

PERSONAL DATA PROTECTION / PRIVACY POLICY (POLICY)

We at PICO (which shall include Pico Art International Pte Ltd, its parent, subsidiaries and related corporations), understand the importance of the protection of Personal Data. Please read this Policy to learn more about how we manage and safeguard the Personal Data that we may from time to time during the course of our business with you, collect, use, disclose and/or process the Personal Data that you have provided or may provide to us. If you have any queries regarding this Policy, please address all concerns and queries to our Data Protection Officer at the address stated below.

By submitting your information to us, or signing up for any products and/or services offered by us, you agree and consent to PICO, collecting, using, processing and/or disclosing your Personal Data in the manner set out in this Policy. If you are providing us Personal Data of another individual, then it is deemed that you have the authority of that other individual to do so and that such other individual consents to our collection, use, processing and disclosure of such Personal Data in accordance with this Policy. You may choose not to provide us with any Personal Data but should do so with the understanding that this may affect our ability and efficiency to provide you with the required services, and also our ability to comply with legal obligations applicable to us. You acknowledge and agree that this Policy may be amended and varied by PICO from time to time to be consistent with developments, industry trends as well as any changes to our legal rights or obligations.

1. Personal Data

“Personal Data” is defined under the Singapore Personal Data Protection Act (“**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. This will include information relating to that individual’s name, identification number, image, address, age, contact details, gender, occupation, marital status, e-mail address, family members, bank accounts, and other personal information required to be processed in connection with the services provided by us to an individual personally.

2. Purpose of Collecting Personal Data

2.1 Generally, your Personal Data is collected in one or more of the following ways :-

- (a) when you submit forms or register online for or relating to or use/purchase any of our products or services;
- (b) when you enter into agreement or provide information through any other transaction with us for any of our products or services;
- (c) when you interact with any of our staff or officers in any manner whatsoever;
- (d) when you respond to any of our promotions, market surveys or contests, lucky draws or events or our request for additional Personal Data or other initiatives;
- (e) when your image is captured by us via CCTV cameras while you are within any of our premises or events or via photographs or videos taken by us or our representatives when you attend any of our events;
- (f) when we receive references from any of our Third Party Providers (as defined below); and/or
- (g) when you request us to contact you or submit your Personal Data to us for any other reason.

2.2 We collect, use, process and disclose your Personal Data in connection with and to facilitate the provision of our services which includes :-

- (a) Providing you with the services and products that you may require;
- (b) Completing projects and services for which we have been appointed and that you may require from time to time, generally performing obligations in the course of or in connection with our provision of goods and/or services requested by you;
- (c) To communicate with you and manage your relationship with us, including verifying your identity, responding to, handling and processing queries, requests, applications, complaints and feedback from you or any other reason in connection with our services and products and business in general;
- (d) Processing payment or credit information or transactions;
- (e) Sending you marketing, advertising or promotional information about our or our Third Party Providers’ products and services including notifying you of events, initiatives, promotions, rewards and loyalty programmes and other promotions. These may be through SMS / MMS / instant messaging,

electronic mail, telephone calls and/or through social media platforms from us or our Third Party Providers;

- (f) Conducting research, surveys, analysis and development activities in order to improve the products and services we offer to you, as well as to improve the overall customer experience and our marketing programmes;
- (g) Storing, hosting, backing-up of your Personal Data and otherwise managing and ensuring the security of our business systems;
- (h) Transmitting to any unaffiliated third parties including the Third Party Providers whether in Singapore or otherwise for any of the purposes mentioned herein;
- (i) Complying with any applicable laws, regulations, codes of practice, guidelines, or rules, or to assist in law enforcement and investigations conducted by any relevant authority;
- (j) To protect and enforce our contractual rights and obligations, and generally meeting our legal obligations as well as to safeguard our legal rights and interests;
- (k) For our internal administration purposes including to manage and improve our services to, and relationship with, you and our clients;
- (l) Any other purposes for which you have provided the information; and
- (m) Any other incidental business purposes related to or in connection with the above.

2.3 In addition, we may collect, use, process and disclose your Personal Data for the following purposes depending on the nature of our relationship with you :-

(a) If you are a tenant or a prospective tenant or utilise our storage facilities

- (i) To conduct appropriate background or credit checks/screening or generally to conduct due diligence;
- (ii) For administration purposes relating to the lease/tenancy or space rental agreement;
- (iii) To issue notices in accordance with the relevant tenancy/lease/space rental agreement;
- (iv) To perform financial transactions such as rental payments;
- (v) Any other purpose directly relating to any of the above.

(b) If you are an existing or prospective vendor, supplier or contractor

- (i) To conduct appropriate background or credit checks/screening or generally to conduct due diligence;
- (ii) To evaluate any proposals or quotations put forward by you;
- (iii) For communication and administration purposes relating to any agreement between us and any work to be carried out by you for us;
- (iv) To issue notices in accordance with such agreement;
- (v) To perform financial transactions such as contract payments; and
- (vi) Any other purpose directly relating to any of the above.

