



**PERSONAL DATA
PROTECTION POLICY
(SINGAPORE)**

Updated 9 April 2018
(Original document 28 February 2014)

1. Introduction

- 1.1 **ComfortDelGro Corporation Limited** (“the Company”), including its subsidiaries, is committed to respecting the privacy of every individual and adhering to the Personal Data Protection Act 2012, Singapore (“PDPA”) when conducting our businesses.
- 1.2 The Company regards the lawful and correct treatment of personal data it holds as essential to its successful operations, and to maintaining confidence between those with whom it deals and itself.
- 1.3 It is also the Company’s policy to ensure that all its employees maintain confidentiality of personal data held by the Company.

2 Definitions

- 2.1 “Individual” is defined as “a natural person whether “living or deceased”.
- 2.2 “Personal data” is defined as data, whether true or not, about an individual who can be identified from
 - (a) that data; or
 - (b) that data and other information to which the Company has or is likely to have access.

3 Data Protection

3.1 Purpose for Collection, Processing and Disclosure

The Company collects personal data about its shareholders, employees, customers, business partners, sub-contractors, vendors and/or suppliers for the following purposes:

- a) commercial reasons of providing our services;
- b) monitoring or tracking our operational, financial or business performance;
- c) marketing and communicating with individuals in relation to our services;
- d) submission of data to governmental authorities and its agencies where it is required by law;
- e) meet safety, security and legal compliance;
- f) establish or preserve a legal claim or defense

Further, to support our business relationships with our customers:

- a) we (or a third party on our behalf) may use personal data to contact our customers about our offer in support of their business needs or to conduct surveys to understand better our customer needs;
- b) we may store and process personal data and share it with our Group's Business Units to better understand our customers' business needs and how we can improve our services.

3.2 Consent

The Company undertakes to ensure that personal data is obtained fairly and lawfully and shall not use or disclose the personal data without the consent of the individual.

To this end, the Company endeavours to seek expressed consent from individuals, whenever practicable, for the main ways in which the Company may collect, process and/or disclose personal data concerning them. This is to allow individuals an opportunity to raise any objections to any intended collection, use, retention, processing or disclosure of personal data. The Company will consider any such objections but reserves the right to collect, use, retain, process and/or disclose personal data in order to carry out its functions as permitted by PDPA and at law.

3.3 Accuracy of Information

The Company will use reasonable endeavours to ensure that the data collected is accurate and up-to-date. However the Company needs the assistance of individuals to update us from time to time to ensure that the data collected is current, complete and accurate.

3.4 Access And Correction Rights

Apart from the mandatory exceptions specified in the PDPA relating to situations where the Company must not provide access, individuals who have given their personal data to the Company have the right to see and correct any inaccurate data at any time. On request of the individual, the Company shall, as soon as reasonably possible, respond to the request.

3.5 Data Security

The Company has put in place adequate and robust IT security systems and operating processes to ensure data security by adopting the CDG IT Risk Management Framework. The framework encompasses ten IT security domains such as access control, network and communication security, Business Continuity Management, data encryption, policies procedures and standards, computer architecture and system security, application program security, cryptography, computer operations security and physical security. Various tools and technologies have been deployed to safeguard the data against unauthorised access, unlawful processing, accidental loss, theft or

destruction. The security measures are constantly updated to meet the ever changing threat levels.

3.6 Retention

The Company will retain personal data collected for as long as it is necessary to fulfil the business purposes for which it is collected, or as required by the relevant law.

3.7 Transfer of Information Overseas

The Company may, from time to time, desire to transfer personal data to countries or territories outside of Singapore in accordance with business purposes made known to individuals. In so doing, the Company shall provide a standard of protection to the personal data so transferred that is comparable to the protection under the PDPA.

The individual's expressed consent would be sought prior to such transfer unless exempted under the law. If an individual wishes to raise an objection to this transfer, then a written notice should be given to the Data Protection Officer.

4. **Data Protection Officer**

4.1 **ComfortDelGro Corporation Limited**, and its subsidiaries, is responsible for its respective data protection policies. All enquiries relating to the collection, use, disclosure or retention of personal data or other matters on the operation of the Personal Data Protection Policy and PDPA should be directed to the Data Protection Officer who can be contacted by email at:

S/n	Company	DPO Contact
1.	ComfortDelGro Corporation Limited	dpo@comfortdelgro.com
2.	SBS Transit	dpo@sbstransit.com.sg
3.	Taxi Business	dpo@cdgtaxi.com.sg
4.	ComfortDelGro Bus	dpo@comfortdelgrobus.com.sg
5.	ComfortDelGro Driving Centre	dpo@cdc.com.sg
6.	ComfortDelGro Engineering	dpo@cdge.com.sg
7.	ComfortDelGro Rent-A-Car	dpo@cdgrentacar.com.sg
8.	Moove Media Pte Ltd / Gobbler	dpo@moovemediacom.sg / dpo_gobbler@moovemediacom.sg
9.	VICOM	dpo@vicom.com.sg
10.	SETSCO	dpo@setsco.com
10.	CDGI	dpo_insurance@comfortdelgro.com.sg

5. Review of the Policy

- 5.1 The Company will review this Policy from time to time and amend it where necessary to ensure continued compliance with the PDPA.