

Privacy Policy

Personal Data Protection Policy

A Bahasa Malaysia translation of this policy can be found [here](#).

Your personal data is important to the Far East Orchard Limited group

Your personal data is important to us and it is our policy to respect the confidentiality of information and the privacy of individuals. This Policy outlines how we manage the personal data we hold in compliance with the Personal Data Protection Act 2012 (No. 26 of 2012) in Singapore (the “**PDPA**”) and to the extent applicable, the General Data Protection Regulation (EU) 2016/679 (“**GDPR**”) and applies to all divisions and organisations in Far East Orchard Limited, including the Far East Hospitality division (collectively, “**FEOR**”). We also comply with local data protection and privacy laws in our operations out of Singapore

What types of personal data do we collect?

We may collect and hold personal data of persons/entities including but not limited to:

- customers;
- job applicants and employees;
- shareholders;
- service providers; and
- other people who we may come into contact.

Examples of such personal data include biodata, health-related information, contact details, account information and your preferences, queries, requests and feedback.

How do we collect your personal data?

The ways in which we may collect your personal data include (but are not limited to) collecting directly or indirectly from you or your authorised representatives in the course of:

- you signing up for alerts or newsletters;
- you visiting our websites, showflats, etc;
- you purchasing or leasing a property from us;
- you making a reservation or staying in properties which we own or operate;
- you dining in our food and beverage outlets;

- you visiting our spas;
- you applying for a job with us;
- you participating in our marketing or promotional events;
- you using our products or services;
- you contacting us with your queries, requests or feedback;
- our conducting or completing of transactions;
- our conducting market research or surveys;
- our conducting interviews.

What kind of purposes do we collect your personal data for?

We may collect, use and/or disclose your personal data. This includes, but is not limited to, all or any of the following purposes:

- conducting and completing transactions (e.g. processing orders and payments; providing products or services that have been requested);
- managing your reservation in any of our hotels or serviced residences or dining in our food and beverage outlets or staying in properties that we own or operate;
- providing customer service (e.g. responding to queries and requests; informing you about service status and product updates; sending you alerts and newsletters);
- maintaining the safety and security of and within our premises, including that of our guests and staff, preventing and detecting potential fraud, and/or protecting our and our guests and staff's legitimate interests generally;
- conducting market research and improving customer service (e.g. conducting market research or surveys; performing market analysis; managing and enhancing our products and services; developing new products; understanding customer behaviour and preferences in relation to our products and services);
- conducting marketing promotions (e.g. sending of alerts, newsletters, marketing materials and invitations from us wholly or through affiliation with third parties; offering promotions and loyalty programmes);
- complying with applicable laws, regulations and other requirements (e.g. providing assistance to law enforcement agencies, regulatory authorities and other governmental agencies; performing internal audits);
- maintaining investor relations (e.g. sending of alerts, newsletters, publications, marketing materials and invitations from us wholly or through affiliation with third parties);
- performing evaluations (e.g. assessing suitability of employees); and

FEOR may decide to buy or sell assets which form part of or relate to its business or a division or organisation within FEOR. In any such transaction, personal data will usually be one of the transferred assets and will be disclosed to the purchaser.

All provision of personal data is on a voluntary basis. However, depending on the circumstance, if you do not provide information about yourself which FEOR has requested, FEOR may not be able to provide you with the relevant product or service.

How do we use and/or disclose your personal data?

We will only use, disclose and/or transfer your personal data for the purposes you have been notified of and consented to or which are permitted under applicable laws and regulations.

We will not sell, rent or give away personal data to third parties for commercial purposes without your consent.

Who do we share your personal data with?

Depending on the product or service concerned, personal data may be disclosed or transferred to:

- other divisions or organisations within FEOR;
- our joint venture/ alliance partners;
- our service providers and specialist advisers/institutions who have been contracted to provide administrative, financial, legal, accounting, information technology, research or other services;
- other insurers, credit providers, courts, tribunals, law enforcement agencies, regulatory authorities and other governmental agencies as agreed or authorised by law;
- credit reporting or reference agencies or insurance investigators; or
- anyone authorised by an individual, as specified by that individual or the contract.

Where personal data is disclosed or transferred to organisations outside of FEOR who handle or obtain personal data as service providers to FEOR, we require such organisations to acknowledge the confidentiality of such personal data, undertake to respect any individual's right to privacy and comply with the PDPA (and where applicable, the GDPR) and this Policy and use such personal data only for our purposes and otherwise follow our reasonable directions with respect to this data.

In addition, where personal data is transferred overseas and we may need to process or deal with your personal data outside Singapore, we will ensure that such transfer is in

compliance with the PDPA and this Policy or is permitted under applicable data protection and privacy laws and regulations.

Cookies

Our cookie policy describes how we use cookies and similar technologies. For more information on the cookies we use on our website, please see our cookie policy [here](#).

How do we manage, protect and store your personal data?

FEOR has appointed a Data Protection Officer (“DPO”) to oversee our management of personal data in accordance with the PDPA (and where applicable, the GDPR).

