

# AX COLEMAN - Information Security and Data Protection Notice

## Information Security

As part of our activities we manage sensitive information. In line with industry best practices, and our organization requirements, we need to fulfil the risk management and ethical responsibilities we face.

A comprehensive coverage of areas including asset management and system access allows us to effectively address these security issues.

## Data Protection Notice

Protecting the security and privacy of your personal data is very important to AX Coleman Pte Ltd, Singapore. We observe the applicable legal regulations for the protection, proper handling, and confidentiality of personal data.

## Personal data

Personal data is any information relating to the data subject (natural person), who can be identified, directly or indirectly (e.g. name, e-mail address, or IP address).

## Contact

When you contact us by e-mail, phone, or fax, we will process the personal data you submit (e-mail, name, phone number, fax number, your inquiry, associated documents) for the purpose of handling your inquiry.

## Transfer and disclosure of personal data

Without your consent, we will not transfer your personal data collected based on your website use to third parties unless it is required to perform our duties or required by law/authorities.

## General Data Protection Notice for Business Partners

In the course of our business relationship with you, it is necessary for us to process your personal data. "Personal data" is any information that relates to an identified or identifiable natural person (e.g. names and addresses).

Protecting the security and privacy of personal data of our business partners including customers and suppliers AX Coleman Pte Ltd, Singapore.

We are obligated to protect your data and take this duty very seriously. We expect the same from our business partners.

## Summary of the processing of personal data of business partners:

1. Categories of personal data processed, purpose of the processing and legal basis

In the context of the business relationship with business partners, AX Coleman may process personal data for the following purposes:

- Communicating with business partners about products, services and projects, e.g. to process inquiries from business partners
- Initiate, process and manage (contractual) relationships and maintain business relationships between AX Coleman and the business partner, e.g. to process orders for products or services, to process payments, for accounting, billing and collection purposes, to make deliveries, to carry out maintenance activities and repairs
- Conducting customer surveys, marketing campaigns, market analysis, and other promotional activities or events
- Maintaining and protecting the security of our products, services and websites, preventing and detecting security threats, fraud and other criminal or malicious activities
- Ensuring compliance with (i) legal obligations (such as record keeping obligations in accordance with tax and commercial law), and (ii) AX Coleman policies
- Settling disputes, enforcing our contractual agreements and establishing, exercising or defending legal claims

For the aforementioned purposes, AX Coleman may process the following categories of personal data:

- Business contact information, such as name, work address, work telephone number and email address;
- Payment data, such as data necessary for processing payments and fraud prevention, including credit card numbers and card security codes;
- Information collected from publicly available sources, information databases and credit agencies;
- Other information that has to be processed to initiate, process and manage (contractual) relationships and maintain business relationships or that you voluntarily provide, such as orders placed, order details, inquiries or project details, correspondence, other data pertaining to the business relationship

The information contained in this document is intended only for the use of the individual or entity named above and may contain information that is legally privileged, confidential and exempt from disclosure under applicable law.

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The processing of personal data is necessary to meet the aforementioned purposes including the performance of a contractual relationship or a pre-contractual activity with the business partner.

If aforementioned personal data is not provided or is insufficient or if AX Coleman cannot collect the respective personal data the purposes described may not be met or the received inquiry/inquiries could not be processed. Note that this would not be considered failure to fulfill our obligations under a contract.

### 2. Transfer and disclosure of personal data

If legally permitted to do so, AX Coleman may transfer personal data to its appointed (for example shipping and logistics partners for executing and processing orders) and related business partners, or courts, authorities, or legal representations. AX Coleman engages processors (service providers) to process personal data (within the scope of an IT support contract, for example). These processors are contractually bound to act in compliance with applicable data protection regulations.

### 3. Retention periods

Unless explicitly indicated otherwise at the time of the collection of your personal data (e.g. in a declaration of consent), your personal data will be erased if the retention of the personal data is no longer necessary to fulfill the purposes for which they were collected and if no statutory retention obligations (such as tax or commercial law) or establishment, exercise or defense of legal claims require us to further retain the data.

### 4. Right of access

You have the right to obtain from the controller confirmation the aforementioned information, subjected to AX Coleman management's approval.

### 5. Protection of your personal data

The security of your personal data is extremely important to us. We take specific measures to protect your personal data against loss, misuse, unauthorized access, manipulation or disclosure.

### 6. Contact

For any questions related to data protection, please contact the below mentioned:

AX COLEMAN PTE LTD  
CRF BUILDING 3 LITTLE ROAD  
#04-01/02 SINGAPORE 536982  
Telephone: + 65 6955 1997

This Information Security and Date Protection Notice for business partners will be revised from time to time.