

SINGAPORE PRIVACY NOTICE

**Effective Date:
August 1, 2025**

If you are a natural person located in Singapore, you may have additional rights with respect to your Personal Data under the Personal Data Protection Act 2012 of Singapore (the “PDPA”), as set forth in this Singapore Privacy Notice (the “Privacy Notice”).

In this Privacy Notice:

- “Personal Data” means data, whether true or not, about an individual who can be identified: (a) from that data; or (b) from that data and other information to which we have or are likely to have access;
- “process” or “processing” means the carrying out of any operation or set of operations in relation to Personal Data, including any of the following:
 - (a) recording;
 - (b) holding;
 - (c) organisation, adaptation or alteration;
 - (d) retrieval;
 - (e) combination;
 - (f) transmission;
 - (g) erasure or destruction;
- “Services” means the products and services provided or to be provided by us to you.

Where applicable, this Privacy Notice is intended to supplement, and not replace, our [Privacy Policy](#). If there are any conflicts between the Privacy Notice and the [Privacy Policy](#), the provision that is more protective of Personal Data shall prevail to the extent of such conflict. Any capitalized terms not defined herein shall have the meaning set forth in our Privacy Policy. If you have any questions about this Privacy Notice or whether any of the following rights apply to you, please contact us at privacy.singapore@agltd.com with the subject line “PDPA Request.”

1. Types of Personal Data we Collect

We currently collect, use, disclose and/or otherwise process the categories of Personal Data listed above in Section I of the Privacy Policy.

You are responsible for ensuring that the Personal Data you provide us is current, complete and accurate. Please update us if there are changes to your Personal Data by writing to privacy.singapore@agltd.com with the subject line “PDPA Request”.

2 How we Obtain the Personal Data and why we Have it

We collect, use, disclose and/or otherwise process the Personal Data in the ways and for the purposes listed in Sections I and II of the Privacy Policy and in this Section of this Privacy Notice. Those purposes may continue

to apply even in situations where your relationship with us (for example, pursuant to a contract) has been terminated or altered in any way, for a reasonable period thereafter (including, where applicable, a period to enable us to enforce our rights under a contract with you).

In some cases, failure to provide your Personal Data to us may result in your inability to use some or all portions of the Services that require such data. In particular, we may require your Personal Data in the form of your Contact Information, Registration Information and Server Log Information in order to perform our obligations under our contracts with you.

We will only collect, use, disclose and/or otherwise process your Personal Data if we have a lawful basis for doing so. Under the PDPA, the lawful bases we rely on for collecting, using, disclosing and/or otherwise processing this information include the following:

a) Your Consent

In some cases, we may collect, use, disclose and/or otherwise process Personal Data based on the consent you expressly grant to us at the time we collect such data. When we collect, use, disclose and/or otherwise process Personal Data based on your consent, it will be expressly indicated to you at the point and time of collection. You can withdraw your consent at any time. You can do this by contacting us via email at privacy.singapore@agltd.com with the subject line "PDPA Request." Please refer to Section 5 of this Privacy Notice for more details regarding the withdrawal of consent.

b) Your Deemed Consent

Where you have voluntarily provided your Personal Data to us, you will generally be deemed to have consented under the PDPA to our collection, use, disclosure and/or processing of such Personal Data for purposes which are objectively obvious and reasonably appropriate from the surrounding circumstances. For example, where you have voluntarily provided your Personal Data to us in relation to your contract with us, you will generally be deemed to have consented to our collection, use, disclosure and/or processing of your Personal Data where such collection, use, disclosure and/or processing of your Personal Data is reasonably necessary for us to perform our obligations under our contract with you, which enables us to provide you with the Services.

c) We Have a Legitimate Interest

In compliance with the PDPA, we may collect, use, disclose and/or otherwise process your Personal Data when we believe it furthers the legitimate interests of us or a third party.

In relying on the legitimate interests exception, we will assess the likely adverse effects on you and only proceed with the collection, use, disclosure and/or processing of your Personal Data after determining that the legitimate interests outweigh any such adverse effect.

