



Shareholder Data Protection Policy

The purpose of this document (“**Shareholder Data Protection Policy**”) is to inform you of how Singapore Shipping Corporation Ltd (“**the Company**”) manages Personal Data, which is subject to the Singapore Personal Data Protection Act (No. 26 of 2012) (“**the Act**”).

By becoming a shareholder of the Company and/or exercising any rights belonging to a shareholder of the Company, including but not limited to the attendance at general meetings of shareholders of the Company, you agree and consent to the Company collecting, using, disclosing and sharing amongst themselves your Personal Data, and disclosing such Personal Data to our authorised service providers and relevant third parties in the manner set forth in this Shareholder Data Protection Policy.

The Company may from time to time update this Shareholder Data Protection Policy to ensure that this Shareholder Data Protection Policy is consistent with our future developments, industry trends and/or any changes in legal or regulatory requirements. Subject to your rights at law, you agree to be bound by the prevailing terms of this Shareholder Data Protection Policy as updated from time to time on our website. Please check back regularly for updated information on the handling of your Personal Data.

1. Personal Data

- 1.1 In this Shareholder Data Protection Policy, “**Personal Data**” refers to any 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, including data in our records as may be updated from time to time.
- 1.2 Examples of such Personal Data you may provide to us include (depending on the nature of your interaction with us) your name, NRIC, passport or other identification number, telephone number(s), mailing address, email address, network data and any other information relating to any individuals which you have provided us in any forms you may have submitted to us, or via other forms of interaction with you.

2. Collection of Personal Data

- 2.1 Generally, we collect Personal Data in the following ways:
 - (a) when you become a shareholder of the Company or in the course of you being a shareholder of the Company;
 - (b) when we seek information from the Central Depository (Pte) Limited (“**CDP**”) in connection with your shareholding in The Company;
 - (c) when you make relevant statutory disclosures to the Company and/or the regulatory authorities in compliance with applicable laws and regulations; and
 - (d) when you provide your Personal Data to the Company for any other reason, including communication with the the Company’s company secretariat, investor relations officers and share registrar, for example, via telephone calls, emails or at general meetings.
- 2.2 If you provide us with any Personal Data relating to a third party (e.g. information of your spouse, children and parents), by submitting such information to us, you represent to us that you have obtained the consent of the third party to provide us with their Personal Data for the respective purposes.
- 2.3 You should ensure that all Personal Data submitted to us is complete, accurate, true and correct.

3. Purposes for the Collection, Use and Disclosure of Your Personal Data

3.1 The Company collects, uses and discloses your Personal Data for the following purposes:

- (a) complying with any applicable rules, laws, regulations, codes of practice or guidelines issued by any legal or regulatory bodies, which are binding on The Company and/or you (including but not limited to responding to, disclosing to regulatory bodies, share registrar and conducting audit checks, due diligence and investigations);
- (b) administering our relationship with you, including without limitation, the maintenance of shareholder register;
- (c) handling of dividend or any other payments;
- (d) facilitating communications with you, including responding to your queries and requests, and sending notices of general meetings, annual reports and shareholder circulars to you;
- (e) making SGXNET announcements and providing responses to the Singapore Exchange ("**SGX**"), CDP and other relevant entities and regulatory authorities;
- (f) facilitating corporate actions (including without limitation, capital reduction, rights or bonus issue and repurchase and cancellation of shares);
- (g) registering shareholders at general meetings and shareholders' events organised by The Company (including without limitation, verification of your identity and/or your proxy);
- (h) taking photographs and/or video recordings of you at general meetings or events organised by the Company, as well as public events, for publication in the Company's annual reports, or posting on the Company's investor relations website, or any other medium the Company deems appropriate;
- (i) providing system access (including but not limited to e-polling system at general meetings);
- (j) legal and investor relations purposes (including without limitation, rendering or procuring legal, regulatory and capital markets advisory); and
- (k) purposes which are reasonably related to the aforesaid.

3.2 In relation to your relationship with us as shareholder of the Company or in your interactions with us, we may also have specifically notified you of other purposes for which we collect, use or disclose your Personal Data. If so, we will collect, use and disclose your Personal Data for these additional purposes as well, unless we have specifically notified you otherwise.

4. Disclosure of Personal Data

4.1 The Company will take reasonable steps to protect your Personal Data against unauthorised disclosure. Subject to the provisions of any applicable law, your Personal Data may be disclosed, for the purposes listed above (where applicable), to the following:

- (a) the Company's company secretaries and share registrar;
- (b) relevant government regulators, statutory boards or authorities, or law enforcement agencies to comply with any applicable laws, rules, guidelines and regulations;
- (c) agents, contractors or third party service providers (including without limitation, legal advisors, e-polling service providers and scrutineers);
- (d) any business partner, investor, assignee or transferee (actual or prospective) to facilitate business asset transactions (which may extend to any merger, acquisition or asset sale) involving any of the Company's group companies; and

- (e) any other party to whom you authorise the Company to disclose your Personal Data.

5. Contacting Us – Withdrawal of Consent, Access and Correction of your Personal Data

5.1 If you:

- (a) have any questions or feedback relating to your Personal Data or our Shareholder Data Protection Policy;
- (b) would like to withdraw your consent to any use of your Personal Data as set out in this Shareholder Data Protection Policy; or
- (c) would like to obtain access and make corrections to your Personal Data records, please contact the Company as follows:

Email: dpo@singaporeshipping.com.sg

Indicate type of inquiry: Shareholder Personal Data

- 5.2 Please note that if your Personal Data has been provided to us by a third party (e.g. CDP), you should contact that organisation or individual to make such queries, complaints, and access and correction requests to the Company on your behalf.

- 5.3 If you withdraw your consent to any or all use of your Personal Data, depending on the nature of your request, the Company may not be in a position to continue to attend to your queries and needs as a Shareholder, or to administer your shareholding. The Company's legal rights and remedies in such event are expressly reserved.

6. Governing Law

- 6.1 This Shareholder Data Protection Policy and your use of this website shall be governed in all respects by the laws of Singapore.