

General Privacy Notice

Effective as of 18 February 2023

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2. Introduction

- 2.1. Your personal data and your rights are important to **SciGen Pte Ltd** and its related corporations (as defined in the Companies Act, Chapter 50 of Singapore, hereinafter referred to as "**SciGen**", "**we**", "**us**", or "**our**").
- 2.2. That is why we designed this Notice to share with you transparently on your rights, and summarily how we may collect and manage your personal data in compliance with the Singapore Personal Data Protection Act 2012 (also referred in this Notice as "**Act**" or "**PDPA**").

3. Your Consent

PLEASE READ THIS NOTICE CAREFULLY BECAUSE BY CONTINUING TO PROVIDE US PERSONAL DATA OR INTERACTING WITH US AS DESCRIBED IN THIS NOTICE, YOU ARE, TO THE EXTENT PERMITTED BY THE ACT AND RELEVANT LAW., ARE:

- a. agreeing and consenting us to process personal data in accordance with this Notice,
- b. agreeing that the personal data that you provided to us is accurate, up-to-date, and complete, and
- c. where you are disclosing personal data of another person to us, you are agreeing that you have provided a copy of this Notice to such other person, and you were authorized by such other person to disclose such personal data to us, and that such personal data is accurate, up-to-date, and complete.

IMPORTANT! PLEASE DO NOT PROVIDE US WITH PERSONAL DATA IF YOU DISAGREE TO THIS NOTICE.

Please note that this Notice does not replace any other consents you may have previously or separately provided to us in respect of your personal data. Your consent to this Notice is in addition to any other rights which we may have at law or contractually to process your personal data.

4. When Does this Notice Apply?

- 4.1. **Applicability.** This Notice applies solely to personal data collected by us when you generally interact with us with the following manner:

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- a. as prospective or actual consumers of our products or services
 - b. as healthcare professionals
 - c. as users or visitors of our official website **www.scigen.com** and its sub-domains (which are collectively hereinafter referred to as the “**Site**”)
 - d. as users that subscribe to our newsletter or any other marketing communications
 - e. as any other individuals that contact us or request us for contact
 - f. as subscribers to our newsletters or other marketing communications
 - g. as attendees or participants in our campaigns, events, or any other initiatives
 - h. as visitors or guests of our premises
- 4.2. **Supplements.** This Notice may be supplemented by supplementary notices for specific interactions, products, or services. Please refer to our [Privacy Hub](#) for more information.
- 4.3. **Additional Languages.** This Notice is further available in other languages. In the event of any conflict, inconsistency or ambiguity between the English text of this Notice and other language translation thereof, the English text shall prevail.
- 4.4. **Third-Party Links.** Our Site may contain links or reference to third-party websites for your convenience (e.g. LinkedIn, Twitter, Facebook, and Youtube). Please note however that we do not own or control such third-party websites or content, and we do not endorse or recommended such third-party websites, its content, products and/or services. Kindly be reminded that this Notice does not apply to such third-party websites, and you are highly recommended to be aware and read the privacy policies carefully of each third-party website you visit.

5. What is Personal Data?

Reference to “**personal data**” in this Notice, have the same meaning provided in the Act.

In general and simplified terms, you can think “**personal data**” as data (either on its own or combined with other information that we have or likely to have access to) can uniquely identify an individual person. Kindly note that business contact information and anonymized data is not personal data.

6. What Types of Personal Data Do SciGen Collects?

- 6.1. The extent of and the exact personal data that are collected and processed varies depending on your relationship with us (e.g. customer, consumer, supplier, business partner, etc.) and how you interact with us (e.g. online or through offline methods such as in-person contact, phone, or mail).

