

Your privacy is important to LeaseWeb Asia Pacific Pte. Ltd. (hereinafter “Leaseweb APAC”). Leaseweb APAC is therefore pleased to provide this Privacy statement to inform you of Leaseweb APAC’s practices with respect to the collection and use of your personal information (“Personal Data”).

COMPLIANCE WITH DATA PROTECTION LAWS

Leaseweb APAC complies with Singapore Personal Data Protection Act 2012 (“PDPA”) and if to the extent applicable international data protection laws, in particular the Regulation 2016/679/EU of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (“GDPR”), both referred to as Privacy Acts.

HOW LEASEWEB APAC MAY COLLECT INFORMATION ABOUT YOU (IN OUR ROLE AS DATA CONTROLLER UNDER THE GDPR)

Leaseweb APAC may collect your Personal Data when:

- You order a service from Leaseweb APAC.
- You enter a promotional game of chance with Leaseweb APAC.
- You participate in a Leaseweb APAC survey.
- You subscribe to a Leaseweb APAC newsletter.
- You ask Leaseweb APAC for more information about a Leaseweb service, or contact Leaseweb APAC with a question, comment or complaint.
- You submit an abuse notification to Leaseweb APAC.
- You use the Leaseweb APAC network, Leaseweb APAC infrastructure and/or other Leaseweb APAC services.

Leaseweb APAC also collects Personal Data about you for Leaseweb Global B.V. (hereinafter “Leaseweb Global”) and other Affiliates of Leaseweb APAC. In addition, Leaseweb APAC may collect Personal Data about you from fraud-prevention agencies, referral partners, business directories and credit reference agencies.

WHAT KIND OF INFORMATION LEASEWEB APAC MAY COLLECT ABOUT YOU IN ACCORDANCE WITH THE PRIVACY ACTS (IN OUR ROLE AS DATA CONTROLLER UNDER THE GDPR)

Leaseweb APAC may collect the following information about you:

- a. Your name, (business/private) address, phone number, date of birth, email address and personal identification numbers.
- b. Your Leaseweb APAC account information – such as Leaseweb APAC services you ordered, domain name registration information, the IP addresses assigned to you, your customer ID, service charges owed and received, the use of Leaseweb APAC services or any other information related to your account.
- c. Your contact with Leaseweb APAC – such as a note or recording of a call you make to Leaseweb APAC, a chat record when you engage in a chat session with Leaseweb APAC, an email or letter you send to Leaseweb APAC or other records of any contact you have with Leaseweb APAC.
- d. Information about your payment method, such as credit card number, bank account number or other banking information.
- e. Information provided by you to Leaseweb APAC when you notify Leaseweb APAC of a (suspected) breach of Leaseweb APAC’s acceptable use policies.
- f. Video footage of you when you are in a Leaseweb APAC datacenter or the public space outside and inside our offices.
- g. Documents and information that certify your identity.

LEGAL GROUNDS UNDER THE PRIVACY ACTS

To process your information as described above, we rely on the following legal bases:

1. **Performance of a contract:** the use of your information may be necessary to perform the contract that you have with us. For example, if you use our services, we will use your information to carry out our obligation to complete and administer that service under the contract that we have with you.
2. **Legitimate interests:** the processing is necessary for the purposes of the legitimate interests pursued by us, namely for information security. We also want to provide you with the best suitable content of the website, emails and newsletters, to improve and promote our products and services and the content on our website, and for administrative, fraud detection and legal purposes.
3. **Consent:** For certain direct marketing purposes, you are free to withdraw your consent at any time. See also the section ‘**CONSENT AND WITHDRAWAL OF CONSENT**’.

You are free to decide whether or not to share certain Personal Data (if any) with us for direct marketing purposes. However, if you decide not to provide certain Personal Data; or if you withdraw your consent thereto at a latter moment, this may have affect how you experience our marketing for similar services.

