



# Jardine Cycle & Carriage

## **Privacy Statement**

We appreciate your interest in us and our products and services. Your privacy is important to us. We respect your right to protect your personal data and understand your desire to avoid unwarranted solicitations. We wish to disclose our privacy policy to you to ensure that you will be comfortable visiting our site and using our products and services (respectively, “Products” and “Services”).

This privacy policy sets out the policies and practices for Jardine Cycle & Carriage Limited and its subsidiaries and affiliates (collectively, “JCCL”, “we”, or “us”), with respect to how JCCL collects, uses, stores, and discloses personal data. This privacy policy applies to personal data collected by JCCL via this website and other websites operated or provided by JCCL, mobile applications provided by JCCL, at JCCL’s showrooms and roadshows, and by any other means in the course of providing the Products and/or Services. In this privacy policy, “personal data” means data, whether true or not, about an individual who can be identified from that data, or from that data and other information to which JCCL has or is likely to have access.

By using this site and/or Products or Services, or by submitting personal data about yourself or someone else to JCCL or its service providers, you agree that JCCL may collect, use, and disclose your personal data in accordance with this privacy policy and as permitted or required by law. If you do not agree with any part of this privacy policy, please do not use this site or the Products or Services, or submit any personal data to JCCL. Please note that JCCL may not be able to provide or continue to provide you with certain Products or Services if you do not consent to JCCL’s use, collection, or disclosure of personal data.

### **A. Collection and Use of personal data**

• JCCL may collect personal data from you, including personal data which you provide when you enter our website or give to us voluntarily in any other way, and including personal data provided by you in connection with the following activities:

- when you purchase a Product from us or use our Services;
- when you participate in our events, roadshows, contests and promotions;
- when you complete our survey forms;
- when you send us enquiries;
- when you download or use JCCL’s mobile applications.

- Such personal data will be used for the following purposes:
  - to build, conduct and maintain our business relationship with you, including to process transactions and payments;
  - to contact you in relation to your transactions and enquiries with us, and to respond to any communications you may have with us;
  - to administer events, roadshows, contests and promotions that you have participated in;
  - to make recommendations on the type of Products and/or Services that you should book, based on our knowledge of your last servicing with us;
  - to improve our website, Products and Services;
  - to better understand our customers;
  - to maintain and update our records;
  - to train our staff and develop our business and operations;
  - where you have provided consent, to send you information about promotions, events, Products and Services that you may be interested in;
  - to engage in business transactions, including any merger or acquisition involving JCCL;
  - to verify or enforce compliance with the policies governing our website or mobile applications, and applicable laws;
  - to protect against misuse or unauthorized use of our website or mobile applications;
  - for any other purposes for which the personal data was provided to us;
  - for any other purposes to which you have consented; and
  - for any other purposes permitted or required by law.
  
- Generally, you can visit most parts of our website without telling us who you are or revealing any information about yourself. However, some features and services may not be accessible unless certain personal data or information is supplied.
  
- Should you decide to withdraw your consent to the collection or use of your personal data for any purpose, you may inform us at any time by contacting our Data Protection Officer at [dpo@jcclgroup.com](mailto:dpo@jcclgroup.com). Please allow us reasonable time to respond and effect any change.

## **B. Information Captured Automatically:**

- As in many websites, when you view pages on our site, the web server automatically receives certain types of information from your computer including information such as your IP address, browser type, operating system, pages you visit on our website, which site you came from or go to and the date and length of your visit. We may use and evaluate such information for the purposes of website administration and understanding our customers better.

## **C. Electronic Commercial Communication:**

- If you have provided us with your email address or mobile phone number, and consented to us sending you promotional and marketing information, we may send you promotional and marketing materials via email, SMS or MMS.
- You can choose not to receive such materials by selecting the unsubscribe option which we provide in each email, SMS or MMS sent to you, or otherwise inform us.
- If you have installed our mobile application(s) on your mobile device, we may send you promotional and marketing materials via push and pop-up notifications through the application(s). You can choose not to receive such materials by disabling push and/or pop-up notifications in the application(s) or in your mobile device settings.

