

VULKAN Industries Far East Pte Ltd (“VIFE”) External Privacy Policy

10 Aug 2018

With the following information we desire to provide you with an overview concerning the processing of your personal data on our part and your rights arising from the data privacy laws. To a great extent the specific data that is processed and the manner in which the data is used are based on the services that have been agreed or requested. Therefore parts of this information may not apply to you.

The following always applies: We, VULKAN Industries Far East Pte Ltd, take the protection of your personal data very seriously. We expressly state that this website is directed exclusively to persons of legal age.

1. Who is responsible for the data processing, and who can I contact?

You can contact our Singapore Data Protection Officer (“DPO”) at the address cited below for any Singapore Personal Data Protection Act 2012 (“PDPA”) matters.

VULKAN Industries Far East Pte Ltd (“VIFE”)
37C Benoi Road, Pioneer Lot, Singapore 627796
Email address: sg.dpo@vulkan.com

2. What sources and data do we use?

VIFE may collect, use and disclose the following data about you:

- a. When you provide Personal Data by filling in online or offline forms when applying for VIFE’s services or feedback, asking queries and job applications, requests and submissions;
- b. If and when you contact VIFE (i.e. telephone calls and emails), we may keep a record of that correspondence;
- c. If and when VIFE contacts you via referrals, we may keep a record of that correspondence;
- d. Details of your visits to our website including, but not limited to, cookies, location data, weblogs and other communication data, that you access;
- e. When you fill up job application forms to apply for a job at VIFE;
- f. If you enter into any contract with VIFE or purchase any products/services from VIFE;
- g. If you participate in any exhibition or event organised by VIFE or where VIFE is a participant (i.e. name cards and visitor satisfaction forms).

VIFE may collect the following kinds of Personal Data through the different channels mentioned above:

1. Name;
2. NRIC/ID/Passport numbers and copies;
3. Business and/or residential addresses;
4. Business and/or personal email addresses;
5. Mobile and business telephone numbers;
6. Date of Birth;

7. Nationality;
8. Pictures and photos, if applicable.

Additionally, if you are applying for employment with VIFE, VIFE will collect the following:

1. Race;
2. Gender;
3. Marital Status;
4. Educational and employment history and professional qualifications, including testimonials and references;
5. Bank account details;
6. Medical, legal and financial history;
7. Next of Kin or family information; and
8. Curricula Vitae, if any.

3. Why do we process your data (reason for the processing) and on what legal grounds do we process your data?

VIFE may use the information we collect from you for any of the following purposes:

1. To perform or carry out VIFE's obligations arising from any contracts entered into between you and us, including inter alia, payment administration;
2. To enable VIFE's subcontractors, third-party agents and service providers, to fulfil obligations/services as stipulated in your contract with VIFE;
3. To handle products and services requests and enquiries (including payments for products and services);
4. To facilitate client training, visa application and travel administration purposes;
5. For security and access registration for shipyards and vessels, etc;
6. For payment administration purposes;
7. To administer and update your records in our databases; monitoring and maintaining a copy of your record of previous transactions;
8. To facilitate the delivery, maintenance and enhancement of VIFE's services, programmes and events;
9. To plan, monitor, and enhance the provision of new services, projects, programmes and planning of events and workshops;
10. To improve VIFE's customer service through your feedback;
11. To process your enquiries and any and all other ancillary administrative purposes;
12. For communications, sales and marketing efforts and leads generation and publicity purposes;
13. For government, audit and other regulatory purposes;
14. For recruitment and evaluation purposes if you apply for a job with VIFE, i.e. to determine job suitability;
15. To apply for employee work visas at the Ministry of Manpower;
16. For internal reporting and/or accounting purposes; and
17. Purposes incidental to each or all of the above.

We may also contact you by any means of communication for which you have given us contact details, including but not limited to via email, telephone numbers, and post, for the purpose of getting your feedback or for providing you with information which we believe could be of interest to you or your organisation.

By your submission of your Personal Data to us, you consent to the onward disclosure of your Personal Data to these agents or service providers and the processing of your Personal data by these agents or service providers.

We only collect, process, use or disclose such Personal Data, in accordance with this policy. If you are acting as an intermediary, or otherwise on behalf of a third party, or supply us with information regarding a third party, you undertake that you are an authorised representative or agent of such third party and that you have obtained consent from such third party to our collection, processing, use and disclosure of their Personal Data. Because we are collecting the third party's data from you, you undertake to make the third party aware of all matters listed in this policy by referring them to our agencies' website.

