

## Privacy Policy ( For Public )

Modern Asia Environmental Holdings Pte. Ltd. ("MAEH," "we," "us," or "our"), in recognition of the importance of securing your personal information, has implemented the following policy to appropriately manage and use personal information in compliance with the provisions of the Personal Data Protection Act 2012 (PDPA) (the "Act") and other applicable laws, regulations, and guidelines in Singapore, striving to meet your expectations.

### 1. Purposes of Use of Personal Information

We use personal information within the scope of the purposes listed below. If any personal information is used for any other purpose, we will, at the time of acquisition of such information, separately specify the purpose of use and announce or notify the person concerned of it, and we will handle the personal information within the scope of the specified purpose of use.

(Personal information of customers contacting us for inquiry)

- To reply to customers contacting us for inquiry, verify their identities, confirm the details of their inquiry and respond to them

(Personal information of business partners (including prospective business partners) )

- To provide information regarding proper use, quality, safety and effectiveness, etc. of services and products
- To exercise and perform the rights and obligations related to transactions
- For the collection of information necessary for business operations or for business contact purpose, etc.

(Personal information of shareholders)

- To exercise and perform the rights and obligations under the Companies Act
- To send a year-end report and other distributions and communication
- For the management of shareholders, including preparation of shareholders data pursuant to the specified criteria based on various laws and regulations
- For administration work in relation to the preparation and submission of payment records

(Personal information of researcher and academics who are working on our research and development)

- To develop better products and services in each business field and conduct research and study for the development
- For the collection of information necessary for business operations or for business contact purpose, etc.

(Personal information of civil servant such as a contact person of concerned public office)

- To obtain required permits and licenses
- To report an incident or recall when it occurs
- For the collection of information necessary for business operations or for business contact purpose

(Personal information of participants/members of the association which we are a member of)

- For the collection of information necessary for business operations or for business contact purpose

(Personal information of reporters, analysts, and institutional investors relating to PR activities)

- To send a year-end report and other distributions and communication
- For the collection of information necessary for business operations or for business contact purpose

(Personal information of users and guests of training or resort facilities)

- To create a hotel register pursuant to the Hotel Business Act
- For the confirmation of users and guests
- For business contact purpose

(Personal information of neighborhood of our facilities)

- To contact in case of emergency or necessity

(Personal information of job applicants)

- For employee screening
- For the management of prospective employees
- To provide information for publicizing employment opportunities information

- For the enhancement of recruitment activities

## 2. Security Measures

With respect to personal information, we have implemented the measures for the prevention of leakage, loss or damage and for other proper control of the personal data.

(Establishment of basic policy)

- This policy has been established in order to ensure the appropriate handling of personal information and inform the contact point for inquiries and complaints.

(Establishment of rules for handling of personal data)

- We establish rules for the controlling of personal information with regard to handling methods, persons responsible or in charge as well as their duties, etc. for each stage of acquisition, use, storing, provision, deletion and destruction of personal data.

(Organizational Security Measures)

- We assign an officer who is responsible for the handling of personal data (Chief Privacy Officer).
- We clarify which employees handle personal data and the scope of personal data to be handled by such employees.
- We establish a system to ensure that any breach or possible breach of laws or any internal rules is reported to Chief Privacy Officer when it is noticed.
- We perform a regular self-check on the handling of personal information, along with an audit by other departments or external auditors.

(Human Security Measures)

- We provide our employees with training on a regular basis on the matters concerning the handling of personal information.
- We specify the matters concerning confidentiality of personal information in the rules of employment.

(Physical Security Measures)

- In areas where personal information is handled, we control the entry and exit of employees, restrict the devices brought into those areas, and take the measures to prevent an unauthorized person from viewing personal information.
- We take the measures for securing devices, electric medium and documents, etc.

containing personal information from theft or loss.

- We take the measures to protect devices and electronic medium containing personal information so that the personal information is not easily revealed when they are carried around, including being moved within the office.

