



Personal Data Protection Policy

This document, Personal Data Protection Policy, in short (“PDPP”) specified how The Management Corporation Strata Title Plan 1073, in short (“MCST”) manages Personal Data in accordance with the Personal Data Protection Act.

By submitting information and interacting with the management office personnel, you agree and give consent to the MCST and our authorized managing agent, for collecting, using, disclosing your Personal Data, and disclosing such Personal Data to the relevant authorised service providers and relevant third parties in the manner set forth in this PDPP.

Personal Data

In this PDPP, “Personal Data” refers to your data and include depending on the nature of your interaction with us your Name, NRIC (for those permitted under the applicable laws), passport or other identification number, telephone number(s), mailing address, email address and any other information relating to any individual which you have provided us via various forms and platforms submitted to us.

If you submit to us any Personal Data of a third party (e.g. data and/or information of your spouse, children, parents, and/or employees), it is assumed that you have already obtained the consent of the third party to provide us with his Personal Data for the respective purpose.

Authorised Managing Agent

The authorised Managing Agent (“MA”) of the MCST refers to Wisely 98 Pte Ltd and its personnel.

Collection of Personal Data

Your Personal Data are generally collected in the following ways:

- a. when you submit an application form or other forms relating to tenancy or any estate management services.
- b. when you interact with our staff or employees of our authorised managing agent, for example, via telephone calls, letters, face-to-face meetings and correspondence/emails.
- c. when you use some of our services, for example, our estate’s web Portal.
- d. when you request that we contact you, be included in an email or other mailing list.
- e. when you are contacted by, and respond to, our person-in-charge officers.
- f. when you submit your Personal Data to us for any other reasons.
- g. when you are at the estate/premises where closed-circuit television cameras (CCTV) are in operations.
- h. when you enter the estate/complex via security Guardhouse.
- i. when you attend any general meeting, council meeting and/or social event of the MCST or any event held at the premises, such personal data shall include your audio data, photo and/or video images
- j. when you write officially to the MCST and/or to our authorised managing agent.



Purposes for the Collection, Use and Disclosure of Personal Data

Generally, the MCST collects, uses and discloses your Personal Data for the following purposes:

- a. managing the administrative and business operations of the MCST, including the site's Management Offices and Headquarter of authorised managing agent and complying with internal policies and procedures.
- b. responding to your queries and requests.
- c. matching any Personal Data held which relates to you for any of the purposes in relation to estate management.
- d. resolving complaints and handling requests and enquiries.
- e. preventing, detecting and assisting the authority for investigation and for analysing and managing commercial risks.
- f. employee training and performance evaluation and identity verification purposes.
- g. for any legal purposes (including but not limited to obtaining legal advice and dispute resolution).
- h. conducting investigations relating to disputes, billing or fraud.
- i. 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 the MCST (including but not limited to responding to regulatory complaints, disclosing to regulatory bodies and conducting audit checks, due diligence and investigations).
- j. purposes which are reasonably related to the management of estate.
- k. when you attend a council meeting and / or a general meeting of the MCST, your attendance shall be explicitly be recorded in the minutes of that meeting and subsequent meetings.
- l. when you write officially to the MCST and/or to our authorised managing agent, your personal data will be tabled at a council meeting of that management corporation and be recorded in the minutes of that and/or subsequent council meetings.
- m. facilities management, including safety and security of our premises (including but not limited to carrying out CCTV surveillance and conducting security clearances).

Disclosure of Personal Data

The MCST shall 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) and to the following parties:

- a. Employees of the MCST or its authorised managing agent and their authorised employees, to provide services to you, address your feedback and requests in relation to your accounts and billing arrangements with the MCST and/or the authorised managing agent.
- b. Agents, contractors and/or third-party service providers who provide operational services to of the MCST, such as courier services, telecommunications, information technology, payment, printing, billing, payroll, human resource related services, processing, technical services, training, security or other services to of the MCST.



- c. Professional advisers such as auditors and lawyers serving of the MCST and/or its authorised managing agent.
- d. Relevant government 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.
- e. Complying with the Building Maintenance & Strata Management Act for matters with respect to voting lists, minutes of general meetings and council meetings and other provisions of the same Act.
- f. Any other party to whom you authorised of the MCST to disclose your Personal Data to.

Data Retention and Disposal of Personal Data

The MCST will review the personal data it holds annually to determine if that personal data is still required for reasonable business or legal purposes. Where necessary, MCST will destroy, dispose of or delete physical and electronic copies of personal data in a permanent and complete manner.

- a. All Accounts, correspondence or any document that contained Personal Data will be securely kept and to be disposed of after five (5) years.
- b. All visitors slips that contained Personal Data of visitors that are collected at the security post of any estate will be disposed of after one (1) year.
- c. Images collected via any closed-circuit television camera (CCTV) are generally available for up to 30 days. The video recorders are programmed to overwrite older images automatically.
- d. In the event of a change in Managing Agent, steps will be undertaken to ensure and certify personal data collected and used will no longer be retained by the exiting Managing Agent as part of the handover process as provided for in the MA contract.

Correction and Withdrawal of Consent

Subject to laws and statutory requirements, any individual whose Personal Data has been provided to of the MCST may the right to request for access to his Personal Data and to make correction and/or to withdraw his consent. Such request must be made in writing by that individual. Depending on the nature of the request and complexity of the data concerned, a fee may be charged for any such request received.

Use of Cookies

Our website may use cookies to monitor browsing preferences and help us analyse data on webpage traffic in order to make website improvements and for statistical analysis purposes. Should you wish to disable the use of cookies, you may do so by changing the settings on your browser. By blocking cookies, you may not be able to experience all of the features of the MCST's website.



Third-Party Sites

Our website may contain links to third party sites. MCST is not responsible for the privacy practices of these other websites. We encourage you to read the privacy policies of such third-party websites carefully.

How to Contact Us

If you have any clarification, correction or requests about your Personal Data of the MCST held, you write officially to:

Managing Agent

Email: wisely@wisely98.com

Wisely 98 Pte Ltd
2 Kallang Avenue
#07-32 CT Hub
Singapore 339407

If you wish to contact us about the protection of your Personal Data, please write to The Data Protection Officer of our authorised managing agent, Wisely 98 Pte Ltd - at the address shown above or email to dataprivacy@wisely98.com.

If your Personal Data is provided to the MCST by a third party (e.g. a referrer), you should contact that individual or organisation that furnished your Personal Data to submit a request to the MCST on your behalf for correction or withdrawal of consent.