

Data Protection Policy

The purpose of this document ("Data Protection Policy") is to inform you of how EuroSports Global and its related corporations (collectively, the "Group") manages Personal Data (as defined below) which is subject to the Singapore Personal Data Protection Act (No. 26 of 2012) ("the Act"). To deal with, process, administer and/or manage your purchase of product(s) from EuroSports Global and/or its subsidiaries ("**EuroSports**") (the "**Purchase**") or your interest in product(s) offered for sale by EuroSports Global and/or its subsidiaries, EuroSports (EuroSports Global and/or its subsidiaries may be referred to as "**we**" or "**us**") will/may need to collect, use, disclose and/or process your personal data.

The EuroSports Global Group is the authorised distributor in Singapore of Automobili Lamborghini, Alfa Romeo, Touring Superleggera and Pagani. Among other things, the Group also sells pre-owned vehicles, develops its own e-mobility scooter under EuroSports Technologies ("Scorpio") and offers leases of vehicles as well as distributes luxury time pieces.

By interacting with us, submitting information to us, or signing up for any products and services offered by us, you agree and consent to the Group, as well as its representatives and/or agents (collectively referred to herein as "ES", "the Group", "us", "we" or "our") collecting, using, disclosing and sharing amongst themselves your Personal Data, and disclosing such Personal Data to ES's authorised service providers and relevant third parties in the manner set forth in this Data Protection Policy.

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

ES may from time to time update this Data Protection Policy to ensure that this Data Protection Policy is consistent with our future developments, industry trends and/or any changes in legal or regulatory requirements. 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 www.eurosportsglobal.com. Please check back regularly for updated information on the handling of your Personal Data.

This Data Protection Policy was last updated on 30 July 2019.

1. Personal Data

1. In this Data Protection Policy, "Personal Data" refers to any data, whether true or not, about an individual 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, including data in our records as may be updated from time to time.
2. Examples of such Personal Data you may provide to us include (depending on the nature of your interaction with us) your name, NRIC, passport or other identification number, telephone number(s), mailing address, email address and any other information relating to any individuals which you have provided us in any forms you may have submitted to us, or via other forms of interaction with you.

2. **Collection of Personal Data**

Generally, we collect Personal Data in the following ways:

1. when you submit any form, including but not limited to customer inquiry forms or other forms relating to any of our products and services;
2. when you enter into any agreement or provide other documentation or information in respect of your interactions with us, or when you use our products and services;
3. when you interact with our staff, including customer service officers, for example, via telephone calls (which may be recorded), letters, fax, face-to-face meetings, social media platforms and emails;
4. when you interact with us via our websites or use services on our websites;
5. when you request that we contact you or request that you be included in an email or other mailing list;
6. when you respond to our promotions, initiatives or to any request for additional Personal Data;
7. when you submit an employment application or when you provide documents or information including your resume and/or CVs in connection with any appointment as an officer, director, representative or any other position;
8. when your images are captured by us via CCTV cameras while you are within our premises, or via photographs or videos taken by us or our representatives when you attend our events;
9. when you are contacted by, and respond to, our marketing representatives and customer service officers;
10. when we seek information about you and receive your Personal Data in connection with your relationship with us, including for our products and services or job applications, for example, from business partners, public agencies, your ex-employer, referral intermediaries and the relevant authorities; and/or
11. when you submit your Personal Data to us for any other reasons.
12. When you browse our website, you generally do so anonymously but please see paragraph 5 below for information on cookies and other technologies which we have implemented on our website. We do not, at our website, automatically collect Personal Data unless you provide such information to us.
13. 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.
14. 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 the products and services you have requested, or delays in providing you with products and services you have requested, or processing your applications.