WHY LEASEWEB APAC PROCESSES YOUR PERSONAL DATA IN ACCORDANCE WITH THE PRIVACY ACTS (IN OUR ROLE AS DATA CONTROLLER UNDER THE GDPR)

Leaseweb APAC processes your Personal Data for the following reasons:

- Processing of Orders and Sales Contracts and provision of services, including full customer verification.
- Conducting market research, conducting retention and customer satisfaction surveys, conducting marketing activities (including through email newsletters, social media and onsite/offsite and online/offline advertisement), conducting sales activities (including analyzing your Personal Data and your use of Leaseweb APAC services for making (personalized) offers and quotes with the aim of entering into a customer relationship, and/or maintaining, renewing or expanding a customer relationship) and offering promotional games of chance.
- Communicating with customers (i) to provide information about services of Leaseweb APAC and affiliated companies, (ii) to provide information about offers, Orders and Sales Contracts, provision of services, order status and payment, (iii) to provide support and maintenance services, (iv) to handle complaints, and (v) to answer questions from (potential) customers.
- Performing financial processes, including (i) calculating, invoicing and collecting of service Fees, (ii) processing financial transactions regarding the acceptance of Orders, and (iii) granting debt collection rights to third parties.
- Investigating creditworthiness and risk management, including prevention of overextending credit to (potential) customers and verifying whether (potential) customers will be able to comply with financial obligations.
- Investigating and processing suspected violations of Leaseweb APAC’s Policies.
- Ensuring the security of persons, goods and objects, and performing fraud detection.

- Conducting legal processes, including (i) conducting legal proceedings, and (ii) collecting evidence for civil legal proceedings relating to you.
- Complying with statutory obligations, including (i) provision of data to authorized authorities in the context of criminal investigations, (ii) complying with (applicable) data retention obligations, and (iii) the provision to third parties of Data concerning customers in connection with an infringement of these third parties' rights.
- Establishing the identity of customers or third parties, including in relation to the provision of access to data centers and our offices.

SHARING YOUR PERSONAL DATA WITH THIRD PARTIES (IN OUR ROLE AS DATA CONTROLLER UNDER THE GDPR)

Leaseweb APAC may share Data about you with:

- Leaseweb Global. This Affiliate of Leaseweb APAC offers tools and services (including the websites www.leaseweb.com, the Leaseweb Customer Portal and the Leaseweb API) that may be used to order or manage Leaseweb APAC Services or to communicate with Leaseweb APAC. Leaseweb APAC may share your Data with Leaseweb Global in connection with said tools and services. Please review the Privacy statement of Leaseweb Global on our website to learn about its practices with respect to the collection, storage and use of your Data.
- Suppliers or agents involved in delivering the services you've ordered with Leaseweb APAC.
- Credit reference, fraud prevention or business scoring agencies, or other credit scoring agencies.
- Domain name registries when Leaseweb APAC registers a domain name on your behalf.
- Debt collection agencies or other debt recovery organizations.
- Law enforcement agencies, regulatory organizations, courts or other public authorities to the extent required by law.
- A Leaseweb APAC customer, if you notify Leaseweb APAC that this customer use of Leaseweb APAC services violates the Leaseweb APAC's Policies or applicable laws.
- A third party that has claimed that your use of the Leaseweb APAC services violates the Leaseweb APAC's Policies or applicable laws (to the extent such sharing is required by law).

LEASEWEB APAC IN ITS ROLE AS IAAS CLOUD HOSTER

Personal Data hosted, transmitted or processed on infrastructure owned by you or leased from Leaseweb APAC is governed by this paragraph. The customer of Leaseweb APAC that owns or has leased Leaseweb APAC infrastructure, will be responsible for determining the purposes and means of the processing of Personal Data, (and this Leaseweb APAC customer (or its customers) will be the data controller in regards to such processing under the GDPR). If at any time Leaseweb APAC has access to personal data stored on infrastructure owned by a Leaseweb APAC customer or leased from Leaseweb APAC, then Leaseweb APAC shall be a data processor, and any actions performed by Leaseweb APAC in relation to such data shall be solely governed by the Sales Contract concluded between Leaseweb APAC and its customer.

