
LOGOS

Group Privacy Policy

1 INTRODUCTION

1.1 Purpose

This Policy describes the procedures adopted by the LOGOS Property Group Limited and its subsidiaries (**LOGOS Group** or **LOGOS**) to manage the collection, use, storage and disclosure of Personal Information (defined below) that it may hold as required for the conduct of its business, including for example those of its employees, clients (such as investors), customers (such as tenants), and the employees, directors, officers or other representatives of organisations with which it does business.

For the purposes of this Policy, **Personal Information** means any information or an opinion about an individual, or an individual who is reasonably identifiable, regardless of whether that information or opinion is true or recorded in a material form. Where the concept of “personal information” or “personal data” has a specific definition under applicable local law, references in this Policy to Personal Information are taken to include that definition.

This Policy may be modified by LOGOS at any time without notice.

1.2 Principles

The LOGOS Group takes privacy seriously and is committed to ensuring the protection of personal information, no matter where the individual is located.

This policy contains procedures to ensure that:

- LOGOS Group collects Personal Information for legitimate and reasonable purposes, and uses or discloses it in connection with the purpose for which it was collected;
- LOGOS Group stores Personal Information appropriately and consistently with the purpose for which it will be used or disclosed; and
- LOGOS otherwise complies with the requirements of applicable law relating to Personal Information.

This Policy covers data stored in both electronic and non-electronic formats.

Additional legal requirements

Where the laws of a particular jurisdiction contain requirements relating to Personal Information that are additional to those set out in this Policy, LOGOS Group must comply with those requirements where they apply. Examples of applicable privacy laws will include the Australian Privacy Act, the European Union General Data Protection Regulation and the Singapore Personal Data Protection Act.

1.3 Scope

This Policy applies to all employees, independent contractors, secondees and interns of the LOGOS Group (“Employees” for the purposes of this Policy).

1.4 Related Policies

The policies listed below support this policy:

- Compliance Manual and Code of Business Conduct
- Speak-up Policy
- Information and Communication Technology Security Policy
- Group Record Retention Policy

1.5 Consequences of non-compliance

LOGOS considers the lawful and correct treatment of Personal Information as critical. Non-compliance with this Policy by an Employee may result in disciplinary action up to and termination of their employment or contractual arrangements with LOGOS.

2 COLLECTION, USE, STORAGE AND DISCLOSURE OF PERSONAL INFORMATION

2.1 Collection of Personal Information

Why LOGOS collects Personal Information

LOGOS may collect Personal Information about individuals for a variety of legitimate business purposes, including for example information about:

- directors of entities with which LOGOS contract (for example, as part of the KYC process on investors, partners, vendors);
- individuals as tenants (for example, when entering into or applying to enter into a lease with LOGOS);
- suppliers (for example, when establishing records and systems to enable payment for goods);
- job applicants (for the purposes of employment);
- individuals as contractors (for example, when establishing records and systems to enable payment for services); and
- other individuals who may come into contact with LOGOS (for example, through our website, or through business dealings between LOGOS and their employer).

What kinds of Personal Information does LOGOS collect

The types of Personal Information LOGOS may collect may include, but is not limited to:

- information about the individual (for example, name, gender, nationality, address, contact details, date of birth and photograph), including copies of passport and other ID documents;
- information about the individual's financial circumstances (for example, bank records, accounts and billing information);
- records of the individual's interactions with LOGOS and its Employees (for example, recorded phone and video conversations, social media posts, details of visits to our websites, emails and other written correspondence)
- information about the individual's professional qualifications (for example, employment history, education, directorships and other existing positions); and
- the individual's tax file number and/or passport number (or individual identification number in the relevant jurisdiction).

How does LOGOS collect Personal Information

LOGOS will primarily collect Personal Information directly from the relevant individual or their employer, for example through direct communication with the individual (either verbally or in writing) or receiving written forms or other records submitted to LOGOS by the individual.

LOGOS may collect Personal Information from third parties where permitted by law, including for example through credit reporting agencies, law enforcement agencies and other government authorities. LOGOS may also collect personal information through third parties where individuals have consented to providing and disclosing personal information - examples include recruitment agencies, consultants.

Where it is reasonable and practical to do so (for example, if it would be reasonable to assume that the individual is not aware of their Personal Information being made available to LOGOS), LOGOS will take reasonable steps to inform the individual that it has the individual's Personal Information.

2.2 Use of Personal Information

LOGOS will use Personal Information only for the purpose for which it was collected (or for any other purposes consented to by the individual, or related purposes for which the individual would reasonably expect it to be used).