(Technical Security Measures)

- We implement access control to limit the persons in charge and the scope of personal information being handled.
- We introduce a system to protect the information system for handling personal information from being externally accessed by someone who is not authorized or malware.

(Understanding of external environment)

- We take these security measures with the understanding of the personal information security system introduced in foreign countries where our group companies keeping personal information are located (please see the “Group Companies List” available in our website)

### **3. Provision of Personal Information to a Third Party**

Unless otherwise permitted by laws and regulations, we shall not provide your personal information to any third party without your prior consent. When we outsource the handling of your personal information to a third party, we will only disclose the personal information after the conclusion of an agreement imposing on such third party obligations to take adequate security measures.

### **4. Outsourcing**

We may outsource the processing of information such as analysis of browsing history of websites, etc. to a third party. In such case, we will provide necessary and adequate supervision to the outsourcing company in accordance with the Act.

### **5. Joint Use of Personal Information**

We may share your personal data within our group companies only when necessary. When jointly using your personal information, we will handle it in compliance with the Act and any other related laws and regulations.

5-1 Personal data items that may be jointly used

Name (if you are a company, name of an officer/employee and its title and affiliation),

address, date of birth, sex, phone number, fax number, email address, and contents of inquiry

#### 5-2 Scope of joint users

The following companies may jointly use it:

[List of companies]

#### 5-3 Purposes of use by joint users

Same as ones listed in Articles 1 and 2 hereof.

#### 5-4 Party responsible for management of personal information

Modern Asia Environmental Holdings Pte. Ltd.

Please refer to the following URL for the address and representative's name:

[https://www.dowa-maeh.com.sg/privacy\\_policy/](https://www.dowa-maeh.com.sg/privacy_policy/)

## **6. Acquisition, Use and Provision of Information Associated with Identifiers Like Cookie**

A cookie is information that the websites send to your web browser and is stored in your device. A web beacon is a mechanism that uses a small image file embedded into a web page or email to transmit information when you browse or open the web page or email. This website uses cookies, web beacons or other similar technology to analyze information such as your browsing history of the website and use it for the following purposes.

- To enhance information and services provided through this website
- To inspect and eliminate any malfunction in order to ensure the technical operation on this website

## **7. Request for Disclosure of Retained Personal Data**

When a person or his/her agent requests the disclosure of his/her personal data retained by us, we will respond without delay, except for the cases below. If we decide not to disclose or there exists no such data, we will notify to that effect.

- When the disclosure is likely to harm the life, body, property or other rights and interests of the person concerned or any third party
- When the disclosure is likely to cause significant hindrance to the performance of our business activities
- When the disclosure results in the violation of laws and regulations

Furthermore, when a person or his/her agent requests rectification, addition or deletion, or cessation of use, or suspension of provision to a third party, of his/her personal data retained by us, we will conduct investigation and respond to such request accordingly in

accordance with laws and regulations.

Please note that we may request submission of documents required for disclosure request, how to request and a form of identification to verify the requester's identity.

If you have any questions on the above, please contact us at the following number or email address:

Modern Asia Environmental Holdings Pte Ltd HOLDINGS CO., LTD.

Administration & General Affairs Department

Tel : +65 6862 3130

E-mail : [waipuay@wms-technochem.com](mailto:waipuay@wms-technochem.com)

#### **8. Supplementary Provision:**

In the event of any discrepancy between the contents of this policy and the Personal Data Protection Act 2012 (PDPA) or other applicable laws and regulations, the provisions of the Personal Data Protection Act 2012 (PDPA) and other relevant laws and regulations shall take precedence.

#### **9. Contact for inquiries and complaints**

If you have any questions or complaints about our handling of personal information, please contact the following email address:

MODERN ASIA ENVIRONMENTAL HOLDINGS PTE. LTD.