Our legitimate interests include:

- **Information Security:** We collect, use, disclose and/or process Contact Information, the information collected through cookies, and the Server Log Information when you use the Services in order to maintain an audit log of activities performed. We collect, use, disclose and/or process this information pursuant to our legitimate interests in tracking usage, combating DDOS or other attacks, removing or defending against malicious individuals or programs, preventing unauthorized access to our

computer and electronic communications system, and ensuring IT and network security generally.

- General Business Development and Management: We collect, use, disclose and/or process Contact Information, Registration Information, and Server Log Information pursuant to our legitimate interest in creating and managing our business relationships with you, including without limitation:
 - To respond to inquiries from you;
 - To provide you with information about our products and services; and
 - To assist you with any issues while using the Services.
- Protection of Rights: We may collect, use, disclose and/or process any categories of Personal Data to respond to claims of violation of third-party rights or to enforce and protect our rights.

d) Business Improvement

We use Server Log Information and information collected through cookies for the purpose of improving or enhancing our Services.

We use identifiers collected through analytics and targeting cookies for the purpose of learning about and understanding your behaviour and preferences in relation to the Services provided by us and to improve the relevant user experiences.

e) We Have a Legal Obligation

We may be required to disclose Personal Data in response to lawful requests by public authorities, including for the purpose of meeting national security or law enforcement requirements. We may also disclose Personal Data to other third parties when compelled to do so by government authorities or required by law or regulation including, but not limited to, in response to court orders and subpoenas.

3. How we Share Your Personal Data

Section II of the Privacy Policy explains how we share your Personal Data with third parties.

4. How we Store and Protect Your Personal Data

We use commercially reasonable administrative, technical, and physical safeguards to protect your Personal Data from loss, misuse, and unauthorized access, disclosure, alteration, or destruction, for which we take into account the nature of the Personal Data, its processing, and the threats posed to it. Unfortunately, no data transmission or storage system can be guaranteed to be secure at all times. If you have reason to believe that your interaction with us is no longer secure, please immediately notify us via email at privacy.singapore@agltd.com with the subject line "PDPA Request."

We retain your Personal Data for as long as needed to fulfill the purposes for which we obtained it, as further described in the Privacy Policy, and for as long as needed for legal or business purposes. We will only keep your Personal Data for as long as allowed or required by law.

5. Your Data Protection Rights

You have certain rights with respect to your Personal Data, including those set forth below. For more

information about these rights, or to submit a request, please email us at privacy.singapore@agltd.com with the subject line "PDPA Request." You are not required to pay any charge for exercising your rights. If you make a request, we will respond to you within the time frame(s) required by applicable data protection laws and guidelines. Please note that in some circumstances, we may not be able to fully comply with your request, such as if it is frivolous or extremely impractical, if it jeopardizes the rights of others, or if it is not required by law, but in those circumstances, we will still respond to notify you of such a decision. In some cases, we may also need you to provide us with additional information, which may include Personal Data, if necessary to verify your identity and the nature of your request.

