

Data Protection and Privacy Policy

AGS CONSULTING SINGAPORE PTE. LTD. (the “Company”, “we”, “our” or “us”) realizes the importance of protecting your personal data.

This document contains the personal data protection and privacy policy adopted by the Company to manage your personal data in accordance with the Personal Data Protection Act 2012 (as may be in force, amended or re-enacted from time to time) and/or other relevant laws and regulations as well as guidelines applicable in Singapore (collectively, the “Act” or “PDPA”). Please take a moment to read this policy to understand the purposes for which we collect, use and/or disclose your personal data. The term “**personal data**” we use herein has the same meaning as defined in the PDPA.

1. Concerning the observance of laws and standards

- 1.1 The Company respects the privacy of individuals and recognizes the need to treat personal data in an appropriate and lawful manner, and is committed to comply with its obligations in this regard, in respect of all personal data it handles.
- 1.2 The Company may change some parts or all of the contents of this policy from time to time to ensure that this policy is in line with the legal and regulatory requirements, as well as the regulations and constitutive documents of the Company. Hence, we advise you to check regularly for updated information on the handling of your personal data.
- 1.3 If you consider that this policy does not follow the PDPA in respect to the personal data about you or others, you should raise the matter with our Data Protection Officer as soon as possible.

2. Concerning the collection, use and/or disclosure of personal data

- 2.1 In general, we collect your personal data in several ways, including but not limited to the following:
 - 2.1.1. When you contact us for our services and/or goods, or enquiries regarding the same, via your selected mode of communication;
 - 2.1.2. When you request us to contact you for any reason;
 - 2.1.3. When you submit your personal data to us for recruitment and/or employment purposes; and
 - 2.1.4. When we receive your personal data from authorized third parties (including but not limited to our service providers and employment agencies).
- 2.2 Personal data that is collected by the Company may include some or all of the following personal information:
 - 2.2.1. Name;

- 2.2.2. Date of birth;
- 2.2.3. Gender;
- 2.2.4. Contact information such as email addresses and telephone numbers;
- 2.2.5. Demographic information such as residential address, postal code, preferences and interests;
- 2.2.6. Bank account information (where necessary);
- 2.2.7. Salary payment information (where necessary);
- 2.2.8. Passport information;
- 2.2.9. CV information: and
- 2.2.10. Other information necessary for the purposes set out in clause 2.3.

The above list is not exhaustive of the categories of personal data the Company may collect. Notwithstanding, the Company will not collect your NRIC/FIN/Passport number unless permitted or required by the Act or any other applicable laws or regulations.

- 2.3 Generally, the Company collects, uses and/or discloses your personal data for the following purposes:
 - 2.3.1. To send information on products and services by e-mail or post.
 - 2.3.2. To provide products and/or service, and to use the information to improve marketing activities (the information may be processed into a form that does not identify individuals and used as statistical data).
 - 2.3.3. In order to display services that match the customer's attributes, etc., the Company's websites use cookies, etc. to collect information on the behaviour history and attributes of customers who visit the Company's websites (information that cannot identify a specific individual on its own, even if it is information about the individual). Specifically, this includes cookies, IP address information, website browsing history and behaviour history, device IDs, user agents and referrers.
 - 2.3.4. To fulfil other claims, liabilities and obligations under various contracts and laws and regulations with the Company.
 - 2.3.5. To manage and evaluate the employees of the Company and their group companies outside Singapore (“**AGS Group**” i.e., direct or indirect subsidiary or any direct or indirect holding company or any such subsidiary of any such holding company or any such holding company of such subsidiary).
 - 2.3.6. When subcontracting and performing accounting due diligence on the target company, the client's work pass application, and other related tasks to other AGS Group entities, for the purpose of processing such tasks.
- 2.4 Your personal data will be retained by the Company for as long as necessary according to our internal policy for the fulfilment of the purposes stated in clause 2.3 or is required to satisfy any legal or business purposes.
- 2.5 The Company will take reasonable steps to protect your personal data against unauthorized collection, use and/or disclosure. Subject to the provisions of any applicable law or regulations, your personal data

may be collected, used and/or disclosed for any purposes listed in clause 2.3 (where applicable), to the following:

- 2.5.1. the Company's staff;
 - 2.5.2. researchers, agents, contractors or third party service providers who provide services to the Company;
 - 2.5.3. our professional advisers such as auditors and lawyers;
 - 2.5.4. relevant government regulators, statutory boards or authorities, or law enforcement agencies to comply with any laws, rules, guidelines, regulations or schemes imposed by any governmental authority; and
 - 2.5.5. any other party to whom you authorise us to disclose your personal data to.
- 2.6 In addition to clause 2.5, the Company will transfer your personal data to the AGS Group, which includes AGS Consulting Co., Ltd in Japan and AGS Malaysia SDN. BHD in Malaysia, for any purposes listed in clause 2.3.
- 2.7 In order to provide the best service possible, the Company may engage a data intermediary to process and handle personal data on its behalf. In these cases, we will only work with recognized personal data management firms and shall enter into contracts with these data intermediaries to include provisions that clearly set out the data intermediaries' responsibilities and obligations to ensure compliance with the Act.

