



Personal Data Protection Policy

Your personal data is important to the 8 Islands Group

At the 8 Islands Group, we are committed to protecting and respecting your privacy. Please read this policy as it contains important information about how we use personal data that we collect from you or that you provide to us.

This policy has been adopted by all of the companies in our group including 8 Islands Pte. Ltd., Barrintonia Investments Pte. Ltd., PT Pulau Nikoi, Sea Almond Investments Pte. Ltd. and PT Pulau Cempedak, collectively the 8 Islands Group, “we”, “us” or “our”.

By accessing the website or providing information, you agree to our privacy practices as set out in this privacy statement. We may change this policy from time to time. You should check this policy frequently to ensure you are aware of the most recent version.

If you have any questions regarding this policy or about our privacy practices, please contact us at the relevant address set out below in the ‘How to Contact Us?’ section.

What type of personal data do we collect?

We may collect and hold personal data of persons/entities including but not limited to:-

- Guests that stay at our resorts
- Job applicants and employees
- Shareholders
- Service providers
- Other people we may come into contact

Examples of such personal data include, but are not limited to: name, contact details, biodata, account information, records of our interactions and your preferences, queries, requests and feedback.

How do we collect your personal data?

The ways in which we may collect your personal data include (but are not limited to) collecting directly or indirectly from you or your authorised representatives in the course of:-

- you visiting our office, resorts, etc
- you signing up for alerts or newsletters
- you making or attempting to make a reservation and/or staying in properties which we own or operate

- you participating in our marketing or promotional events
- you using our products or services
- you contacting us with your queries, requests or feedback
- our conducting or completing of transactions
- our conducting market research or surveys
- you applying for a job with us
- our conducting interviews
- use or view our website via your browser's cookies

What kind of purposes do we collect your personal data for?

In general, we may use your personal data for the following purposes:-

- managing your reservation at any of our resorts or staying in properties that we own or operate
- conducting and completing transactions (e.g. processing order and payments; providing products or services that have been requested)
- providing customer service (e.g. responding to queries and requests; informing you about service status and product updates; sending you alerts and newsletters)
- conducting market research and improving customer service (e.g. conducting market research or surveys; performing market analysis; managing and enhancing our products and services; developing new products)
- conducting marketing promotions (e.g. sending of alerts, newsletters, marketing materials and invitations from us wholly or through affiliation with third parties; offering promotions and loyalty programs)
- complying with applicable laws, regulations and other requirements (e.g. providing assistance to law enforcement agencies, regulatory authorities and other governmental agencies; performing internal audits)
- maintaining investor relations (e.g. sending of alerts, newsletters, publications, marketing materials and invitations from us wholly or through affiliation with third parties)

All provision of personal data is on a voluntary basis. However, in most cases, if you do not provide information about yourself which we have requested, we may not be able to provide you with the relevant product or service.

Marketing

We would like to send you information about products and services of ours that we think you would like, as well as those of our community engagement partner, The Island Foundation.

If you have agreed to receive our newsletters, you may always opt out at a later date.

You have the right at any time to stop us from contacting you for marketing purposes or giving your data to other companies in our group. If you no longer wish to be contacted for marketing purposes, please click [here](#).

How do we use and/or disclose your personal data?

We will only use, disclose and/or transfer your personal data for the purposes you have been notified of and consented to or which are permitted under applicable laws and regulations.

We will not sell, rent or give away personal data to third parties for commercial purposes without your consent.

Who do we share your personal data with?

Depending on the product or service concerned, personal data may be disclosed or transferred to:-

- other divisions or organizations within the 8 Island group of companies
- our joint venture / alliance partners
- our service providers and specialist advisers/institutions who have been contracted to provide administrative, financial, legal, accounting, information technology, research or other services
- other insurers, credit providers, courts, tribunals, law enforcement agencies, regulatory authorities and other governmental agencies as agreed or authorized by law
- anyone authorized by an individual, as specified by that individual or the contract

Where personal data is disclosed or transferred to organizations outside of the 8 Islands Group who handle or obtain personal data as service providers to us, we require such organizations to acknowledge the confidentiality of such personal data, undertake to respect an individual's right to privacy and comply with relevant privacy regulations and this Policy and use such personal data only for our purposes and otherwise follow our reasonable directions with respect to this data.

