

PERSONAL DATA PROTECTION POLICY

This Data Protection Policy (“**Policy**”) sets out the basis upon which Transmedic Group (which consist of Transmedic Pte Ltd, its subsidiaries and related corporation including but not limited to its Affiliates (“**Affiliates**” are entities that control, are controlled by, or are under common control, in each case either directly or indirectly with either a subsidiary or related corporation of the Group (“**our**”, “**us**” or “**we**”)) (“**the Company**”) may collect, use, disclose or otherwise process personal data of all persons we engage in accordance with respective local Personal Data Protection Act (“**PDPA**”). This Policy applies to personal data in our possession or under our control, including personal data in the possession of organisations which we have engaged to collect, use, disclose or process personal data for our purposes.

APPLICATION ON THIS POLICY

1. This Policy applies to all persons engaged in a contract of service with us (whether on a part-time, temporary, or full-time basis collectively referred to as “**employees**”), or as interns and trainees attached to us; or all persons engaged in contract for service (“**independent consultant / contractor**”), or all persons who have applied for any such position with us (“**job applicant**”), or all persons (“**customers**”) who have contacted us through any means to find out more about any goods or services we provide, or may or has entered into a contract with us for the supply of any goods or services by us; or all persons (“**vendors**”, “**principals**”) that entered into a contract with us for the supply of any goods or services to us. This Policy serves to inform you that your personal data is being processed by us or on our behalf. By providing us with your personal data or continuing to communicate with us, we shall regard that you have consented to the processing of such data pursuant to this Policy.

DESCRIPTION OF PERSONAL DATA

2. As used in this Policy, “personal data” and “processing” shall have the same meaning as prescribed in the PDPA. Personal data means data, whether true or not, about all the persons we engage 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.
3. If you are an **employee**, personal data which we may collect in the context of your employment with us includes, without limitation, your:
 - a. Name or alias, gender, national identification or passport number, date of birth, nationality and country/city of birth, residential status, religion, race, marital status;
 - b. Residential address, mobile & home numbers, email address and other contact details;
 - c. Photos and audio/video footages provided or taken during corporate activities/events (including CCTV recording);
 - d. Employment, national service and training history;
 - e. Salary information and bank account details;
 - f. Details of your next-of-kin, spouse and other family members;
 - g. Work related health issues and disabilities;
 - h. Records on leave of absence from work;
 - i. Finger prints, Photographs and other audio-visual information;
 - j. Performance assessments and disciplinary records;
 - k. Any additional information provided to us by you as a job applicant (i.e. prior to being engaged as an employee); and
 - l. All other information that you may make available to us for any other reason from time to time.
4. If you are a **job applicant**, personal data which we may collect includes, without limitation, your:
 - a. Name or alias, gender, national identification or passport number, date of birth, nationality and country/city of birth, religion, race, marital status;
 - b. Mailing address, telephone numbers, email address and other contact details;
 - c. Resume/cover letter, educational qualifications, professional qualifications and certifications, and employment references;
 - d. Employment (current/past) and training history;
 - e. Work-related health issues and disabilities;
 - f. Photographs; and

- g. All other information that you may make available to us for any other reason from time to time.
5. If you are a **customers/vendors/principals**, personal data which we may collect in the context of your interaction with us includes, without limitation, your:
- a. Name or alias, gender, national identification or passport number, date of birth, nationality and country/city of birth, residential status, religion, race, marital status;
 - b. Residential address, mobile & home numbers, email address and other contact details;
 - c. Employment & education;
 - d. Details of your next-of-kin, spouse and other family members;
 - e. Health conditions;
 - f. Photographs and other audio-visual information;
 - g. Bank account details; and
 - h. Any additional information that you may make available to us for any other reason from time to time.

SOURCE OF PERSONAL DATA

6. Generally, the Company may collect personal data in various ways including:
- a. Direct submission by you or when you provide documents or information such as your resume with your employment and training history, your personal particulars which includes salary information and bank account details, photographs, details of your next-of-kin, spouse and other family members and employment references;
 - b. If you provide us with any personal data relating to a third party. By submitting such personal data to us, you also represent to us and must ensure that you have notified the third party of the terms of this Policy and obtained his consent thereto.
 - c. Register for a specific Product and/or Service (e.g. to create implant card);
 - d. Contact us with a question or request for assistance or submission of complaint form;
 - e. Visit our websites and applications (through the use of cookies / mobile advertising IDs and other technologies);
 - f. Interact with us on the telephone or in person;
 - g. Registration for webinars;
 - h. Attend a conference, exhibition or meeting (e.g. from business cards);
 - i. From public information sources, search services and other third parties;
 - j. When you submit your personal data to us for any other reason;
 - k. Photo and video recordings at corporate activities/events (including CCTV recording); and
 - l. Any other information which we may collect from other sources.
7. Other terms used in this Policy shall have the same meanings given to them in the PDPA (where the context so permits).

