



Management Policies and Procedures

MPP-018 Rev. A3

PRIVACY AND PERSONAL DATA PROTECTION POLICY

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MANAGEMENT POLICIES AND PROCEDURES

MPP-018 PRIVACY AND PERSONAL DATA PROTECTION POLICY

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1. BACKGROUND AND PURPOSE

- (a) InfraCo Asia Development Pte. Ltd (**IAD**), InfraCo Asia Investments Pte Ltd (**IAI**), and their subsidiaries (together, **InfraCo Asia**) were established by the Private Infrastructure Development Group (**PIDG**) to promote the development of private sector infrastructure in developing countries of South Asia and South-East Asia. PIDG comprises of member donor countries (**PIDG Members**), including UK, Australia, and Switzerland, among others.
- (b) InfraCo Asia respects the confidentiality and security of personal data and the privacy of individuals and is committed to complying with the Personal Data Protection Act 2012 (“**PDPA**”) (set out in **Appendix A**) and, where applicable, the European General Data Protection Regulation (“**GDPR**”) (set out in **Appendix C**).
- (c) InfraCo Asia acknowledges that the information provided by any individual may be confidential. InfraCo Asia will not sell, rent, distribute or otherwise make personal information commercially available to any third party, except as otherwise indicated in this Policy (for example, where provided to service providers, contractors, and/or communications and online platforms for provision of services to or on behalf of InfraCo Asia). InfraCo Asia will maintain the confidentiality of and protect each individual's Personal Data in accordance with this Policy and the PDPA, and where applicable, in accordance with the GDPR and applicable laws.

2. FRAMEWORK AND APPLICABILITY

- (a) This Privacy and Personal Data Protection Policy (“**Policy**”) outlines how InfraCo Asia manages the Personal Data that InfraCo Asia collects, uses and discloses.
- (b) InfraCo Asia collects Personal Data insofar as required in connection with the business and/or the activities conducted by InfraCo Asia (including in relation to InfraCo Asia's business dealings and interactions with the Participants and/or PIDG/PIDG Members). Once there is no business or legal purpose for retaining the Personal Data as referred to in the foregoing, InfraCo Asia will delete the Personal Data. InfraCo Asia does not collect Personal Data randomly or indiscriminately without purpose.
- (c) Insofar as is required under the PDPA, this Policy shall be applicable to InfraCo Asia (including its directors, officers, employees, companies and projects), and to other participants and organizations (“**Participants**”) involved with the InfraCo Asia companies and/or projects in all jurisdictions, and which shall include the following:
 - (i) **Developer** - Developer services provider contracted with InfraCo Asia under a “Developer Services Agreement” (or similar) with respect to the development of a portfolio of projects;
 - (ii) **Co-Developer** - Co-development party contracted with InfraCo Asia under a joint development agreement or joint venture agreement (or similar) with respect to the development of a particular project or portfolio of projects;
 - (iii) **Fund Manager** - Fund management party contracted with InfraCo Asia under a “Management Services Agreement” (or similar) with respect to the development of a particular project or portfolio of projects;
 - (iv) Director, officer, or employee of a Developer;
 - (v) Director, officer, or employee of a Co-Developer; or
 - (vi) Director, officer, or employee of a Fund Manager.
- (d) InfraCo Asia, its Developers, Co-Developers and Fund Managers shall be considered for the purposes of this policy as each part of the InfraCo Asia Group, within which InfraCo Asia shall collect, share and disclose Personal Data, subject to this Policy.
- (e) Insofar as is required under the GDPR, where applicable:
 - (i) InfraCo Asia will typically be a 'data controller' (being the party that that decide what personal data the business will collect and why); and
 - (ii) InfraCo Asia's service providers, contractors, communications and online platforms will be a 'data processor' (being the parties that maintain and process the data either according to instructions from the data controller or according to their own respective standards).

- (f) For avoidance of doubt, nothing in this policy shall affect any rights which InfraCo Asia and/or the Participants may have at law in connection with the collection, use or disclosure of Personal Data.

