



PDPA COMPLIANCE POLICY OF
GENESIS-GLOBAL GEMS & JEWELLERY (SINGAPORE) PTE. LTD. (the
“Company”)

1. Consent to collect, use or disclose the individuals' personal data.

The Company (acting through its employees, contract staff, officers and/or authorised agents or representatives) shall collect the customer's contact information, in particular, the mobile number, telephone number and email address of the customer solely for the purpose of contacting the customer as a follow-up of each deal (e.g. to inform the customer that the setting of item of jewellery has been completed; the gemmological report relating to a gemstone has been issued; and/or the item purchased is ready for collection). As the purpose of such collection is wholly in the interest of the customer and is purely perfunctory and administrative in nature, no formal consent is required from the customer, it being that the customer would always agree to give such contact details in any case. This is in alignment with the stipulated criteria for waiver of consent as stated in the Second Schedule of the PDPA 2019.

In the unlikely event that any customer instructs the Company to destroy, or refrain from using in the context contemplated above, any of the customer's contact information (as more particularly described above), the Company shall delete such information from its records and shall treat the related transaction as incapable of being completed if such instruction results in the inability of the Company to fulfil its objectives in the context contemplated above. Any deposits paid or full payment paid by the customer in respect of such transaction shall not be refundable according to the Company's legal contract-making policy, despite the transaction being deemed as incapable of being completed, it being that such lack of completion shall be treated as wholly caused by the customer's instruction to destroy, or refrain from using in the context contemplated above, the relevant information. The Company reserves all its legal rights in connection with any legal proceedings that may ensue due to such instructions, including but not limited to seeking damages and/or any legal and/or equitable remedies available under applicable laws in a court of competent jurisdiction.

Collection of personal data from persons who enter into any form of written agreement, understanding or arrangement with the Company as part of the contract making process is deemed to be consented to by such persons upon the execution of such written agreement, understanding or arrangement. As such, no formal consent will be required to be obtained from such persons in respect of contract making; the contract itself being evidence of consent in and of itself.

2. Purpose of collecting, using or disclosing the individuals' personal data.

Unless the intended purpose is to contact the customer for sales and marketing objectives, no consent shall be obtained from the customer in respect of the scenarios covered in point 1 above. In the event that the purpose is for sales and marketing objectives, formal consent for usage of the information and any disclosure of such information shall be obtained from the customer in the form shown in **Annex A**.

Due to the nature of the Company's business as a regulated dealer of precious stones and precious metals, no consent shall be obtained from the customer in respect of personal data that is collected for the purpose of the Company's satisfaction of, and compliance with, all applicable prevailing anti-money laundering ("AML") legislation as may be required by any authority of competent jurisdiction. In this regard, all the provisions of this Policy, including but not limited to the provisions as to storage and disposal of personal data, shall apply to such personal data as if the data was collected for purposes apart from AML and as the circumstances may require. In no event shall any such personal data be used for any purpose apart from the purpose of AML compliance.

In respect of personal data of persons who enter into any form of written agreement, understanding or arrangement with the Company and whose data is contained within such documentation, the purpose of collecting, using or disclosing such data (as the case may be) shall be evidently clear from, and governed by, the terms of the contract itself. No other documentation shall be necessary to be referred to or created.

3. Notification to collect, use or disclose the individuals' personal data

The customer will be deemed notified of the collection of personal data when the consent form as per Annex A (the "Consent Form") has been duly completed and signed by the customer. All circumstances of use or disclosure as consented to by the customer shall be indicated by the customer in the Consent Form itself. The Company shall only use or disclose such personal data in accordance with the ambit of consent provided by the customer, as evidenced by the Consent Form.

In respect of personal data of persons who enter into any form of written agreement, understanding or arrangement with the Company and whose data is contained within such documentation, any notification to use or disclose the individuals' personal data (as the case may be) shall be governed by the terms of the contract itself and/or by application of prevailing contract laws and laws relating to legal proceedings.

4. Access and correction of the individuals' personal data

The customer shall be provided a copy of the Consent Form, which shall state the method(s) of access and correction of the customer's personal data.

In respect of personal data of persons who enter into any form of written agreement, understanding or arrangement with the Company and whose data is contained within such documentation, any correction of the individuals' personal data shall be governed by the terms of the contract itself and/or by application of prevailing contract laws.

5. Openness of the Personal Data Protection Policies, procedures and practice

All of the Company's PDPA policies, procedures and practice shall be uploaded onto the Company's official website for public viewing.

