

Personal Data Protection Act

Your privacy is important to us. The purpose of this Data Protection Policy is to inform you of how DALVEY BREEZE DEVELOPMENT PTE LTD manages Personal Data in accordance with the Personal Data Protection Act 2012 (“the Act”).

DALVEY BREEZE DEVELOPMENT PTE LTD informs its Website users that it adopts technical and organizational means towards avoiding loss, misuse, alteration, non-authorized access and theft of any personal data provided through the Website, taking into account the state of technology, nature of the data and risks to which it is exposed.

By interacting with us, submitting information to us or signing up for any promotions or services offered by us, you agree and consent to DALVEY BREEZE DEVELOPMENT PTE LTD, its related corporations and affiliates, (collectively referred to herein as “DALVEY BREEZE DEVELOPMENT PTE LTD”, “us”, “we” or “our”), as well as our respective representatives collecting, using, disclosing and sharing amongst ourselves your Personal Data, and disclosing such Personal Data to DALVEY BREEZE DEVELOPMENT PTE LTD’s authorized service providers and relevant third parties in the manner set forth in this Privacy Policy.

This Privacy Policy supplements but does not supersede nor replace any other consents you may have previously provided to DALVEY BREEZE DEVELOPMENT PTE LTD nor does it affect any rights which DALVEY BREEZE DEVELOPMENT PTE LTD may have at law in connection with the collection, use or disclosure of your Personal Data. Please check regularly for updated information on the handling of your Personal Data.

1. Your Personal Data

In this Privacy Policy, “Personal Data” refers to any data or information about you from which you can be identified either (a) from that data; or (b) from that data and other information to which we have or are likely to have access. Examples of such Personal Data which you may provide to us include (depending on the nature of your interaction with us:

(a) your name, NRIC, passport or other identification number, telephone number(s), mailing address, email address and any other information relating to you which you have provided us in any forms you may have submitted to us, or in other forms of interaction with you;

(b) information about your use of DALVEY BREEZE DEVELOPMENT PTE LTD website and services, including cookies, IP address, subscription account details and membership details, but only to the extent that we may identify you from such information;

(c) your employment history, education background, and income levels;

(d) your payment related information, such as your bank account or credit card information, and your credit history; and

(e) information about your usage of and interaction with our website and/or services including computer and connection information, device capability, bandwidth, statistics on page views, and traffic to and from our website.

2. Collection of Personal Data

Generally, DALVEY BREEZE DEVELOPMENT PTE LTD collects your Personal Data in the following ways:

- (a) when you submit forms to us to any of our products or services;
- (b) when you interact with our customer service officers;
- (c) when you use some of our services, e.g. our enquiry form;
- (d) when you request that we contact you;
- (e) when you are contacted by, and respond to, our marketing representatives and agents;
- (f) when you respond to our request for additional Personal Data
- (g) when you ask to be included in an email or other mailing list;
- (h) when you respond to our promotions and other initiatives;
- (i) when you enter into tenancy agreements and /or any forms of agreement with us;
- (j) when we receive references from business partners and third parties, for example, where you have been referred by them;
- (k) when you submit your Personal Data to us for whatsoever reason.

If you provide us with any Personal Data relating to a third party (e.g. information of spouse, children, parents, employees and/or authorised representatives), by submitting such information to us, you represent to us that you have obtained the consent of the said third party to you providing us with their Personal Data for the respective purposes.

You should ensure that all Personal Data submitted to us is complete, accurate, true and correct. Failure on your part to do so may result in our inability to provide you with products and services you have requested.

