

## DATA PROTECTION POLICY

We are committed to respecting your privacy. Please read this Policy carefully.

### Purpose of this Policy

1. This Data Protection Notice ("**Policy**") sets out the basis which Capital E Marketing and Events Pte Ltd. ("**we**", "**us**", or "**our**") may collect, use, disclose, deal with and process personal data that you provide us, that we receive through/from third parties, and/or which is in our possession or comes into our possession, whether now or in the future.
2. We own and/or operate website(s) such as this website you are accessing and any other webpages which may be used for events we organize or host for our clients and/or any mobile apps that may be published by us (the said website and mobile apps may be collectively or individually referred to as the "**Website**").
3. In this Policy:

"**CAE Group**" refers to us and our affiliates, related corporations and associated companies, around the world;

"**Personal data**" is defined under the Singapore's Personal Data Protection Act (the "**PDPA**") as 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 organisation has or is likely to have access;

"**Purposes**" has the meaning described in paragraph 11;

"**Website**" has the meaning described in paragraph 2;

"**Transaction**" has the meaning described in paragraph 11;

"**You**" or "**your**" refers to the individual whose personal data we are receiving, collecting, using, disclosing or processing.

### What Information Do We Receive/Collect?

4. We receive or collect information about you in various situations such as, but not limited to:
  - (a) When you provide your information to us, when you use our Website, when you interact with us, when you interact with or enter into (or attempt to enter into) a transaction with us;
  - (b) When you submit online forms relating to any of our products or services, or submit any online queries;
  - (c) When you interact with our customer service officers or any of our staff, for example, business interactions in events and exhibitions, telephone calls, letters, online forms (such as any "Contact Us" forms on the Website), social media platforms and emails;
  - (d) When you sign up for any event or exhibition, or use or purchase our services or products;

- (e) When you request that we contact you;
- (f) When you respond to our request for additional Personal Data;
- (g) When you ask to be included in an email or other mailing list;
- (h) When you respond to our promotions or other initiatives;
- (i) When you respond to our market surveys;
- (j) When you submit a job application;
- (k) When we receive references from business partners and third parties, for example, where you have been referred by them;

5. Personal data which we may receive or collect include, but may not be limited to:

- Name
- Date of birth
- Home address
- Contact information such as mobile number, email address
- Transactional information
- Your preferences
- Credit card and/or other financial related information that is used for a transaction
- Location Information of yourself and/or your computer or device

We will receive or collect your personal data in accordance with the PDPA.

6. We may collect and store certain information automatically when you visit the Website. Such examples include the internet protocol (“IP”) address used to connect your computer or device to the internet, connection information such as browser type and version, your operating system and platform, a unique reference number linked to the data you enter on our system, login details, the full URL clickstream to, through and from the Website (including date and time), cookie number and/or your activity on the Website, including the pages you visited, the searches you made.

### Cookies

- 7. We may use cookies to identify you from other users on the Website. A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer or device. You can block or deactivate cookies in your browser settings.
- 8. We use log-in cookies in order to remember you when you have logged in for a seamless experience. We may use session cookies to track your movements from page to page and in order to store your selected inputs so you are not constantly asked for the same information.
- 9. The Website may use Google Analytics to understand how you use the Website and ways that we can improve your experience. These cookies may track activities such as how long you spend on the Website and the pages that you visit so we can continue to produce engaging content.
- 10. By continuing to use the Website, you agree to the use of cookies on the Website as

outlined above. However, please note that we have no control over the cookies used by third parties.

### The Purposes For Which We Collect, Use Or Disclose Your Personal Data

11. We will/may collect, use, disclose and/or process your personal data for one or more of the following purposes:
- (a) processing, facilitating and/or dealing with your interest in the events and meetings we organize or host, and/or services you wish to procure from us;
  - (b) considering, processing, facilitating (including carrying out risk or fraud analysis), dealing with and/or managing, your request/application for or your purchase of, intended purchase of an invitation or a seat or admission to the events or meeting we organize or are a sponsor of, or your purchase of our services (the “**Transaction**”);
  - (c) dealing with, facilitating, processing and/or administering a membership account or event participation account that you may open with us;
  - (d) facilitating, processing, dealing with, administering and/or managing Transaction(s) or intended Transaction(s);
  - (e) providing services to you;
  - (f) administering, facilitating, managing, processing and/or dealing with your relationship with us, the Transaction(s) with us, any transactions or activities carried out by you on the Website or at our and/or our clients’ premises, exhibition halls, your requests, including but not limited to dealing with your adhoc queries, requests, dealing with your preferences, processing your tickets to any events whether online or physical, and payment transactions, implementing transactions and the supply of services to you. Without limiting the generality of the foregoing, should you make a transaction that includes third party individual(s), or, on behalf of third party individual(s) or for third party individual(s), you consent to us disclosing personal data that identifies you, to the said third party individual(s) (such as but not limited to your name);
  - (g) administering, facilitating, processing and/or dealing in any matters relating to your use or access of the Website or including identifying you for login to the Website, our portals and other online services provided by us. Without limiting the generality of the foregoing:
    - (i) this may include our collection and subsequent processing of your location data or data that identifies your location;
    - (ii) if you :
      - (1) gain access to or sign in to the Website, using your login credentials of a social networking site such as but not limited to Facebook, Instagram, Twitter (“**Social Networking Site**”), or
      - (2) use any features of a Social Networking Site such as its widgets, plug-ins and browser push notifications, made available to you on our Website,it may result in information or your personal data being collected or shared between us and the third party. For example, if you use Facebook’s “Like” feature, Facebook may register the fact that you “liked” a product and may post that information on Facebook.