Consent for the collection and use of your Personal Data

You consent to the collection, use and disclosure of your Personal Data for the above mentioned purposes and agree to be bound by the obligations it imposes on you, when you accept this Privacy Policy. You accept this Privacy Policy when you continue to browse on VIFE's website.

In this regard, please note that it is on your part to ensure that all personal data submitted to us is complete, accurate, true and correct at the time of submission. Failure on your part to do so may result in our inability to provide you with products and services you have requested.

Please note that if you do not consent to any of the above business purposes, VIFE may also be unable to meet the purposes for which the information was collected.

Does VIFE disclose Personal Data to third parties?

VIFE may disclose your Personal Data to any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in the Companies Act (Cap. 50).

On occasion, VIFE may use third party agents and service providers to assist us in the use of your Personal Data as outlined above "Why do we process your data (reason for the processing) and on what legal grounds do we process your data?" You consent to such use of your Personal Data by continuing to browse on VIFE's website.

VIFE will not transfer Personal Data within or outside Singapore unless it is ensured that the Personal Data will be accorded a level of protection which is comparable to the protection under the PDPA.

For how long does VIFE retain your Personal Data?

VIFE will cease to retain Personal Data, as soon as it is reasonable to assume that the purpose for collection of such personal data is no longer being served by such retention, and such retention is no longer necessary for legal or business purposes.

For EU residents, Vulkan Group processes personal data in harmony with the provisions of the EU General Data Protection Regulation (GDPR) and the German Data Protection Act (Bundesdatenschutzgesetz (BDSG)). Please refer to Vulkan Group's Data Protection Policy at <http://www.vulkan.com/en-us/holding/data-privacy> for more details.

4. What does this mean, now based on the provision of this website with the services made available herein?

4.1 Provision of the website and creation of log files

Each time our website is called up our system automatically collects data and information from the computer system of the computer that calls up our website. The following data is collected in this regard:

- (1) Information concerning the browser type and version used
- (2) The operating system of the user
- (3) The user's Internet service provider
- (4) The user's IP address
- (5) Date and time of the access
- (6) Websites from which user's system gets to our website
- (7) Websites that are called up by the user's system via our website

The data is likewise stored in the log files of our system. Storage of this data together with other personal data of the user does not take place.

The temporary storage of the IP address through the system is necessary to enable a delivery of the website to the computer of the user. For this the IP address of the user must remain stored for duration of the session. The data is stored in log files to ensure the functionality of the website. In addition, we use the data to optimize the website and to ensure the security of our IT systems. An evaluation of the data for marketing purposes does not take place in this context.

The data is deleted as soon as it is no longer required for purpose for which it is collected. In the case of collection of data for provision of the website, this is the case when the respective session is ended.

In the case of storage of the data in log files this is the case after seven days at the latest. Storage extending beyond the limits cited above is possible. In this case the IP addresses of the users are deleted or distorted, so that an allocation of the calling client is no longer possible.

Collection of the data for provision of the website and storage of the data for log files is strictly required for operation of the website. Consequently there is no possibility of objection on the part of the user.

4.2 Use of cookies

When visiting our website we occasionally use cookies. Among other reasons, we use them to make our offering user-friendly, effective, and secure.

In this regard, the following data is stored and transmitted: (e.g.

- Language settings
- Items in a shopping cart

Use of technically necessary cookies occurs the purpose of making the use of our website easier for you. Some of the functions of our website cannot be offered without the use cookies. For these functions it is necessary for the browser to again be recognized after a change of websites. We require your cookies for the following applications:

- (1) Shopping cart
- (2) To apply the language settings

The user data collected through technically necessary cookies is not used to create user profiles.

Cookies are stored on your computer, and transmitted by your computer to our website. Consequently, you as the user have complete control over the user of the cookies. By changing your Internet browser settings you can deactivate or restrict the transmission of cookies. Cookies that are already stored can be deleted at any time.

This can also occur in an automated process. If cookies are deactivated for our website, it may be the case that all functions of the website can no longer be used in full scope.

Moreover, on our website we also use cookies that enable an analysis of user behavior on our website. In this manner the following data can be transmitted:

- Frequency and duration of page call-ups
- Use of a website function

The data collected in this manner is pseudonymized through technical precautions. Therefore an allocation of the data to the calling-up user is no longer possible. The data is not stored together with other personal data of the users.

When calling up our website you will be informed of the use of cookies for analysis purposes via an info banner and referred to this privacy statement. In this context a notice also occurs that states how the storage of cookies can be suppressed in browser settings.

