

# Privacy Policy

*last updated: september 7, 2015*

Your privacy is important to us. The purpose of this Privacy Policy is to inform you of how Goldbell Engineering Pte Ltd and/or its related entities, affiliates and subsidiaries (collectively referred to as “Goldbell”, “us”, “we” or “our”) manages personal data in accordance with the Personal Data Protection Act 2012 (“the Act”) and the associated regulations and guidelines as may from time to time be issued by the Personal Data Protection Commission of Singapore.

This Privacy Policy is designed to assist you in understanding how we collect, use, disclose and/or process the personal data you have provided to us, as well as to help you to make an informed decision before providing us with your personal data.

## 1. Consent

1. By interacting with us and/or our websites, you agree and consent to us - as well as our respective representatives - collecting, using, disclosing and sharing your personal data among ourselves, our business partners and other relevant third parties (who may be based outside Singapore), in the manner set forth in this Privacy Policy. You should immediately cease the use of our websites if you do not agree with the terms of this Privacy Policy.
2. If you are accepting the terms of this Privacy Policy on behalf of a company or any other legal or natural person, you represent and warrant that you have full authority to bind that company or person to the terms of this Privacy Policy.

## 2. Information We Collect

- i. There are two broad categories of information that we collect from you – (a) personal data and (b) non-personal data.
  - a. Personal Data
    - i. “Personal Data” means data, whether true or not, about an individual who can be identified (i) from that data from that data and other information to which we have or are likely to have access.

- ii. We collect certain types of Personal Data, including your name, gender, date of birth, identification numbers, your company and position within the company, contact information (e.g. address, telephone number and email address), payment information (e.g. credit and debit card information), photographs and video footages taken at events organised by us and/or our business partners and any other information which you may provide in any forms submitted to us or via other forms of interaction with you.
  - iii. Personal Data is collected in various circumstances, including the following:-
    - I. When you purchase a product from us or use any of our services (including submitting any enquiry, order form or contract proposal to us and/or entering into any agreement with us regarding any of our goods and services);
    - II. When you register as a member of websites owned, operated or hosted by us on behalf of our business partners, or use services on such websites;
    - III. When you take part in any contest, survey or promotion conducted by us and/or our business partners;
    - IV. When you participate in events, exhibitions or roadshows organised by us and/or our business partners;
    - V. When we receive references from business partners and third parties, for example, where you have been referred by them;
    - VI. When you submit an application to us for employment or an internship; and
    - VII. When you submit your Personal Data to us for any other reason.
  - iv. We may also obtain personal data about you from other sources and combine it with information you provide to us. If you provide us with any Personal Data relating to a third party (e.g. information of employees 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.
- b. Non-personal Data
- i. We also collect certain non-personal data when you visit and use our websites. Such data is entirely anonymous and is aggregated for statistical analysis (“Aggregate Information”). For example, we receive certain standard information that your browser sends to every website you browse, including your IP address, browser type, choice of language, operating system and access times.
  - ii. We may also use website analytic tools on our websites to retrieve information from your browser, including the site you came from, the search engine(s) and the keywords you may have used to find our websites, the pages you viewed within our websites, your browser add-ons and your browser’s dimensions.

- iii. From time to time, we may use independent companies to measure and analyse the Internet usage across our websites. For instance, we may use services from other service providers that enable us to derive a general geographic area based on your IP address in order to customise certain services to your geographic area.
- iv. We may use technologies such as cookies and web beacons to collect information about the pages you view, the links you click and other actions that you take on our websites.

#### *Cookies*

- v. When you access our website, we store Aggregate Information about your visit in a small text file called a “cookie” on your hard disk by a web server.
- vi. This Aggregate Information is collated to assist us to identify you and remember your preferences, so that we can provide you with a customised experience when you visit our websites.
- vii. Most browsers automatically accept cookies. You can, however, modify your browser settings to disable cookies. If you choose to do so, some of the functionality of our websites may be impaired.

#### *Web beacons*

- viii. In addition to cookies, we may also use electronic images known as web beacons to deliver or communicate with cookies, in order to better understand how you interact with the content on our websites.
- ix. We also may include web beacons, including web beacons from third parties, in e-mail messages to determine whether messages have been opened and acted upon.
- x. The information we obtain in this manner enables us to customise and personalise the services we offer, as well as measure the overall effectiveness of our online content, advertising campaigns, and the goods and services we offer.