Overview of the categories and example personal data that we may collect and purpose of processing includes:

- a. **Identification data** such as name, title, gender, date of birth, national registration identity card or passport number, and driving license
 - b. **Contact data** such as correspondence address, delivery address, e-mail address, fax number and telephone number
 - c. **Contract or commercial data** such as products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies
 - d. **Financial data** such as payment card details, preferred payment method, and bank account
 - e. **Professional or employment data** such as CV, job title, function, department, educational history, professional experiences, licences, specialties, qualifications, organizational or institutional affiliations, publications, credentials, and other professional achievements
 - f. **Audio-visual data** which you may be identified. This may be provided to us when you share image, voice recordings or videos to us. Also, if you visit our premises or facilities, you might be recorded by surveillance system or device (e.g. CCTV) that were placed for security purposes
 - g. **Preference data** that you may have voluntarily share, such as communication preferences, feedback or opinions of our products or services, and interests in receiving marketing materials
- 6.2. **Sensitive or special categories of data.** We do not seek to collect or otherwise process sensitive personal data in the ordinary course of our business. We only process your sensitive personal data when:
- a. it is upon your request, in which we rely on your prior explicit consent. For example, you may volunteer your physical or mental health or condition information when enquiring our products, or request us to investigate into your concerns, and

- b. it is permitted or required by the law. For example, compliance with legal obligations, detection and prevention of crime (including the prevention of fraud), and health, safety, security and environmental compliance (e.g. if you meet with us in-person at our premises, your body temperature, health symptoms, vaccination status, and other related information in connection with public and workplace health and safety plans and protocols designed to prevent the transmission of COVID-19 or other infectious diseases)

7. How Does SciGen Collect My Personal Data?

7.1. **Directly from you.** We mostly collect personal data above directly from you which you have voluntarily share during your interaction with us. For example, you may voluntarily share your personal data:

- a. through your access and use of our Site
- b. during conversations between you and our representatives
- c. when you complete an application, purchase order or payment arrangement

7.2. **Data Automatically Collected or Generated.** When you visit the Site using electronic device, we may obtain technical data about you. Such data consists of connectivity, technical or aggregated usage data, such as IP address, non-identifying data regarding the device, operating system, browser version locale and language settings used. We do not use such data to learn a user's true identity, but mostly to have a better understanding of how our is used to improve the overall user experience and functionality of our Site. For more information, you may refer to our Cookies & Other Technologies Notice in the [Privacy Hub](#) technologies.

7.3. **Third-party sources.** Sometimes depending on the type of interactions we have with you, we may receive information from other third-party sources such as:

- a. Third-party that was authorized or by yourself or by law to act on your behalf, such as your caregiver, agent, and court appointed guardian
- b. Third-party that you have consented to disclose your personal data, such as references, your doctor or other healthcare professional
- c. Third-party plugins or applications that you have consented or voluntary disclose your personal data, such as social media channels like LinkedIn, Facebook, Twitter, and Youtube.
- d. Government sources such as regulatory authorities, court, and enforcement officials
- e. Publicly available data sources, such as information on the Internet
- f. Other third-parties service providers that support our legitimate business operations and needs, for example:-

technology providers that collect information via cookies, web beacons, and other related tracking technologies (For more details, please see Cookies & Other Technologies Notice)

Security-related providers that assist with due diligence, compliance, and fraud prevention and detection such as credit or consumer reporting agencies

IT-related providers, such as website hosting and cloud provider, network security services who retain information on malware threats detected

Events-related providers, such as host, vendors, and organizers at events or trade shows who may share feedback received.

Such information may identify you (and as such be considered as personal data) but may also be in the form where it is aggregated and anonymized where it cannot identify you.

7.4. Where permitted by the law, we may combine both the information you provide us and automatically collected information with other information collected from third-party sources.

8. For What Purpose Do SciGen Collect & Process My Personal Data?

The purpose of processing depends on your interaction and relationship with us. Your personal data may be processed for any of the following purposes:

- 8.1. To serve you, including:
 - a. Respond to your queries, and address concerns, feedback, or complaints (if any) that you shared
 - b. Serve third-parties you requested us to serve
 - c. Connect and manage our relationship with you, such as connecting with you when you participate in our pages in third-party social media platforms, and keeping track of our past engagements and interactions

- d. To inform you of important updates, such as notifying you of important updates in terms, conditions and/or policies
- e. Invite you to participate in research, events and other activities that may be interest or be useful to you
- f. Where you have shared your preferences, to allow us to personalize and improve our interactions. This allows us to present our communications, products and services tailored to you per your interests, needs and preference.
- g. Fulfill other purposes that you consented, including serving you with newsletter or any other promotional or marketing materials which you have subscribed or consented to

