

Your privacy is important to us. The purpose of this Privacy Policy is to inform you of how we handle or process your personal data in accordance with the Personal Data Protection Act 2012 (“the Act”). Please take a moment to read this Privacy Policy so that you know and understand the purposes for which we collect, use and disclose your Personal Data.

By interacting with us, submitting information to us or signing up for any promotions or services offered by us, you agree and consent to International Metal Engineering Pte Ltd, (collectively referred to herein as "IME", "us", "we" or "our") collecting, using, disclosing and sharing amongst themselves your Personal Data, and disclosing such Personal Data to IME and relevant third parties in the manner and for any of the purposes set forth in this Privacy Policy. In addition, this Privacy Policy will also provide you with more information on the bases upon which we may lawfully collect, use and/or disclose your Personal Data without your consent, where permitted by applicable law.

This Privacy Policy supplements but does not supersede nor replace any other consents you may have previously provided to IME nor does it affect any rights which IME may have at law in connection with the collection, use or disclosure of your Personal Data, and any consents you may have provided in connection with this Privacy Policy are cumulative and additional to any rights which we may have under applicable law to handle or process your Personal Data.

We reserve the right to update or modify this Privacy Policy from time to time, and send you notification of updates to this Privacy Policy in any form as we may deem appropriate. While you should regularly check this Privacy Policy, we may also inform you of how we process your Personal Data by publishing (or amending) this Privacy Policy and, where required by applicable law, by posting a notice, or reaching you via other forms of communication (e.g. sending you an email) based on the contact particulars that we may have of you in our records from time to time. You may also contact us in the manner disclosed in this Privacy Policy to learn about our handling or processing of your Personal Data.

To the maximum extent permissible under applicable law, you agree to be bound by the prevailing terms of the Privacy Policy as updated from time to time on our websites and/or as you may be notified. Hence, please check regularly for updated information on the handling of your Personal Data.

1. Your Personal Data

1.1 In this Privacy Policy, “Personal Data” refers to any data or information about you from which you can be identified either (a) from that data; or (b) from that data and other

information to which we have or are likely to have access. Examples of such Personal Data which you may provide to us include (depending on the nature of your interaction with us:

- (a) your name, email address and any other information relating to you which you have provided us in any forms you may have submitted to us, or in other forms of interaction with you;
- (b) information about your use of IME's website and services, including cookies, IP address, subscription account details and membership details, but only to the extent that IME may identify you from such information;
- (c) information about your usage of and interaction with our website and/or services including computer and connection information, device capability, bandwidth, statistics on page views, and traffic to and from our website.

2. Collection of Personal Data

2.1 Generally, IME collects your Personal Data in the following ways:

- (a) when you submit forms or other documents relating to any of our products or services;
- (b) when you request that we contact you;
- (c) when you are contacted by, and respond to, our marketing representatives, agents and other service providers;
- (d) when you respond to our request for additional Personal Data;
- (e) when you ask to be included in an email or other mailing list;
- (f) when you respond to our promotions and other initiatives;
- (g) when we receive references from business partners and third parties, for example, where you have been referred by them;
- (h) when you submit your Personal Data to us for any other reason.

2.2 When you browse our website, you generally do so anonymously but please see the section below on cookies and other related technologies which we have implemented on our website. We do not, at our website, automatically collect Personal Data unless you provide such information to us.

2.3 If you provide us with any Personal Data relating to a third party (e.g. information of spouse, children, parents, employees and/or authorised representatives), by submitting such information to us, you represent to us that you have obtained the consent of the third party to you providing us with their Personal Data for the respective purposes.

2.4 You should ensure that all Personal Data submitted to us is complete, accurate, true and correct. Failure on your part to do so may result in our inability to provide you with products and services you have requested, or processing any requests and applications you may have made to us.

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

3.1 Generally, IME collects, uses and discloses your Personal Data for the following purposes:

- (a) responding to, processing and handling your queries, purchases, requests, complaints and feedback;
- (b) matching any Personal Data held which relates to you for any of the purposes listed herein;
- (c) protecting and enforcing our contractual and legal rights and obligations;
- (d) conducting audits, reviews and analysis of our internal processes, action planning and managing commercial risks;
- (e) compliance with any applicable rules, laws and regulations, codes of practice or guidelines or to assist in law enforcement and investigations by relevant authorities; and/or
- (f) any other purpose relating to or reasonably necessary for any of the above.

