

Privacy Policy

Policy Statement

This Privacy Policy (the "Policy") applies to the collection, use and disclosure of an individual client/customer's Personal Data (hereinafter defined) arising from goods and/or services offered by Grand Dunman Website ("Grand Dunman"). At Grand Dunman, we respect the privacy and confidentiality of personal data and we are committed to protecting your privacy and safeguarding your personal data.

1. General

1.1

This Policy provides information on the obligations and policies of Grand Dunman in respect of an individual client/consumer's Personal Data. Grand Dunman undertakes to use reasonable efforts in applying, where practicable, those principles and the processes set out in this Policy to its operations.

1.2

Grand Dunman's management, staff and representatives shall use reasonable endeavours to respect the confidentiality of and keep safe all Personal Data collected, stored, disclosed and used for, or on behalf of, the Group. Grand Dunman shall use reasonable endeavours to ensure all collection, storage, disclosure and usage of Personal Data by it shall be done in an appropriate manner and in accordance to the Personal Data Protection Act and this Policy.

1.3

For the purposes of this Policy, in line with the provisions under the Singapore Personal Data Protection Act 2012 (No. 26 of 2012) (the "Act"), "Personal Data" shall mean data, whether true or not, about an individual who can be identified from that data; or from that data and other information which an organisation has or is likely to have access. Such Personal Data shall also refer to that which is already in the possession of Grand Dunman or that which shall be collected by Grand Dunman in future.

2. Statement of Practices

Managing the Collection, Use and Disclosure of Personal Data

2.1

Obtaining Consent: To the fullest extent required by the PDPA, before Grand Dunman collect, use or disclose your personal data, you will be notified of the purpose why it is doing so. Grand Dunman next obtains written confirmation from you on your expressed consent. As far as possible, Grand Dunman will not collect more personal data than necessary for the stated purpose. Under certain circumstances, Grand Dunman may assume deemed consent from you when you voluntarily provide your personal data for the stated purpose, e.g. when you submit your Personal Data for employment purposes.

2.2

Third-Party Consent: If you have a one-on-one meeting with Grand Dunman or do a transaction with Grand Dunman on behalf of another individual, you must first obtain consent from that individual in order for Grand Dunman to collect, use or disclose his/her personal data. If you consent to us obtaining your personal information through third-party service providers designated by us, we shall obtain your personal information as per above-mentioned including any information registered by you with the third party through such third-party service providers. Further, you agree to give Grand Dunman the consent to use and store your data in a manner consistent with this Privacy Policy.

2.3

Withdrawal of Consent: If you wish to withdraw consent, you should give Grand Dunman reasonable advance notice. You have to be aware, though, of the likely consequences of your withdrawal of consent, e.g. without your personal contact information Grand Dunman may not be able to inform you of future services offered by us or our clients. Your request for withdrawal of consent can take the form of an email or letter to Grand Dunman, or through the “UNSUB” feature in an online service.

Types of Personal Data Collected

2.4

As part of its day to day activities, Grand Dunman may collect from data subjects, through various means, including via referrals, introducers, roadshows, seminars, meetings, cookies, personal networks and social media, and any modes of communications and forms (e.g. survey forms, feedback forms) used by the Group from time to time, the following Personal Data:

- Your personal information such as full name, last 3 digits and letter of NRIC/passport, residential address, work address, e-mail address, telephone number, mobile phone number, date of birth, gender, dependants' details necessary to fulfil special requests such as bereavement, emergency contact information, bank account/credit card details, photographs and images, and etc.
- Your personal government-issued identification document numbers such as NRIC/FIN/Work Permit/birth certificate and passport numbers; only when required under the law or necessary to accurately establish or verify your identity to a high degree of fidelity.
- Other personal details (where relevant) when applying for an employee position: name, nationality, marital status, languages spoken or written; professional and work experience (job title, occupation, employment history, work experience, Curriculum Vitae; education and professional qualifications, schools attended, academic transcripts, membership of professional bodies).

- Grand Dunman may also collect non-personally identifiable information about you, such as use of our website, internet protocol addresses, browser and computer system information, cookies, invisible pixels, web beacons, and aggregated data related to your use of our Platforms.

Should you require more details on types of personal data we collect about you, you may visit our website: <https://www.GrandDunman.com> or contact us at the info@granddunman-developer-official.com.

Tracking of User Activity

Where we track user activity, we will document this in our data inventory, and disclose such activity in our External Privacy Notice.

Cookies

Grand Dunman use “cookies” on our websites to track website visitorship, activity and experience. Cookies are files with a small amount of data, which may include an anonymous unique identifier. Cookies are sent to your browser from a website and stored on your computer’s hard drive, and most web browsers are designed to accept cookies. If you do not wish to receive any cookies, you may instruct your browser to refuse all cookies or to indicate them when a cookie is being sent. However, you may not be able to use some portions of Grand Dunman’s website if you do not to accept cookies.