By your proceeding pursuant to (1) or (2) above, you consent to such collection, use or disclosure of your personal data;

- (h) monitoring, processing and/or tracking your use of the Website in order to provide you with a seamless experience, facilitating or administering your use of the Website, and/or to assist us in improving your experience in using the Website;
- (i) administering, facilitating, processing and/or dealing in any transactions or activities carried out by you on the Website;
- (j) providing services to you relating to, or, administering your participation in events or meetings organised or hosted by us;
- (k) carrying out and/or facilitating your instructions or responding to any enquiry given by (or purported to be given by) you or on your behalf;
- (l) contacting you or communicating with you via phone/voice call, text message and/or fax message, email and/or postal mail for one or more of the Purposes stated herein. You acknowledge and agree that such communication by us could be by way of the mailing of correspondence, documents 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;
- (m) understanding and/or managing your interests, concerns and preferences;
- (n) the conduct of training or training purpose, so as to develop or improve our products or services and/or our staff's and agents' services and/or service quality. Without limiting the generality of the foregoing, such training may involve collection, use, disclosure or processing of your personal data including your feedback, comments and/or reviews;
- (o) carrying out due diligence or other screening activities (including background checks, anti-money laundering checks, know your client checks) in accordance with legal or regulatory obligations (whether of Singapore or other countries) applicable to us or any of our group entity, the requirements or guidelines of governmental authorities (whether of Singapore or other countries) which we determine are applicable to us or any of our group entity, and/or our or any group entities' risk management procedures that may be required by law (whether of Singapore or other countries) or that may have been put in place by us or any CAE Group entities;
- (p) complying with or as required by any applicable law, governmental or regulatory requirements of any jurisdiction applicable to us or any CAE Group entity, including meeting the requirements to make disclosure under the requirements of any law binding on us, or any CAE Group entity, and/or for the purposes of complying with any guidelines, requests or directions issued by regulatory or other authorities, including public agencies, ministries, statutory boards (whether of Singapore or other countries), with which we or any CAE Group entity is expected to comply;
- (q) conducting research, analysis and development activities (including but not limited to, data analytics, surveys and/or profiling) to improve our, or, a CAE Group entity's events, products, services and/or facilities in order to enhance any continued interaction between yourself and us or a CAE Group entity connected or in relation to the Website, or your Transaction(s); or to improve any of our, or a CAE Group

entity's products or services or, whether now or in the future;

- (r) for marketing purpose where you have provided your consent to us for the same, and with such consent, we, and/or the CAE Group may/would be providing you with marketing, advertising and promotional information, materials and/or documents relating to products, services and/or events (including products, services and/or events we (and/or a CAE Group entity), or with third party organisations or our business partners whom we may collaborate with, will be selling, marketing, offering, organizing, hosting, involved in or promoting, whether such products, services and/or events exist now or are created in the future;
- (s) to administer rewards, surveys, contests, or other promotional activities or events sponsored or managed by us or our business partners;
- (t) storing, hosting, backing up (whether for disaster recovery or otherwise) of your personal data, whether within or outside Singapore;
- (u) to facilitate and/or ensure the safety and security of our premises, our clients, our staff and/or visitors to our premises or premises where we organise or host events;
- (v) to deal with, handle and/or conduct disciplinary, security, crime prevention and/or quality assurance processes, matters and/or arrangements. Without prejudice to the generality of the aforesaid, if there are surveillance cameras installed at our premises and/or offices, whether now or in future, such surveillance cameras are for security, crime prevention, safety and training reasons. You acknowledge that your personal data will be collected by such cameras and processed by us consequently, should you visit our premises or offices;
- (w) maintaining and/or developing our IT or business systems and infrastructure including testing and upgrading of these systems;
- (x) securing online transactions, preventing fraud, dealing with payment incidents and managing debt collection;
- (y) creating reports with respect to your Transaction(s);
- (z) facilitating, dealing with and/or administering internal or external audit(s) of our business or the business of any CAE Group entities, or any Transaction(s);
- (aa) dealing with and/or facilitating a business asset transaction or a potential business asset transaction, where such transaction involves us or any CAE Group entity as a participant. For purposes of this Policy, "**business asset transaction**" is defined in the PDPA and includes 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 organisation;
- (bb) record-keeping purposes and producing statistics and research for internal and/or statutory reporting and/or record-keeping requirements, for us or any CAE Group entity;
- (cc) for our or any CAE Group entity's reporting purposes, including but not limited to, reporting on our business performance;
- (dd) where you are an employee or an applicant applying for a position with us, to manage your application, employment and any termination thereof;

