

## Privacy Policy

### A. Who We Are?

1. We are LN Development (Stirling) Pte Ltd ("LN" or "we" or "our" or "us"). We own and/or operate website(s) such as [www.stirling-ln.com.sg] (the "Website"). We are a private limited company registered in Singapore (Co. Reg. No. 201612530G) at 1 Raffles Quay #23-02 Singapore 048583.

### B. What Is The Purpose Of This Policy?

2. The purpose of this Privacy Policy is to inform you and provide you with an understanding of how we handle, collect, use, disclose and process personal data about you that you give us, that we receive through third parties or that is in our possession. Please read this Privacy Policy carefully.
3. We take our responsibilities under Singapore's Personal Data Protection Act (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.
4. The contents of this Privacy Policy may change over time so please check back frequently. Any changes to this Privacy Policy will be posted on and can be viewed at our Website.

### C. What Information Do We Collect?

5. "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 organisation has or is likely to have access. LN collects information about you when you provide your information to us, when you use our Website, when you interact with us and/ or when you enter into a transaction with us. Personal data which we may collect from our purchasers and visitors to our websites include but not limited to:

- Name
- Home Address
- Location Information of yourself and/or your computer or device
- Contact Information
- Transactional Information
- Identification number (such as National ID, Passport Numbers, etc.)
- Photograph
- Bank Account Number, mortgage details and bank loan details
- The property or type of properties you are interested in
- The property you have purchased and the purchase price

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

6. We may also collect and store certain information automatically when you visit the Website. 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 our Website, including the pages you visited, the searches you made.

7. We may receive information about you from third parties if you use any websites or social media platforms operated by third parties (for example, Facebook, Instagram, Twitter etc.) and, if such functionality is available, you have chosen to link your profile on our Website with your profile on those other websites or social media platforms.

#### D. Cookies

8. We may use cookies to identify you from other users on the Website.
9. 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.
10. You can block or deactivate cookies in your browser settings.
11. We use log-in cookies in order to remember you when you have logged in for a seamless experience.
12. 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.
13. Our Website may use Google Analytics which is one of the most widespread and trusted analytics solution on the web for helping us to understand how you use the Website and ways that we can improve your experience. These cookies may track things such as how long you spend on the Website and the pages that you visit so we can continue to produce engaging content.
14. By continuing to use the Website, you are agreeing 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.
15. For further information on types of cookies and how they work visit [www.allaboutcookies.org](http://www.allaboutcookies.org)

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

16. We will generally seek your consent for our collection, use and disclosure of your personal data. However, there may be certain situations where your consent is deemed under the PDPA, or where we are entitled to collect, use and disclose your personal data without consent. Situations where the PDPA permits us to collect, use and disclose your personal data without consent include:
  - (a) where personal data is required for our legitimate interests. Such legitimate interests may include purposes related to detecting or preventing illegal activities (e.g. fraud, money laundering);
  - (b) where personal data is required for dealing with and/or facilitating a business asset transaction or a potential business asset transaction. A "business asset transaction" means the purchase, sale, lease, merger or amalgamation or any

other acquisition, transfer, disposal or financing of an organisation or a portion of an organisation or of any of the business or assets of an organisation; or

- (c) where personal data is required for business improvement purposes, such as for improving or enhancing our goods and services.
17. We will/may collect, use, disclose and/or process your personal data, either with your consent or pursuant to an exception under the PDPA for one or more of the following purposes :
- (d) processing and dealing with your interest in any property development or property project (the "Project") which we and/or our partners are selling or marketing whether now or in the future, where you have expressed such interest to us;
  - (e) contacting you on matters relating to your interest in a Project;
  - (f) considering and/or processing your application for purchase of one or more units in a Project (the "Purchase");
  - (g) facilitating, processing, dealing with, administering and/or managing a Purchase by you;
  - (h) administering, facilitating, managing, processing and/or dealing with your ownership of unit(s) in a Project;
  - (i) administering, facilitating, processing and / or dealing in any matters relating to your use of the Website;
  - (j) 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;
  - (k) administering, facilitating, processing and/or dealing in any transactions or activities carried out by you on the Website;
  - (l) carrying out your instructions or responding to any enquiry given by (or purported to be given by) you or on your behalf;
  - (m) 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;
  - (n) 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 applicable to us (whether Singapore or non-Singapore), the requirements or guidelines of governmental authorities which we determine are applicable to us (whether Singapore or non-Singapore),

and/or our risk management procedures that may be required by law (whether Singapore or non-Singapore) or that may have been put in place by us;

- (o) to prevent or investigate any fraud, unlawful activity or omission or misconduct, whether or not there is any suspicion of the aforementioned; dealing with conflict of interests; or dealing with and/ or investigating complaints;
- (p) complying with or as required by any applicable law, governmental or regulatory requirements of any jurisdiction applicable to us or our affiliates/associated companies, including meeting the requirements to make disclosure under the requirements of any law binding on us or our affiliates/associated companies, and/or for the purposes of any guidelines issued by regulatory or other authorities (whether of Singapore or non-Singapore), with which we or our affiliates/associated companies are expected to comply;
- (q) complying with or as required by any request or direction of any governmental authority (whether Singapore or non-Singapore) which we are expected to comply with; or responding to requests for information from public agencies, ministries, statutory boards or other similar authorities. For the avoidance of doubt, this means that we may/ will disclose your personal data to the aforementioned parties upon their request or direction;
- (r) conducting research, analysis and development activities (including but not limited to data analytics, surveys and / or profiling) to improve our services and facilities in order to enhance any continued interaction between yourself and us connected or in relation to the Website, a Project or any future Project type which you have indicated to us your interest in, or your Purchase; or to improve any of our products, services or Projects, whether now or in the future. Without limiting the generality of the foregoing, we may/will in this regard send you surveys or request a face to face interview survey, by way of email or postal mail;
- (s) for marketing purpose and in this regard, we would be providing you with marketing, advertising and promotional information, materials and/or documents relating to Projects, products, contests, services and/ or events (including Projects, products, services and/or events of third party organisations with which we may collaborate with) that we (including our affiliates/related corporations) or such third party organisations may be selling, marketing, offering, organizing, involved in or promoting, whether such Projects, products, services and/or events exist now or are created in the future, :
  - (i) by way of postal mail, electronic transmission to your email address(es), and/or through other modes of communication that is not the 3 DNC Modes in compliance with the Personal Data Protection Act ("PDPA"). You may opt out of this or withdraw from this at any time by sending an email to our Data Protection Officer. For the avoidance of doubt, unlike (ii) below, the application of or your acceptance of or your consent to, this Privacy Policy, constitutes your consent to this subparagraph (i);

