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DATA PROTECTION NOTICE

This Data Protection Notice ("**Notice**") sets out the basis upon which APDC Global Holdings Pte. Ltd (UEN 202009870C) and its subsidiaries (together "**Zerra Group**", "**Zerra**", "**we**", "**us**" or "**our**") may collect, use, disclose or otherwise process your personal data in accordance with the Personal Data Protection Act 2021 ("**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.

APPLICATION OF THIS NOTICE

1. This Notice applies to all Zerra personnel working at all levels and grades, including senior managers, officers, directors, employees, consultants, contractors, trainees, home workers, part-time and fixed-term employees, casual and agency staff and volunteers, or any other person associated with us, or who performs services for or on behalf of the Group, wherever located (collectively "**Zerra Personnel**").

2. Please be advised that the data protection notice will be applicable to the relevant entity specified below:

   (a) in the case of an employee, trainee, home workers, part-time and fixed-term employees, casual and agency staff and volunteers, the entity specified in your contract;
   (b) in the case of a director, the entity of which you are appointed a director;
   (c) in the case of a consultant and contractor, the entity by which you are engaged,

   and this entity will ensure that all personal data is managed in compliance with this policy.

PERSONAL DATA

3. As used in this Notice, "**personal data**" means data, whether true or not, about a Zerra Personnel 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.

4. Your personal data which we may collect in the context of your employment/engagement with us as Zerra Personnel includes, without limitation, your:

   (a) name or alias, gender, NRIC/FIN or passport number, personal tax reference number, date of birth, nationality, and country and city of birth;
   (b) residential and/or mailing address, telephone numbers, email address and other contact details;
   (c) specimen signature;
   (d) licence number;
   (e) Employment/ professional and training history;
   (f) Salary/ remuneration information and bank account details;
   (g) details of your CPF;
   (h) details of your next-of-kin, spouse and other family members;
   (i) work-related health issues and disabilities;
   (j) records on medical, health and claims in the purpose of Group Medical Insurance provided to you;

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(k) records on leave of absence from work;
(l) photographs and other audio-visual information;
(m) performance assessments and disciplinary records;
(n) any additional information provided to us by you as a job applicant (that is, prior to being engaged as a Zerra Personnel); and
(o) education details.

5. 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

6. We generally collect personal data (a) that you knowingly and voluntarily provide in the course of or in connection with your employment, job application or engagement with us, or via a third party who has been duly authorised by you to disclose your personal data to us (your "**authorised representative**", which may include your job placement agent or corporate secretary), after (i) you (or your authorised representative) have been notified of the purposes for which the personal 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) for which 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).

7. Your personal data will be collected and used by us for the following purposes and we may disclose your personal data to third parties where necessary for the following purposes:

(a) performing obligations under or in connection with your contract of employment/engagement with us, including payment of remuneration, CPF, medical insurance, expenses, tax, and making the necessary filings, etc.;
(b) all administrative and human resources related matters within Zerra Group, including administering payroll, granting access to our premises and computer systems, processing leave applications, administering your CPF, insurance and other benefits, processing your claims and expenses, investigating any acts or defaults (or suspected acts or defaults) and developing human resource policies;
(c) performing the necessary corporate secretarial obligations to comply with relevant laws or agreements which the Zerra Group is subject to;
(d) performing due diligence and annual review related matters by us, any third parties or agents who have business relationship with us;
(e) managing and terminating our employment relationship/engagement with you, including monitoring your internet access and your use of our intranet email to investigate potential contraventions of our internal or external compliance regulations, and resolving any grievances (including any employment related);
(f) assessing and evaluating your suitability for employment/appointment or continued employment/appointment in any position within Zerra Group;
(g) verifying your identity and the accuracy of your personal details (excluding the use of national identification numbers for system authentication or password credentials) and other information provided;
(h) for business operations purposes in connection with our service providers including trustees, investment managers, registrars, transfer agents, custodians, administrative service agents, banks, consultants and auditors;

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(i) ensuring business continuity for our organisation in the event that your employment/engagement with us is or will be terminated;
(j) facilitating any proposed or confirmed merger, acquisition or business asset transaction involving Zerra Group, or corporate restructuring process;
(k) facilitating compliance with any laws, customs and regulations which may be applicable;
(l) in case we are required by any regulatory/government/statutory authority (including any stock exchanges); laws, rules or regulations; or court proceedings; and
(m) any other purpose directly related to any of the above.