If you are a healthcare professional, the additional specific purposes may further apply to you:

- a. Visitation by our personnel or sales representatives
- b. Invite you to scientific or medical events, trainings and other activities that may be interest or be useful to you, both online and in-person, such as conferences, webinars and remote detailing
- c. Provide you with appropriate, adequate and updated information about scientific and health matters, as well as our products and services (by digital means or otherwise), which may be personalized to your professional area and interests where we have your consent or a legitimate interest
- d. Recruitment and evaluation of suitability for engagement or participation in events, clinical trials and other research studies, and advisory committee

8.2. To perform contract, including:

- a. Perform tasks in preparation of a contract, such as getting relevant information and documentation to prepare the contract
- b. Fulfill obligations in the contract, such as managing products or services that you have ordered, or managing any events or seminars that you have registered to participate in
- c. Manage payments or reimbursements of any fees or charges

8.3. Fulfill legitimate business interest, including:

- a. To manage and improve the Site, including compile and evaluate the Site, including its content, for the purpose of developing and improving the quality, engagement, satisfaction, accessibility, convenience, efficacy, and security of the Site (including Site's contents and functions).
- b. To research, develop, manage, improve, and expand our products, services, and business activities, including:

Compile and evaluate data to understand usage trends, interests, usefulness, effectiveness, accessibility, consumer satisfaction, safety and quality pertaining to our products, services, and business activities

Conduct and manage research and development, such as market studies, consumer studies, and clinical studies and trials

Invite you to provide feedback, surveys, or comments on our products, services, and events

Manage and train our personnel

- c. To create and ensure safe and secure environment, and improve thereof, including:

To conduct verification on information provided, due diligence, conflict of interest checks, and/or risk assessments where we find it necessary. For example, we will conduct verification of requester's identity and authorization when there is a request for access to personal data

To conduct audits in order to verify that our internal processes function as intended and are compliant with legal, regulatory, or contractual requirements

To detect, investigate, and prevent fraud, spam, abuse, theft, security incidents, and other activities that are contrary to the law, our policies, or is otherwise malicious or harmful

To track and manage any reports pertaining to adverse events, product quality, safety and security of our facilities, products, services and business activities

To carry and manage our business operations, including to manage merger, sale, acquisition, divestiture, restructuring, reorganizing, dissolution, bankruptcy or other change of ownership or control pertaining to us

To establish, pursue, exercise and enforce our rights, and further defend ourselves in any legal claims or proceedings which we may be involved in

- d. Fulfill legal obligations, including:

Complying with the law (which includes regulatory requirements, industry standards and court orders) that we are subjected to. For example, we will need to fulfil record-keeping and reporting obligations for compliance with anti-corruption laws, such as ensuring record-keeping and reporting obligations pertaining to HCP transfer of value

Respond legal requests, such as providing support in investigations by regulatory or enforcement authorities, comply with a subpoena, respond to any legal process

- e. Fulfill any other purposes permitted or required by the law, and are incidental to any of the purposes detailed in this Notice.

Change of Purpose. We will only use and process your personal data for the purposes for it was consented for as described in this Notice. If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

9. What Happens If I Do Not Provide My Personal Data?

We only collect personal data that is provided on a voluntary basis.

We will indicate when it is necessary to provide the personal data to us to enable us to process your personal data for the intended purpose. Please note that we may not be able to fulfil the intended purposes if you decline to provide such obligatory personal data. For example, we will not be able to perform a proper or complete investigation to your complaint if you decline to provide details of your complaint, or otherwise provide an update to you if you decline to provide accurate contact information.