6. Accuracy of the individuals' personal data

The Company shall use reasonable endeavours to ensure the accuracy of the customer's personal data regarding the customer's identity. All other personal data, such as contact particulars, shall be obtained in good faith from the customer based on trust as to accuracy, as it is impracticable for the Company to verify their accuracy. In any case, the Company shall rely on the customer's truthfulness in providing such personal data to the Company.

7. Protection of the individuals' personal data

All personal data stored in hardcopy format shall be kept safely under lock and key. In any case, the Company shall and has installed tight security systems in the Company's business premises due to the very nature of the Company as a company dealing with high valued goods. All staff of the Company are also required to adhere to the Company's security requirements on a daily operational basis.

All personal data stored in softcopy/digital format (e.g. computer hard drives) shall be protected by updated firewall systems. No personal data of customers shall be removed from the Company's authorised computer systems or other authorised electronic storage devices. In no event shall the Company permit the storage of personal data in any unauthorised computer system or electronic storage device.

8. Retention of the individuals' personal data

Unless otherwise consented to by the customer in writing, all personal data of customers shall be stored for up to a maximum of 7 years. Thereafter, the data shall be destroyed or removed from the Company's records in such a manner that would prevent retrieval of the data by any means, including the method(s) of data forensics.

All personal data of persons who are appointed agents or business referral representatives of the Company and who have entered into a written agreement with the Company in relation to such appointment, and all personal data of customers who have entered into any form of understanding or agreement with the Company pertaining to any investment plan or gems brokerage arrangement, shall be kept by the Company for up to 7 years from the date of termination, full performance or expiration (as the case may be) of such written agreement, understanding or arrangement.

9. Transfer of the individuals' personal data

In no event shall any personal data be transferred or disclosed to any third party without the prior written consent of the person to whom the personal data relates. Access to and usage of all personal data shall be by authorised employees, personnel, directors or officers of the Company on a need-to-know basis and for authorised purposes only.

10. Do - Not - Call Registry (DNC)

No calls to the mobile or other telephone numbers of the customer shall be made unless it is for the purpose(s) in respect of which prior consent of the customer had been obtained explicitly or by reasonable inference, such as the scenarios contemplated in point 1 above.

