



DAWN SHIPPING GROUP
Global Reach, Local Solutions.

DAWN SHIPPING GROUP PERSONAL DATA PROTECTION POLICY

The purpose of this Data Protection Policy is to inform you of how we manage your Personal Data (as defined below) in accordance with the Personal Data Protection Act 2012 (No. 26 of 2012) (as may be amended from time to time, the “PDPA”).

By providing your Personal Data to us, you acknowledge and agree that you have fully read and understood this Data Protection Policy, and are consenting to the collection, use, processing and disclosure of your Personal Data as described in this Data Protection Policy and as permitted under the PDPA or applicable law.

This Data Protection Policy supplements but does not supersede nor replace any other consents you may have previously provided to us in respect of your Personal Data, and your consents herein are additional to any rights which we may have at law to collect, use or disclose your Personal Data.

We reserve the right to amend and revise this Data Protection Policy from time to time. Subject to your rights at law, you agree to be bound by the prevailing terms of this Data Protection Policy as updated from time to time on our website at www.sla.org.sg.

1. PERSONAL DATA

- 1.1. In this Data Protection Policy, “Personal Data” is refers to any 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.
- 1.2. Examples of Personal Data that you may provide to us include, depending on the nature of your interaction with us, amongst others, your name, NRIC, passport or other identification number or information, contact information, financial records, photographs and video images.
- 1.3. Unless restricted by the PDPA or any other applicable law, you agree that we may process your personal data in the manner, and for the purposes set out in the terms described in this Data Protection Policy.

2. COLLECTION OF PERSONAL DATA

- 2.1. Generally, we may collect Personal Data from you in the following ways:
 - (a) when you submit an application form or other forms for a membership;

- (b) when you submit an application form or other forms for a programme/event/activity organised by us;
- (c) when you submit an application form or other forms for in relation to council or other committee elections;
- (d) when you communicate or interact with us directly via telephone calls, letters, face-to-face meetings with our officers or employees, email, social media or any other means;
- (e) when you request that we contact you or request that you be included in an email or other mailing list, such as a membership mailing list, or when you respond to our promotions, initiatives or to any request for additional Personal Data;
- (f) when your images are captured by us via security cameras while you are within our premises, or via photographs or videos taken by us or our representatives when you attend programmes/events/activities at our premises;
- (g) when you participate in surveys and other types of research carried out by us or when you are contacted by, and respond to, our marketing representatives and officer;
- (h) when you submit an employment application or when you provide documents or information including your resume, academic qualifications and professional qualifications in connection with any appointment as an officer, director, representative or any other position;
- (i) when you provide your billing and payment information to us; and

2.2. If you provide us with any Personal Data relating to a third party (e.g. information of your spouse, children, parents, and/or employees), by submitting such information to us, you represent to us that you have obtained the consent of the third party to provide us with their Personal Data for the respective purposes set out in this Data Protection Policy.

2.3. You should ensure that all Personal Data submitted to us is complete, accurate, true and correct.

2.4. When you browse our website, you generally do so anonymously but please see Section 6 below on cookies. We do not, at our website, automatically collect Personal Data unless you provide such information or login with your account credentials.

3. PURPOSES FOR THE COLLECTION, USE AND DISCLOSURE OF PERSONAL DATA

3.1. Generally, we collect, use and disclose your Personal Data for the following purposes:

- (a) to respond to your queries, feedback, complaints and requests;
- (b) to manage our administrative and business operations;
- (c) to provide support and administrative services to you and for the general administration of your membership with us or participation in a programme/event/activity organised by us;
- (d) to inform you of programmes/events/activities organised by us;
- (e) for security, verification, logistical and administrative purposes for

programmes/events/activities organised by us;

- (f) to maintain our member or other records;
- (g) to monitor or record phone calls and customer-facing interactions for quality assurance, employee training, performance evaluation and identity verification purposes;
- (h) to generate financial, regulatory, management or survey reports and statistics for our business and administrative purposes;
- (i) for marketing and publicity purposes and to provide media announcements and responses;
- (j) to meet or comply with our internal policies and procedures and any applicable laws, rules, regulations, codes of practice or guidelines, orders or requests issued by any court, legal or regulatory bodies (including but not limited to disclosures to regulatory bodies, conducting audit checks, due diligence and investigation);
- (k) to disclose your personal data where necessary to government agencies for official purposes and disclosed to external third parties for, or in connection with, the above purposes, or where required by law;
- (l) to prevent, detect and investigate crime, offences or breaches including that related to the security of our premises (including but not limited to the use of security cameras); and/or
- (m) purposes which are reasonably related to the above or for any other purpose which we may notify you at the time of obtaining your consent.

