

## ***Privacy Policy***

This Privacy Policy (“**Policy**”) sets out the basis on which Leave a Nest Singapore Pte Ltd (“**we**”, “**us**”, or “**our**”) may collect, use, disclose or otherwise process the personal data collected by, through and/or from you in accordance with the Personal Data Protection Act 2012 (the “**PDPA**”). This Policy applies to personal data in our possession or under our control, including personal data in the possession of organisations or individuals that we have engaged to collect, use, disclose or process personal data for our purposes.

### Personal data

1. As used in this Policy, “**Personal Data**” means data, whether true or not, about you or any other person 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.
2. Depending on the nature of your interaction with us, some examples of Personal Data which we may collect from you include, but may not be limited to, your name and identification information such as parts of your identification number, contact information such as your address, email address or telephone number, education institutions, educational standards, and date of birth.
3. Other terms used in this Policy shall have the meanings given to them in the PDPA (where the context so permits).

### Collection, use, and disclosure of Personal Data

4. We generally do not collect your Personal Data unless (a) it is provided to us voluntarily by you directly, via a third party who has been duly authorised by you to disclose your personal data to us (your “**Authorised Representative**”), or (b) when collection and use of your Personal Data without consent is permitted or required by the PDPA or other laws. We shall seek your consent before using your Personal Data for a purpose which has not been notified to you (except where permitted or authorised by law).
5. We may collect and use your Personal Data for any or all of the following purposes: (a) performing obligations in the course of or in connection with our provision of our services to you; (b) verifying your identity and eligibility for the services provided to you ; (c) responding to, handling, and processing queries, requests, applications, complaints, and feedback from you; (d) managing your relationship with us; (e) complying with any applicable laws, regulations, codes of practice, guidelines, or rules, or to assist in law enforcement and investigations conducted by any governmental and/or regulatory authority; (f) any other purposes for which you have provided the information; (g) transmitting to any unaffiliated third parties including the vendors from which you may directly procure services apart from us, our affiliated entities or companies (which includes, without limitation, to Leave a Nest Co., Ltd (“**LAN-JP**”) – our affiliated company in Japan), our third party service providers and agents, and relevant governmental and/or regulatory authorities, whether in Singapore or abroad, for the aforementioned purposes; and (i) any other incidental business purposes

related to or in connection with the above.

6. We may disclose your Personal Data: (a) where such disclosure is required for performing obligations in the course of or in connection with our provision of the services requested by you; (b) where such disclosure is required for us to verify your eligibility to receive the services you have requested; or (c) to third party service providers, agents and other organisations we have engaged to perform any of the functions listed in clause 5 above for us.
7. The purposes listed in the above clauses 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 any contract with you).

#### Withdrawing your consent

8. The consent that you provide for the collection, use and disclosure of your Personal Data will remain valid until such time it is being withdrawn by you in writing. You may withdraw consent and request us to stop using and/or disclosing your Personal Data for any or all of the purposes listed above by submitting your request in writing or via email to our Data Protection Officer at the contact details provided below in clause 24.
9. Upon receipt of your written request to withdraw your consent, 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 against and liabilities to us. In general, we shall endeavour to process your request within fourteen (14) business days of receiving it.
10. Whilst we respect your decision to withdraw your consent, please note that depending on the nature and scope of your request, we may not be in a position to continue providing our services to you and we shall, in such circumstances, notify you before completing the processing of your request.
11. Please note that withdrawing consent does not affect our right to continue to collect, use and disclose personal data where such collection, use and disclose without consent is permitted or required under applicable laws.

#### Access to and correction of Personal Data

12. You are entitled to make (a) an access request for access to a copy of the Personal Data which we hold about you or information about the ways in which we use or disclose your Personal Data; or (b) a correction request to correct or update any of your Personal Data which we hold about you. If you wish to do so, you may submit your request in writing or to our Data Protection Officer at the contact details provided below in clause 24.

13. Please note that a reasonable fee may be charged for an access request. If so, we will inform you of the fee before processing your request.
14. We will respond to your request as soon as reasonably possible. Should we not be able to respond to your request within thirty (30) days after receiving your request, we will inform you in writing within thirty (30) days of the time by which we will be able to respond to your request. If we are unable to provide you with any Personal Data or to make a correction requested by you, we shall generally inform you of the reasons why we are unable to do so (except where we are not required to do so under the PDPA).

#### Protection of your Personal Data

15. To safeguard your Personal Data from unauthorised access, collection, use, disclosure, copying, modification, disposal or similar risks, we have introduced appropriate administrative, physical and technical measures such as disclosing Personal Data both internally and to our authorised third parties only on a need-to-know basis.
16. You should be aware, however, that no method of transmission over the Internet or method of electronic storage is completely secure. While security cannot be guaranteed, we strive to protect the security of your information and are constantly reviewing and enhancing our information security measures.

#### Accuracy of Personal Data

17. In order to ensure that your Personal Data we retain is current, complete and accurate, please update us if there are changes to your Personal Data by informing our Data Protection Officer in writing or at the contact details provided below in clause 24.

#### Retention of Personal Data

18. We may retain your Personal Data for as long as it is necessary to fulfil the purpose for which it was collected, or as required or permitted by applicable laws.
19. We will cease to retain your Personal Data, or remove the means by which the data can be associated with you, as soon as it is reasonable to assume that such retention no longer serves the purpose for which the personal data was collected, and is no longer necessary for legal or business purposes.

#### Transfers of Personal Data outside of Singapore

20. We may, from time to time, transfer your Personal Data out of Singapore for the purposes and in the manners set out in clauses 5 and 6 above.
21. Your Personal Data, after having been transferred out of Singapore, may be stored in locations outside of Singapore and may also be accessed from elsewhere in the world.

22. We will take steps at all times to ensure that your Personal Data continues to receive a standard of protection that is at least comparable to that provided under the PDPA.
23. You consent to your Personal Data being transferred out of Singapore and dealt with in the manner set out at clauses 20, 21, and 22 above.

#### Data Protection Officer

24. You may contact our Data Protection Officer, Mr Shohei Maekawa if you have any enquiries or feedback on our personal data protection policies and procedures, or if you wish to make any request, in the following manner: [19 Tai Seng Avenue, Singapore 534054, [maekawa@lne.st](mailto:maekawa@lne.st) and +65-8730-7435].

#### Effect of Policy and changes to Policy

25. This Policy applies in conjunction with any other policies, notices, contractual clauses and consent clauses that apply in relation to the collection, use and disclosure of your Personal Data by us. We may revise this Policy from time to time without any prior notice by publishing the latest version of this Policy on this website. Your continued use of our services constitutes your acknowledgement and acceptance of such changes.