

This Data Protection Notice (“Notice”) sets out the basis which ANGLO ASIA TRADING (SINGAPORE) PTE. LTD. (“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.

## **PERSONAL DATA**

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 a customer 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.

Depending on the nature of your interaction with us, some examples of personal data which we may collect from you include name, residential address, email address and date of birth.

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**

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).

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; and
- (i) any other incidental business purposes related to or in connection with the above.

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; or
- (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.

### **WITHDRAWING YOUR CONSENT**

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.

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 thirty (30) business days of receiving it.

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.

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**

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.

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.

We will respond to your request as soon as reasonably possible. In general, our response will be within thirty (30) 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).

### **PROTECTION OF PERSONAL DATA**

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, and disclosing personal data both internally and to our authorised third party service providers and agents only on a need-to-know basis.

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**

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**

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.

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.

### **CROSS-BORDER TRANSFERS OF PERSONAL DATA**

Unless for business-related needs, we generally do not transfer your personal data to other jurisdictions. However, if we do so, we will obtain your consent for the transfer to be made and we will take steps to ensure that your personal data continues to receive a standard of

protection that is at least comparable to that provided under the applicable personal data protection laws and regulations.

ANGLO ASIA TRADING (SINGAPORE) PTE. LTD. internal employees may be located outside Singapore and may access personal data stored in Singapore for their daily business operations. If ANGLO ASIA TRADING (SINGAPORE) PTE. LTD. employees process data outside of Singapore, they will do so only with internal authorized IT equipment that strictly meets all internally defined protection and security requirements. All ANGLO ASIA TRADING (SINGAPORE) PTE. LTD. employees undergo the necessary awareness training to comply with data protection obligations and ensure secure data processing.

### **DATA PROTECTION OFFICER SINGAPORE**

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:

Martina Troppmair

anglo\_asia\_trading@resguard-solutions.com

### **EFFECT OF NOTICE AND CHANGES TO NOTICE**

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.

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.

### **SPECIFIC INFORMATION**

#### **Website**

Every time an user visits our website, technical information of the user is collected for the contributions to the subject of information security, information (also referred to as server log files) is automatically collected by us or the webspace provider.

Among other information this includes: website name, file, date, data volume, web browser and web browser version, operating system, the domain name of your Internet provider, the referrer URL (the page from which you accessed our offer) and the IP address.

Without this information, it would not be technically possible to deliver and display the website content. In this respect, collecting data is absolutely necessary. Furthermore, we use this information for statistical purposes. They help us to optimise our services and technology. We also reserve the right to check the log files in case of suspected illegal use of our services.

ANGLO ASIA TRADING (SINGAPORE) PTE. LTD. does not track its customers over time and across third party websites to provide targeted advertising and therefore does not respond to Do Not Track (DNT) signals.

## **Cookies**

This website uses cookies. Cookies are text files that are stored on your computer by the server. They contain information about the browser, the IP address, the operating system and the Internet connection. We will not pass on this data to third parties or link it to personal data without your consent.

Cookies have two main purposes. They help us make it easier for you to navigate through our services and they also enable the website to be displayed correctly. They are not used to spread viruses or to open programs.

## **Integrating third-party services and content**

Our range includes content, services and services from other suppliers. For example, this might be videos, graphics or images from other websites. In order for this data to be retrieved and displayed in the user's browser, transmitting the IP address is absolutely necessary. The providers (hereinafter referred to as "third-party providers") detect the IP address of the respective user.

## **Contact form**

If you contact us via the online contact form or by email, we will save the information you provide, your IP address and the time it was sent. This allows us to answer your request and ask possible follow-up questions.

## **Google Analytics**

This website uses the standard analysis tool "Google Analytics" of Google Inc. (short: "Google"). Google Analytics uses cookies (text files that are stored on the computer). The generated information about the use of the website is transmitted to an American server of Google and stored for further processing. With your privacy in mind, we have extended Google Analytics with the option "anonymizeIP" so that all data is collected anonymously. The default IP address provided by your browser will not be merged with other data provided by Google. In exceptional cases, the full IP address will be transmitted and truncated on a Google (US) server.

The data collected by Google Analytics is evaluated to generate reports on user activity and to optimize your user experience. In order to contradict the storage of the cookies, please make the appropriate setting in your browser. Please note that you can only use other areas of this website to a limited extent.

## **Job Applications**

If you apply to ANGLO ASIA TRADING (SINGAPORE) PTE. LTD., we process your personal data as a controller. Providing your personal data is necessary for an application to proceed. You are entitled to the data subject rights outlined in this document.

## **Lawfulness**

We process your personal data to take steps prior to an employment at your request. Any additional processing beyond this application process is based on another, separately declared legal basis.

## **Application process**

Our application process is mostly conducted by email and includes following steps:

- (1) Letter of motivation
- (2) Curriculum vitae
- (3) Description of your qualification and education
- (4) Attestation of your qualification and education

The extent of your application documents is determined by you. We will only collect data necessary to proceed with the application process.

If we invite you to an interview, we collect further personal data encompassing your personal interests and particulars of your professional aspirations and qualification.

### **Transfer of application data**

We share your application data within our organisation with persons involved in the application process: human resources managers, subject matter experts and potential superiors.

### **Storage and record keeping**

If you enter into an employment contract with us, we keep your application data until the conclusion of that contract's retention periods.

If we do not close an employment contract, we keep your application data for twelve months. If you want to receive updates on open positions, you may grant us your separate, written consent to do so.