The use of analysis cookies occurs for the purpose of improving the quality of our website and its content. Through the use of analysis cookies we learn how the website is used and thus can continuously optimize our offering.

Cookies are stored on your computer, and transmitted by your computer to our website. Consequently, you as the user have complete control over the user of the cookies. By changing your Internet browser settings you can deactivate or restrict the transmission of cookies. Cookies that are already stored can be deleted at any time. This can also occur in an automated process. If cookies are deactivated for our website, it may be the case that all functions of the website can no longer be used in full scope.

When calling up our website you will be informed of the use cookies for analysis purposes and your consent to the processing of personal data used in this context will be obtained. In addition you are referred to this privacy statement.

The use of analysis cookies occurs for the purpose of improving the quality of our website and its content. Through the use of analysis cookies we learn how the website is used and thus can continuously optimize our offering.

Cookies are stored on your computer, and transmitted by your computer to our website.

Consequently, you as the user have complete control over the user of the cookies. By changing your Internet browser settings you can deactivate or restrict the transmission of cookies. Cookies that are already stored can be deleted at any time. This can also occur in an automated process. If cookies are deactivated for our website, it may be the case that all functions of the website can no longer be used in full scope.

4.3 Contact form and email contact

There is a contact form on our website that can be used for making contact with us electronically. If you avail yourself of this possibility, then the data entered in the input screen will be transmitted to us and we will store it. This data is:

- (a) Company
- (b) First name
- (c) Last name
- (d) Address
- (e) Postcode
- (f) Country
- (g) Industry
- (h) Telephone no.
- (i) Fax no.
- (j) Email
- (k) Attachment

- (l) Message
- (m) Security query

In addition the following data will also be stored at the time of registration:

- (a) The IP address of the user
- (b) Date and time of the registration

For the processing of your data your consent will be obtained as part of the sender process and you will be referred to this data privacy statement.

Alternatively contact can be made via the provided email address. In this case the personal data transmitted with your email will be stored. There is no forwarding of your personal data to third parties in this context. The data will be used exclusively for the processing of the conversation.

We use personal data on the input screen only for processing of the contacting. In the case of contacting via email, the required legitimate interest in the processing of the personal data also applies. The other personal data processed during the sending procedure is used to prevent misuse of the contact form and to assure the security of our IT systems.

The data is deleted when it is no longer required for achievement of the purpose for which it was collected. For the personal data from the input screen of the contact form and the data that has been sent via email, this is then the case, when the respective conversation with you is concluded.

This is then the case, when it can be inferred from the circumstances that the subject matter in question has been definitively clarified. The personal data additionally collected during the send procedure will be deleted after a period of 7 days at the latest.

You have the possibility of revoking your consent to the processing of your personal data at any time. Contact us via email at any time to object to the storage of your personal data. In such a case the conversation cannot be continued.

(There follows a description of the manner in which revocation of the consent and objection to the storage is possible).

In this case, all personal data that has been stored in the course of contacting will be deleted.

4.6 Job applicant management

As part of job applicant management we process the personal data that you make available to us for initiation of an employment relationship.

We process and store your personal data as long as required for the fulfillment data processing purposes or fulfillment of legal, contractual or statutory obligations. Thereafter the data will be deleted or its processing will be restricted. In the case that after conclusion of the application process an employment relationship does not come about, we will delete your data 3 years after conclusion of the application process at the latest. If we desire to store your application beyond the 3-year period, in a so-called "applicants pool", then we would request your consent in this regard after expiration of the 3-year period.

Of course, in addition you are entitled to withdraw your application at any time. In this case your data would likewise be deleted, if it is no longer required for the purpose for which it was collected. Sending an email to us

with the appropriate content is sufficient in this regard. Likewise revocation of any consents that have been issued is possible at any time.

4.4 Google Analytics

This website uses Google Analytics, incl. the Google Analytics advertising functions. This is a web analysis service of Google Inc. ("Google"). Google Analytics uses so-called "cookies", text files which are stored on your computer and that allow an analysis of your use of the website.

Google Analytics is used exclusively with activated IP anonymization (so-called IP-masking). This means that the IP address of Google users within the Member States of the European Union, or in other States party to the Agreement on the European Economic Area, is shortened by Google. The full IP address will only be transmitted to a Google server in the USA and shortened there in exceptional cases, if for example, there are technical failures in Europe.