In addition, where personal data is transferred overseas, we will ensure that such transfer is in compliance with this Policy or is permitted under applicable data protection and privacy laws and regulations.

How do we manage, protect and store your personal data?

We securely store your data on cloud based systems provided by Google, Mailchimp, Siteminder and Frontdesk Anywhere and hard drives of computers and mobile devices owned by the 8 Islands Group and their staff. Usage of these systems are restricted to staff that require access to provide you with the relevant products and services.

The 8 Islands Group has appointed a Privacy Officer to oversee our management of personal data.

We regard breaches of your privacy very seriously and we have implemented measures to secure and protect your information, such as training our employees who handle your personal data to respect the confidentiality of such personal data and your privacy, storing personal data in a combination of secure computer storage facilities and paper based files and other records, taking steps to protect the personal data we hold from misuse, loss, unauthorised access, modification or disclosure.

However, you will appreciate that it is not for us to perfectly secure your personal data from cyber attacks, such as hacking, spyware and viruses. Accordingly, you will not hold us liable for any unauthorized disclosure, loss or destruction of your personal data arising from such risks.

We will also cease to retain your personal data when we no longer require such personal data for the purposes we originally notified you of or for any business or legal needs.

What are your data protection rights?

We would like to make sure you are fully aware of all of your data protection rights. Every user is entitled to the following:

- **The right to access** – You have the right to request for copies of your personal data from us. We may charge you a small fee for this service.
- **The right to rectification** – You have the right to request that we correct any information you believe is inaccurate. You also have the right to request for us to complete the information you believe is incomplete.
- **The right to erasure** – You have the right to request that we erase your personal data, under certain conditions.
- **The right to restrict processing** – You have the right to request that we restrict the processing of your personal data, under certain conditions.
- **The right to object to processing** – You have the right to object to our processing of your personal data, under certain conditions.
- **The right to data portability** – You have the right to request that we transfer the data that we have collected to another organization, or directly to you, under certain conditions.

If you make a request, we have one month to respond to you. If you would like to exercise any of these rights, please email us at: privacy@cempedak.com.

How do we use cookies?

We may use cookies in a range of ways to improve your experience on our website, including:

- Keeping you signed in to any restricted areas we may have

- Understanding how you use our website

What types of cookies do we use?

There are a number of different types of cookies, however, our website uses:-

- **Functionality** – We use these cookies so that we recognize you on our website and remember your previously selected preferences. These could include what location you are in. A mix of first-party and third-party cookies are used.
- **Advertising** – We use these cookies to collect information about your visit to our website, the content you viewed, the links you followed and information about your browser, device, and your IP address. The Island Foundation does not share any online data collected through cookies with third parties.

How to manage cookies

You can set your browser not to accept cookies, and the above website tells you how to remove cookies from your browser. However, in a few cases, some of our website features may not function as a result.

Privacy policies of other websites

The [Cempedak Island website](#) contains links to other websites. Our privacy policy applies only to our website, so if you click on a link to another website, you should read their privacy policy.

Changes to our privacy policy

The 8 Islands Group keeps its privacy policy under regular review and places any updates on this web page. This privacy policy was last updated on 1 August 2021.

How to contact us?

If you have any questions about our privacy policy, the data we hold on you, or you would like to exercise one of your data protection rights, please do not hesitate to contact us. You can contact our Privacy Officer at privacy@cempedak.com.

What if you have a complaint?

If you consider that any action of the 8 Islands Group breaches this Policy or any relevant privacy policy legislation, you can make a complaint to our Privacy Officer by sending an email to privacy@cempedak.com. We will endeavour to act promptly in response to a complaint.

Should you wish to report a complaint or if you feel we have not addressed your concern in a satisfactory manner, you may contact the Personal Data Protection Commission Singapore through their [website](#).