COLLECTION, USE AND DISCLOSURE OF PERSONAL DATA

8. We generally do not collect your personal data unless it is provided to us voluntarily by you directly or via a third party who has been duly authorised by you to disclose your personal data to us (your "**authorised representative**"), which may include your job placement agent after
- a. you (or your authorised representative) have been notified of the purposes for which the data is collected, and
 - b. you (or your authorised representative) have provided written consent to the collection and usage of your personal data for those purposes, or
 - c. collection and use of personal data without consent is permitted or required by the PDPA or other laws.

We shall seek your consent before collecting any additional personal data and before using or sharing your personal data from time to time with our employees, representatives and/or Affiliates for a purpose which has not been notified to you (except where permitted or authorised by law).

9. If you are an **employee**, your personal data will be collected and used by us for the following purposes and we may disclose your personal data to third parties when necessary for the following purposes:
- a. Performing obligations under or in connection with your contract of employment with us, including payment of remuneration and processing of income tax;
 - b. All Administrative and Human Resources related matters within our Company, including administering payroll, granting access to our premises and computer systems, processing leave applications, administering your

- medical insurance and other benefits, processing your claims and expenses, anything related to travel arrangements, investigating any acts or defaults (or suspected acts or defaults) and developing human resource policies;
- c. Managing and terminating our employment relationship with you, including the monitoring of Grab and/or taxi service usage and emails to investigate potential contraventions of our internal or external compliance regulations, and resolving any employment related grievances;
 - d. Assessing and evaluating your suitability for employment/appointment or continued employment/appointment in any position within our Company;
 - e. Ensuring business continuity for our Company in the event that your employment with us is or will be terminated;
 - f. Performing obligations under or in connection with the provision of our services to our clients;
 - g. Facilitating any proposed or confirmed merger, acquisition or business asset transaction involving any part of our Company, or corporate restructuring process;
 - h. Facilitating our compliance with any laws, customs and regulations which may be applicable to us; and
 - i. Use of photos or video taken at corporate activities / events for publicity in public media platform.
10. If you are a **job applicant**, your personal data will be collected and used by us for the following purposes and we may disclose your personal data to third parties where necessary for the following purposes:
- a. Assessing and evaluating your suitability for employment in any current or prospective position within the organisation; and
 - b. Verifying your identity and the accuracy of your personal details or other information provided.
11. If you are a **customers/vendors/principals**, your personal data will be collected and used by us for the following purposes and we may disclose your personal data to third parties where necessary for the following purposes:
- a. performing obligations in the course of or in connection with our provision of the goods and/or services requested/or provided by you;
 - b. verifying your identity;
 - c. responding to, handling, and processing queries, requests, applications, complaints, and feedback from you;
 - d. managing your relationship with us;
 - e. processing payment or credit transactions (if applicable);
 - f. complying with any applicable laws, regulations, codes of practice, guidelines, or rules, or to assist in law enforcement and investigations conducted by any governmental and/or regulatory authority;
 - g. any other purposes for which you have provided the information;
 - h. transmitting to any unaffiliated third parties including our third-party service providers and agents, and relevant governmental and/or regulatory authorities, whether in Singapore or abroad, for the aforementioned purposes; and
 - i. any other incidental business purposes related to or in connection with the above.
12. The purposes listed in the above clauses may continue to apply even in situations where your relationship with us (for example, pursuant to a contract) has been terminated or altered in any way, for a reasonable period thereafter (including, where applicable, a period to enable us to enforce our rights under any contract with you).