3.2. If you have registered or are participating in our programmes/events/activities, we also collect, use and disclose your Personal Data for the following purposes:

- (a) assessing and processing any applications or requests made by you for any programme/event/activity organised by us (including verifying your qualifications);
- (b) for marketing and publicity purposes and to provide media announcements and responses;
- (c) to meet or comply with our internal policies and procedures and any applicable laws, rules, regulations, codes of practice or guidelines, orders or requests issued by any court, legal or regulatory bodies (including but not limited to disclosures to regulatory bodies, conducting audit checks, due diligence and investigation);
- (d) to disclose your personal data where necessary to government agencies for official purposes and disclosed to external third parties for, or in connection with, the above purposes, or where required by law;
- (e) for marketing and publicity purposes and to provide media announcements and responses;

- (f) to meet or comply with our internal policies and procedures and any applicable laws, rules, regulations, codes of practice or guidelines, orders or requests issued by any court, legal or regulatory bodies (including but not limited to disclosures to regulatory bodies, conducting audit checks, due diligence and investigation);
- (g) to disclose your personal data where necessary to government agencies for official purposes and disclosed to external third parties for, or in connection with, the above purposes, or where required by law;
- (h) to prevent, detect and investigate crime, offences or breaches including that related to the security of our premises (including but not limited to the use of security cameras); and/or
- (i) purposes which are reasonably related to the above or for any other purpose which we may notify you at the time of obtaining your consent.

3.3. If you have registered or are participating in our programmes/events/activities, we also collect, use and disclose your Personal Data for the following purposes:

- (a) assessing and processing any applications or requests made by you for any programme/event/activity organised by us (including verifying your qualifications);
- (b) creating and maintaining member or participant profiles in our system database for internal records and reference;
- (c) providing customer/member service and support
- (d) invoicing and collection and administering debt recovery and debt management;
- (e) administering and conducting information sessions, courses, events and programmes;
- (f) generating publicity materials for our programmes/events/activities; and/or
- (g) purposes which are reasonably related to the aforesaid or for any other purpose which we may notify you at the time of obtaining your consent.

3.4. If you are a member or prospective member, we also collect, use and disclose your Personal Data for the following purposes:

- (a) processing your membership application and assessing the suitability for membership;
- (b) recording meeting minutes and your attendance at our seminars or meetings;
- (c) providing member service and support and for logistical management; and/or
- (d) purposes which are reasonably related to the aforesaid or for any other purpose which we may notify you at the time of obtaining your consent.

3.5. If you submit an application us as a candidate for employment or other position, we also collect, use and disclose your Personal Data for the following purposes:

- (a) processing your application (including but not limited to pre-recruitment checks involving your qualifications and facilitating interviews);
- (b) conducting interviews;
- (c) conducting background screen and obtaining employee references;
- (d) assessing your suitability for the position applied for and for evaluative purposes; and/or
- (e) purposes which are reasonably related to the aforesaid or for any other purpose which we may notify you at the time of obtaining your consent.

3.6. If there is any change in, or additional purpose, for which we collect, use and disclose your Personal Data depending on the specific circumstances and situations in which your Personal Data is collected, we will update you accordingly.

4. DISCLOSURE OF PERSONAL DATA

4.1. Subject to the provisions of any applicable law, your Personal Data may be disclosed, for the purposes listed above (where applicable), to the following entities or parties, whether they are located overseas or in Singapore:

- (a) our related corporations;
- (b) recruitment and screening agencies;
- (c) co-organisers for our programmes/events/activities;
- (d) media companies;
- (e) agents, contractors or third party service providers who provide operational services to us, such as courier services, telecommunications, information technology, payment, printing, billing, payroll, processing, technical services, training, market research, call centre, security, employee recognition or other services, or who provide services for our programmes/events/activities;
- (f) our partners or collaborators in our programmes/events/activities (including training institutions and trainers);
- (g) industry event organisers;
- (h) our professional advisers such as consultants, auditors and lawyers;
- (i) relevant government ministries, regulators, statutory boards or authorities or law enforcement agencies to comply with any laws, rules, guidelines and regulations or schemes imposed by any governmental authority; and
- (j) any other party whom you authorise us to disclose your Personal Data or whom we are permitted to disclose your Personal Data to under the PDPA.

