

GIC EXTERNAL PERSONAL DATA PROTECTION POLICY

Date updated: 22 January 2024



GIC External Personal Data Protection Policy

This Personal Data Protection Policy informs you of how GIC Private Limited and its subsidiaries, all overseas offices and relevant investment holding/management services companies (collectively, "GIC Group"), as well as its representatives and/or agents (collectively referred to herein as "GIC", "the Group", "us", "we" or "our") manage your Personal Data (defined below).

Please take a moment to read this Personal Data Protection Policy so that you know and understand the purposes for which we collect, use and disclose your Personal Data.

Depending on the country in which your Personal Data is being collected, used, disclosed or processed by us, different country-specific addendum¹ may apply. If your Personal Data has been collected, used or disclosed by us in a particular country, you should check if there is a country-specific addendum applicable to you and the terms of the collection, use, disclosure and processing of your Personal Data. The terms set out in such addendums are in addition to the terms set out in this Personal Data Protection Policy and form an integral part of this Personal Data Protection Policy.

The security of your Personal Data is important to us. We have taken reasonable steps to safeguard the Personal Data under our control against unauthorised access, disclosures and other similar risks. Access to your Personal Data is restricted to those parties who need to know such Personal Data in relation to the purposes specified in this Personal Data Protection Policy. By interacting with us including through electronic mail message or phone conversations, accessing and using GIC websites, intranet or portal or submitting information to us, you agree and consent to us collecting, using, disclosing and sharing amongst ourselves your Personal Data, and disclosing such Personal Data to GIC's authorised service providers and relevant third parties in the manner set forth in this Personal Data Protection Policy.

If you do not agree to this Personal Data Protection Policy, please do not access or use GIC websites, intranet or portal.

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

GIC may update or change this Personal Data Protection Policy from time to time to ensure that it is consistent with our future developments, industry trends and/or any changes in legal or regulatory requirements. All changes will be posted on this page.

Subject to your rights at law, you agree to be bound by the prevailing terms of this Personal Data Protection Policy as updated from time to time on this website. Please check back regularly for updated information on the handling of your Personal Data.

This Personal Data Protection Policy was last updated on **22 January 2024**.

¹ There is no country-specific addendum for Singapore.

QUICK LINKS TO ADDENDUMS

1. [Australia Addendum](#)
2. [Brazil Addendum](#)
3. [China Addendum](#)
4. [India Addendum](#)
5. [Japan Addendum](#)
6. [Korea Addendum](#)
7. [UK Addendum](#)
8. [U.S. Addendum](#)

1. Personal Data

1.1 In this Personal Data Protection Policy, "Personal Data" shall mean the following (unless otherwise defined in the country-specific addendums):

- a. Personal Information, being any data, whether true or not, about an individual who can be identified (i) from such data; or (ii) from such 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;

Examples of such Personal Information 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, facial biometric information and any other information relating to either yourself or any other individuals which you have provided us in any forms you may have submitted to us, or via other forms of interaction with you;

- b. Information other than Personal Information submitted by you to us via GIC websites, intranet or infrastructure as indicated in the respective country addendum.

2. Collection of Personal Data

2.1 Generally, we collect Personal Data in the following ways:

- a. when you register and login to our career website;
- b. when you submit forms or applications to us;
- c. when you submit your resumes and/or CVs to us;
- d. when you submit queries, requests, complaints or feedback to us;
- e. when you respond to our request for additional Personal Data;
- f. when you ask to be included in an email or other mailing list;
- g. when a recruitment agency refers your resume to us;
- h. when you respond to our initiatives or contact us;
- i. when you browse our intranet or other websites;
- j. when you take part in events organised solely or jointly by GIC and/or any third parties;
- k. when you are employed or engaged by GIC;
- l. when you provide information (including biometric information) to GIC for access control or security purposes;
- m. when you register to be a part of our alumni network; and/or

- n. when you submit your Personal Data to us for any other reasons.
- 2.2 If you provide us with any Personal Data relating to a third party (e.g. information of your dependents, spouse, children and/or parents), by submitting such information to us, you represent and warrant to us that they have read and understood this Personal Data Protection Policy and that you have obtained the requisite consent of such third party and/or are authorized to provide us with such Personal Data for the relevant purposes contained in this Personal Data Protection Policy.
- 2.3 You are to 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 fulfil your requests and/or applications or delays in processing your applications.
- 2.4 When you browse GIC websites, intranet or portal, you generally do so anonymously but please see paragraph 5 below for information on cookies and other technologies which we have implemented on GIC websites, intranet or portal.