3. Purposes for the Collection, Use and Disclosure of Your Personal Data

Generally, DALVEY BREEZE DEVELOPMENT PTE LTD collects, uses and discloses your Personal Data for the following purposes:

- (a) responding to your queries and requests and responding to complaints;
- (b) managing the infrastructure, business operations and complying with our internal policies and procedures;
- (c) facilitating business asset transactions (which may extend to any merger, acquisition or asset sale);
- (d) matching any Personal Data held which relates to you for any of the purposes listed herein;

- (e) verifying your identity;
- (f) preventing, detecting and investigating crime, including fraud and money-laundering, and analysing and managing other commercial risks;
- (g) protecting and enforcing our contractual and legal rights and obligations;
- (h) conducting audits, reviews and analysis of our internal processes, action planning and managing commercial risks;
- (i) preventing, detecting and investigating crime and managing the safety and security of our premises and services (including but not limited to carrying out CCTV surveillance and conducting security clearances);
- (j) compliance with any applicable rules, laws and regulations, codes of practice or guidelines or to assist in law enforcement and investigations by relevant authorities; and/or
- (k) any other purpose relating to any of the above.

In addition, where permitted under the Act, DALVEY BREEZE DEVELOPMENT PTE LTD may also collect, use and disclose your Personal Data for the following purposes:

- (a) providing services, products and benefits to you, including promotions, loyalty and reward programmes;
- (b) matching Personal Data with other data collected for other purposes and from other sources (including third parties) in connection with the provision or offering of products and services, whether by us or other third parties;
- (c) administering contests, competitions and conducting lucky draws, including, where necessary, in order to announce the results of these contests, competitions and lucky draws and identify and contact the winners, and in order to publicise and conduct marketing strictly related to these contests, competitions and lucky draws;
- (d) sending you details of products, services, special offers and rewards, either to our customers generally, or of particular products and services which may be of interest to you; and
- (e) conducting market research, understanding and determining customer location, preferences and demographics for us to review, develop and improve our products, services and also develop special offers and marketing programmes.
- (f) photos and videos collected to be used for our sale and marketing material;

4. Disclosure of Personal Data

DALVEY BREEZE DEVELOPMENT PTE LTD will take reasonable steps to protect your Personal Data against unauthorised disclosure. Subject to the provisions of any applicable law, this Personal Data may be disclosed, for the purposes listed above (where applicable), to the following third parties, whether they are located overseas or in Singapore:

- (a) DALVEY BREEZE DEVELOPMENT PTE LTD's affiliates;
- (b) agents, contractors or third party service providers who provide services to DALVEY BREEZE DEVELOPMENT PTE LTD, such as telecommunications, information technology, payment, processing, market research, newspaper vendor services, newspaper delivery services, storage, archival or other services to DALVEY BREEZE DEVELOPMENT PTE LTD;
- (c) vendors or any third party business partners who offer goods and services or sponsor contests or other promotional programs on DALVEY BREEZE DEVELOPMENT PTE LTD's sites, whether in conjunction with us or not;
- (d) external business and charity partners in relation to corporate promotional events;
- (e) the Credit Bureau, or in the event of default or disputes, any debt collection agencies or dispute resolution centres;
- (f) any business partners, investors, assignees or transferees (actual or prospective) to facilitate business asset transactions which may extend to any merger, acquisition or asset sale;
- (g) anyone to whom we transfer or may transfer our rights and duties;
- (h) banks, credit card companies and their respective service providers;
- (i) our professional advisors such as our auditors and lawyers;
- (j) relevant government regulators or authority or law enforcement agencies to comply with any laws or rules and regulations imposed by any governmental authorities; and
- (k) any other party to whom you authorise us to disclose your Personal Data

5. Third-Party Sites

Our website may contain links to other websites operated by third parties, such as our business partners. We are not responsible for the privacy practices of websites operated by third parties that are linked to our website. We encourage you to learn about the privacy policies of such third party websites. Some of these third party websites may be co-branded with our logo or trademark, even though they are not operated or maintained by us. Once you have left our website, you should check the applicable terms, conditions and policies of the third party website to determine how they will handle any information they collect from you.

6. Feedback, Enquiries and Withdrawals of Your Personal Data

Should you have any feedback or enquiries relating to your Personal Data or if you wish to withdraw consent to use of your Personal Data, please contact kim@dalveyhaus.com

Please note that if your Personal Data has been provided to us by a third party, you should contact such party directly to make any queries, feedback, and access and correction requests to us on your behalf.