3. PERSONAL DATA

- (a) “**individual**” as used or referred to in this Policy means a natural person.
- (b) “**Personal Data**” as defined in this Policy means any data or information about an individual from which they can be identified either (a) from that data; or (b) from that data and other information to which they have or are likely to have access.
- (c) Examples of Personal Data which an individual may provide include, but is not limited to (depending on the nature of their interaction with InfraCo Asia):
- (i) their name, NRIC number, passport number or other identification number, telephone number(s), mailing address, email addresses and any other information relating to them which they have provided InfraCo Asia in any form (i.e. job application forms, information enquiry, investment proposal, etc.);
 - (ii) information about the individual’s use of our websites and services, including cookies, IP addresses, email subscription and membership details (where applicable);
 - (iii) the individual’s Curriculum Vitae, employment history, testimonials and referrals, previous drawn income/income levels, education background, medical history and disabilities and legal and bankruptcy history (if applicable); and
 - (iv) the individual’s payment related information, such as the individual’s bank account / credit card details, and/or their credit history.

4. COLLECTION OF PERSONAL DATA

- (a) Generally, InfraCo Asia, its Participants and the PIDG/PIDG Members collect Personal Data in the following ways:
- (i) when individuals submit soft or hard copy forms, materials or information to InfraCo Asia or relating to InfraCo Asia;
 - (ii) when individuals register or submit details or provide interactions in connection with websites, communications or online platforms owned or operated by or on behalf of InfraCo Asia or any applicable data processors;
 - (iii) when individuals use or download InfraCo Asia, data controller or data processor information;
 - (iv) when individuals interact with InfraCo Asia’s employees and staff and/or its Participants and/or PIDG/PIDG Members and/or applicable data controllers and/or data processors, including during face-to-face meetings, email or by way of the telephone or other means of communication or interaction;
 - (v) when individuals enter into a contract, agreement or arrangement with InfraCo Asia or its Participants and/or PIDG/PIDG Members and/or applicable data controllers and/or data processors;
 - (vi) when individuals disclose or establish any online accounts, profiles, communications or interactions with InfraCo Asia and/or its Participants and/or PIDG/PIDG Members and/or applicable data controllers and/or data processors;
 - (vii) when individuals submit a request for InfraCo Asia and/or its Participants and/or PIDG/PIDG Members and/or applicable data controllers and/or data processors to contact them;
 - (viii) when individuals respond to requests to submit additional Personal Data;
 - (ix) when individuals subscribe or ask to be included in an email or other mailing or communications list;
 - (x) when individuals respond to marketing or publicity initiatives;
 - (xi) when individuals respond to surveys or questionnaires;
 - (xii) when individuals submit applications to InfraCo Asia and/or its Participants and/or PIDG/PIDG Members and/or applicable data controllers and/or data processors (including in relation to job applications, service proposals etc.);

- (xiii) when InfraCo Asia and/or its Participants and/or PIDG/PIDG Members and/or applicable data controllers and/or data processors receives references or information from business partners and/or third parties (including, where individuals have been referred);
 - (xiv) when individuals request that InfraCo Asia and/or its Participants and/or PIDG/PIDG Members and/or applicable data controllers and/or data processors contacts them for any reason;
 - (xv) when individuals browse or interact with InfraCo Asia's website and/or communications or online platforms; and
 - (xvi) when individuals submit their Personal Data to InfraCo Asia and/or its Participants and/or PIDG/PIDG Members and/or applicable data controllers and/or data processors for any other reason.
- (b) Where individuals provide any Personal Data of a third party (including information of their business partners, shareholders, their dependent, spouse, children and/or parents) to InfraCo Asia and/or its Participants and/or PIDG/PIDG Members and/or applicable data controllers and/or data processors, they represent and warrant that they have obtained the consent of that third party for the collection, use and disclosure of their Personal Data for the purposes set out above.
- (c) All individuals should ensure that all Personal Data submitted to InfraCo Asia and/or its Participants and/or PIDG/PIDG Members and/or applicable data controllers and/or data processors is complete, accurate, true and correct. Failure on their part to do so may result in InfraCo Asia's (and/or applicable data controllers' and/or data processors') inability to utilise the Personal Data in the way it was intended when submitted.