Purpose of Collection of Personal Data

2.5

The Personal Data mentioned in Paragraph 2.4 is collected for the following purposes:

- Process job applications, recruitment and selection;
- Customer Care and account management;
- Prospecting for potential clients through various channels stated in Paragraph 2.4;
- Fact-finding of potential clients’ real estate needs;
- Planning and sourcing for interested clients based on the clients’ budget goals and real estate preferences;
- Completion of a sales transaction;
- Process facilities booking;
- Keeping clients informed of new real estate and investment opportunities that may be relevant to them;
- Administration and servicing of a membership program;
- Analyse website visitors;
- Market research and analysis (using anonymised data);
- Carry out our obligations arising from any contracts entered into between you and us; and
- Comply with legal obligations and regulatory requirements.
- Communicate with enquirers and analyse website visitors
- Notify you about our services, special events and programs
- Respond to enquiries, update requests and feedback on user experience
- Monitor the movement of visitors to our physical premises for safety and/or security purposes

Disclosure of Personal Data

2.6

In order to carry out the functions described above, Grand Dunman may, from time to time, disclose your Personal Data between its Organisational entities.

2.7

Without derogating from any of the above, Grand Dunman may also disclose your Personal Data to the following third parties:

- Regulators and law enforcement officials e.g. Strata Title Board, Small Claims Tribunal, Building & Construction Authority, Council for Estate Agencies, Singapore Police Force;
- Government agencies e.g. Ministry of Manpower, Ministry of Health, and etc;
- External advisors e.g. lawyers, auditors and accountants;
- Real estate developers;
- Financial institutions providing loans;
- Insurance companies;
- Third party service providers and consultants e.g. IT/Technical Support/ IT service providers, including but not limited to webhosting companies and cloud service providers;
- Credit, debit and charge card companies, banks and other entities processing payment; and
- Any agent or subcontractor acting on Grand Dunman' behalf for the provision of its services (e.g. Recruitment Agencies / Head hunters, Commercial Service and Training Providers).

2.8

While Grand Dunman will only share your data with authorised persons on a 'need to know basis', Grand Dunman may disclose your Personal Data to the abovementioned parties also in the occurrence of any of the following events:

- To the extent that Grand Dunman is required to do so by the law;
- In connection with any legal proceedings or prospective legal proceedings;
- To establish, exercise or defend Grand Dunman's legal rights;
- To any person and/or entity for the purpose of processing such information on Grand Dunman's behalf;
- To third parties who provide services to Grand Dunman or on its behalf;
- With your consent; and
- For the purposes of disaster recovery.

Optional Provision of Personal Data

2.9

In some instances, you may also be requested to provide certain Personal Data that may be used to better tailor the type of information presented to you. In most cases, this type of data is optional although, where the requested service is a personalised service, or provision of a service is dependent on your providing all requested data, failure to provide the requested data may

prevent Grand Dunman from providing the service. This type of data includes, but is not limited to:

- Lifestyle, hobbies and leisure activities
- Family and household demographics

2.10

Under certain circumstances, telephone calls made to any of Grand Dunman's service hotlines or inquiry telephone numbers will be recorded for the purposes of quality control, staff management and development. In such an event, by agreeing to this Policy, you hereby give your clear and unambiguous consent for the collection, use and disclosure of such Personal Data in accordance to this Policy.

3. Transfer of Personal Data Overseas

3.1

Your Personal Data may be processed by Grand Dunman's affiliates, agents, introducers and third parties providing services to organisations in jurisdictions outside of Singapore. If there is a need for Grand Dunman to transfer your personal data to another country, Grand Dunman will ensure that the standard of data protection in the recipient country is comparable to that of Singapore's PDPA.

3.2

With regards to international properties, Grand Dunman will disclose your personal data to developers based in jurisdictions outside of Singapore. Those developers will be required, via contractual agreement with Grand Dunman, to undertake care of the personal data and comply to obligations equivalent to those required by the Singapore Personal Data Protection Act to accord similar levels of protection.

4. Accuracy of Personal Data

4.1

Where possible, Grand Dunman will validate data provided and take reasonable precautions using generally accepted practices and guidelines and verification checks to ensure that the personal data we have collected from you is reasonably accurate, complete and up-to-date. This includes the use of checksum verification on some numeric fields such as account numbers or credit card numbers. In some instances, Grand Dunman is able to validate the data provided against pre-existing data held by it. In some cases, Grand Dunman is required to see original documentation before we may use the Personal Data such as with Personal Identifiers and/or proof of address.

To assist in ensuring the accuracy of your Personal Data in the possession of Grand Dunman, please inform the Group of any updates of any parts of your Personal Data by sending a clearly worded email to the Data Protection Officer (DPO) at the email address provided at Paragraph 2.4. Further, Grand Dunman may, from time to time, conduct a verification exercise with you to update it on any changes to your Personal Data.

5. Protection of Personal Data

5.1

Grand Dunman uses commercially reasonable physical, administrative and technical safeguards to protect and maintain the confidentiality and integrity of your Personal Data and will not knowingly allow unauthorised access, use, disclosure or otherwise to this data to anyone outside the Group, other than to you or as described in this Policy.

