

ROOTS Communications Pte Ltd (“ROOTS”) Personal Data Policy

ROOTS respect the protection of the Personal Data of individuals and value the relationship we have with you. As such, we are committed to conduct our business in compliance with applicable laws on data privacy protection and data security.

The purpose of this policy is to explain how ROOTS collects, protects, and uses personal data in the course of providing our services to you. It will also explain how you can reach and provide feedback on our personal data protection practices.

1. Personal Data

In this Policy, “**Personal Data**” means data that can identify an individual.

Examples of the types of Personal Data that we collect include (but not limited to):

- a) Full name
- b) NRIC number / FIN number / passport number
- c) Bank account details
- d) Telephone number (Mobile or Residential)
- e) Personal email address
- f) Residential address
- g) Vehicle number
- h) Thumbprint
- i) Photographs or CCTV footage of an individual

2. Collection of Personal Data

In general, the ways in which we collect data, directly or indirectly, include (but not limited to):

- a) when you submit any form, online or offline, relating to any of our products and services;
- b) when you enter into any agreement or provide other information in respect of your interactions with us, or when you use our products and services;
- c) when you interact with our staff, including customer service officers, for example, via telephone calls, letters, fax, face-to-face meetings, social media platforms and emails;
- d) when you use our electronic services, or interact with us via our websites or use services on our websites;
- e) when you request that we contact you, online or offline, or request that you be included in an email or other mailing list;

- f) when you respond to our electronic direct mailers, promotions or to any request for additional Personal Data;
- g) when you submit an employment application, resume and/or CVs while seeking employment opportunities with us
- h) when your images are captured by our CCTV cameras while you are within our premises
- i) when you are photographed or videoed by our representatives when you attend our events on or off premises;
- j) when you are contacted by, and respond to, our marketing representatives and customer service officers;
- k) when we seek information about you, as a representative of your company, in connection with your relationship with us, including for our products and services or job applications, for example, from business partners, public agencies, your ex-employer, referral intermediaries and the relevant authorities; and/or
- l) when you submit your Personal Data to us for any other reasons.

3. Purpose for Collection, Use or Disclosure of Personal Data

In general, we collect and use the Personal Data that you provide to us for the following purposes:

- a) Verify your identity
- b) Respond to, process and handle your queries, feedback, complaints and enquires
- c) Request feedback for events/seminars conducted by ROOTS for performance monitoring and future improvements
- d) Manage the safety and security of our premises, not limited only to CCTV footage
- e) Organize promotional events like roadshows, exhibitions and seminars
- f) Interact through marketing campaigns like electronic direct mailers and newsletters
- g) Conduct investigations related to disputes, billing and claims
- h) Comply with applicable laws, regulations and other requirements
- i) Purposes which are reasonably related to the aforesaid

In addition, ROOTS collect and uses your Personal Data for the following purposes depending on the nature of our relationship:

If you are a Vendor / Business Partner

- a) Conduct due diligence as required for ROOTS internal policies and practices
- b) Evaluate the products and services provided by vendors / business to ROOTS

- c) Facilitate overseas travel arrangement, directly or indirectly under ROOTS invitation
- d) Create and maintain vendor / business partners profile in our internal systems
- e) Purposes which are reasonably related to the aforesaid

If you are a Customer

- a) Provide customer service and support, including but not limited to delivery, administrative support and customer relationship management
- b) Facilitate overseas travel arrangement, directly or indirectly under ROOTS invitation
- c) Administer credit worthiness, debt recovery and debt management
- d) Purposes which are reasonably related to the aforesaid

If you are an Employee / Candidate

- a) Conduct interview and process your application, but not limited to checks including your qualifications and references
- b) Administer surveys and reviews for training needs analysis and improve work related practices
- c) Perform typical HR function, but not limited to payroll, insurance coverage, company directories and emergency contacts
- d) Facilitate overseas travel arrangement
- e) Facilitate site access arrangement, on premise and off premise
- f) Purpose which are reasonably related to the aforesaid

We only collect and use Personal Data for purposes which you have consented to and for which we have been authorized. If we need to use your Personal Data for any purpose which you have not previously consented to, we would seek your consent prior to using your Personal Data for the new purpose.

4. Disclosure of Personal Data

We will take reasonable steps to protect your Personal Data, especially against unauthorized disclosure. In the course of or in connection with providing our products and services to our customers, we may disclose, share and transfer Personal Data to the following parties for the following purposes:

- a) To our customers/subcontractors/consultants/business partners for purposes of providing products and services to our customers, including but not limited to tenders, ITQ and RFQ
- b) To our sub-contractors for the purposes of providing products and services to our customers on our behalf
- c) To government and non-government authorities and/or agencies for the security, regulatory permits or approvals
- d) To vendors and third party service providers for the purposes of marketing and promotions, but not limited to electronic direct mailers, product training and roadshows
- e) To companies providing insurance and medical services to ROOTS

- f) To travel agencies, hotels and embassies for the purposes of facilitating overseas travel arrangements
- g) To law enforcement authorities, government agency or regulatory authority ordering the disclosure of the Personal data necessary for investigations or legal proceedings
- h) To any other party whom you have authorized us to disclose your Personal Data to

5. Protection of Personal Data

We will take reasonable efforts to protect Personal Data in our possession and control through technological and organizational security arrangements to prevent unauthorized access, collection, use, disclosure, copying, modification, disposal, deletion and other similar risks to Personal Data.

6. Retention of Personal Data

ROOTS only retains Personal Data for as long as the retention is required for the purposes for which we collected the Personal Data, the purposes described in this Policy and for our business and legal purposes. Generally, we do not retain Personal Data for a period of longer than 7 years.

7. Contact Us – Withdrawal, Access and Correction

If you:

- a) have any questions or comments about this Policy and our policies
- b) would like to withdraw your consent to any use of your Personal Data as set out in this policy
- c) would like to obtain access or make correction to your Personal Data records

you may contact our Data Protection Officer in writing:

Email address: dpo@rootscomm.com
Mailing address: Data Protection Officer
ROOTS Communications Pte Ltd
3 Kallang Sector, #04-06
Singapore 349278

Please note that if a third party has provided your Personal Data to us, you should contact that organization or individual to make such queries, access and correction requests to ROOTS on your behalf.

If you withdraw your consent to any or all use of your Personal Data, ROOTS may not be able to continue to provide its products and services to you, which in turn may also result in the termination of any agreements with ROOTS, and your being in breach of your contractual obligations or undertakings. ROOTS' legal rights and remedies in such events are expressly reserved.