Examples of how LOGOS may use Personal Information include:

to allow it to provide products or services that have been requested by the individual or their employer;

- to provide customer support such as responding to enquiries or requests for assistance;
- for marketing purposes, including to provide updates about LOGOS Group and the products and services that it offers (where it does this, it will provide an option to unsubscribe or opt out of further direct marketing communications);
- to improve its products and services;
- to assist in the management and administration of its business;
- to communicate generally with the individual or their employer;
- to assess the suitability of prospective tenants, investors, suppliers or other counterparties;
- to comply with regulatory and legal obligations; and
- to recruit and onboard new Employees.

2.3 Storage of Personal Information

LOGOS will take reasonable steps to protect Personal Information that it holds from unauthorised access, modification, misuse, interference and loss. Personal Information is held on secure servers or in storage located in controlled environments. LOGOS is required to maintain the confidentiality of any Personal Information held. LOGOS employees and contractors are trained in how to keep Personal Information safe and secure.

The length of time for which LOGOS holds Personal Information will vary depending on:

- the purpose for which it was collected and used – LOGOS will need to keep the data for as long as is necessary for that purpose; and
- legal obligations – laws or regulations may set a minimum period for which LOGOS is required to keep Personal Information.

2.4 Disclosure of Personal Information

LOGOS may disclose Personal Information to other entities within the LOGOS Group for the purposes described above.

LOGOS may disclose Personal Information to third parties for a variety of purposes including as described below:

- LOGOS's business partners, contractors and service providers who assist LOGOS in the operation of its business or to provide a customer service (for example, a company which helps maintain LOGOS computer systems or sends out LOGOS mail);
- LOGOS's financiers and insurers where required by those parties;
- third party agencies for the purposes of those parties carrying out screening, due diligence and/or background checks;
- regulators, governments, law prevention, detection, investigation or enforcement authorities, tax, social or labour authorities and any other authorities, official bodies or other government agencies required by law (or to third parties as directed by them or where required by law); and
- anyone authorised by the individual to whom the Personal Information relates.

LOGOS will limit the Personal Information disclosed to third parties to the minimum required for them to perform their services for LOGOS, or what is required by law.

LOGOS may sometimes disclose Personal Information overseas (where permitted by that jurisdiction's laws) to allow external parties to perform their services for LOGOS.

LOGOS is not a data broker and does not sell any of the Personal Information it holds.

3 ACCESS TO PERSONAL INFORMATION

Where LOGOS holds an individual's Personal Information, the individual will have the following rights which it may generally exercise free of charge:

- the right to complain about the handling of Personal Information by LOGOS;
- the right to obtain information regarding the processing of their Personal Information and access to their Personal Information held by LOGOS;
- the right to withdraw consent to the use of Personal Information (or to request particular restrictions on its use) – but note that there may be circumstances where LOGOS remains required or entitled to continue to retain and use it;
- the right to request that corrections to Personal Information held with LOGOS if it is inaccurate or incomplete; and
- the right to request erasure of Personal Information in certain circumstances – but note that there may be circumstances where LOGOS remains required or entitled to retain it.

Individuals may exercise these rights by writing to the LOGOS Privacy Officer (details below). LOGOS will require evidence to verify the identity of the individual. These rights may be limited by legal, regulatory or administrative requirements which LOGOS will notify the relevant individual of if applicable.

4 USE OF LOGOS WEBSITES

A Privacy Statement is available on the LOGOS Group website, which outlines the information LOGOS will collect on its website (including through the use of cookies and other tracking tools) and how LOGOS will use that information. Refer to www.logosproperty.com/privacy-policy.

5 CONTACT

The Logos Group Privacy Officer can be contacted as follows:

Attn: Viknesh Ilangovan, Group Compliance Manager

Email: vikneshilangovan@logosproperty.com

Address: 50 Collyer Quay, #05-05, OUE Bayfront, Singapore 049321

6 REVIEW CYCLE AND APPROVAL

The Group Compliance Manager will have primary responsibility for administering this Policy, including ensuring that this Policy is current, and is responsible for conducting a review at least every two years from the date of last review and approval, or earlier if required.

This Policy is approved by Senior Management under delegation from the Board of LOGOS Holdco Pte Ltd. Any amendments to this Policy must be approved by the Board or under delegation from the Board.

Version History

Version	Purpose of amendments	Date of Approval
1.0	Initial Policy (replaces Privacy Policy that was originally designed to meet AU and SG legal / regulatory requirements only)	June 2023