5. WITHDRAWAL OF CONSENT AND ACCESS AND CORRECTION OF PERSONAL DATA

5.1. If you would like to (i) withdraw your consent to the use of your Personal Data as set out in this Data Protection Policy; or (ii) obtain access and make corrections to your Personal Data records, please contact our Data Protection Officer via the following channels:

- (a) Email: it@dawnsg.com
- (b) Write to: The Data Protection Officer
Dawn Shipping Group
32 Pioneer Road North, Dawn Logistics
Centre, Singapore 628473

5.2. We may charge for a request for access in accordance with the requirements of the PDPA.

5.3. We will try to respond to your question or request promptly. We may however, depending on the nature of the question or request, need up to 30 days to provide you an estimate of when we will be able to respond to you.

5.4. Please note that if you withdraw your consent to any or all use of your Personal Data, depending on the nature of your request, we may no longer be in a position to continue to provide membership benefits and services to you or administer any contractual relationship in place, which in turn may also result in the termination of your membership or agreements with us. Our legal rights and remedies in such event are expressly reserved.

6. USE OF COOKIES

6.1. Cookies are small text files stored in your computing or other electronic devices which allow us to remember you.

6.2. Our website uses cookies to distinguish you from other users of our website by storing, generally non-personally identifiable, information (e.g. session information such as the number of times you visit our website and the location from which you are accessing the website). We use cookies: (i) to track your activities on our website; and (ii) the purposes described in this Data Protection Policy, but they will not generally allow us to obtain information of a personal nature such as your name and address. We will only be aware of such information if you provide the information to us or you have set the preferences in your browser to provide this information automatically.

6.3. By using our website or platforms, you agree to the use of cookies and other technologies as set out in this Data Protection Policy. If you do not agree to such use, please refrain from using our website or disable the cookies associated with these technologies by changing the preferences on your browser. Please note that changing these settings may limit the functionality of some web pages or prevent them from loading properly.

6.4. Our website may, from time to time, contain links to and from third party websites. If you follow a link to any of these websites, please note that these websites have their own data protection policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any Personal Data to these websites.

7. SECURITY OF PERSONAL DATA

- 7.1. We will take reasonable steps to protect your Personal Data against unauthorised disclosure and have put in place appropriate security safeguards and practices to protect your Personal Data from unauthorised access, collection, use, disclosure, copying, modification disposal or similar risks in accordance with the PDPA.
- 7.2. We limit access to your personal data to those employees, agents, contractors and other third parties on a 'need to know' basis.

8. DISPOSAL OF PERSONAL DATA

- 8.1. We will cease to retain documents that contain Personal Data about you or that refers to you as soon as it is reasonable to assume that the purpose for which we collected it is no longer being served by us retaining it and we no longer need it for a business or legal purpose. Alternatively, we may anonymise the personal data so that it can no longer be associated with you.

9. TRANSFER OF PERSONAL DATA OUT OF SINGAPORE

- 9.1. We will ensure that any transfer of Personal Data to a territory outside of Singapore will be in accordance with the PDPA so as to ensure a standard of protection to personal data so transferred that is comparable to the protection under the PDPA.

10. GOVERNING LAW

- 10.1. This Data Protection Policy shall be governed in all respects by the laws of Singapore.

11. DATA PROTECTION OFFICER

- 11.1. You can contact us to get further information in relation to this Data Protection Policy, to provide comments or to make any complaint by contacting our data protection officer as follows:

- (a) Email : it@dawnsg.com
- (b) Write to: The Data Protection Officer
Dawn Shipping Group
32 Pioneer Road North, Dawn Logistics
Centre, Singapore 628473
- (c) Phone : +65-888-43210