(c) If you are a candidate for employment with us

- (i) To process your application for possible recruitment as an employee;
- (ii) To provide or obtain references on your past employment history and to conduct background checks/screenings;
- (iii) To evaluate your suitability for the position applied for;
- (iv) For our internal administrative and human resource purposes including for payroll and other benefits;
- (v) To assess your performance; and
- (vi) Any other purposes relating to the above.

2.4 The purposes listed above, may continue to apply even in the situations where your relationship with us has terminated or altered in any way, for a reasonable period thereafter.

3. Disclosure of Personal Data

3.1 Your Personal Data will be protected and kept confidential. However, we work with external parties to provide you with a seamless experience in relation to products and services that you purchase from us. We may be required to disclose your Personal Data to such external parties for one or more of the

purposes stated above, in the course of and in order for us to provide services or deliver products to you. We will do so in accordance with the law and to the extent where appropriate or necessary. The external parties include PICO's respective representatives (including our legal or financial advisers), agents, third party service providers, contractors and other business partners or collaborators (including without limitation our sponsors or government agencies or bodies) (together referred to as "**Third Party Providers**"). We may be required to disclose your Personal Data in compliance with applicable laws, and we also draw your attention to the exceptions in the PDPA where Personal Data may be collected, used and disclosed without your consent.

- 3.2 We generally do not transfer your Personal Data to countries outside of Singapore. However, if we do so, we will comply with all applicable laws on protection of your Personal Data and take steps to ensure that your Personal Data continues to receive a standard of protection that is at least comparable to that provided under the PDPA.

4. Accuracy of Personal Data

- 4.1 We will endeavour to keep your Personal Data accurate and up-to-date. Please inform us of any changes to your Personal Data as and when it occurs, so that we may continue to provide you with better services. We will not be held responsible for acting on inaccurate or incorrect Personal Data arising from you not updating us of any changes to your Personal Data that had been given to us.
- 4.2 You may request to access and/or correct your Personal Data currently in our possession by submitting a written request at our office as set out below. We will provide you with the relevant Personal Data within a reasonable time from such request being made, and correct any errors that you may require us to make.
- 4.3 We may impose a nominal charge for handling and processing your requests, to be settled prior to us allowing access or making corrections.

5. Use of Cookies & Third Party Links

- 5.1 We may use data collection devices such as "cookies" on our websites. This helps us analyse and measure the promotional effectiveness of our websites, and help us provide you information that is targeted to your interests. "Cookies" are small files placed on your device that assist us in providing our services. Most are "session cookies" which will automatically be deleted from your hard drive at the end of a session. However, some are necessary cookies required for the operation of our site. If your browser permits, you may decline our cookies although this may mean that you may not be able to fully utilise certain features on our websites and you may be required to enter your passwords more frequently during your session on our websites.
- 5.2 We are not responsible for the privacy practices of any third party sites that are or may be linked to our website. You should check the privacy policies of these third parties independently.

6. Security and Retention of Personal Data

- 6.1 We will put in place reasonable security precautions to ensure that your Personal Data is adequately protected from misuse, loss, unauthorised access, modification or disclosure. However, we will not be responsible for any unauthorised use of your Personal Data by third parties which are attributable to reasons beyond our control.
- 6.2 We retain Personal Data in accordance with our legal, regulatory, business and operations obligations. We do not keep Personal Data longer than is necessary and we will destroy or anonymize Personal Data that we no longer require for the purposes stated above.

7. Withdrawal of Consent

- 7.1 You may withdraw your consent to the collection, use, processing and/or disclosure of your Personal Data in our possession or under our control by submitting a written request to us at our office address as stated below. Your consent may be withdrawn for all or any of the purposes listed above. Your request will be processed by us within a reasonable time and we will thereafter not collect, use, process and/or disclose your Personal Data in the manner as stated in your written request. Whilst we respect your right and

decision to withdraw your consent, please note that depending on the nature and scope of your request, there may be legal consequences which may affect your rights and liabilities to us, and/or we may not be in a position to continue providing our goods and services to you. We shall, in such circumstances, notify you before completing the processing of your request to withdraw consent.

7.2 Where you have consented to receiving marketing information from our Third Party Providers, if you change your mind, you will have to contact and notify the relevant Third Party Provider to do so.

8. Administration and Management of Personal Data

If you have any queries about this Policy or any complaints relating to your Personal Data or wish to request for access to or correction of or withdrawal of consent for collection, use or disclosure of your Personal Data, please contact our Data Protection Officer as follows :-

Attention: Mr Ng Meng Chuen
Pico Art International Pte Ltd
20 Kallang Avenue, Pico Creative Centre,
Singapore 339411.
Tel:- (65) 6290 0100
Fax :- (65) 6291 8516
Email :- sg.info @sg.pico.com

9. Revisions to this Policy

This Policy will be reviewed by us from time to time to take into account any changes in law or to our operations and practices as well as to any changes to our business environment. We reserve the right to amend the terms of this Policy at our absolute discretion.

10. Governing Laws

This policy is governed by the laws of Singapore.