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

1. Generally, ES collects, uses and discloses your Personal Data for the following purposes:
 - I. responding to, processing and handling your queries, feedback, complaints and requests;
 - II. verifying your identity;
 - III. managing and planning the administrative and business operations of ES and complying with internal policies and procedures;
 - IV. facilitating business asset transactions (which may extend to any mergers, acquisitions or asset sales);
 - V. requesting feedback or participation in surveys, as well as conducting market research and/or analysis for statistical, profiling or other purposes for us to design our products, understand customer behaviour, preferences and market trends, and to review, develop and improve the quality of our products and services;

- VI. matching any Personal Data held which relates to you for any of the purposes listed herein;
- VII. preventing, detecting and investigating crime and analysing and managing commercial risks;
- VIII. managing the safety and security of our premises and services (including but not limited to carrying out CCTV surveillance and conducting security clearances);
- IX. monitoring or recording phone calls and customer-facing interactions for quality assurance, employee training and performance evaluation and identity verification purposes;
- X. in connection with any claims, actions or proceedings (including but not limited to drafting and reviewing documents, transaction documentation, obtaining legal advice, and facilitating dispute resolution), and/or protecting and enforcing our contractual and legal rights and obligations;
- XI. conducting any form of investigations including but not related to those relating to disputes, billing, fraud, offences, prosecutions etc;
- XII. meeting or complying with any applicable rules, laws, regulations, codes of practice or guidelines issued by any legal or regulatory bodies which are binding on ES (including but not limited to responding to regulatory complaints, disclosing to regulatory bodies and conducting audit checks, due diligence and investigations); and/or
- XIII. purposes which are reasonably related to the aforesaid.

2. In addition, ES collects, uses and discloses your Personal Data for the following purposes depending on the nature of our relationship:

- I. If you are a purchaser or seller of automobiles or are leasing vehicles from us or purchasing pre-owned vehicles from us (whether existing or prospective), or use our other products or services:
 - a. providing customer service and support (including but not limited to customer relationship management, processing your orders, facilitating and providing reminders of your service booking requests and appointments, providing you with administrative support, administering insurance coverage, vehicle warranties and special service campaigns, administering the lease of the vehicle, and providing delivery and pick-up services);
 - b. administering and processing your requests including creating and maintaining profiles of our customers in our system database for administrative purposes;
 - c. personalising your experience at ES's touchpoints and conducting market research, understanding and analysing customer behaviour, location, preferences and demographics in order to improve our service offerings;
 - d. administering debt recovery and debt management; and/or
 - e. purposes which are reasonably related to the aforesaid.
- II. If you are an employee, officer or owner of an external service provider or vendor outsourced or prospected by ES:
 - a. assessing your organisation's suitability as an external service provider or vendor for ES;
 - b. managing project tenders and quotations, processing orders or managing the supply of goods and services;
 - c. creating and maintaining profiles of our service providers and vendors in our system database;
 - d. processing and payment of vendor invoices and bills;
 - e. facilities management (including but not limited to issuing visitor access passes and facilitating security clearance); and/or
 - f. purposes which are reasonably related to the aforesaid.

- III. If you submit an application to us as a candidate for employment:
 - a. conducting interviews;
 - b. processing your application (including but not limited to pre-recruitment checks involving your qualifications and facilitating interviews);
 - c. obtaining references and for background screening;
 - d. assessing your suitability for the position applied for;
 - e. enrolling successful candidates as our employees and facilitating human resource planning and management (including but not limited to preparing letters of employment, name cards and building access passes); and/or
 - f. purposes which are reasonably related to the aforesaid.

3. Furthermore, where permitted under the Act, ES may also collect, use and disclose your Personal Data for the following "Additional Purposes":

- I. providing or marketing services, products and benefits to you, including promotions, product upgrades, loyalty and reward programmes;
- II. organising roadshows and promotional events and administering contests and competitions;
- III. 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;
- IV. sending you details of products, services, special offers and rewards, either to our customers generally, or which we have identified may be of interest to you;
- V. conducting market research, understanding and analysing customer behaviour, location, preferences and demographics for us to offer you other products and services as well as special offers and marketing programmes which may be relevant to your preferences and profile; and/or
- VI. purposes which are reasonably related to the aforesaid.

4. If you have provided us with your Singapore telephone number(s) and have indicated that you consent to receiving marketing or promotional information via your Singapore telephone number(s), then from time to time, ES may contact you using such Singapore telephone number(s) (including via voice calls, text, fax or other means) with information about our products and services.