DEEMED CONSENT BY NOTIFICATION

8. We may also collect, use or disclose your personal data for secondary purposes that differ from the primary purpose which we had originally collected for pursuant to paragraphs 5 and 6 above. If we intend to rely on deemed consent by notification for such secondary purposes, we will notify you of the proposed collection, use or disclosure of your personal data through appropriate mode(s) of communication.

9. Before relying on deemed consent by notification, we will assess and determine that the collection, use and disclosure of the personal data will not likely have an adverse effect on you.

10. You will be given ten (10) business days to inform us in writing if you wish to opt-out of the collection, use and disclosure of your personal data for such purposes.

11. After the lapse of the opt-out period, you may notify us that you no longer wish to consent to the purposes for which your consent was deemed by notification by withdrawing your consent for the collection, use or disclosure of your personal data in relation to those purposes.

RELIANCE ON LEGITIMATE INTERESTS EXCEPTION

12. In compliance with the PDPA, we may collect, use or disclose your personal data without your consent for our legitimate interests or that of another person. Before relying on the legitimate interests exception of the PDPA, we will assess the likely adverse effects on you and determine if the legitimate interests outweigh any adverse effect.

13. In line with the legitimate interests' exception, we may collect, use or disclose your personal data for purposes including the following:

(a) fraud detection and prevention;
(b) detection and prevention of misuse of services;
(c) network analysis to prevent fraud and financial crime and perform credit analysis; and
(d) collection and use of personal data on company-issued devices to prevent data loss.

14. The purposes listed in paragraphs 5 to 12 above may continue to apply even in situations where your relationship with us has been terminated or altered in any way, for a reasonable period thereafter (including, where applicable, a period to enable us to enforce our rights under any contract with you).

WITHDRAWING YOUR CONSENT

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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 by submitting your request in writing or via email to our Data Protection Officer at the contact details provided below.

16. 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 your employment, processing your job application or engagement 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 paragraph 14 above.

17. 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.

18. 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 ten (10) business days of receiving it.

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, 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 ten (10) business days. Should we not be able to respond to your access request within ten (10) business days after receiving your access request, we will inform you in writing within ten (10) business 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).

22. Please note that depending on the request that is being made, we will only need to provide you with access to the personal data contained in the documents requested, and not to the entire documents themselves. In those cases, it may be appropriate for us to simply provide you with confirmation of the personal data that our organisation has on record, if the record of your personal data forms a negligible part of the document.

PROTECTION OF PERSONAL DATA

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23. 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 up-to-date antivirus protection, encryption, use of privacy filters secure storage and transmission of personal data, and disclosing personal data both internally and to our authorised third party service providers and agents only on a need-to-know basis.

24. 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

25. 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

26. We may retain your personal data for as long as it is necessary to fulfil the purposes for which it was collected, or as required or permitted by applicable laws.

27. We will cease to retain your personal data, or remove the means by which the personal data can be associated with you, as soon as it is reasonable to assume that such retention no longer serves the purposes for which the personal data was collected, and are no longer necessary for legal or business purposes.

TRANSFERS OF PERSONAL DATA OUTSIDE OF SINGAPORE

28. Your personal data we collect may be transferred to and processed by third parties in other countries. In all such instances, we shall ensure that the transfer of your personal data is carried out in accordance with any applicable laws, and that appropriate safeguards are put in place before such transfer takes place.

DATA PROTECTION OFFICER

29. If you have any questions, feedback, or requests regarding our personal data protection policies and procedures, please reach out to our Data Protection Officer. You can also find more information about your data protection officer and escalation channel(s) here: Privacy Policy | Zerra DC

EFFECT OF NOTICE AND CHANGES TO NOTICE

30. This Notice applies in conjunction with any other policies, notices, contractual clauses and consent clauses that apply in relation to the collection, use and disclosure of your personal data by us.

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31. 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 became effective. Your continued employment and participation in our recruitment process or engagement constitute your acknowledgement and acceptance of such changes.

Last Updated: 21 July 2026