- (ii) if you have separately expressly consented to one or more of the following 3 DNC Modes, by way of the 3 modes of communications of voice calls, text messages or faxes (the "3 DNC Modes") to your Singapore telephone number, in compliance with the requirements of the PDPA; and/or
  - (iii) Notwithstanding (ii) above, regardless that you have not separately provided express consent as aforementioned in (ii) above, LN reserves its right to send a specified fax message (as defined in Singapore's Personal Data Protection (Exemption from Section 43) Order 2013) (the "Exemption Order") and/or a specified text message (as defined in the Exemption Order) (i.e. a marketing fax message or marketing text message) to your Singapore telephone number, if :
    - (1) there is an ongoing relationship between LN and you and the purpose of the message is related to the subject of the ongoing relationship, pursuant to the requirements and conditions of the Exemption Order; or
    - (2) the law permits.
  - (t) storing, hosting, backing up (whether for disaster recovery or otherwise) of your personal data, whether within or outside Singapore;
  - (u) creating reports with respect to potential purchasers' interest in a Project or purchases made by purchasers in a Project including your Purchase;
  - (v) facilitating, dealing with and/or administering external audit(s) or internal audit(s) of the business of LN and/or of its affiliates/related corporations, Purchase(s), and/or transactions related to any Project;
  - (w) dealing with and/or facilitating a business asset transaction or a potential business asset transaction.;
  - (x) record-keeping purposes and producing statistics and research for internal and/or statutory reporting and/or record- keeping requirements, of LN or of its affiliates/related corporations; and
  - (y) the reporting purpose of LN, its shareholders and their respective affiliates, related corporations and associated companies globally including, but not limited to, reports with regard to LN's business performance;
18. LN may/will need to disclose your personal data to third parties, whether located within or outside Singapore, for one or more of the above Purposes. Where we are required to disclose your personal data to a third party in order to perform a contract between you and us, your consent for our disclosure will be deemed. There may also be situations where the PDPA allows us to disclose personal data without your consent, such as where this is pursuant to our legitimate interests, where it is required for a business asset transaction, or for business improvement purposes. Alternatively, we may/will seek your consent for us to disclose your personal data to such third parties (whether located within or outside Singapore) for one or more of the above Purposes. Without limiting the generality of the foregoing or of paragraph 16, such third parties include:

- (a) third party organisations which we partner with for developing a Project;
  - (b) our associated or affiliated organisations or related corporations;
  - (c) any of our agents, contractors or third party service providers that 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 property agents, managing agents of Projects which you have made a Purchase, mailing houses, telecommunication companies, information technology companies and data centres;
  - (d) our lawyers and the lawyers appointed by you to act for you in a Purchase; and
  - (e) third parties to whom disclosure by LN is for one or more of the Purposes and such third parties would in turn be collecting and processing your personal data for one or more of the Purposes.
19. We may share your information with any member of our group (which means our subsidiaries, our ultimate holding company and its subsidiaries), which may be based in countries other than Singapore, from time to time for one or more of the Purposes.
20. 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.
21. We may/will also be 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 information we collect 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).

## F. How Do We Store Data

22. 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.
23. We will put in place measures such 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.

## G. Rights

24. 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

dpo@loganproperty.com. We will process your request within a reasonable time from such a request for withdrawal of consent being made, 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.

25. 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 dpo@loganproperty.com. 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.
26. 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. Note that the PDPA exempts certain types of personal data from being subject to your access request.
27. 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. Note that the PDPA exempts certain types of personal data from being subject to your correction request as well as provides for situation(s) when correction need not be made by us despite your request.
28. We will hold and deal with your personal data in accordance with the PDPA.

## H. Complaints or Enquiry Process

29. If you have any complaint or grievance regarding about how we are handling your personal data or require information about how we are complying with the PDPA, we welcome you to contact us with your complaint, grievance or enquiry.
30. Please contact us with your complaint, grievance or enquiry by emailing us at dpo@loganproperty.com.
31. Where you are sending an email in which you are submitting a complaint, your indication at 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".
32. We will certainly strive to deal with any complaint or grievance that you may have speedily and fairly.

## I. General

33. Your consent that is given pursuant to this Privacy Policy is additional to and does not supersede any other consents that you had provided to LN with regard to processing of your personal data.

34. For the avoidance of doubt, in the event that Singapore personal data protection law 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 and shall in no way be derogated by this Privacy Policy.
35. If you have any queries on this Privacy 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 us at: [dpo@loganproperty.com](mailto:dpo@loganproperty.com).

*Last Updated June 2021*