We regard breaches of your privacy very seriously and we have implemented appropriate security measures to secure and protect your information, such as training our employees who handle your personal data to respect the confidentiality of such personal data and your privacy, storing personal data in a combination of secure computer storage facilities and paper based files and other records, and taking steps to protect the personal data we hold from misuse, loss, unauthorised access, modification or disclosure.

However, you will appreciate that it is not for us to perfectly secure your personal data from cyber-attacks, such as hacking, spyware and viruses. Accordingly, you will not hold us liable for any unauthorised disclosure, loss or destruction of your personal data arising from such risks.

The PDPA also requires us not to store personal data longer than necessary. We will cease to retain your personal data when we no longer require such personal data for the purposes we originally notified you of or for any business or legal needs.

How do we keep personal data accurate and up-to-date and how to exercise your right to correct the personal data we hold of you?

We endeavour to ensure that the personal data we hold about you is accurate and up-to-date. We realise that such personal data changes frequently with changes of address and other personal circumstances. We encourage you to contact us as soon as possible in order to update any personal data it holds about you. Please complete the [Personal Data Correction Form](#) and send to the DPO of FEOR you have been dealing with. Our contact details are set out below. We may require you to verify your identity.

How to exercise your right to access the personal data we hold of you?

To make a request to access the personal data we hold about you, please contact the DPO of FEOR you have been dealing with in writing using the [Request to Access Personal Data Form](#). We will require you to verify your identity and to specify what data you require. Depending on the circumstance, we may charge a reasonable fee to cover the cost of verifying the application and locating, retrieving, reviewing and copying any material requested. If the data sought is extensive, we will advise the likely cost in advance and can help to refine your request if required.

How to exercise your right to withdraw your consent?

The consent that you provide will remain valid until such time it is being withdrawn by you in writing. To make a request to withdraw your consent previously given, please contact the DPO of FEOR in writing.

Upon receipt of your written request to withdraw your consent, we may require reasonable time (depending on the complexity of the request and to be determined on a case by case basis) for your request to be processed and for us to notify you of the consequences of us acceding to the same.

What if you have a complaint?

If you consider that any action of FEOR breaches the PDPA (or where applicable, the GDPR) or this Policy, you can make a complaint to the Coordinating DPO by completing the [Complaint Form](#). FEOR will endeavour to act promptly in response to a complaint.

How to contact us?

You can contact the Data Protection Officer of FEOR at DPO@fareastorchard.com.sg

Updates to this Policy

This Policy will be reviewed from time to time to take account of new laws and technology, changes to our operations and practices and the changing business environment. This Policy was last updated in March 2023. If you are unsure whether you are reading the most current version, please contact us.

[Personal Data Correction Form](#)

[Request to Access Personal Data Form](#)

[Complaint Form](#)

[Personal Data Removal Form](#)

[Personal Data Removal Form \(EU Individuals only\)](#)

Cookie Policy

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our website.

Our cookie policy describes how we use cookies and similar technologies. For more information on how we handle your personal data, please read our privacy policy.

What is a cookie?

A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer. Cookies contain information that is transferred to your computer's hard drive. Cookies transmit information about you and your use of our website, such as your browser type, search preferences, data relating to advertisements that have been displayed to you or that you have clicked on, and the date and time of your use.

What types of cookies do we use?

We use two types of cookies on our website: "session cookies" and "persistent cookies".

Session cookies are temporary cookies that are used to remember you during the course of your visit to the website, and they expire when you close the web browser.

Persistent cookies are used to remember your preferences within the website and remain on your desktop or mobile device even after you close your browser. We use these cookies to analyse user behaviour so that we can improve our website functionality for you. These cookies also allow us to serve you with targeted advertising and measure the effectiveness of our site functionality and advertising.

In addition, please note that we use third-party cookies from third-party service providers to help us analyse, execute and improve our advertising and marketing efforts to you.

What kind of data do our cookies collect?

Data collected by our cookies are pseudonymous, and cannot be attributed to you or any other specific person without the use of additional information.

Data collected by our cookies are kept completely separate – we do not combine the data collected, used and stored by our cookies with any other form of personal and identifiable data.

Purposes of the cookies

- (i) **Strictly necessary cookies.** These are cookies that are required for the operation of our website by enabling basic functions like page navigation and access to secure areas of the website.
- (ii) **Analytical/performance cookies.** They allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily.
- (iii) **Functionality cookies.** These are used to recognise you when you return to our website. This enables us to personalise our content for you and remember your preferences.
- (iv) **Targeting cookies.** These cookies record your visit to our website, the pages you have visited and the links you have followed. We will use this information to make our website and the advertising displayed on it more relevant to your interests. We may also share this information with our third-party service providers for this purpose.

How do I manage cookies?

You can choose to reject or block all or specific types of cookies set by virtue of your visit to our website by adjusting the cookie preferences on your browser.

Please refer to this website: <https://www.aboutcookies.org.uk/managing-cookies> to learn how you can manage cookie preferences on your browser.

However, please note that if all cookies are disabled or removed (including strictly necessary cookies), not all features of our website may operate as intended, for example you may not be able to visit certain areas of our website or you may not receive personalised information when you visit our website.