- (ee) for contact tracing and other response measures, either pursuant to ongoing governmental or health or workplace regulatory requirement or in an emergency that threatens the life, health or safety of other individuals;
- (ff) anonymization of your personal data. In this regard, you acknowledge that personal data that has been anonymized is no longer personal data and the requirements of applicable local data protection law (i.e. the PDPA) would no longer apply to such anonymized data;

with each of the above purposes collectively referred to as the “**Purposes**”.

12. Arising from our processing of your personal data, new personal data about you may be created.
13. We may disclose your personal data to third parties, whether located within or outside 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 may and 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. Without limiting the generality of the foregoing or any other paragraphs in this Policy, such third parties include:
  - (a) any CAE Group entities;
  - (b) any of our agents, contractors or third party service providers who process, or will be processing, your personal data on our behalf, including but not limited to, those which provide administrative or other services to us such as mailing houses, telecommunication companies, information technology companies and data centres, hosting and maintenance service providers, payment service providers, anti-fraud service providers, analysis services service providers, payment transactions service providers, marketing service providers, marketing solution service providers, customer service providers;
  - (c) third parties with whom we enter into or may enter into any contractual or other arrangement in relation to the products (where applicable) or services to be provided to you, or in relation to the Transaction; and
  - (d) third parties to whom disclosure by us is for one or more of the Purposes, and where such third parties would in turn be collecting and processing your personal data for one or more of the Purposes.
14. We may share your information with any CAE Group entities, which may be based in countries other than Singapore, from time to time for one or more of the Purposes.
15. For the avoidance of doubt, you consent to our using, disclosing and/or processing personal data that we currently possess about you, that we had lawfully received and/or we lawfully receive in future, from third parties or other CAE Group entities, for the Purposes.
16. You may withdraw your consent for the collection, use and/or disclosure of your personal data in our possession or under our control by emailing us at [idran@capital-e.asia](mailto:idran@capital-e.asia). We will process your request within a reasonable time from such a request for withdrawal of

consent, and will thereafter not collect, use and/or disclose your personal data in the manner stated in your request, unless an exception under the law or a provision in the law permits us to. However, your withdrawal of consent could result in certain legal consequences arising from such withdrawal, including us being unable to perform the transactions requested by you or the termination of your relationship with us (depending on the extent of your withdrawal), as the case may be.

17. We may collect, use, disclose or process your personal data for other purposes that do not appear above. However, we will notify you of such other purpose at the time of obtaining your consent, unless processing of your personal data without your consent is permitted by the PDPA or by law.
18. We may/will be receiving or collecting from sources other than yourself, personal data about you, for one or more of the above Purposes, and thereafter using, disclosing and/or processing such personal data for one or more of the above Purposes. We may combine information we receive from other sources with information you give to us and/or with information we have about you. We may use this information and the combined information for the Purposes set out above (depending on the types of information we receive).
19. We take 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 any failure to update us.

#### Notification of Reliance on Legitimate Interests Exception to Process Personal Data Without Consent

20. We may rely on the legitimate interests exception under the PDPA to collect, use or disclose your personal data without your consent, for the purpose of detecting and/or preventing:
  - (a) fraud;
  - (b) an illegal activity; and/or
  - (c) the misuse of services provided by or to be provided by us,on the basis that such collection, use or disclosure is for our legitimate interests and that such legitimate interests outweigh any adverse effect (if any) on you.
21. If we are to rely on this exception, we may/will need to disclose your personal data that is being processed in reliance on such exception, to third parties, whether located within or outside Singapore, for the purposes stated in paragraph 20 above, and such third parties, would be processing your personal data for the purposes stated in paragraph 20 above.
22. Should you have any queries regarding our reliance on this legitimate interests exception, please contact our Data Protection Officer at: [idran@capital-e.asia](mailto:idran@capital-e.asia).