5. In relation to particular products and services or in your interactions with us, we may also have specifically notified you of other purposes for which we collect, use or disclose your Personal Data. If so, we will collect, use and disclose your Personal Data for these additional purposes as well, unless we have specifically notified you otherwise.

6. You have a choice to withdraw your consent for receiving marketing or promotional materials/communication. You may contact us using the contact details found below.

7. Please be aware that once we receive confirmation that you wish to withdraw your consent for marketing or promotional materials/communication, it may take up to 30 calendar days for your withdrawal to be reflected in our systems. Therefore, you may still receive marketing or promotional materials/communication during this period of time. Please note that even if you withdraw your consent for the receipt of marketing or promotional materials, we may still contact you for other purposes in relation to the products and services that you have requested or purchased from ES.

4. Disclosure of Personal Data

1. ES will take reasonable steps to protect your Personal Data against unauthorised disclosure. 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:

- I. ES's related corporations and affiliates;

- II. ES's dealers;
- III. companies providing services relating to insurance to ES;
- IV. agents, contractors, sub-contractors or third party service providers who provide operational services to ES, such as courier services, telecommunications, information technology, payment, printing, billing, processing, technical services, transportation, training, market research, call centre, security, or other services to ES;
- V. vendors or third party service providers and our marketing and business partners in connection with marketing promotions, products and services;
- VI. any business partner, investor, assignee or transferee (actual or prospective) to facilitate business asset transactions (which may extend to any merger, acquisition or asset sale);
- VII. external banks, credit card companies, other financial institutions and their respective service providers;
- VIII. our professional advisers such as consultants, auditors and lawyers;
- IX. companies providing insurance and warranty services to ES's automotive customers;
- X. 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/or
- XI. any other party to whom you authorise us to disclose your Personal Data to.

5. Use of Cookies, Web Beacons, and Similar Technologies on the website

- 1. When you visit or interact with our sites, services, we or our authorized service providers may use cookies, web beacons, and other similar technologies for collecting and storing information to help provide you with a better, faster, and safer web experience.
- 2. The information collected by us or our authorised service providers may recognise a visitor as a unique user and may collect information such as how a visitor arrives at our sites, what kind of browser a visitor is on, what operating system a visitor is using, a visitor's IP address and a visitor's click stream information and time stamp (for example, which pages they have viewed, the time the pages were accessed and the time spent per web page).
- 3. However, we do not store any of your personal data on any of our cookies or other similar technologies. The use of cookies, web beacons and similar technologies by us on our website has different functions. They are either necessary for the functioning of our services, help us improve our performance, or serve to provide you with extra functionalities.
 - Session cookies expire at the end of your browser session and allow us to link your actions during that particular browser session.
 - Persistent cookies are stored on your device in between browser sessions, allowing us to remember your preferences or actions across multiple sites.
 - First-party cookies are set by the site you are visiting
 - Cookies can be disabled or removed by tools that are available in most commercial browsers. The preferences for each browser you use will need to be set separately and different browsers offer different functionality and options.

4. Contacting Us – Withdrawal of Consent, Access and Correction of your Personal Data

- I. If you:
 - a. have any questions or feedback relating to your Personal Data or our Data Protection Policy;
 - b. would like to withdraw your consent to any use of your Personal Data as set out in this Data Protection Policy; or
 - c. would like to obtain access and make corrections to your Personal Data records, please contact us via email: dataprivacy@eurosportsauto.com.sg.

- II. Please note that if your Personal Data has been provided to us by a third party (e.g. a referrer or your company), you should contact that organisation or individual to make such queries, complaints, and access and correction requests to ES on your behalf.
- III. If you withdraw your consent to any or all use of your Personal Data, depending on the nature of your request, ES may not be in a position to continue to provide its products and services to you, or administer any contractual relationship in place, which in turn may also result in the termination of any agreements with ES, and your being in breach of your contractual obligations or undertakings. ES's legal rights and remedies in such event are expressly reserved.

5. **Governing Law**

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