Human Resources Department

Samantha Liow

HR Representative

E-mail: [samantha.liow@wmw-technochem.com](mailto:samantha.liow@wmw-technochem.com)

Established on 01 September 2024

Approved by

Keishi TAKEMASA

President

**Modern Asia Environmental Holdings Pte. Ltd.**

Registered Address : 23 Tuas Avenue 11, Singapore 639086

Office Address : 04 Tuas Avenue 18, Singapore 638890

## **Privacy Policy for Personal Information of Employees and Their Family Members**

Modern Asia Environmental Holdings Pte. Ltd. (“MAEH”, “we”, “us” or “our”), in recognition of the importance of securing personal information of an employee, etc. working for us (including our officers, employees and any other person who is engaged in our business as well as a retiree who was previously engaged in our business; collectively “Employee, etc.”) and his/her family members, will follow the following policy to appropriately manage and use personal information in compliance with the provisions of the Personal Data Protection Act 2012 (PDPA) (the “Act”) and other laws and regulations and guidelines related thereto.

### **1. Purposes of Use of Personal Information of an Employee, etc.**

The personal information provided by an Employee, etc. to us at the time of his/her joining us or thereafter will be used for the following purposes:

- 1.1 Business communication and equipment/facility management-related work;
- 1.2 Work related to relocation (including temporary assignment and transfer; the same shall apply hereinafter), evaluation, commendation, discipline, qualification and other personnel management;
- 1.3 Clerical work related to labor management;
- 1.4 Work related to salary, bonus, retirement allowance, company pension, etc.;
- 1.5 Work related to recruiting and hiring;
- 1.6 Work related to education and training;
- 1.7 Work related to employee benefits;
- 1.8 Work pertaining to sanitary and safety, and health management, etc.;
- 1.9 Work related to employment insurance and social insurance;
- 1.10 Work based on laws and regulations, such as handling of affairs related to tax and social security;
- 1.11 Work related to an employee stock ownership plan;
- 1.12 Work related to certificate of employment;
- 1.13 Handling required in connection with administrative process;
- 1.14 Business contact, including sending of an invitation to alumni association;
- 1.15 Provision of information on company status, sending of a year-end report and other distributions; and
- 1.16 Work related to or incidental to the above items.

## 2. Purposes of Use of Personal Information of an Employee, etc.'s Family Members

The personal information provided by an Employee, etc. to us at the time of his/her joining or thereafter will be used for the following purposes:

- 2.1 Contact in case of emergency;
- 2.2 Work related to payment of salary (including various allowances) to an Employee, etc.;
- 2.3 Work related to management of employee benefits and company pension, etc.;
- 2.4 Work based on laws and regulations, such as handling of affairs related to tax and social security; and
- 2.5 Work related to or incidental to the above items

## 3. Purposes of Use of Specific Personal Information (including individual numbers (My Number) and personal information containing individual numbers) of an Employee, etc. and His/Her Family Members

- 3-1 Clerical work related to filing of a notification of employment insurance;
- 3-2 Clerical work related to filing of a notification of health insurance and employees' pension insurance;
- 3-3 Clerical work related to filing of a notification of national pension No.3 insured persons;
- 3-4 Preparation and submission, etc. of a withholding certificate and other clerical work related to tax withholding;
- 3-5 Clerical work related to preparation of a report, notification and application form for property accumulation savings for housing and property accumulation pension savings;
- 3-6 Clerical work related to preparation and provision, etc. of legal documents pertaining to an employee stock ownership plan;
- 3-7 Clerical work related to preparation and submission of a payment report of compensation, fees, contract money or award;
- 3-8 Clerical work related to preparation and submission of a payment report regarding stocks;
- 3-9 Clerical work related to preparation and submission of a payment report for real estate rentals or consideration for acquisition of real estate; and
- 3-10 Clerical work related to the above items.