3. Concerning the consent for collection, use and/or disclosure of personal data

- 3.1 By submitting your personal data to the Company, you agree and consent to the collection, use and/or disclosure of your personal data by the Company for a part or all of the purposes set out in clause 2.3.
- 3.2 If at any time we decide to collect, use or disclose your personal data in a different manner as to the purposes set out above, we will request your consent to the additional purpose(s) in writing, in which you may refuse to give at your discretion.
- 3.3 If you provide us with personal data relating to a third party (e.g. information of your spouse, children, parents or relatives), you represent and warrant to us that you have obtained the consent of such third party to provide us with their personal data for the relevant purposes. Where the personal data provided relates to a child or ward, you represent and warrant to us that you are either his/her parent or legal guardian, and that such personal data is legitimate, indeed and accurate.
- 3.4 You may at any time withdraw any consent given in respect of the collection, use or disclosure of your personal data by giving prior notice in the form of a formal written request addressed to the Data Protection Officer.
- 3.5 In the event that you withdraw your consent to the Company in relation to the purposes mentioned above,

the Company shall cease to collect, use and/or disclose your personal data within ten (10) working days upon receiving your withdrawal request. Please note that once consent is withdrawn, it may not be possible for us to accomplish the purposes as set out in clause 2.3, and hence, we may be unable to continue providing the requisite services to you.

4. Concerning personal data management and security measures

The Company will take reasonable measures to protect your personal data from unauthorized access or modification, improper collection, use or disclosure, unlawful destruction or accidental loss. You should be aware, however, that no method of transmission over the internet or electronic storage is 100% secure. While security cannot be guaranteed, we strive to protect the security of the personal data and will constantly review and enhance our information security measures. In the event that we have credible grounds to believe that an incident of personal data breach has occurred, we will take reasonable and expeditious steps in accordance with the Act.

5. Concerning access, correction and accuracy of personal data

- 5.1 You may apply for a copy of your personal data held by the Company, or request for your personal data to be updated or corrected, by sending a formal written request to our Data Protection Officer. Please be informed that we are entitled to charge a fee to recover the costs directly related to the access of the personal data for the time and effort spent by us in responding to the same, and will let you know the amount accordingly.
- 5.2 Within thirty (30) days upon receiving your request, the Company shall:
 - 5.2.1. provide you with a copy of your personal data under our custody and/or other relevant information in accordance with the Act therein;
 - 5.2.2. correct your personal data as soon as practicable and inform you that the relevant correction has been made; or
 - 5.2.3. inform you that your request for access or correction of your personal data is rejected, if the request was made in circumstances predefined by the Act where such access or correction is prohibited or not required.
- 5.3 You should ensure that all personal data submitted to us is complete and accurate. Failure to do so may result in our inability to provide you with the information or services you requested.
- 5.4 The Company shall make a reasonable effort to ensure that the personal data collected by or on behalf of the Company is accurate.

6. Concerning transfer of personal data outside of Singapore

The personal data we collect from you may be transferred to destination(s) outside Singapore as per clause 2.6 for the fulfilment of any of the purposes stated in clause 2.3. The Company will ensure that any transfers of your personal data to a territory outside of Singapore will be in accordance with the PDPA so as to ensure a standard of protection to personal data so transferred that is comparable to the protection under the PDPA.

In particular, the Company has a Data Protection Agreement with the Group Company which obliges the Group Company to protect personal data that the Company transfers to it at a standard of protection comparable to that under the Act.

7. Concerning the establishment and continual improvement of a management system for personal data protection

In order to appropriately manage personal data, the Company shall continually work towards improving the development of our data management system and internal company regulations.

8. Contact information

Should you have a complaint or require more information about how we manage your personal data, please contact our Data Protection Officer at:

Phone: +65-6904-9454

Email: ksuzuki@agsc.co.jp

Implemented from: 1st Jan 2026