With the IP anonymization method used by Google the complete IP address is not written to a hard disk at any time, as the entire anonymization occurs almost directly in RAM after receipt of the request.

The IP address communicated by your browser will not be linked by Google with other data.

On behalf of the operator of this website, Google will use this information to evaluate your use of the website, to produce reports on website activities and to provide other services, in particular also functions for display advertising, as well Google Analytics reports concerning the performance according to demographic characteristics and interests related to the use of the website and of the Internet to the operator of the website.

Google will also transmit this information to third parties if necessary, if this is legally prescribed or if third parties process this data on behalf of Google. In no way does this involve personal data. In the Google Analytics reports on performance based on demographic characteristics and interests, data obtained by Google via interest-based advertising and visitor data of third-party providers, such as age groups or interest groups) are used.

You can prevent the use of cookies through an appropriate setting of your browser software, however we expressly state that in this case it is possible that you will not be able to use all the functions of this website to their full extent.

In addition, you can prevent collection of data related to your use of the website generated by the cookie (incl. your IP address) and transmission of this data Google, as well as the processing of this data by Google by downloading and installing the Browser Plug-In available at the following link:

Downloading and installing the Google Browser Plug-In

You can also prevent collection of your personal data through Google Analytics by clicking the following link. An opt-out cookie will be set that prevents the future collection of your data when visiting this website.
<https://tools.google.com/dlpage/gaoptout?hl=en>

Deactivating Google Analytics

More detailed information concerning the use conditions and data privacy and protection is provided at <https://www.google.de/analytics/terms/de.html> or at <https://www.google.de/intl/de/policies/>.

5. How does VIFE protect your Personal Data?

The Personal Data that we hold about you may be stored on servers in Singapore. VIFE implements a variety of security measures to maintain the safety of your submitted information. All electronic storage and transmission of personal data is secured and stored on managed servers with controlled access and appropriate security technologies.

Although every reasonable effort has been made to ensure that all personal data will be so protected, VIFE cannot be responsible for any unauthorised use or misuse of such information and from risks which are inherent in all internet communications.

Your Personal Data will only be disclosed for the express purpose of delivering the product or service requested and shall not be sold or disclosed to any other company for any other reason whatsoever without your consent.

6. Links to third party websites from VIFE's website

Our websites may contain links to other external websites, such as our business partners. We are not responsible for the privacy policies and practices of these websites taken care of by third-parties. We strongly encourage you to check the privacy policy of each website that you visit. Some of these third-party websites may have our logo or trademark acknowledged on their website. However, these websites are not operated and maintained by us. Please contact the owner of the respective websites should you have any questions on their privacy policies.

7. What rights can you assert?

Please contact VIFE's Data Protection Officer should you wish to have access to or seek to update, correct or withdraw the consent to collect and use your Personal Data. Your email should identify yourself and state which Personal Data and information about its use and/or disclosure is requested.

8. Do I have to make my personal data available?

Within the framework of our business relationship, you must provide that personal data that is required for the commencement and execution of a business relationship and the fulfillment of the associated contractual obligations or that we are legally obligated to collect. As a rule, without this data we will be compelled to refuse to enter into a contract or to execute the order, or we will not be able to continue fulfilling an existing contract, and possibly we will have to terminate the contract.

9. How does VIFE protect your Personal Data?

The Personal Data that we hold about you may be stored on servers in Singapore. VIFE implements a variety of security measures to maintain the safety of your submitted information. All electronic storage and transmission of personal data is secured and stored on managed servers with controlled access and appropriate security technologies.

Although every reasonable effort has been made to ensure that all personal data will be so protected, VIFE cannot be responsible for any unauthorised use or misuse of such information and from risks which are inherent in all internet communications.

Your Personal Data will only be disclosed for the express purpose of delivering the product or service requested and shall not be sold or disclosed to any other company for any other reason whatsoever without your consent.

10. Information concerning your right to object as set out article 21 of the GDPR.

For EU residents, Vulkan Group processes personal data in harmony with the provisions of the EU General Data Protection Regulation (GDPR) and the German Data Protection Act (Bundesdatenschutzgesetz (BDSG)). Please refer to Vulkan Group's Data Protection Policy at <http://www.vulkan.com/en-us/holding/data-privacy> for more details.

11. Additional information

If you are concerned about the handling of your Personal Data, or if you have any complaints or queries related to your Personal Data or our Privacy Policy, please contact VIFE's Data Protection Officer ("DPO") at sg.dpo@vulkan.com.

VIFE reserves the right to change this Policy with or without notice from time to time.