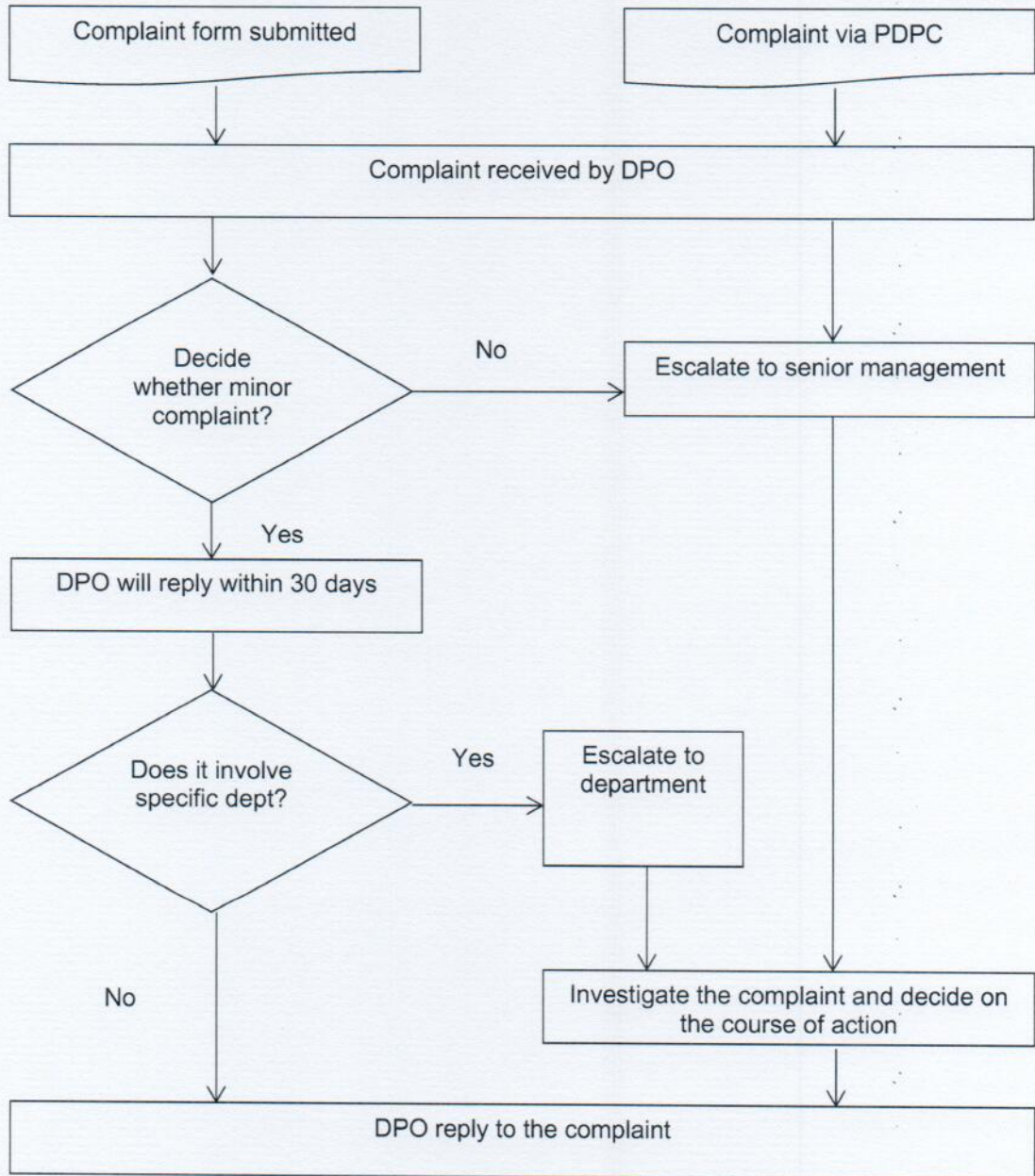


Our Procedures

- a. Data Protection Officer is the person responsible to handle complaints by any individual relating to the Personal Data Protection Act.
- b. If it is a minor complaint and DPO is in a position to reply, he would reply within 30 days.
- c. If the complaint involves a specific department, he would consult this department before replying.
- d. If it is a serious complaint, he would escalate the matter to senior management before replying to the complainant. He would issue a "holding reply" to the complainant as follow:

"We are now looking into your complaint, We take a serious view of all complaints received. We shall reply to you as soon as possible."
- e. If the complains comes via the Personal Data Protection Commission (PDPC), senior management must be consulted before replying to PDPC. DPO shall not respond on his own to the PDPC without senior management's approval.
- f. We do not entertain oral complaint.
- g. We do not entertain the request if we do not hold any personal data of the individual requesting on our Complaint Process.
- h. We shall provide information on our Complaint Process to all authorities, customers, employees and individuals whose personal data are held by us.

Complaint Process



Annex 'A'

CONSENT FORM FOR SENDING MARKETING MATERIALS

You, the undersigned person, agree that Genesis-Global Gems & Jewellery (Singapore) Pte. Ltd. is hereby permitted by you to, and may, collect, use and disclose your personal data, which you have provided in this form, for providing marketing materials that you have, by signing this form, agreed to receive in accordance with the Personal Data Protection Act 2012 (including all latest updated versions of the same as may be enacted and enforced by the relevant authorities) and our company's data protection policy (available for your perusal at our website www.genesis-global.com.sg).

Please completely shade or tick the relevant circles below if you agree to receive the following:

- Our organisation's monthly newsletter (sent by us via email or text message on platforms including but not limited to Whatsapp, Telegram, WeChat and/or Signal).

- Information sent by us about our organisation's products, services and/or events, including but not limited to updates on our latest promotions and new products and services, via the following channels:
 - Email
 - Text Message on platforms including but not limited to Whatsapp, Telegram, WeChat and/or Signal
 - Phone Call

- Information sent by us on selected third parties' products and/or services, including but not limited to updates on their latest promotions, new products and/or services, via the following channels:
 - Email
 - Text Message on platforms including but not limited to Whatsapp, Telegram, WeChat and/or Signal
 - Phone Call

- Information sent by our business partners* on their products and services, via the following channels:
 - Email

- Text Message on platforms including but not limited to Whatsapp, Telegram, WeChat and/or Signal
- Phone Call

****Please note that information will be sent directly by our business partners. We shall disclose the relevant contact information to them for that purpose.***

Name: _____

Date: _____ **Signature:** _____

Please visit our website at www.genesis-global.com.sg for further details on our data protection policy. You may access and/or correct your personal data or withdraw/amend consent to the collection, use or disclosure of your personal data, by email to the contact person identified in the Contact Us section of our website. Upon receiving your email, we will contact you within 30 days to follow-up on your instruction. Please note that a nominal fee of S\$30.00 shall be chargeable by us for each occasion of access to your personal data, which fee shall be payable upfront before access is facilitated by us. Access to your personal data shall be carried out at our designated premises during office hours on such date and time that is reasonable, convenient and acceptable to both parties.