External Data Intermediaries who process and maintain your personal data on our behalf will be bound by contractual information security arrangements we have with them.

6. Access and Correction of Personal Data

6.1

In accordance with the Act, you have the right to:

- a). check whether the Group holds any Personal Data relating to you and, if so, obtain copies of such data; and
- b). require the Group to correct any Personal Data relating to you which is inaccurate for the purpose for which it is being used.

6.2

Grand Dunman reserves the right to charge a reasonable administrative fee in order to meet your requests under Clause 6.1(a). Upon payment of the requisite fee under Clause 6.1(a) and/or receipt of your request under Clause 6.1(b).

6.3

If you wish to verify the details you have submitted to Grand Dunman or if you wish to check on the manner in which Grand Dunman uses and processes your personal data, Grand Dunman's security procedures mean that it may request proof of identity before revealing any information. This proof of identity will take the form of full details of name, contact number and NRIC or Passport or FIN number. You must therefore keep this information safe as you will be responsible for any action which Grand Dunman takes in response to a request from someone using your details.

7. Storage and Retention of Personal Data

7.1

Grand Dunman will delete, as reasonably possible, or otherwise anonymise any Personal Data in the event that the original purpose has been fulfilled or it is not required for any reasonable business or legal purposes of the Group. The Personal Data will be deleted from the Grand Dunman's electronic, manual, and other filing systems in accordance with its internal policies and procedures and/or other agreements. Based on our Document Retention Policy, we will ensure that your personal data that are no longer needed by us will be destroyed or disposed of in a secure manner.

8. Contacting You

8.1

To the extent that any of the communication means which you have provided Grand Dunman with (which may include your telephone number and fax number) is/will be listed on the Do Not Call Registry (the "DNC"), or by any other means of indication, you hereby grant Grand Dunman your clear and unambiguous consent to contact you using all of your communication means you have provided to the Organisation, including via voice calls, SMS, Whatsapp, MMS, fax or other similar communications applications or methods, for the purposes as stated in Paragraph 2.5.

9. Change of Policy

9.1

Grand Dunman reserves the right to alter any of the clauses contained in this Policy in compliance with local legislation and/or to meet its global policy requirements, and for any other purpose deemed reasonably necessary by the Group. You should revisit this page periodically for any changes. Changes to this policy are effective when they are posted on this page. If you do not agree to the modified terms, you should inform Grand Dunman as soon as possible of the terms to which you do not consent. Pending such notice, if there is any inconsistency between these terms and the additional terms, the additional terms will prevail to the extent of the inconsistency.

10. Governing Law

10.1

This Policy is governed by and shall be construed in accordance with the laws of Singapore. You hereby submit to the non-exclusive jurisdiction of the Singapore courts.

11. Miscellaneous

11.1

This Policy only applies to the collection and use of Personal Data by Grand Dunman. It does not cover third-party sites to which Grand Dunman provide links. Grand Dunman does not share your Personal Data with third-party websites. Grand Dunman is not responsible for the privacy and conduct practices of these third-party websites. It is important that you review the Privacy Policy of every website that you visit. Grand Dunman has no control over, and are unable to assume any responsibility for, the content, privacy policies or practices of any third-party websites or services.

11.2

Grand Dunman will not sell your personal information to any third party without your permission, but it cannot be responsible or held liable for the actions of third-party sites which you may have linked or been directed to Grand Dunman's website.

12. Contacting the Data Protection Officer

12.1

You may write in to Grand Dunman, based on reasonable grounds, to request access to and/or correction of Personal Data relating to you, such Personal Data which is in the possession and control of Grand Dunman, Grand Dunman shall provide and/or correct that data in a reasonable time and manner in accordance with its standard procedures as stated in this Policy.

12.2

In accordance with the Personal Data Protection Act, Grand Dunman has established a process for receiving and responding to any query or complaint that may arise with respect to the application of this Act. To ensure that Grand Dunman receives your complaints and enquiries, please send the same via email to info@granddunman-developer-official.com.

12.3

The consent which you provided to Grand Dunman for the collection, use and disclosure of your Personal Data remains valid until we receive written notification of your request to withdraw consent.

Should you not wish for Grand Dunman to use your Personal Data for any of the purposes listed above, you may withdraw consent for our use of your personal data for such purpose.

Please be advised that we will not be able to provide you with services and/or membership benefits that you requested for or have with us if you withdraw consent.

To ensure that you are able to continue to enjoy your privileges and/or allow us to continue serving you, you may first contact Grand Dunman to understand more.

In relation to the above, kindly note that any withdrawal of consent does not apply to situations where the collection, use and disclose of Personal Data without consent is permitted or required under applicable laws.

Grand Dunman treats all such queries and complaints seriously and will deal with them confidentially and within reasonable time.

While Grand Dunman endeavours to fulfil your request within 30 days, please note that a fee may be charged for facilitation depending on the specific request, which we will advise accordingly. If we are unable to do so within 30 days, we will notify you of the additional time with an estimate of the fee, if required.

Effective Date: 9 June 2023