### **3. Purposes for collection, use, disclosure and processing of Personal Data**

1. Depending on your relationship with us, your Personal Data may be collected, used, disclosed and/or processed for various purposes, including the following:-
  - a. To provide goods and services to you (e.g. the delivery, distribution, leasing and/or sale of any vehicle or equipment, the provision of fleet management or consultancy services, the provision of after-sales and/or maintenance services);
  - b. To fulfill any agreement made with you;
  - c. To verify and process your personal particulars and payments;

- d. For customer management (e.g. for identification purposes, to communicate with you in the context of the contractual relationship - to send welcome letters, issue invoices, billing reminders, information on service issues and other technical announcements);
- e. To send to you surveys, information, promotions, updates as well as marketing and advertising materials in relation to our goods and services and those of our business partners or third party organisations;
- f. To send to you information about any administrative changes, updates and/or amendments to our policies, terms and conditions;
- g. To respond to your queries, requests, feedback and/or complaints;
- h. For organising events or other marketing or promotional activities;
- i. For marketing research, user profile and statistical analysis and other development activities to improve our goods and services for your benefit;
- j. To protect and enforce our contractual and legal rights and obligations, including but not limited to matters relating to accident claims, litigation and/or third party settlement;
- k. To comply with any applicable laws and regulations, codes of practices, guidelines or to assist in law enforcement and/or investigations by any governmental authority, public agency, statutory board or similar authority;
- l. Human resource and recruitment purposes; and
- m. For any other purposes which we notify you of at the time of obtaining your consent.  
*If you are an employee or a potential employee:-*
- n. To process your application (including pre-recruitment checks);
- o. To provide or obtain employee references or other relevant references for background screening;
- p. To collect information about your suitability for the position applied for;
- q. To organise training and staff development programs;
- r. To assess your performance;
- s. To administer benefits and payroll processing;
- t. To provide you with tools to facilitate or as required for you to do your job;
- u. To communicate with you as required by us to comply with our policies and processes, including for business continuity purposes; and
- v. For any other purposes which we notify you of at the time of obtaining your consent.  
(Collectively, the “Purposes”)

#### 4. Sharing of Personal Data

1. In order to facilitate our business operations and provision of goods and services, your Personal Data may be disclosed, for one or more of the Purposes listed above, to the

following third parties (whether located in Singapore or abroad):-

- a. Agents, contractors or third party service providers who provide operational services to us, such as information technology, training, market research, administration of our websites, customer support, processing of transactions, distribution of communications to you, as well as storage services;
  - b. Vendors or any third party business partners who offer goods and services or sponsor contests or other promotional programs on our websites, whether in conjunction with us or not;
  - c. Third party business partners in relation to corporate promotional events;
  - d. The credit bureau, or in the event of default or disputes, any debt collection agencies or dispute resolution centres;
  - e. 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);
  - f. Anyone to whom we transfer or may transfer our rights and duties;
  - g. Banks, credit card companies and their respective service providers;
  - h. Our professional advisors such as our auditors and lawyers;
  - i. Relevant government regulators or authority or law enforcement agency to comply with any laws or rules and regulations imposed by any governmental authority; and
  - j. Any other party to whom you authorise us to disclose your personal data
2. In situations in which a business partner or third party under a contract with us collects Personal Data about you, we will require the third party to exercise reasonable care in protecting your Personal Data so that it is in compliance with the Act.

## **5. Access to and Correction of Personal Data**

Subject to certain exceptions in the Act, you may request to access or correct your information. You may do so by submitting your request to us via email or letter. Please refer to our contact details at paragraph 11 of this Privacy Policy.

## **6. Retention of Personal Data**

1. We will retain your Personal Data collected for as long as it is necessary to fulfill the purpose for which it is collected, the legal and/or business purposes of Goldbell, and/or as may be required by applicable law.
2. When destroying Personal Data, we will take commercially reasonable and technically feasible measures to make the data irrecoverable or irreproducible, as may be required by applicable law.

## 7. Accuracy of Personal Data

1. We will take reasonable efforts to ensure that your Personal Data is accurate and complete, if your Personal Data is likely to be used by us to make a decision that affects you, or disclosed to another organisation.
2. However, this means that you should ensure that all Personal Data submitted to us is complete, accurate, true and correct. You must also update us of any changes in your Personal Data that you had initially provided us with. We will not be responsible for relying on inaccurate or incomplete personal data arising from your not updating us of any changes in your Personal Data that you had initially provided us with.