10. Who Does SciGen Disclose My Personal Data To?

If it is necessary for the fulfillment of the purposes you have consented for as described in this Notice, your personal data may disclosed and transferred to, and/or processed by the following categories of parties for processing whether within or outside Singapore:

- a. **our personnel and related corporations**
- b. **our business partners** such as external scientists and healthcare professional to review and assist us with healthcare activities (such as clinical studies, patient support programs, et cetera).
- c. **our external advisors** such as lawyers, accountants, company secretary, auditors, insurers and brokers.
- d. **our third-party providers**, as like many businesses, we may engage specialized providers that can help us serve you better, such as pharmacovigilance providers, data storage and analytics providers, payment processors, shipping providers, customer service and support providers, technical support, et cetera.
- e. **relevant government regulators or authorities, statutory boards, law enforcement agencies, industry regulators** or any person to whom we are compelled or required to do so under law.
- f. **potential acquirers and other stakeholders** in the event of potential, proposed or actual business transfer, whether in whole or in part, sale of business, disposal, acquisition, merger, spin-off, joint venture, assignment, reorganisation of our business, assets or stock or similar transaction.
- g. **any other party to whom you authorize** us to disclose your personal data.

Sometimes we may cease to act as a distributor of particular products. If you were the purchaser of such a product, we may provide your personal data to the new distributor or the manufacturer of the product so that the new distributor or the manufacturer can provide you with support and assistance in respect the product and maintain records of purchasers and users of the product.

11. Is My Personal Data Transferred Internationally?

Your personal data may be disclosed to and processed by our related corporations and third parties detailed in [Who Does SciGen Disclose My Personal Data To?](#), some of which may be located outside of Singapore, for the fulfillment of the purposes you have consented for as described in this Notice.

We take appropriate steps to ensure that the overseas recipients are bound by legally enforceable obligations to protect your personal data at a standard that is comparable to the protection under the Act, and do not breach the personal data protection obligations relating to your personal data.

By providing your personal data to us, you are consenting to any such disclosure, transfer, and further processing of your personal data outside Singapore as described in this Notice.

12. How Is My Personal Data Protected?

To protect your personal data from being misused, lost, or otherwise access, modified or disclosed in an unauthorized manner, we take appropriate measures that are consistent with Act and other applicable laws. For example, our third party providers will only process personal data held by us where they are obliged to treat the information confidential and to keep it secure, and we limit access and processing of your personal

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data on a need to know basis to those employees and third parties that are subjected to duty of confidentiality.

13. How Long Does SciGen Retain My Personal Data?

We may retain your personal data for as long as it is necessary to fulfil the purpose for which it was collected and processed for, and as legally required or permitted by the Act and other relevant laws.

When your personal data is no longer needed, we will take remove it from our records, or otherwise take steps to remove the means by which the data can be associated with you.

14. Minor's Personal Data

This Site is designed towards and designed for use by persons at least aged eighteen (18) years and older.

In any event, we do not solicit or knowingly collect personal data from persons under the age of eighteen (18) years (for the purpose of this Notice, hereafter referred as "minor")

When a minor's personal data is collected based on the consent of the holders of parental responsibility, we will only process said minor's personal data as permitted by the law or explicitly consented to by the holders of parental responsibility.

Parents and guardians are encouraged to observe, participate in, and guide online activities of minors.

If you believe your minor has provided such personal data to us, such as on this Site, we strongly recommend that you [Contact Us](#) immediately and we will do our best to promptly remove such personal data.

15. What are My Duties?

15.1. **Your duty to inform us of changes.** It is important that the personal data we hold about you is accurate, complete, and current. Please keep us informed of changes to your personal data during your relationship with us.

15.2. **Sharing of Other Individual's Personal Data.** If you share with us personal data of other individuals, it is your responsibility to collect such personal data in compliance with Act and relevant laws. For instance, you should share a copy of this Notice to such other individuals and obtain their prior consent before sharing their personal data with us.

