



**PERSONAL DATA
PROTECTION POLICY
(SINGAPORE)**

28 February 2014

1. Introduction

VICOM Limited (“the Company”), including its **subsidiaries**, is committed to respecting the privacy of every individual and adhering to the Personal Data Protection Act 2012, Singapore (“PDPA”) when conducting our businesses.

The Company regards the lawful and correct treatment of personal data it holds as essential to its successful operations and to maintaining confidence between those with whom it deals and itself.

It is also the Company’s policy to ensure that all its employees maintain confidentiality of personal data held by the Company.

2. Data Protection

The Company collects personal data about its shareholders, employees, customers, business partners, sub-contractors, vendors and/or suppliers for specified purposes like provisioning our services, conducting our business activities, administering our operations, complying with statutory regulations and establishing our legal claims.

The Company undertakes to ensure that personal data is obtained fairly and lawfully and shall not use or disclose the personal data without the consent of the individual.

Apart from the mandatory exceptions specified in the PDPA relating to situations where the Company must not provide access, individuals who have given their personal data to the Company have the right to see and correct any inaccurate data at any time. On request of the individual, the Company shall, as soon as reasonably possible, respond to the request.

The Company will retain personal data collected for as long as it is necessary to fulfil the business purposes for which it is collected, in compliance with PDPA.

3. Data Security

The Company has put in place adequate and robust IT security systems and operating processes to ensure data security by adopting an IT Risk Management Framework. The security measures are constantly updated to meet the ever changing threat levels.

4. Data Protection Officer

VICOM Limited and its subsidiaries are responsible for its respective data protection policies. All enquiries relating to the collection, use, disclosure or retention of personal data or other matters on the operation of the Personal Data Protection

Policy and PDPA should be directed to the Data Protection Officer who can be contacted by email at:

S/n	Company	DPO Contact
1.	VICOM	dpo@vicom.com.sg
2.	SETSCO	dpo@setsco.com

5. Review of the Policy

The Company will review this Policy from time to time and amend it where necessary to ensure continued compliance with the PDPA.