submitting your personal data to YAP, you agree and consent to the collection, use and/or disclosure of your personal data by YAP for some or all of the purposes mentioned above.

The purpose listed in the above clauses may continue to apply, even in situations where your relationship with us has been terminated or altered in any way, for a reasonable period thereafter (including, where applicable, a period to enable us to enforce our rights under any contract with you).

In cases where personal data is collected for a purpose not shown above, YAP will notify you of the purpose and seek your consent for collecting, using and/or disclosing your personal data for that purpose.

Subject to the provisions of any applicable law or regulations, your personal data may be collected, used and/or disclosed for the purposes listed above (where applicable), to the following:

- (a) YAP's staff;
- (b) YKK Corporation and/or YKK AP Inc (YAP's ultimate parent company and parent company in Japan respectively)
- (c) Agents, contractors or third party service providers who provide services to YAP;
- (d) Our professional advisers such as auditors and lawyers;
- (e) Relevant government regulators, statutory boards or authorities, or law enforcement agencies to comply with any laws, rules, guidelines, regulations or schemes imposed by any governmental authority; and
- (f) Any other party to whom you authorize us to disclose your personal data to.

YAP may engage a data intermediary to process and handle personal data on its behalf. In these cases, we will only work with recognized personal data management firms and shall enter into contracts with these data intermediaries to include provisions that clearly set out

the data intermediaries' responsibilities and obligations to ensure compliance with the PDPA.

3. Withdrawing Consent

The consent that you provide for the collection, use and disclosure of your personal data will remain valid until such time it is being withdrawn by you in writing. You may withdraw consent and request us to stop using and/or disclosing your personal data for any or all of the purposes listed above by submitting your request in writing or via email to our DPO(s) at the contact details provided below.

In the event you withdraw your consent to YAP we shall cease to collect, use and/or disclose your personal data within 30 days upon receiving your withdrawal request. If we are unable to process and effect your request within 30 days, we shall inform you within this period by which we are able to process and effect your request.

Please note that once consent is withdrawn, it may not be possible for us to accomplish the purposes as set out above. We shall, in such circumstances, notify you before completing the processing of your request.

Please also note that withdrawing consent does not affect our right to continue to collect, use and disclose personal data where such collection, use and disclosure without consent is permitted or required under applicable laws.

4. Protection of Personal Data

YAP has taken reasonable measures to protect your personal data from unauthorized access or modification, improper collection, use or disclosure, unlawful destruction or accidental loss. You should be aware, however, that no method of transmission over the internet or electronic storage is 100% secure. While security cannot be guaranteed, we strive to protect the security of the personal data and will constantly review and enhance our information security measures.

5. Access, Correction and Accuracy of Personal Data

You may apply for a copy of your personal data held by YAP, or request for your personal data to be updated or corrected, by sending a formal written request to our DPO(s). Please be informed that we are entitled to charge a fee to recover the costs directly related to the access of the personal data for the time and effort spent by us in responding to the same, and will let you know the amount accordingly.

Within 30 days upon receiving your request, YAP shall:

- (a) Provide you with a copy of your personal data under our custody and/or other relevant information in accordance with the PDPA therein;

- (b) Correct your personal data as soon as practicable and inform you that the relevant correction has been made;
- (c) Inform you that your request for access or correction of your personal data is rejected, if the request was made in circumstances predefined by the PDPA where such access or correction is prohibited or not required; or
- (d) Inform you that we require more time to respond to your request and the period/time by which we are able to effect your request.

We generally rely on personal data provided by you. You shall ensure that all personal data submitted to us is complete and accurate. Failure to do so may result in our inability to provide you with the information or fulfil the purposes stated above.

YAP shall make a reasonable effort to ensure that the personal data collected by or on behalf of YAP is accurate.

6. Retention of Personal Data

We may retain your personal data for as long as it is necessary to fulfil the purpose for which it was collected, or as required or permitted by applicable laws.

We will cease to retain your personal data, or remove the means by which the data can be associated with you, as soon as it is reasonable to assume that such retention no longer serves the purpose for which the personal data was collected, and is no longer necessary for legal or business purposes.

7. Transfer of Personal Data

The personal data we collect from you may be transferred to multiple destinations outside Singapore. YAP will ensure that any transfers of your personal data to a territory outside of Singapore will be in accordance with the PDPA so as to ensure a standard of protection to personal data so transferred that is comparable to the protection under the PDPA.

8. Third Party's Personal data

If you are providing any third party's personal data to us, you represent to us that you have obtained the consent of that third party to provide us with his/her personal data for the relevant purposes.

9. Joint Use of Personal data among the YKK Group Companies

All the YKK Group companies jointly use the following personal data gathered and YAP assumes responsibility for the management of such information. As abovementioned in Clause 7, we will ensure compliance with the PDPA if any personal data is transfer outside of Singapore.

10. Establishment and Continual Improvement of Personal Data Management System for Personal Data Protection

In order to appropriately manage personal data, YAP shall continually work towards improving the development of our data management system and internal company regulations.

11. Use of Cookies

Cookies are small text files that may be automatically stored on your web browser that can be retrieved by our website. We may use cookies to enable or enhance the functionality of our websites, or to analyze visitor traffic for marketing or other purposes. We may also use web analytic consultants to research certain usage and activities on parts of our website. Cookies can make our website more useful by storing information about your preferences, thus enabling us to provide a more personalized service to you.

Most web browsers are initially set to accept cookies. You can adjust settings on your web browser so that you will be notified when receiving a cookie. If you would prefer, you can set your web browser to disable cookies. However, by disabling them, you may not be able to use certain functions or enter certain parts of our websites.

12. Social Media Widgets

Our website includes social media features. These features may collect your IP address, which page you are visiting on our site, and may set a cookie to enable the feature to function properly. Social media features and widgets are either hosted by a third party or hosted directly on our websites. Your interactions with these features are governed by this Policy.

13. Contact Information

For any complaints, questions, concerns about our personal data protection policies and practices, withdrawal of consent, or to request access to, update or correct the personal data within our possession and control, please contact:

The Data Protection Officer
YKK AP Facade Pte Ltd / YKK AP Singapore Pte Ltd
3 International Business Park
#02-02/12 Nordic European Centre
Singapore 609927
+65 6268 3333
Email: tankl@ykkapfacade.com

14. Changes to the Privacy Policy

YAP reserves the right to unilaterally modify this Policy from time to time without any prior notice to ensure that this Policy is in line with the legal and regulatory requirements, as well as the constitutive documents of YAP. Hence, we advise you to check regularly for updated information on the handling of your personal data. You may determine if any such revision has taken place by referring to the date on which this Policy was last updated.

Last Updated: 1 June 2022