5. HOW DOES INFRACO ASIA USE PERSONAL DATA AND TO WHOM MAY PERSONAL DATA BE DISCLOSED?

- (a) **General Purposes**
- InfraCo Asia, the Participants and the PIDG / PIDG Members are in the business of infrastructure development across multiple jurisdictions. Accordingly, InfraCo Asia, its Participants and the PIDG/PIDG Members (and applicable data controllers and/or data processors) generally come into possession of Personal Data in the course of its business, transactions and dealings with potential parties, stakeholders, contractors, vendors, promoters and/or participants in connection with its projects and activities. Without limiting the foregoing, InfraCo Asia and/or any of its Participants and/or the PIDG/PIDG Members (and/or applicable data controllers and/or data processors) may collect, use and disclose Personal Data for the following purposes:
- (i) to verify the individual's personal particulars and process transactions or requests;
 - (ii) to evaluate the proposals for working with InfraCo Asia and to conduct relevant investigatory background checks on the individual;
 - (iii) to manage or facilitate business or other transactions (which may extend to any merger, acquisition or sale) or to evaluate proposals, opportunities, projects and business dealings involving InfraCo Asia and/or its Participants or in relation the projects/activities they are involved in;
 - (iv) to administer and manage the applicable relationship between the individual and InfraCo Asia or any of the Participants and/or PIDG/PIDG Members and/or applicable data controllers and/or data processors, including the verification of the individual's identity and/or the identity of the individual's proxy (as may be applicable);
 - (v) to communicate InfraCo Asia's codes, policies, procedures, terms and conditions and other information or administrative function (including in relation to any changes or developments or for emergency contacts or business continuity purposes);
 - (vi) to manage InfraCo Asia's and/or the Participants' and/or the PIDG/PIDG Members' business operations and activities, as well as to comply with their other internal policies and procedures;
 - (vii) to inform the individual of InfraCo Asia's performance, activities, projects and/or initiatives (including provision through the sending of circulars, reports, newsletters, communications or the provision of responses to inquiries, marketing, alerts, activity update or publicity materials);
 - (viii) to conduct research for profiling, analysis, statistics and planning;

- (ix) to update records, including in relation to the databases of InfraCo Asia and/or the Participants and/or the PIDG/PIDG Members; monitoring and maintaining a copy of the individual's record of previous transactions and/or interactions with InfraCo Asia and/or the Participants and/or the PIDG/PIDG Members, as applicable;
- (x) to collect, use and disclose Personal Data in association with and amongst the Participants, PIDG/PIDG Members or joint-venture or alliance partners for the purposes of furthering the applicable business, transaction and/or dealing to which the Personal Data pertains;
- (xi) to communicate and respond to the individual's queries, requests and complaints, if any;
- (xii) to handle disputes and complaints and conduct and facilitate investigations and proceedings when required;
- (xiii) to protect and enforce InfraCo Asia's and/or Participants' and/or the PIDG/PIDG Members' reputation or their contractual and legal rights and obligations (including in relation to carrying out CCTV surveillance and conducting security clearances and investigatory background checks with third party service providers);
- (xiv) to prevent, detect and investigate crime (including fraud and money-laundering), and to analyze and manage other commercial and/or reputational risks;
- (xv) to prevent, detect and investigate crime and managing the safety and security (including in relation to carrying out CCTV surveillance and conducting security clearances and investigatory background checks with third party service providers);
- (xvi) to comply with any applicable rules, laws and regulations, codes, policies, procedures, guidelines or schemes;
- (xvii) to assist in law enforcement and investigations by relevant authorities;
- (xviii) in relation to employment, engagement of or contracting with an individual by InfraCo Asia and/or a Participant and/or the PIDG/PIDG Members:
 - (1) to evaluate the individual's suitability, including pre-recruitment checks and checking on provided references for more detailed background screening/vetting;
 - (2) to collect information about the individual's suitability for the position applied for;
 - (3) to organise training and staff development programs;
 - (4) to maintain and manage employee relations, including annual performance assessments/appraisals;
 - (5) to administer and manage benefits and payment/payroll processing;
 - (6) to provide the individual with the relevant/correct tools as required for the individual to do carry out their job responsibilities;
- (xix) in relation to general business, filing, reporting, disclosure or transaction purposes;
- (xx) for provision to InfraCo Asia's service providers, contractors, communications and online platforms (and/or applicable data controllers or data processors) for the above and/or below mentioned purposes; and
- (xxi) in relation to any related or other purpose.