3.2 In addition, IME may collect, use and disclose your Personal Data for the following purposes, depending on the nature of our relationship with you:

- (a) to verify and process your personal particulars and payments in relation to all queries, purchase orders and requests from you;
- (b) to provide you with the goods and services which you have purchase, including the provision and delivery of products requested;
- (c) communicating with you to inform you of changes and development to IME policies, terms and conditions and other administrative information, including for the purposes of servicing you in relation to products and services offered to you;
- (d) resolving complaints and handling requests and enquiries;
- (e) conducting market research for statistical, profiling and statistical analysis for the improvement of services provided to you; and
- (f) any other purpose relating to or reasonably necessary for any of the above;

3.3 In addition, where permitted under applicable laws, IME may also collect, use and disclose your Personal Data, and share your Personal Data with IME business partners, service providers and/or other third parties for the following purposes (which we may describe in our documents and agreements as "Additional Purposes" for the handling of Personal Data):

- (a) providing services, products and benefits to you, including promotions;
- (c) sending you details of products, services and special offers, either to our customers generally, or of particular products and services or special offers which may be of interest to you; and
- (e) conducting market research, data analytics, understanding and determining customer location, preferences and demographics for us, and/or other third parties to develop insights into the industry, review, develop and improve our products, services and also develop special offers and marketing programmes.

3.5 In relation to particular products or services 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, then we will collect, use and disclose your Personal Data for these purposes as well.

3.6 You may withdraw your consent for receiving marketing or promotional materials/communication by contacting us. Once we receive confirmation that you wish to withdraw your consent for marketing or promotional materials/communication, it may take up to 30 calendar days for your withdrawal to be reflected in our systems. Therefore, you may still receive marketing or promotional materials/communication during this period of time. Please note that even if you withdraw your consent for the receipt of marketing or promotional materials, we may still contact you for other purposes in relation to the products and services that you have requested or purchased from IME.

4. Disclosure of Personal Data

4.1 IME will take reasonable steps to protect your Personal Data against unauthorised disclosure. Subject to the provisions of any applicable law, this Personal Data may be disclosed, for the purposes listed above (where applicable), to the following third parties, whether they are located overseas or in Singapore:

- (a) Third party service providers who provide operational services to IME
- (b) the Credit Bureau, or in the event of default or disputes, any debt collection agencies or dispute resolution centres;
- (c) 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);
- (d) anyone to whom we transfer or may transfer our rights and duties;
- (e) banks, credit card companies and their respective service providers;
- (f) our professional advisors such as our auditors and lawyers;

- (g) relevant government regulators or authority or law enforcement agency to comply with any laws or rules and regulations imposed by any governmental authority; and
- (h) any other party to whom you authorise us to disclose your personal data.

5. Deemed consent

5.1 In addition to the matters set forth above, subject to and in accordance with applicable law, you shall be deemed to have consented to IME collecting, using, disclosing and sharing amongst ourselves your Personal Data, and disclosing such Personal Data to IME's authorised service providers and relevant third parties:

- (a) where in response to a request for your Personal Data in connection with identified purposes, you voluntarily provide such Personal Data to IME for such purpose(s);
- (b) where the collection, use or disclosure of your Personal Data is reasonably necessary for the conclusion and/or performance of a contract between you and us or any other organisation entered into at your request, which may include recipients of your Personal Data not indicated in this Privacy Policy; or
- (c) where we have brought to your attention our intention to collect, use or disclose your personal data for identified purposes, and you have not taken any action to opt out within the period specified in our notices. For this purpose, you agree that we may provide you such notices via the IME website, or via other forms of communication (e.g. email) based on the contact particulars that we may have of you in our records from time to time.