- **Right of access:** You can request more information about the Personal Data we hold about you and request a copy of such Personal Data, or information about the ways in which we have used or disclosed your personal data within a year before the date of your request, subject to the following:
 - Depending on the request that is being made, we will only need to provide you with access to the personal data contained in the documents requested, and not to the entire documents themselves. In those cases, it may be appropriate for us to simply provide you with confirmation of the personal data that we have on record, if the record of your personal data forms a negligible part of the document.
 - We will respond to your request as soon as reasonably possible. In general, our response will be within 30 days. Should we not be able to respond to your access request within 30 days after receiving your access request, we will inform you in writing within 30 days of the time by which we will be able to respond to your request. If we are unable to accede to your request, we will generally inform you of the rejection of the request and the reasons why we are unable to do so (except where we are not required or not permitted to do so under applicable law).
- **Right to request for correction of Personal Data:** If you believe that any Personal Data we are holding about you is incorrect or incomplete, you can request that we correct or supplement such data. We will respond to your request as soon as practicable. In general, our response will be within 30 days. Should we not be able to respond to your correction request within 30 days after receiving your correction request, we will inform you in writing within 30 days of the time by which we will be able to respond to your request. If we are unable to accede to your request, we will generally inform you of the rejection of the request and the reasons why we are unable to do so (except where we are not required or not permitted to do so under applicable law).
- **Right to withdraw consent:**
 - If we are collecting, using, disclosing and/or processing your Personal Data based on your consent (as indicated at the time of collection of such data), you have the right to withdraw your consent at any time on giving us reasonable notice. In particular, you may object at any time to the collection, use, disclosure or processing of your Personal Data for direct marketing purposes by clicking "Unsubscribe" within an automated marketing email or by submitting your request to privacy.singapore@agltd.com with the subject line "PDPA Request". In such case, your Personal Data will no longer be used for that purpose.
 - Please note, however, that if you exercise this right, you may have to then provide express consent on a case-by-case basis for the collection, use, disclosure or processing of certain of your Personal Data, if such collection, use, disclosure or processing is necessary to enable you to utilize some or all of our Services.
 - Once we have received reasonable notice that you have withdrawn your consent, we will no

longer collect, use, disclose or process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law or unless otherwise agreed with you. Please note that we may require reasonable time (depending on the complexity of the request and its impact on our relationship with you) for your request to be processed and for us to notify you of the consequences of us acceding to the same, including any legal consequences which may affect your rights and liabilities to us. In general, we shall seek to process your request within 10 business days of receiving it. Please also note that the withdrawal of your consent will not affect the lawfulness of any collection, use, disclosure or processing of Personal Data based on your consent before its withdrawal, or the lawfulness of any collection, use, disclosure or processing of Personal Data where it is permitted or required under applicable laws.

- We will respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws. We reserve the right to keep any information in our archives that we deem necessary to comply with our legal obligations, resolve disputes and enforce our agreements. Please note that all of these rights are subject to applicable exemptions and restrictions and are not absolute rights. If we need to rely on these exemptions or restrictions, we will provide this information to you in our response.

6. How to Complain

If you have any concerns about our use of your Personal Data, you can make a complaint to us at privacy.singapore@agltd.com with the subject line "PDPA Request."

You also have the right to lodge a complaint about the collection, use, disclosure or processing of your personal data with the Personal Data Protection Commission of Singapore where such collection, use, disclosure or processing has not been carried out in accordance with the PDPA.

7. Corporate Restructuring

In the event of a merger, reorganization, dissolution, or similar corporate event, or the sale of all or substantially all of our assets, the information that we have collected, including Personal Data, may be transferred to the surviving or acquiring entity. All such transfers shall be subject to our commitments with respect to the privacy and confidentiality of such Personal Data as set forth in this Privacy Notice.

8. Transfers of Personal Data

When we transfer Personal Data outside of Singapore, we take steps to ensure that your Personal Data continues to receive a standard of protection that is at least comparable to that provided under the PDPA. This includes taking steps to ensure that the recipient of the Personal Data is bound by legally enforceable obligations (including obligations under the receiving country's data protection laws and contractual obligations placed on the recipient of the data) to provide to the transferred Personal Data such a standard of protection. You may request a copy of these safeguards by writing to us at the address provided in the Our Contact Information section below.

9. Updates to this Privacy Notice

If, in the future, we intend to collect, use, disclose or process your Personal Data for a purpose other than that which it was collected, we will provide you with information on that purpose and any other relevant information

at a reasonable time prior to such processing. After such time, the relevant information relating to such collection, use, disclosure or processing will be revised or added appropriately within this Privacy Notice and/or the Privacy Policy, and the “Effective Date” at the top of this page will be updated accordingly.

10. Our Contact Information

Please reach out to privacy.singapore@agltd.com for any questions, complaints, or requests regarding this Privacy Notice, and include in the subject line “PDPA Request.”

You may also contact the Data Protection Officer of our representative office in Singapore, whose details are set out below:

Name of Data Protection Officer: Christian Jung

Business Contact No.: +65 6232 2191

Business Email: cjung@agltd.com