

Data Protection Policy

We at Septeni Asia Pacific Pte. Ltd. (“**Septeni**”) take our responsibilities under the Personal Data Protection Act 2012 (the “**PDPA**”) seriously. We also recognize the importance of the personal data you have entrusted to us and believe that it is our responsibility to properly manage, protect and process your personal data.

This Data Protection Policy is designed to assist you in understanding how we collect, use and/or disclose the personal data you have provided to us, as well as to assist you in making an informed decision before providing us with any of your personal data.

If you, at any time, have any queries on this policy or any other queries in relation to how we may manage, protect and/or process your personal data, please do not hesitate to contact our Data Protection Officer (the “**DPO**”) at:

privacy@septeni.com

1 INTRODUCTION TO THE PDPA

1.1 “Personal Data” is defined under the PDPA to mean data, whether true or not, about an individual who can be identified from that data, or from that data and other information to which an organization has or is likely to have access. Common examples of personal data could include names, identification numbers, contact information, medical records, photographs and video images.

1.2 We will collect your personal data in accordance with the PDPA. In general, before we collect any personal data from you, we will notify you of the purposes for which your personal data may be collected, used and/or disclosed, as well as obtain your consent for the collection, use and/or disclosure of your personal data for the intended purposes.

2 PURPOSES FOR COLLECTION, USE & DISCLOSURE OF PERSONAL DATA

2.1 The personal data which we collect from you may be collected, used and/or disclosed for the following purposes :

- (a) Processing, administering and managing your relationship with Septeni;
- (b) Managing Septeni’s infrastructure and business operations;
- (c) Managing enquiries and instructions from you;

- (d) Dealing in any matters relating to the services which you have engaged Septeni for (including the mailing of correspondence, statements, invoices, reports or notices to you, which could involve disclosure of certain personal data about you to bring about delivery of the same as well as on the external cover of envelopes / mail packages);
- (e) Conducting customer due diligence and personal identification in accordance with laws, regulations and policies including Septeni's internal policies;
- (f) Sending you marketing, advertising and promotional information about other Internet advertising products and/or services that Septeni may be selling or marketing, and which Septeni believes may be of interest or benefit to you by way of postal mail and/or electronic transmission to your e-mail address(es);
- (g) Providing you with various proposals and advice on current and/or future products and services from Septeni or of our partner companies;
- (h) Conducting market research and data analysis; and
- (i) Reporting and sharing with our affiliate companies located in Japan, Korea, the United Kingdom and the United States of America.

2.2 In order to conduct our business operations more smoothly, we may also be disclosing the personal data you have provided to us to our third party service providers, agents and/or our affiliates or related corporations, which may be sited outside of Singapore, for one or more of the above-stated Purposes. This is because such third party service providers, agents and/or affiliates or related corporations would be processing your personal data on our behalf for one or more of the above-stated Purposes.

3 SPECIFIC ISSUES FOR THE DISCLOSURE OF PERSONAL DATA TO THIRD PARTIES

3.1 We respect the confidentiality of the personal data you have provided to us.

3.2 In that regard, we will not disclose any of your personal data to any third parties without first obtaining your express consent permitting us to do so. However, please

note that we may disclose your personal data to third parties without first obtaining your consent in certain situations, including, without limitation, the following :

- (a) cases in which the disclosure is required based on the applicable laws and/or regulations;
- (b) cases in which the purpose of such disclosure is clearly in your interests, and if consent cannot be obtained in a timely way;
- (c) cases in which the disclosure is necessary to respond to an emergency that threatens the life, health or safety of yourself or another individual;
- (d) cases in which there are reasonable grounds to believe that the health or safety of yourself or another individual will be seriously affected and consent for the disclosure of the data cannot be obtained in a timely way, provided that we shall, as soon as may be practicable, notify you of the disclosure and the purposes of the disclosure;
- (e) cases in which the disclosure is necessary for any investigation or proceedings;
- (f) cases in which the personal data is disclosed to any officer of a prescribed law enforcement agency, upon production of written authorisation signed by the head or director of that law enforcement agency or a person of a similar rank, certifying that the personal data is necessary for the purposes of the functions or duties of the officer; and/or
- (g) cases in which the disclosure is to a public agency and such disclosure is necessary in the public interest.