## **D. Information sharing**

- We do not sell your personal data to third parties.
- We may disclose personal data as follows:
  - to service providers whom we engage to perform services on our behalf. We will disclose only the personal data that such service providers need to deliver the services on our behalf, and our disclosure will strictly be for such purposes only and the service providers will be required to use the personal data only for the purposes for which it was disclosed to them;
  - to our affiliates who perform services or functions for us in conjunction with our services to you, but only where there is an arrangement between

us which prohibits them from disclosing or using the personal data other than for the purposes for which it was disclosed;

- to other members of the Jardine Matheson group of companies, for the purposes of building, conducting and maintaining our commercial relationship with you, to improve the group's business and operations, products and services, and to better understand our customers;
- to our principals for whom we are dealers or distributors, for the purposes of recording our transaction with you relating to our principals' products and services;
- to service providers providing financing and insurance services where you have opted to apply for such services, for the purpose of administering your application;
- to government authorities or law enforcement agencies at their request;
- to verify or enforce compliance with the policies governing our website or mobile applications, and applicable laws;
- to protect against misuse or unauthorized use of our website or mobile applications;
- to any other persons and for any other purposes to which you have consented; and
- to any other persons and for any other purposes permitted or required by law.

• Personal data collected by us may be transferred to, stored and/or processed in countries outside Singapore. Before we make such a transfer, we will take appropriate steps to ascertain whether, and ensure that, the recipient of the personal data is legally obliged to protect the personal data to a standard comparable to that under the Singapore Personal Data Protection Act 2012.

• Should you decide to withdraw your consent to the disclosure of your personal data for any purpose, you may inform us at any time by contacting our Data Protection Officer at [dpo@jcclgroup.com](mailto:dpo@jcclgroup.com). Please allow us reasonable time to respond and effect any change.

• If you provide us with personal data of a third party, you warrant that you have the requisite authority and permission to consent to our collection, use and disclosure of such personal data as set out in this Privacy Statement

## **E. Children**

- We do not intend to collect, use, or disclose personal data from or about minors nor do we knowingly collect, use or disclose any such personal data. However, as we cannot distinguish the age of persons who access our website or mobile applications, our privacy policy applies to all who access our website or mobile applications.
- If a child has provided us with personal data without the consent of his parent or guardian, the parent or guardian should email us to request the removal of the personal data.
- We encourage parents and teachers to be involved in their children's internet activity. It is particularly important for parents to guide their children when they are asked to provide personal information online.

## **F. Cookies**

- A cookie is a small data file that is written to your hard drive that contains information about your visit to a web page. This helps us to identify you and remember your preferences the next time you visit us. Only information that you have provided will be stored in the cookie, and only the site which created the cookie can read it. This does not allow it access to the rest of the computer. If you prefer not to receive cookies, you may configure your browser not to accept them or to notify and require approval before accepting new cookies.
- Some web pages/sites may not function properly if the cookies are not accepted, or you may have to provide the same information each time you visit those pages.

## **G. Security**

- JCCL endeavours to protect your personal data, including through reasonable security arrangements to prevent unauthorised access, collection, use, disclosure, copying, modification, disposal or similar risks to your personal data.
- However, as information technology continues to evolve rapidly, no transmission of data over the internet can be guaranteed to be completely secure. While every effort is made to protect the privacy of our visitors, we cannot guarantee the security of any information transmitted to or through our

website or mobile applications.

- If you use any User identification, password, personal identification number or other authentication information on our website, please ensure that such information is kept secure and that you do not share it with anyone. We cannot take responsibility for any security lapses or unauthorised third-party access arising from your failure to keep such information secure.

- Please note that certain parts of our website, Products and Services are not confidential and are accessible to the general public. Any personal data that you may post or upload to such publicly accessible features of the website, Products or Services will be available to the general public.

#### **H. Retention**

- JCCL will cease to retain personal data, or will anonymise such personal data, once the purpose for which the personal data was collected is no longer being served, and there are no legal or business reasons necessitating such retention.

#### **I. Access and Correction**

- JCCL takes reasonable steps to ensure the personal data it holds is accurate and complete. If you wish to access the personal data JCCL holds about you, or to correct or update such personal data, you may contact our Data Protection Officer at [dpo@jcclgroup.com](mailto:dpo@jcclgroup.com). Please allow us reasonable time to respond and effect any change. Please note that in certain circumstances, we are not obliged to accede to your request.

#### **J. Third party websites**

- Our privacy policy does not extend to third-party websites that may be linked from this website, or from any other broadcast affiliated with us.

#### **K. Amendments to Privacy Policy**

- We may revise this privacy policy from time to time by updating this version, and will post our revisions on this website. By continuing to use this website and any of its pages, or continuing to use our Products or Services, you are agreeing to be bound by such revisions. Please visit this web page from time to time to determine if there have been any changes to these terms.

- If you have any questions or concerns about our privacy policy, please contact us at [dpo@jcclgroup.com](mailto:dpo@jcclgroup.com).