(b) Additional Purposes

- (i) InfraCo Asia may also notify individuals of other additional purposes for which InfraCo Asia collects, uses or discloses Personal Data that is not specified in this Policy. If so, InfraCo Asia will collect, use and disclose Personal Data for these additional purposes as well, unless InfraCo Asia has specifically notified the individual otherwise.
- (ii) From time to time, the individual's Personal Data may also be disclosed by InfraCo Asia to the following third parties outside of InfraCo Asia and/or its Participants and/or PIDG/PIDG Members:
 - (1) agents, contractors, sub-contractors, third party service providers and specialist advisers contracted by InfraCo Asia and/or the Participants and/or the PIDG/PIDG Members to provide administrative, financial, research, operational or other services, such as telecommunications, information technology, payment, payroll, processing, training, market research, investigatory services, storage and archival;
 - (2) insurers or insurance investigators and credit providers;
 - (3) in the event of default or disputes, any debt collection agencies or dispute resolution centres;
 - (4) any business partner, investor, assignee or transferee (actual or prospective) (which may extend to any merger, acquisition or asset sale);

- (5) professional advisors such as our auditors and lawyers;
 - (6) relevant government regulators or authority or law enforcement agencies;
 - (7) anyone to whom InfraCo Asia's rights and obligations may be transferred;
 - (8) banks, credit card companies and their respective service providers; and
 - (9) any other party as may be notified and/or consented to by the individual.
- (iii) It is InfraCo Asia's general policy that it requires that third party organisations outside of InfraCo Asia and/or its Participants and/or PIDG/PIDG Members which handle or obtain Personal Data, such as external service providers to InfraCo Asia, to acknowledge the confidentiality, security and sensitivity of this personal data and undertake to respect any individual's right to privacy and comply with the PDPA and/or GDPR, as applicable.
- (iv) The Participants, PIDG/PIDG Members or joint-venture or alliance partners may also collect, use and disclose Personal Data for their own independent purposes, for which the applicable Participants, PIDG/PIDG Members and joint-venture or alliance partners shall be responsible for its relevant collection, usage and disclosure, and its relevant obligations under law and the PDPA and/or GDPR, as applicable.
- (v) If, in the future, there is a re-organisation in InfraCo Asia's corporate structure, there might be a need to transfer all information to new entities or third parties. All individuals will be notified of this or they would be a prominent notice on the InfraCo Asia website.

6. INTERACTION WITH INFRA CO ASIA WEBSITE; USE OF COOKIES

- (a) InfraCo Asia relies predominantly on its website and email mailing list programs, which are used to inform individuals about projects, services and/or news we supply/publish. When individuals interact with InfraCo Asia on InfraCo Asia's website and/or communications or online platforms operated on or on behalf of InfraCo Asia, certain information will be collected or analysed (including, as applicable, the use of "cookies" where a small data file is sent to the individual's browser to store and track aggregate information about them).
- (b) Where cookies are used by InfraCo Asia's website and/or communications and/or online platforms, these are used to track information such as the number of users and their frequency of use, profiles of users and their preferred sites. InfraCo Asia does not envisage that information like age, gender and bank details will be collected.
- (c) Should each individual wish to disable the cookies, they may do so by changing the settings on their browser. However, they might not be able to enter certain part(s) of InfraCo Asia's website thereafter **(Appendix B: Cookie Policy)**.
- (d) Depending on the information and/or services that individuals request, they may be asked to provide their name, email addresses and/or other information which will be stored in InfraCo Asia's (and/or applicable data controllers' and/or data processors') communications, marketing and/or online platforms. Such platforms may be used to inform individuals about projects, services and/or news that InfraCo Asia supplies or publishes. Email marketing messages may contain tracking beacons/tracked clickable links or similar server technologies that can track subscriber activity. Where used, such marketing messages may record a range of subscriber data relating to engagement, geographic, demographics and already stored and/or other subscriber data. Other types of data that may be collected may include information on interests in InfraCo Asia communications or events, accessing device type, source, operating system, internet protocol address, browser type, browser version, location, the pages of the InfraCo Asia website that are visited, the time and date of any visit, the time spent on those pages and other statistics.
- (e) Individual preferences for receiving any marketing emails, updates and other information, can be requested to be corrected or deleted by the individual by notifying InfraCo Asia that the individual wishes to be 'unsubscribed'. Unsubscribing can be done by clicking on the word 'unsubscribe' in the footer of sent marketing emails or by contacting the Data Protection Officer as set out in paragraph 11 below.
- (f) By using any of InfraCo Asia's services, including interacting with InfraCo Asia or accessing InfraCo Asia's websites or online communications, all individuals acknowledge and consent their Personal Data and such other information as described above being obtained and used by InfraCo Asia in accordance with this Policy.

