

**THE MANAGEMENT CORPORATION STRATA TITLE PLAN NO. 2197  
(SUNTEC CITY)**

3 Temasek Boulevard #B1-65 Suntec City Mall Singapore 038983  
Tel: 6825 2699 Fax: 6219 0900

## **SECURITY AND ACCESS CONTROL PRIVACY NOTICE [FACIAL RECOGNITION & QR CODE ACCESS ONBOARDING]**

The Security and Access Control Privacy Notice (“**Notice**”) sets out the basis which The Management Corporation Strata Title Plan No. 2197 (“**MCST 2197**”) and APM Property Management Pte Ltd (“**APM**”), collectively (“**we**”, “**us**”, or “**our**”) may collect, use, disclose or otherwise process personal data of our occupiers during the Facial Recognition & QR Code Access Onboarding process (“**Process**”) and other instances of building security and access control (“**Security and Access Control**”).

This Notice applies to personal data in our possession or under our control, including personal data in the possession of organisations which we have engaged to collect, use, disclose or process personal data for our purposes. This Notice explains who we are, what information we collect, why we collect it, how we use that information, who has access to your data and the privacy choices we offer to you.

### **WHO WE ARE**

APM is the managing agent of the MCST 2197 and we operate the access control and registration procedure, on our office and sites (including third parties on site). These procedures apply to the sites in Singapore. The Security & Operations department is responsible for your personal data and has made agreements with the external parties involved in Security and Access Control.

### **PERSONAL DATA**

As used in this Notice:

“**occupier**” means an individual who (a) works in the building we manage (b) requires access into the building (c) may, or has, entered into a contract with us for the supply of any goods or services by us; and

“**personal data**” means data, whether true or not, about an occupier who can be identified: (a) from that data; or (b) from that data and other information to which we have or are likely to have access.

Depending on the nature of your interaction with us, some examples of personal data which we may collect from you include name, email address, telephone number, company name.

### **COLLECTION, USE AND DISCLOSURE OF PERSONAL DATA**

For the realization of this Process, the Community & Experience team, Access Control and Security teams will collect data from the Occupiers on behalf of the Security & Operations Department. In this respect, we collect the following categories of personal data:

- For the occupiers: full name, company name, work email address, contact number, Suntec+ membership status
- In terms of the collection and use of information and other activities that requires processing of personal data, the Access control and request Procedure is lawful and in compliance with Article 6. 1 c-f GDPR (compliance with law, ensuring the vital interest of

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the data subject, performance of the task carried out in the public interest and for the legitimate interest of the data controller) and Article 9.2 b), c) GDPR (processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the controller or of the data subject in the field of employment and social security and social protection law, processing is necessary for the vital interest of the data subjects).

The Process and Security and Access control procedure is fully configured according to the GDPR/PII/PDPA and to the strict rules of authorized access of the personal data that are collected. Data is entered by yourself/colleagues via the online registration service or the security and reception employee directly in the access system. The recipients of the collected data are only authorized employees of APM.

**THE PURPOSES FOR THE USE OF YOUR PERSONAL DATA**

The purposes are strictly related to the above-mentioned legal grounds for processing activities. Nevertheless, in order to be more specific, we are collecting/processing your personal for the following reasons:

- presence and access control of all persons registered in the access system;
- monitoring the safety of the building, occupiers and third party;
- monitoring the properties of APM, its employees or third parties;
- attendance registration of the people on the sites (e.g. in case of calamities);
- compliance with law- meet the requirements Working Conditions, related to informing people about the danger at the site (gate instruction)

**FURTHER PROCESSING AND THIRD PARTIES**

Following to the aforementioned purposes and the closely related purposes, the information will be shared with us.

We will not share data with third parties, unless

- i. sharing is necessary to comply with law's requirement, regulation, enforceable governmental request, legal defense;
- ii. sharing is necessary for protecting your vital interest;

**YOUR DATA SUBJECT'S RIGHTS**

Our goal is to be clear about what information we collect so that you can make meaningful choices about how it is used. We thought it would be helpful to set out your following privacy rights as they are defined in GDPR/PII/PDPA:

- right to access your personal data that we process;
- right to have rectified your inaccuracies in personal data that we hold about you;
- right to object to certain processing of your personal data by us;
- right to be forgotten, which means that your details might be removed from systems

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that we use to process your personal data. except if APM Property Management Pte Ltd has to keep information from legislation or other legitimate interests

- right of data portability (known as the right to request the transmission of your data to another controller);
- the right to lodge a complaint to your supervisory authority.
- For a further understanding of your rights and procedure please contact your designated GDPR, PII and PDPA Data Protection Officer.

**PROTECTION OF PERSONAL DATA**

To safeguard your personal data from unauthorised access, collection, use, disclosure, copying, modification, disposal or similar risks, we have introduced appropriate administrative, physical and technical measures such as encryption, and disclosing personal data both internally and to our authorised third party service providers and agents only on a need-to-know basis.

You should be aware, however, that no method of transmission over the Internet or method of electronic storage is completely secure. While security cannot be guaranteed, we strive to protect the security of your information and are constantly reviewing and enhancing our information security measures.

**ACCURACY OF PERSONAL DATA**

We generally rely on personal data provided by you (or your authorised representative). In order to ensure that your personal data is current, complete and accurate, please update us if there are changes to your personal data by informing our Data Protection Officer in writing or via email at the contact details provided below.

**RETENTION OF PERSONAL DATA**

We may retain your personal data for as long as it is necessary to fulfil the purpose for which it was collected, or as required or permitted by applicable laws.

We will cease to retain your personal data, or remove the means by which the data can be associated with you, as soon as it is reasonable to assume that such retention no longer serves the purpose for which the personal data was collected, and is no longer necessary for legal or business purposes.

We manage the relevant personal data and the access registration in the automated access registration system. According to the Article 5(1) (e) GDPR, data will be stored only for the purposes for which the personal data are processed unless exception mentioned under this article applies.

The personal master data included in the registration system is removed immediately after the right of access has expired, unless the person is on a blacklist. In that case, master data will remain in the system until the period for which the access is denied has expired. The access records included in the access registration system is removed immediately, after that the registrations are destroyed.

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**TRANSFERS OF PERSONAL DATA OUTSIDE OF SINGAPORE**

There will be no transfer of data to a (government) authority and/or commercial parties to third countries.

**DATA PROTECTION OFFICER**

You may contact our Data Protection Officer if you have any enquiries or feedback on our personal data protection policies and procedures, or if you wish to make any request, in the following manner:

Email Address : [DPO@apmasia.com.sg](mailto:DPO@apmasia.com.sg)

**EFFECT OF NOTICE AND CHANGES TO NOTICE**

This Notice applies in conjunction with any other notices, contractual clauses and consent clauses that apply in relation to the collection, use and disclosure of your personal data by us.

We may revise this Notice from time to time without any prior notice. You may determine if any such revision has taken place by referring to the date on which this Notice was last updated. Your continued use of our services constitutes your acknowledgement and acceptance of such changes.

Effective date : 01/07/2019  
Last updated : 21/12/2020