#### 4. Joint Use of Personal Information

We may share personal information of an Employee, etc. and his/her family members within our group companies (“Modern Asia Environmental Holdings Pte Ltd Group”) listed in Schedule as follows. However, such personal information may be jointly used only to the extent necessary to achieve its purpose of use:

##### 4.1 Personal data items that may be jointly used

The following personal information of an Employee, etc. and his/her family members that we obtain and retain will be jointly used only to the extent necessary to achieve the purposes of joint use:

- a. Basic information regarding a subject Employee, etc., such as his/her name, employee No., contact, address, affiliation, and title, etc.;
- b. Information regarding family members of an Employee, etc., such as their names and dependency status, etc.;
- c. Information regarding personnel management, such as an Employee, etc.’s grade, relocation, evaluation, qualification, career, commendation and discipline, etc.;
- d. Information regarding salary, bonus, retirement allowance, and company pension, etc.
- e. Information regarding employee benefits, such as usage of benefits;
- f. Health-related information, such as health check results, etc.;
- g. Information regarding work-related disaster; and
- h. Any other information obtained and retained in connection with personnel/business management.

##### 4.2 Scope of joint users:

Modern Asia Environmental Holdings Pte Ltd Group companies

##### 4.3 Purposes of use by joint users:

Same as ones listed in Articles 1 and 2 hereof

##### 4.4 Party responsible for management of personal information:

Modern Asia Environmental Holdings Pte. Ltd.

The address and representative’s name are as described in the following URL:

<https://www.dowa-maeh.com.sg/about-us/>

## 5. Provision of Personal Information to a Third Party

Unless otherwise permitted by laws and regulations, we shall not provide personal information of an Employee, etc. to any third party without his/her prior consent. Provided, however, that in the event of temporary assignment, etc. required for our business, the Employee, etc. will give prior consent to the provision of minimum information required, such as his/her career summary, to the company to which he/she will be assigned.

## 6. Outsourcing

To the extent necessary to achieve the purposes of use, we may outsource the handling of personal information to a third party in order to run our business smoothly and efficiently. In such case, we will provide necessary and adequate supervision to the outsourcing company in accordance with the Act.

## 7. Request for Disclosure of Retained Personal Data

When an Employee, etc. or his/her agent requests the disclosure of his/her personal data retained by us, we will respond without delay, except for the cases below. If we decide not to disclose or there exists no such data, we will notify to that effect.

- 7.1 When we cannot confirm that the Employee, etc. is the person concerned with regard to the retained personal information;
- 7.2 When we cannot confirm the authority of the agent making the request;
- 7.3 When the request form is incomplete or the request is not made in accordance with the procedures specified by us;
- 7.4 When the information requested for disclosure is not retained personal information;
- 7.5 When the disclosure is likely to harm the life, body, property or other rights and interests of the person concerned or any third party;
- 7.6 When the request is likely to heavily hinder the appropriate performance of our business;
- 7.7 When the disclosure results in the violation of laws and regulations; or
- 7.8 When we are under no obligation to disclose it pursuant to the Act.
- 7.9 Furthermore, when an Employee, etc. or his/her agent requests rectification, addition or deletion, or cessation of use, or suspension of provision to a third party, of such personal data retained by us, we will conduct inspection and respond to such request accordingly in accordance with laws and regulations. At the time of request, the requester must submit documents required for the disclosure request, how to request and documents to identify whether the

requester is the Employee, etc. or his/her agent.

8. Supplementary Provision: In the event of any discrepancy between the contents of this policy and the Personal Data Protection Act 2012 (PDPA) or other applicable laws and regulations, the provisions of the Personal Data Protection Act 2012 (PDPA) and other relevant laws and regulations shall take precedence.

9. Contact for inquiries and complaints

If you have any questions or complaints about our handling of personal information, please contact the following email address:

**MODERN ASIA ENVIRONMENTAL HOLDINGS PTE. LTD.**

Human Resources Department

Samantha Liow

HR Representative

E-mail: [samantha.liow@wmw-technochem.com](mailto:samantha.liow@wmw-technochem.com)

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