#### Provision Of Third Party Personal Data By You

23. Should you provide us with personal data of any individual other than yourself, you

represent, undertake and warrant to us that:

- (a) for any personal data of individuals that you disclose to us, you would have, prior to such disclosure, obtained consent from the individuals whose personal data are being disclosed, to :
  - (i) permit you to disclose the individuals' personal data to us for the Purposes; and
  - (ii) permit us and the CAE Group to collect, use, disclose and/or process the individuals' personal data for the Purposes;
- (b) at our request, you will use such form(s) or document(s) provided by us in obtaining such consents from the individuals in question (for the avoidance of doubt, we are under no obligation to you to create any such form(s) or document(s));
- (c) any personal data of individuals that you disclose to us are accurate; and
- (d) for any personal data of individuals that you disclose to us, that you are validly acting on behalf of such individuals and that you have the authority of such individuals to provide their personal data to us and for the CAE Group to collect, use, disclose and process such personal data for the Purposes.

#### How Do We Store Data?

- 24. Security of your personal data is important to us. We will put in place reasonable security arrangements 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.
- 25. We will put in place measures to ensure 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 other legal or business purposes.

#### Rights

- 26. You have the right to request us not to use your personal data for marketing purposes. Please let us know if you wish to withdraw your consent you had provided to us, by emailing us at [idran@capital-e.asia](mailto:idran@capital-e.asia).
- 27. You have the right to access and/or correct any personal data that we hold about you, subject to exceptions under the law. This right can be exercised at any time by emailing us at [idran@capital-e.asia](mailto:idran@capital-e.asia). We will need enough information from you in order to ascertain your identity as well as the nature of your request, so as to be able to deal with your request. With respect to your access request, we may charge a fee in order to process it.
- 28. For a request to access personal data, once we have sufficient information from you to deal with the request, we will seek to provide you with the relevant personal data within 30 days. Where we are unable to respond to you within the said 30 days, we will notify



you of the soonest possible time within which we can provide you with the information requested. Do note that at the date of this Policy, the PDPA exempts certain types of personal data from being subject to your access request.

29. For a request to correct personal data, once we have sufficient information from you to deal with the request, we will correct your personal data within 30 days. Where we are unable to do so within the said 30 days, we will notify you of the soonest practicable time within which we can make the correction. Do note that at the date of this Policy, the PDPA exempts certain types of personal data from being subject to your correction request, and also provides for situation(s) when correction need not be made by us despite your request.
30. The above is subject to variations and amendments to the PDPA, pursuant to which, other rights may be accorded to you under the PDPA.
31. We hold and deal with your personal data in accordance with the PDPA.

### Complaint Process

32. If you have any complaint or grievance regarding about how we are handling your personal data or about how we are complying with the PDPA, we welcome you to contact us with your complaint or grievance.
33. Please contact us with your complaint or grievance by emailing us at [idran@capital-e.asia](mailto:idran@capital-e.asia).
34. Where you are sending an email submitting a complaint, your indication within the subject header that it is a PDPA complaint would assist us in attending to your complaint speedily by passing it on to the relevant staff in our organisation to handle. For example, you could insert the subject header as "PDPA Complaint".
35. We will certainly strive to deal with any complaint or grievance that you may have speedily and fairly.

### General

36. Your consent that is given pursuant to this Policy is additional to and does not supersede any other consents that you had provided to us or any CAE Group entity in respect of processing your personal data.
37. The Website is not intended for use by any person below the age of 18. We do not and do not intend to, transact through the Website directly with anyone we know to be under the age of 18. By providing any personal data to us, you declare and affirm that you are at least 18 years of age and above and agree to the terms set out in this Policy.
38. For the avoidance of doubt, in the event that the PDPA permits an organisation such as us to collect, use or disclose your personal data without your consent, such permission granted by the law shall continue to apply. Further, where Singapore personal data protection law permits us to handle, retain or process your personal data without having to comply with or as exceptions to, the data protection obligations in the PDPA, such rights given to us to do so will continue to prevail, notwithstanding anything stated in this Policy.
39. General Data Protection Regulation ("**GDPR**"): Where personal information is collected from or transferred to the European Union, the CAE Group is to comply with the

principles of data protection set out in the GDPR. We process your personal information as a Processor and/ or to the extent that we are a Controller, as defined in the GDPR. If we transfer your information outside of the European Union, for example to our servers located in Australia or other countries both inside and outside of the European Union, these countries may not have similar data protection laws to the European Union. By submitting your personal data, you are agreeing to this transfer, storing or processing. If we transfer outside for the European Union, we will take steps to ensure that appropriate security measures are taken with the aim of ensuring your privacy rights continue to be protected as set out in this Policy. Please let us know if you have any objection to your personal information being disclosed to an overseas recipient. If so, this may affect our ability to provide our products and services to you.

40. The contents of this Policy may change over time so please check back frequently. Any changes to this Policy will be posted on and can be viewed at our Website.

If you 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 at: [idran@capital-e.asia](mailto:idran@capital-e.asia)