7. THIRD-PARTY WEBSITES

- (a) The InfraCo Asia website may contain links to other websites operated by third parties (including in relation to the Participants and PIDG/PIDG Members).
- (b) InfraCo Asia is not responsible for the privacy practices of websites operated by third parties that are linked to this website. InfraCo Asia encourages all individuals to learn about the privacy policies of such third-party websites.
- (c) Once each individual has left InfraCo Asia's website, they should check the applicable privacy policy of the third-party website to determine how such websites will handle any Personal Data.
- (d) InfraCo Asia requests all individuals to please contact the owner of any respective third-party websites ((including in relation to the Participants and PIDG/PIDG Members) for answers on any questions on their privacy policies.

8. KEEPING PERSONAL DATA ACCURATE AND UP-TO-DATE

- (a) InfraCo Asia endeavours to ensure that Personal Data stored by InfraCo Asia is accurate and up-to-date.
- (b) InfraCo Asia also understands that Personal Data may change frequently, such as changes of address and other personal circumstances. Accordingly, InfraCo Asia encourages the individual to contact the Data Protection Officer as set out in paragraph 11 below to update their Personal Data.
- (c) Incomplete or outdated Personal Data may result in InfraCo Asia's inability to provide the individual with products and services they have requested.

9. ACCESS REQUESTS AND WITHDRAWAL OF CONSENT

- (a) Please contact InfraCo Asia in writing via its appointed Data Protection Officer as set out in paragraph 11 below if you wish to seek access to, request a correction to, or withdraw the consent to collect and use, your Personal Data.
- (b) All individuals making such requests should identify themselves and state which Personal Data and information about its use and / or disclosure is requested. InfraCo Asia may require further information from the requesting individual in order to verify their identity before disclosing any personal information or to ensure that the right information is being removed and/or corrected.
- (c) If an individual withdraws their consent to any or all purposes and depending on the nature of their request, InfraCo Asia may not be in a position to continue to interact or conduct business or transactions with the individual.
- (d) Please note that if an individual's Personal Data has been provided by a third party or person (e.g. a referrer), the individual should contact that third party or person to make such queries, complaints, and access and correction requests to InfraCo Asia on the individual's behalf.

10. MANAGEMENT AND SECURITY

- (a) A Data Protection Officer to oversee management of the Personal Data in accordance with this Policy and the PDPA has been appointed by InfraCo Asia.
- (b) InfraCo Asia will, subject to the provisions of applicable law, take reasonable steps to protect Personal Data against unauthorised disclosure. InfraCo Asia's general policy is to ensure that its employees who handle Personal Data appreciate how to respect the confidentiality, security and sensitivity of Personal Data.
- (c) Recipients of InfraCo Asia Information shall please also note the conditions of receiving information which may be considered confidential and/or privileged and/or subject to copyright material or proprietary rights. In this regard, please refer to **Appendix D: Disclaimer**.

11. HOW TO CONTACT US

- (a) If any individual has any questions about this Policy, any complaints relating to their Personal Data or they would like to obtain access, further information and / or make corrections to their Personal Data records (for which InfraCo Asia may at its discretion charge a fee to cover the cost of verifying the application and locating, retrieving and copying any material requested), please contact InfraCo Asia's designated Data Protection Officer in writing using the below details:

To: InfraCo Asia Development Pte. Ltd.
Att: Data Protection Officer
Contact: privacy@infracoasia.com

12. REVIEW POLICY

- (a) This Policy will be reviewed from time to time by InfraCo Asia.
- (b) InfraCo Asia may also from time to time update this Policy to take account of new laws and technology, any changes to InfraCo Asia's operations and practices and the changing business environment. In this regard, individuals should please check and peruse this Policy periodically.
- (c) If anyone is unsure whether they are reading the most current version of this Policy, please contact InfraCo Asia directly.