3.3 The instances listed above at paragraph 3.2 are not intended to be exhaustive. For an exhaustive list of exceptions, you are encouraged to peruse the Second, Third and Fourth Schedules of the PDPA which is publicly available at <http://statutes.agc.gov.sg>.

3.4 In all other instances of disclosure of personal data to third parties with your express consent, we will endeavour to provide adequate supervision over the handling and administration of your personal data by such third parties, as well as to provide for adequate forms of protection over such personal data.

4 REQUEST FOR ACCESS AND/OR CORRECTION OF PERSONAL DATA

- 4.1 You may request to access and/or correct the personal data currently in our possession at any time by submitting your request through the following methods :
- (a) E-mail : privacy@septeni.com
 - (b) Office address : 6 Eu Tong Sen Street #11-03 SOHO 1 @ The Central Singapore 059817
- 4.2 For a request to access personal data, we will provide you with the relevant personal data within a reasonable time from such a request being made.
- 4.3 For a request to correct personal data, we will undertake the following :
- (a) we will correct your personal data as soon as practicable after the request has been made; and
 - (b) subject to paragraph 4.4, we will send the corrected personal data to every other organisation to which the personal data was disclosed by Septeni within a year before the date the correction was made, unless that other organisation does not need the corrected personal data for any legal or business purpose.
- 4.4 Notwithstanding paragraph 4.3(b), we may, if you so consent, send the corrected personal data only to specific organisations to which the personal data was disclosed by us within a year before the date the correction was made.
- 4.5 We will also be charging you a reasonable fee for the handling and processing of your requests to access your personal data. We will provide you such details before the processing of your access request.
- 4.6 Notwithstanding any of the other provisions of this paragraph 4, please note that we are entitled under the PDPA to refuse any personal data access or correction request on any of the grounds specified under sections 21(3) and 22(2) respectively of the PDPA. Further grounds of refusal to process any personal data access and correction request are contained in the Fifth and Sixth Schedules of the PDPA respectively. In particular :
- (a) we may refuse to process your access request (i) in the event that your request would unreasonably interfere with our operations because of the repetitious or systematic nature of the requests; (ii) in the event that the burden or expense of providing access would be unreasonable to us or disproportionate to your interests; (iii) in the event that the information you requested access for is trivial; or (iv) your request is otherwise frivolous or vexatious; and/or
 - (b) we may refuse to process your correction request in the event that we are satisfied on reasonable grounds that such correction should not be made.

5 REQUEST TO WITHDRAW CONSENT

5.1 You may withdraw your consent for the collection, use and/or disclosure of your personal data in our possession or under our control at any time by submitting your request through the following methods :

- (a) E-mail : privacy@septeni.com
- (b) Office address : 6 Eu Tong Sen Street #11-03 SOHO 1 @
The Central Singapore 059817

5.2 We will process your request within a reasonable time from such a request for withdrawal of consent being made, and will thereafter refrain from collecting, using and/or disclosing your personal data in the manner stated in your request.

6 ADMINISTRATION AND MANAGEMENT OF PERSONAL DATA

6.1 We will take appropriate measures to keep your personal data accurate, complete and updated.

6.2 We will also take commercially reasonable efforts to take appropriate precautions and preventive measures to ensure that your personal data is adequately protected and secured. Appropriate security arrangements will be taken to prevent any unauthorized access, collection, use, disclosure, copying, modification, leakage, loss, damage and/or alteration of your personal data. However, we cannot assume responsibility for any unauthorized use of your personal data by third parties which are wholly attributable to factors beyond our control.

6.3 We will also take commercially reasonable efforts to ensure that the 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 other legal or business purposes.

7 UPDATES ON DATA PROTECTION POLICY

7.1 As part of our efforts to ensure that we properly manage, protect and process your personal data, we will be reviewing our policies, procedures and processes from time to time.

- 7.2 We reserve the right to amend the terms of this Data Protection Policy at our absolute discretion. Any amended Data Protection Policy will be posted on our website and can be viewed at [<http://www.septeni.co.jp/ap/>].
- 7.3 You are encouraged to visit the above website from time to time to ensure that you are well informed of our latest policies in relation to personal data protection.

Last Updated on 1st July 2014