

**THE MANAGEMENT CORPORATION STRATA TITLE PLAN NO. 2197  
(SUNTEC CITY)**

3 Temasek Boulevard #B1-65 Suntec City Mall Singapore 038983  
Tel: 6825 2699 Fax: 6219 0900

**DATA PROTECTION & PRIVACY NOTICE FOR CUSTOMERS**

The Data Protect & Privacy Notice (“**Notice**”) sets out the basis which The Management Corporation Strata Title Plan No. 2197 (“**MCST 2197**”) and APM Property Management Pte Ltd (“**APM**”), collectively (“**we**”, “**us**”, or “**our**”) may collect, use, disclose or otherwise process personal data of our customers in accordance with the Personal Data Protection Act (“**PDPA**”).

This Notice applies to personal data in our possession or under our control, including personal data in the possession of organisations which we have engaged to collect, use, disclose or process personal data for our purposes. This Notice explains who we are, what information we collect, why we collect it, how we use that information, who has access to your data and the privacy choices we offer to you.

**WHO WE ARE**

1. APM is the managing agent of the MCST 2197 and we operate the access control and registration procedure, on our office and sites (including third parties on site). These procedures apply to the sites in Singapore.

**PERSONAL DATA**

2. As used in this Notice:

“**customer**” means an individual who (a) has contacted us through any means to find out more about any goods or services we provide, or (b) may, or has, entered into a contract with us for the supply of any goods or services by us; and

“**personal data**” means data, whether true or not, about an occupier who can be identified: (a) from that data; or (b) from that data and other information to which we have or are likely to have access.

3. Depending on the nature of your interaction with us, some examples of personal data which we may collect from you include include name, identification numbers such as nric, fin, work permit and birth certificate, email address, telephone number, nationality, gender and employment information.
4. Other terms used in this Notice shall have the meanings given to them in the PDPA (where the context so permits).

**COLLECTION, USE AND DISCLOSURE OF PERSONAL DATA**

5. We generally do not collect your personal data unless (a) it is provided to us voluntarily by you directly or via a third party who has been duly authorised by you to disclose your personal data to us (your “**authorised representative**”) after (i) you (or your authorised representative) have been notified of the purposes for which the data is collected, and (ii) you (or your authorised representative) have provided written consent to the collection and usage of your personal data for those purposes, or (b) collection and use of personal data without consent is permitted or required by the PDPA or other laws. We shall seek your consent before collecting any additional personal data and before using your personal data for a purpose which has not been notified to you (except where permitted or authorised by law).

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6. We may collect and use your personal data for any or all of the following purposes:
- (a) performing obligations in the course of or in connection with our provision of the goods and/or services requested by you;
  - (b) verifying your identity;
  - (c) responding to, handling, and processing queries, requests, applications, complaints, and feedback from you;
  - (d) managing your relationship with us;
  - (e) processing payment or credit transactions;
  - (f) complying with any applicable laws, regulations, codes of practice, guidelines, or rules, or to assist in law enforcement and investigations conducted by any governmental and/or regulatory authority;
  - (g) any other purposes for which you have provided the information;
  - (h) transmitting to any unaffiliated third parties including our third party service providers and agents, and relevant governmental and/or regulatory authorities, whether in Singapore or abroad, for the aforementioned purposes;
  - (i) any other incidental business purposes related to or in connection with the above; and
  - (j) MCSTs carry out duties and functions as set out in the BMSMA (Refer to Sections 46 and 65 of the BMSMA), for example, to properly maintain the common property. In the course of performing their duties and functions under the BMSMA, MCSTs are required to collect personal data of individuals for a number of specific purposes. For instance, MCSTs are required to collect the name and address of the subsidiary proprietor, the name of any mortgagee of the lot, and the name of the representative of the subsidiary proprietor where such subsidiary proprietor is a company, for the purposes of preparing and maintaining a strata roll. Subsidiary proprietors are also required to give written notice to the MCST of their addresses in Singapore for the service of notices<sup>8</sup>, as well as to provide the names and addresses of the proxy giver or proxy holder in the proxy form . Under the BMSMR, MCSTs are required to collect the names, NRIC/FIN numbers and addresses of elected members of the council and executive committee of the MCST.
7. We may disclose your personal data:
- (a) where such disclosure is required for performing obligations in the course of or in connection with our provision of the goods and services requested by you;
  - (b) to third party service providers, agents and other organisations we have engaged to perform any of the functions with reference to the above mentioned purposes; or
  - (c) Contact tracing and security purposes.

**COLLECTION, USE AND DISCLOSURE OF PERSONAL DATA – SPECIFIC TO SECURITY & ACCESS CONTROL FUNCTION**

8. For the realization of building access and security controls (“**Security and Access Control**”), data will be collected on behalf of the Security & Operations department.
9. Specific to this function, the Access control and request Procedure is lawful and in compliance with Article 6. 1 c-f GDPR (compliance with law, ensuring the vital interest of the data subject, performance of the task carried out in the public interest and for the legitimate interest of the data controller)and Article 9.2 b),c) GDPR (processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the controller or of the data subject in the field of employment and social security and social protection law, processing is necessary for the vital interest of the data subjects).