## 8. Security

1. We take the security and protection of your Personal Data very seriously. As such, we store your Personal Data on secure servers and have put in place appropriate security arrangements to prevent unauthorised access, collection, use, disclosure, copying, modification, disposal of your Personal Data.
2. However, please note that no electronic transmission of information can be entirely secure. We cannot assume responsibility for any unauthorised use of your Personal Data by third parties which are wholly attributable to factors beyond our control.
3. If you use any User identification, password, personal identification number or other authentication information on our websites, please ensure that such information is kept secure and that you do not share it with anyone. If you are sharing a computer with anyone, you should always log out before leaving a site or service to protect access to your information from subsequent users. We shall not be responsible for any security lapses or unauthorised third-party access arising from your failure to keep such information confidential.

## 9. Opt-Out

1. If you do not wish to receive any further information from us regarding our goods and services, promotions or events via e-mail, you may unsubscribe by following the steps as stated in the respective mailers, newsletters or promotional e-mail.
2. If you do not wish to be contacted via voice call, text message and/or fax message regarding our goods and services, promotions or events, you may inform us via e-mail or letter. Please refer to our contact details at paragraph 11 of this Privacy Policy.
3. If you do not want your Personal Data to be shared among us and our business partners, you may opt-out of such information sharing by contacting us via e-mail or letter. Please refer to our contact details at paragraph 11 of this Privacy Policy.

4. Please note that if you withdraw your consent for a limited purpose, we may still contact you or use your information for other purposes for which you have not withdrawn your consent and such personal data may still be shared, as permitted under the Act and other applicable law.

## 10. Third Party Sites

Our websites 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 websites. You are encouraged 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 websites, 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.

## 11. Contact Details

1. If you, at any time, wish to:-
  - a. Enquire about this policy or about how we may manage, protect and/or process your Personal Data; or
  - b. Complain about the way we manage, protect and/or process your Personal Data; or
  - c. Access or correct your Personal Data in our control or possession; or
  - d. Withdraw your consent for us to collect, use, disclose and/or process your personal data;

Please do not hesitate to contact our Data Protection Officer at:-

- i. E-mail address:

***YaoJiaLiang@goldbellcorp.com***

Attention it to the 'Data Protection Officer'.

- ii. Office address:

***47 Scotts Road #12-01/02 Goldbell Towers Singapore 228233***

Attention it to the 'Data Protection Officer'

2. Such enquiry / complaint / request / withdrawal shall be deemed to have been made when received by Goldbell.

3. Please indicate in the subject header the nature of your correspondence. We will certainly strive to revert to you speedily.

## 12. No Waiver

The failure on our part to enforce any part of this Privacy Policy shall not constitute a waiver of any of our rights hereunder for past or future actions.

## 13. Governing Law

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

## 14. Changes to Policy

1. As part of our efforts to ensure that we properly manage, protect and process your personal data, we will be reviewing our policies, procedures and processes from time to time.
2. We reserve the right to amend the terms of this Privacy Policy at our absolute discretion. We will notify you of changes to this Privacy Policy by posting the amended policy with the date it was revised on our websites.
3. You are encouraged to visit the websites from time to time to ensure that you are well informed of our latest policy in relation to Personal Data protection.

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## brands we distribute

[Fuso \(/vehicles/fuso\)](/vehicles/fuso)

[FIAT \(/vehicles/fiat-professional\)](/vehicles/fiat-professional)

[IVECO \(/vehicles/iveco\)](/vehicles/iveco)

[Mitsubishi \(/equipment/mitsubishi-forklift\)](/equipment/mitsubishi-forklift)

[STILL \(/equipment/still\)](/equipment/still)

[Nichiyu \(/equipment/nichiyu\)](/equipment/nichiyu)

[Rocla \(/equipment/rocla-forklift\)](/equipment/rocla-forklift)

[Airman \(/equipment/airman\)](/equipment/airman)

[Renault Truck Defense \(/vehicles/renault-truck-defense\)](/vehicles/renault-truck-defense)

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## more about goldbell

[About Us \(/about-goldbell/about-goldbell-group\)](/about-goldbell/about-goldbell-group)

[Careers \(/about-goldbell/careers\)](/about-goldbell/careers)

[Happenings \(/about-goldbell/happenings\)](/about-goldbell/happenings)

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## can we help?

[Vehicles \(/vehicles/overview\)](/vehicles/overview)

[Equipment \(/equipment/overview\)](/equipment/overview)

[Goldbell Care \(/goldbell-care/about-goldbell-care/aftersales-support\)](/goldbell-care/about-goldbell-care/aftersales-support)

[Financing \(/financing\)](/financing)

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## quick links



[Locations \(/contact-us/numbers-locations/locations\)](/contact-us/numbers-locations/locations)

[Contact Us \(/contact-us/enquiry-form\)](/contact-us/enquiry-form)

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## connect with us



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