WITHDRAWING CONSENT

13. Subject to applicable legal restriction and contractual conditions, the consent given previously for the use of your personal data remains valid until such time it is being withdrawn, in full or in part, by you in writing by submitting your request in writing or via email to our Data Protection Officer: pdpaenquiry@transmedicgroup.com.
14. Upon receipt of your written request to withdraw your consent, we may require reasonable time (depending on the complexity of the request and its impact on our relationship with you) for your request to be processed and for us to notify you of the consequences of us acceding to the same, including any legal consequences which may affect your rights and liabilities to us. In general, we shall seek to process and effect your request within thirty (30) days from your date of notification.
15. Whilst we respect your decision to withdraw your consent, please note that depending on the nature and extent of your request, we may not be in a position to process your job application (as the case may be), to continue providing our goods or services to you and we shall, in such circumstances, notify you before completing the processing of your request (as

outlined above). Should you decide to cancel your withdrawal of consent, please inform us in writing in the manner described in clause 13 above.

16. Please note that withdrawing consent does not affect our right to continue to collect, use and disclose personal data where such collection, use and disclose without consent is permitted or required under applicable laws.

ACCESS TO AND CORRECTION OF PERSONAL DATA

17. If you wish to make: (a) an access request for access to a copy of the personal data which we hold about you or information about the ways in which we use or disclose your personal data, or (b) a correction request to correct or update any of the personal data which we hold, you may submit your request in writing or via email to our DPO: pdpaenquiry@transmedicgroup.com.
18. We will respond to your request as soon as reasonably possible. Should we not be able to respond to your request within thirty (30) days after receiving your request, we will inform you in writing within thirty (30) days of the time by which we will be able to respond to your request. If we are unable to provide you with any personal data or to make a correction requested by you, we may generally inform you of the reasons why we are unable to do so (except where we are not required to do so under the PDPA).

PROTECTION OF PERSONAL DATA

19. To safeguard your personal data from unauthorised access, collection, use, disclosure, copying, modification, disposal or similar risks, we have introduced appropriate administrative, physical and technical measures such as up-to-date antivirus protection and access rights to digital storage to secure all storage and transmission of personal data by us, and disclosing personal data both internally and to our authorised third party service providers and agents only on a need-to-know basis.
20. You should be aware, however, that no method of transmission over the internet or method of electronic storage is completely secured. While security cannot be guaranteed, we strive to protect the security of your information and are constantly reviewing and enhancing our information security measures.

ACCURACY OF PERSONAL DATA

21. We generally rely on personal data provided by you (or your authorised representative). In order to ensure that your personal data is current, complete and accurate, please update us if there are changes to your personal data by informing the HR Department in writing or via email.

RETENTION OF PERSONAL DATA

22. We may retain your personal data for as long as it is necessary to fulfil the purposes for which they were collected, or as required or permitted by applicable laws.
23. We will cease to retain your personal data, or remove the means by which the data can be associated with you, as soon as it is reasonable to assume that such retention no longer serves the purposes for which the personal data were collected, and are no longer necessary for legal or business purposes.

TRANSFER OF PERSONAL DATA OUTSIDE OF COUNTRY

24. Due to international presence, your personal data may be accessed by or transferred to our subsidiaries and related corporation including but not limited to our Affiliates from various countries around the world in order for us to fulfil the purpose prescribed above. As a result, we may transfer your personal data to countries located outside of the respective country you are in and you hereby consent to the transfer, which may have data protection related laws and rules that are different from the standards provided under PDPA.
25. Personal data may be transferred to an authorised external party, if we believe it is necessary or appropriate to:
 - a. ensure compliance with applicable data protection related laws which may include responding to request from public and government authorities, cooperation with law enforcement agencies or other legal reasons; and/or
 - b. satisfy purposes for which personal data has been collected by us or to enforce our terms and conditions.

DATA PROTECTION OFFICER

26. You may contact our **Data Protection Officer** if you have any enquiries or feedback on our personal data protection policies and procedures, or if you wish to make any request, in the following manner:

Email : pdpaenquiry@transmedicgroup.com

EFFECT OF POLICY AND CHANGES TO POLICY

27. This Policy applies in conjunction with any other policies, notices, contractual clauses and consent clauses that apply in relation to the collection, use and disclosure of your personal data to us.
28. We may revise this Policy from time to time without any prior notice. Your continued employment and participation in our recruitment process constitute your acknowledgement and acceptance of such changes.

ACKNOWLEDGEMENT AND CONSENT

I acknowledge that I have read and understood the above and consent to the collection, use and disclosure of my personal data by Transmedic Group for the purposes set out in the Policy.

I may withdraw consent for such collection, use and disclosure, and make an access or correction request in respect of my personal data, in accordance with the Policy.

Name & Signature

Date