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10. The Security and Access Control procedure is fully configured according to the GDPR/PII/PDPA and to the strict rules of authorized access of the personal data that are collected. Data is entered by yourself/colleagues via the online registration service or the security and reception employee directly in the access system. The recipients of the collected data are only authorized employees of APM.
11. The purposes are strictly related to the above-mentioned (described in clause 6 above) legal grounds for processing activities. Nevertheless, in order to be more specific, we are collecting/processing your personal for the following reasons:
  - (a) presence and access control of all persons registered in the access system;
  - (b) monitoring the safety of the building, occupiers and third party;
  - (c) monitoring the properties of APM, its employees or third parties;
  - (d) attendance registration of the people on the sites (e.g. in case of calamities);
  - (e) compliance with law- meet the requirements Working Conditions, related to informing people about the danger at the site (gate instruction)

**FURTHER PROCESSING AND THIRD PARTIES**

12. Following to the aforementioned purposes and the closely related purposes, the information will be shared with us.
13. We will not share data with third parties, unless
  - (a) sharing is necessary to comply with law's requirement, regulation, enforceable governmental request, legal defense;
  - (b) sharing is necessary for protecting your vital interest;

**YOUR DATA SUBJECT'S RIGHTS**

14. Our goal is to be clear about what information we collect so that you can make meaningful choices about how it is used. We thought it would be helpful to set out your following privacy rights as they are defined in GDPR/PII/PDPA:
  - (a) right to access your personal data that we process;
  - (b) right to have rectified your inaccuracies in personal data that we hold about you;
  - (c) right to object to certain processing of your personal data by us;
  - (d) right to be forgotten, which means that your details might be removed from systems that we use to process your personal data. except if APM Property Management Pte Ltd has to keep information from legislation or other legitimate interests
  - (e) right of data portability (known as the right to request the transmission of your data to another controller);
  - (f) the right to lodge a complaint to your supervisory authority.

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- (g) For a further understanding of your rights and procedure please contact your designated GDPR, PII and PDPA Data Protection Officer.

**WITHDRAWING YOUR CONSENT**

15. 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 collecting, 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 Data Protection Officer at the contact details provided below.
16. Upon receipt of your written request to withdraw your consent, we may require reasonable time (depending on the complexity of the request and its impact on our relationship with you) for your request to be processed and for us to notify you of the consequences of us acceding to the same, including any legal consequences which may affect your rights and liabilities to us. In general, we shall seek to process your request within **seven (7) business days** of receiving it.
17. Whilst we respect your decision to withdraw your consent, please note that depending on the nature and scope of your request, we may not be in a position to continue providing our goods or services to you and we shall, in such circumstances, notify you before completing the processing of your request. Should you decide to cancel your withdrawal of consent, please inform us in writing in the manner described in clause 15 above.
18. Please note that withdrawing consent does not affect our right to continue to collect, use and disclose personal data where such collection, use and disclose without consent is permitted or required under applicable laws.

**ACCESS TO AND CORRECTION OF PERSONAL DATA**

19. If you wish to make (a) an access request for access to a copy of the personal data which we hold about you or information about the ways in which we use or disclose your personal data, or (b) a correction request to correct or update any of your personal data which we hold about you, you may submit your request in writing or via email to our Data Protection Officer at the contact details provided below.
20. Please note that a reasonable fee may be charged for an access request. If so, we will inform you of the fee before processing your request.
21. We will respond to your request as soon as reasonably possible. In general, our response will be within **two (2) business days**. Should we not be able to respond to your request within thirty (30) days after receiving your request, we will inform you in writing within thirty (30) days of the time by which we will be able to respond to your request. If we are unable to provide you with any personal data or to make a correction requested by you, we shall generally inform you of the reasons why we are unable to do so (except where we are not required to do so under the PDPA).

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22. To safeguard your personal data from unauthorised access, collection, use, disclosure, copying, modification, disposal or similar risks, we have introduced appropriate administrative, physical and technical measures such as encryption, and disclosing personal data both internally and to our authorised third party service providers and agents only on a need-to-know basis.
23. You should be aware, however, that no method of transmission over the Internet or method of electronic storage is completely secure. While security cannot be guaranteed, we strive to protect the security of your information and are constantly reviewing and enhancing our information security measures.

**ACCURACY OF PERSONAL DATA**

24. We generally rely on personal data provided by you (or your authorised representative). In order to ensure that your personal data is current, complete and accurate, please update us if there are changes to your personal data by informing our Data Protection Officer in writing or via email at the contact details provided below.

**RETENTION OF PERSONAL DATA**

25. 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.
26. 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.
27. We manage the relevant personal data and the access registration in the automated access registration system. According to the Article 5(1) (e) GDPR, data will be stored only for the purposes for which the personal data are processed unless exception mentioned under this article applies.
28. The personal master data included in the registration system is removed immediately after the right of access has expired, unless the person is on a blacklist. In that case, master data will remain in the system until the period for which the access is denied has expired. The access records included in the access registration system is removed immediately, after that the registrations are destroyed.

**TRANSFERS OF PERSONAL DATA OUTSIDE OF SINGAPORE**

29. There will be no transfer of data to a (government) authority and/or commercial parties to third countries.

**DATA PROTECTION OFFICER**

30. You may contact our Data Protection Officer if you have any enquiries or feedback on our personal data protection policies and procedures, or if you wish to make any request, in the following manner:

Email Address : [DPO@apmasia.com.sg](mailto:DPO@apmasia.com.sg)

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**EFFECT OF NOTICE AND CHANGES TO NOTICE**

31. This Notice applies in conjunction with any other notices, contractual clauses and consent clauses that apply in relation to the collection, use and disclosure of your personal data by us.
32. We may revise this Notice from time to time without any prior notice. You may determine if any such revision has taken place by referring to the date on which this Notice was last updated. Your continued use of our services constitutes your acknowledgement and acceptance of such changes.

Effective date : 01/07/2019  
Last updated : 08/01/2021