APPENDICES

APPENDIX A

PERSONAL DATA PROTECTION ACT 2012 (PDPA)

Link: <https://sso.agc.gov.sg/Act/PDPA2012>

APPENDIX B**INFRACo ASIA COOKIE POLICY***(a) Use of Cookie Policy*

This Cookie Policy applies to any websites which are operated by or on behalf of InfraCo Asia (“**Websites**”). By using and accessing our Websites, you are consenting to our use of cookies in accordance with this Cookie Policy. This Cookie Policy may be updated from time to time. Updates to the Cookie Policy will be posted on our Websites.

If you do not agree to our use of cookies as set out in this Cookie Policy, you should disable the cookies associated with our Websites by changing your browser settings accordingly. However, you may not be able to enter certain part(s) of the Websites, and some of the functions and services may not be able to function without cookies. This may also impact your user experience while on our Websites.

(b) What are cookies?

Cookies are small files containing a string of characters that are sent to your computer when you visit our Websites. Depending on the type of cookies, they may store user preferences and other information.

(c) What do we use cookies for?

We use cookies to track information such as the number of users and their frequency of use, profiles of users and their preferred sites. Information like age, gender and bank details are not collected.

We use cookies to make the Websites easier to use and to better tailor our products and services to your interests and needs. Cookies may also be used to help speed up your future activities and experience on our Websites. When you interact with us on our Websites, we may collect for the purposes of analysis statistical information, such as number of users, their frequency of use, the number of page views (or page impressions) that occur on the Websites and common entry and exit points into and out of the Websites. We use such statistical information to understand how people use our Websites and to help us improve their structure and contents.

-END-

APPENDIX C

GENERAL DATA PROTECTION REGULATION (GDPR) (EU)

Link: <https://gdpr-info.eu/>

APPENDIX D

DISCLAIMER

All recipients of communication (electronic or otherwise) by or on behalf of InfraCo Asia Development Pte. Ltd., InfraCo Asia Investments Pte. Ltd., members of the Private Infrastructure Development Group or any other person (including any members, employees and agents of the same) should note that all of the information, contents and any attachments transmitted in the communication are intended only for the recipient to whom it is addressed and may contain confidential and/or privileged and/or subject to copyright material.

Any review, retransmission, dissemination or other use of, or taking of any action in reliance upon, the information, contents or attachments (or any part of the same) of the communication by persons or entities other than the intended recipient are prohibited.

If person(s) are not the intended recipient or if person(s) have received the communication (or any of the information, materials or contents contained therein or attached thereto) in error: (i) please contact the sender, (ii) permanently delete all of the information, contents and materials from any computer into which the communication may have been transmitted, and (iii) do not disclose any part of the same to any person.

Any views or opinions expressed or implied in the communication are solely those of the author of the communication and do not necessarily represent those of InfraCo Asia Development Pte. Ltd., InfraCo Asia Investments Pte. Ltd., members of the Private Infrastructure Development Group or any other person (including any members, employees and agents of the same).

To the extent permitted by law, InfraCo Asia Development Pte. Ltd., InfraCo Asia Investments Pte. Ltd., members of the Private Infrastructure Development Group or any other person (including any members, employees and agents of the same) do not accept or assume any liability, responsibility or duty of care for any consequences of you or anyone else acting, or refraining to act, in reliance on the information contained in or attached to the communication or for any decision based on it.

Where InfraCo Asia Development Pte. Ltd. or InfraCo Asia Investments Pte. Ltd. have collected or have been provided personal data, please refer to the Privacy and Personal Data Protection Policy, accessible at: <http://infracoasia.com/legal/>. Visitors to the website are also subject to the Cookie Policy, accessible at: <http://infracoasia.com/wp-content/uploads/2018/05/Cookie-Policy.pdf>.