16. What are My Choices & Rights?

16.1. Pursuant to and subjected to the Act, you can exercise the following rights by submitting your request to our Data Protection Officer listed in the [Contact Us](#) using the relevant Request Form provided in the [Privacy Hub](#):

- a. **Right to access your personal data**, where we provide information of personal data that is in our possession or control, and the ways in which that personal data was used or disclosed by us for past year (or any other duration required by the applicable law)
- b. **Right to correct your personal data**, where you can correct your personal data to the extent it is inaccurate, incomplete, misleading or not up-to-date.
- c. **Right data portability**, where you may have the right to request applicable personal data in a structured, commonly used and machine-readable format and transmitted to another entity without hindrance.
- d. **Rights to limit the processing of personal data, or withdraw your consent.**

Kindly note that there are some choices you can personally take first to limit the processing of personal data or withdraw your consent, such as:

- i. **Site.** You can decide not to submit any personal data by not entering any forms or data fields in our Site, and not using any available personalized services.
- ii. **Direct Marketing.** Direct marketing materials are only provided to you if you have voluntarily subscribed, i.e., opted-in. You can withdraw your consent by opting-out at any time by contacting us using the details listed in [Contact Us](#). We will process your request as promptly as practical, however you may receive communications for a transitional period whilst we update your request.
- iii. **Cookies & Other Technology.** You can manage your preferences when you first visit our Site.

Thereafter, you can change your mind by changing your cookie preference at any time by selecting "[Cookie Settings](#)" which can be found in our Site. You can decline future cookies and/or delete any existing cookies through your browser settings. Each browser is different, so you should check your browser's "[Help](#)" menu to learn how to change your cookie preferences.

For more details, please see Cookies & Other Technologies Notice in the [Privacy Hub](#). Just note that you may not be able to access the complete functionality or experience designed for the Site if you decline or delete cookies.

If you wish to limit the processing, or otherwise withdraw your consent for other matters not mentioned above, please submit your request to our Data Protection Officer listed in the [Contact Us](#) using the relevant Request Form provided in the [Privacy Hub](#).

- 16.2. As one of the safeguards to ensure security and confidentiality of personal data, kindly note that we, for any request submitted, will first perform verification and validation the identity of the requester to ensure that the requester is either is legitimately the person about whom we collected the personal data, or authorized by the person about whom we collected the personal data.

We verify every request carefully. You are encouraged to ensure that request submitted has:

- a. sufficient details that allows us to reasonably verify you are the person about whom we collected personal data or an authorized representative, and
- b. sufficient details that allows us to properly understand, evaluate, and respond to request.

We will always aim to help you when you wish to exercise your rights but in some instances we may have lawful grounds to reject your request, such as when we cannot verify your identity to determine if the requested personal data relates to you, or when there is an existing legal or contractual basis, or where permitted by the Act or any other relevant law. If that happens, we will give you written reasons for any rejections.

We will investigate any request you make promptly and will respond to you within the timelines stipulated by the Act. Kindly note that period may be extended where this is needed to help us respond properly and we will let you know the reasons for the delay.

Kindly note where permitted under the Act, we may charge a reasonable fee in relation to your request, particularly where the request is complex, or otherwise repetitive or excessive.

17. I Like to Lodge a Complaint. What is the Process?

If you believe that there is breach of your personal data, please submit your complaint to our Data Protection Officer as listed in the [Contact Us](#) using the Complaint Form provided in the [Privacy Hub](#).

18. Contact Us

Should you have any questions, feedback, or concerns relating to this Notice or of your personal data interactions with us, or otherwise wish to exercise your personal data rights, or otherwise wish to lodge a complaint, please do not hesitate to contact us via our Data Protection Officer at the following

Email : dpo@scigen.com.sg

Phone : +65 6779 6638

Address : SciGen Pte Ltd, 150 Beach Road #32-05/08, Gateway West, Singapore 189720

19. Updates to this Notice

We may, from time to time, we may amend this Notice for various reasons, for example:

- a. to improve this Notice, such as changing the design or look of the Notice, or adding clarification where required, or correcting inadvertent errors,
- b. to accurately reflect and update our data handling practices,
- c. to reflect new developments and features in our business, technologies, Site, goods, and services that may relate to your personal data, and
- d. to comply with changes with the applicable law, regulatory requirements, and industry practices.

The amended Notice will be effective on the publication date detailed above. We will notify you of the changes by displaying prominently on this Site that there are changes to the Notice.

Kindly note that your continued interaction with us or providing of personal data after such notification of such changes indicates or otherwise constitutes your acceptance to such changes. Where required, we will obtain your consent.

You are responsible to periodically review this page for the latest information on our data handling practices.