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

- 3.1 GIC generally collects, uses, discloses and processes your Personal Data for the following purposes:
 - a. responding to your queries and requests and complaints;
 - b. managing the infrastructure and business operations of GIC and complying with internal policies and procedures, including providing you with access and/or use of websites, systems and infrastructure (including but not limited to processing CCTV records, office access logs and enabling biometric identifiers);
 - c. managing our alumni programme and/or corporate social responsibility projects;
 - d. facilitating investments, business asset transactions (which may include but is not limited to any merger, acquisition or asset sale) and business agreements with counterparties;
 - e. matching any Personal Data we hold which relates to you for any of the purposes listed herein;
 - f. verifying your identity and conducting background checks, to the extent permissible by law, and due diligence;
 - g. conducting data analytics for the purpose of (i) system and process improvements, (ii) risk/fraud management, (iii) regulatory and compliance risk management, (iv) investment insights and (v) enhancements to human resources processes;
 - h. dispute resolution, preventing, detecting and investigating non-compliance with laws, regulations, and internal corporate policies, including fraud and financial crimes, analysing and managing other commercial risks and risks arising from GIC's operations and investment activities;

- i. protecting and enforcing our contractual and legal rights and obligations;
- j. conducting audits, reviews and analysis of our internal processes;
- k. fulfilling GIC's legal, contractual or regulatory obligations, including complying with any applicable laws, regulations, rules, codes of practice or guidelines or to assist in law enforcement and investigations by relevant authorities; and/or
- l. purposes reasonably related to any of the above.

3.2 In addition, GIC may collect, use and / or disclose your Personal Data for the following purposes, depending on the nature of our relationship with you:

- a. if you are a job applicant:
 - i. verifying and processing your personal particulars, processing your application, evaluating your suitability, eligibility or qualification for employment with GIC as well as assessing your financial status;
 - ii. communicating with you to inform you of changes and developments to GIC's policies, terms and conditions and other administrative information;
 - iii. sending you updates and alerts related to job applications which you may have requested for;
 - iv. conducting market research for statistical, profiling and statistical analysis for the improvement of services provided to you; and/or
 - v. purposes reasonably related to any of the above.
- b. if you are an employee, officer or owner of an external service provider or vendor:
 - i. verifying and processing your personal particulars and assessing your organisation's and/or your suitability, eligibility or qualification as an external service provider or vendor for GIC as well as your organisation's and your financial status;
 - ii. communicating with you to inform you of changes and developments to GIC's policies, terms and conditions and other administrative information;
 - iii. managing project tenders and quotations, processing orders or managing the supply of goods and services;
 - iv. creating and maintaining profiles of our service providers and vendors in our system database;
 - v. processing and payment of vendor invoices and bills; and/or
 - vi. purposes reasonably related to any of the above.

- c. if you are an employee, officer or owner of our investment counterparties, including our joint venture partners, brokers, investee companies etc.:
 - i. verifying and processing your personal particulars to maintain accurate records;
 - ii. communicating with you to inform you of changes and developments to GIC's policies, terms and conditions and other administrative information;
 - iii. creating and maintaining profiles of our investment counterparties in our system database; and/or
 - iv. purposes reasonably related to any of the above.

3.3 Furthermore, where permitted under applicable law, if you attend events organised by GIC or jointly by GIC and third parties, photographs and/or video recordings may be taken at events which you have attended, and used and disclosed for our marketing and/or promotional purposes. Such photographs and videos may be published on our website, social media channels or made publicly available to recipients overseas for our marketing and/or promotional purposes.