6. Other Bases for Handling or Processing Your Personal Data

6.1 In addition to and without limiting the consents you have provided to our collection, use and disclosure of your Personal Data for the purposes set out elsewhere in this Privacy Policy, where permitted by applicable law, IME may also in accordance with the requirements thereof also collect, use and/or disclose your Personal Data as further detailed below including without your further consent, where we meet the requirements of applicable law:

- (a) for our legitimate interests or the legitimate interests of any other person, including but not limited to the purposes expressly set forth in this Privacy Policy; or
- (b) for improving our products, services, processes or business, understanding customer preferences and personalising experiences and recommendations, based on your Personal Data records with IME (regardless whether you are an existing or prospective customer of IME).

7. Use of Cookies and Related Technologies

7.1 When you interact with us on our websites, applications or services, we may collect or analyse anonymised information from which individuals cannot be identified ("**Aggregate**

Information”), such as number of users and their frequency of use, the number of page views (or page impressions) that occur on the website and common entry and exit points into website.

7.2 IME uses cookies, and other related technologies which have different functions.

They are either necessary for the functioning of our services, help us improve our performance, or serve to provide you with extra functionalities.

Cookies – Small data file which is sent to your browser to store and track Aggregate Information about you when you enter our websites. The cookie is used to track information such as the number of users and their frequency of use, profiles of users and their preferred sites

Cookies can be disabled or removed by tools that are available in most commercial browsers.

The preferences for each browser you use will need to be set separately and different browsers offer different functionality and options.

Web beacons - Small graphic images (also known as "pixel tags" or "clear GIFs") that are not apparent to the user. Tracking links and/or similar technologies consist of a few lines of programming code and can be embedded in our websites or platforms. Web beacons are usually used in conjunction with cookies and primarily used for statistical analysis purposes. This technology can also be used for tracking traffic patterns on websites and platforms, as well as finding out if an e-mail has been received and opened and to see if there has been any response.

7.3 We may use the terms "cookies" or "related technologies" interchangeably in our policies to refer to all technologies that we may use to collect or store information in your browser or device or that collect information or assist in identifying you as a unique user in the manner described above.

7.4 IME may use an independent company (the “**Third Party Market Research Company**”) to measure and analyse the Internet usage across IME website. IME uses the Third Party Market Research Company’s services to collect the following core information on the usage of our websites, including:

- (a) The number of page views (or page impressions) that occur on IME website;
- (b) The number of unique visitors to IME website;
- (c) How long these unique visitors (on average) spend on IME website when they do visit; and
- (d) Common entry and exit points into IME website.

7.5 This information is aggregated by the Third Party Market Research Company and provided to IME to assist in analysing the usage of IME website. Such data is also accessible by media organizations and research companies, for the purpose of conducting industry comparisons with other Internet portals.

7.6 Pages on IME website may be coded with software which enables the Third Party Market Research Company to track visitors to our websites.

7.7 For more information about the cookies and other related technologies we use, please see our **Cookie Policy**. Should you wish to disable the cookies associated with these technologies, you may do so by changing the setting on your browser. However, you may not be able to enter certain part(s) of our website.

8. Third-Party Sites

8.1 Our website may contain links to other websites operated by third parties, such as our business partners. We are not responsible for the privacy practices of websites operated by third parties that are linked to our website. We encourage you to learn about the privacy policies of such third party websites. Some of these third party websites may be co-branded with our logo or trademark, even though they are not operated or maintained by us. Once you have left our website, you should check the applicable terms, conditions and policies of the third party website to determine how they will handle any information they collect from you.

9. Withdrawal, Access and Correction of your Personal Data

9.1 Should you wish to withdraw consent to use of your Personal Data please contact IME, contact details of which are found in IME contact page on the IME website.

9.2 Please note that if your Personal Data has been provided to us by a third party, you should contact such third party directly to make any queries, feedback, and access and/or correction requests to IME on your behalf.

9.3 Please note that if you withdraw your consent to any or all use of your Personal Data, depending on the nature of your request, IME may not be in a position to continue to provide its products or services to you or administer any contractual relationship in place, and this may also result in the termination of any agreements with IME and your being in breach of your contractual obligations or undertakings, and IME's legal rights and remedies in such event are expressly reserved.

10. Governing Law

10.1 This Privacy Policy shall be governed in all respects by the laws of Singapore.

(Updated as of 15 November 2021.)