4. Disclosure and/or Transfer of Personal Data

4.1 GIC 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 to the parties listed below (whether located in your local jurisdiction or overseas), for the purposes listed above (where applicable) to:

- a. other entities within GIC;
- b. insurance companies and brokers in connection with staff insurance;
- c. recruitment agencies;
- d. agents, contractors or third party service providers who provide operational services to GIC, such as courier services, telecommunications, information technology, advertising, payment, payroll, processing, training, market research, storage, archival, customer support, marketing and social media partners in relation to marketing and/or promotional photographs and videos published on our website, social media channels or otherwise made publicly available to recipients overseas, investigation services or other services to GIC;
- e. any business partner, investor, assignee or transferee (actual or prospective) to facilitate business asset transactions (which may extend to any mergers, acquisitions and debt or asset sale);
- f. local and overseas financial institutions and their respective service providers;
- g. our professional advisers such as our consultants, auditors and lawyers;

- h. trade unions²;
- i. business and charity partners in relation to events planning;
- j. relevant government regulators, government ministries, statutory boards, embassies, or authorities and/or law enforcement agencies, whether local or overseas, to comply with any directions, laws, regulations, rules, codes of practice or guidelines, or schemes issued or administered by any of them;
- k. other organisations which may request that we provide them with your Personal Data for evaluative purposes; and/or
- l. any other party to whom you authorise us to disclose your Personal Data.

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

- 5.1 When you visit, access or interact with GIC websites, intranet or portal and use our 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.
- 5.2 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 websites, 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).
- 5.3 The use of cookies, web beacons and similar technologies by us on our website perform 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.

Cookies – Small text files (typically made up of letters and numbers) placed in the memory of your browser or device when you visit a website or view a message. Cookies allow a website to recognize a particular device or browser. There are several types of cookies:

- a. Session cookies expire at the end of your browser session and allow us to link your actions during that particular browser session.
- b. Persistent cookies are stored on your device in between browser sessions, allowing us to remember your preferences or actions across multiple sites.
- c. First-party cookies are set by the site you are visiting.
- d. Third-party cookies are set by a third-party site separate from 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 selected separately and different browsers offer different functionalities and options.

² This is not applicable to the India and UK Addendum.

Web beacons - Small graphic images (also known as “pixel tags” or “clear GIFs”) may be included on our websites and services. Web beacons typically work in conjunction with cookies to profile each unique user and user behaviour.

Similar technologies – Technologies that store information in your browser or device utilizing local shared objects or local storage, such as flash cookies, HTML 5 cookies, and other web application software methods. These technologies can operate across all of your browsers.

5.4 We offer certain website features and services that are available only through the use of these technologies. You are always free to block, delete, or disable these technologies if your browser so permits.

5.5 However, if you decline cookies or other similar technologies, you may not be able to take advantage of certain website features or services tools. For more information on how you can block, delete, or disable these technologies, please review your browser settings. You may refer to the Cookie Policy on our website for detailed information on the cookies we use, as well as the purposes for which we use such cookies.

6. Use of Anonymised Information

6.1 From time to time, we may aggregate and anonymise Personal Data and send this aggregated, anonymised data to our authorised service providers for the purposes of statistical studies and service improvement relating to GIC websites, intranet or portal, and for purposes reasonably related thereto.

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

7.1 If you:

- a. have any questions or feedback relating to your Personal Data or our Personal Data Protection Policy;
- b. would like to withdraw your consent to any use of your Personal Data as set out in this Personal Data Protection Policy; or
- c. would like to obtain access or make corrections to your Personal Data, please contact any of the following:

Name: Lynn Hew Ooi Lyn

Email: lynnhew@gic.com.sg

Contact number: +65-68898377

Department: Legal and Compliance Department

Group Email: GrpLCD_PersonalData@gic.com.sg

7.2 If you withdraw your consent to any or all use of your Personal Data, depending on the nature of your request, GIC may not be in a position to administer or comply with the relevant contractual agreement or arrangement in place. This may also adversely impact and affect

your employment relationship or other agreements or arrangements with GIC. GIC's legal rights and remedies in such event are expressly reserved.

8. Governing Law

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