DATA RESIDENCY

Your data hosted on your own infrastructure or on Leaseweb's infrastructure is located in Singapore.

DATA SOVEREIGNTY

Leaseweb APAC has no possession, custody, or control over any Personal Data that is stored in the E.U. or that controlled by other Leaseweb Sales Entities.

RETENTION PROCEDURES

Leaseweb APAC will store your Personal Data as long as necessary to perform the purposes of processing as stated in this Privacy statement.

TECHNICAL AND ORGANIZATIONAL SECURITY PROCEDURES AND DATA TRANSFERS

In accordance with the Singapore Personal Data Protection Act and the international data protection laws, in particular the GDPR, we observe adequate procedures to prevent unauthorized access to, and the misuse of, Personal Data. We use appropriate business systems and procedures to protect and safeguard the Personal Data. We also use security procedures and technical and physical restrictions for accessing and using the Personal Data on our servers. Only authorized personnel are permitted to access Personal Data in the course of their work. Our business processes apply a series of security services are compliant with the industry security standards, including ISO 27001, SOC 1, PCI DSS.

Leaseweb APAC has implemented the following, but not limited to, generic information security measures across its organisation: network segmentation, next generation firewalls, anti-virus software, full disk encryption of end-points, encrypted communication via SSL or VPN, Security Information and Event Management solutions, dedicated Security Operating Centre, monthly security awareness training, segregation of duties, role-based access permissions (based on least-privilege), secure disposal facilities of confidential information, periodic pentesting of public facing services, secure development training, integrated security monitoring during development, tools to enable employees to work secure (such as password managers), physical security zones. Per application or communication, additional security measures can be implemented.

Leaseweb APAC is frequently being audited by external parties to ensure it complies with relevant normative frameworks and controls within the Leaseweb Circle of Trust model. See <https://www.leaseweb.com/security-certifications> for more information.

Because Leaseweb has various local Sales Companies with customers located in many different countries around the world, it is important that Leaseweb complies with data privacy laws in many jurisdictions. In our role as data processor under the GDPR, we offer to EU-based customers the [Standard Contractual Clauses](#) to enable the lawful transfer of Personal Data from the European Economic Area ("EEA") and Switzerland to other countries globally, unless such country is qualified with an Adequacy Decision. The Standard Contractual Clauses set out the Leaseweb Affiliate commitment to privacy and data protection when processing data in connection with the provision of products and services to our customers, and dealing with the transfer of Personal Data outside the EEA and Switzerland in connection with the provision of such products and services.

DATA PROTECTION OFFICER

Leaseweb APAC has appointed a Data Protection Officer ("DPO") to oversee the data protection responsibilities under PDPA and is also registered with the Dutch supervisory authority under number FG008004, positioned at our global headquarters in The Netherlands. This office serves as our international center of expertise for international data protection laws compliance, in particular GDPR compliance, effectively centralizing our

connection with the Dutch supervisory authority, as the permitted one-stop shop facility for the DPO. The DPO can be reached at: privacy@sg.leaseweb.com.

YOUR RIGHTS

In accordance with the Privacy Acts, you have a number of rights regarding your Personal Data and the processing thereof:

- You can view and, if necessary, change your Personal Data in your account at any time.
- If you wish to know what information Leaseweb APAC, Leaseweb Global and other Affiliates of Leaseweb APAC have collected about you.
- If you want to make changes to the Personal Data you have seen you cannot change in your account.
- You also have the right to obtain from us the erasure of your Personal Data (right to be forgotten).
- In addition, you may, under certain circumstances, have the right to restriction of the processing of your Personal Data.
- You have the right to object, on grounds relating to your particular situation, at any time to processing of your Personal Data.
- You have the right to receive your Personal Data, which you have provided to us, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller when the processing is based on your consent or is necessary for the performance of a contract.

If you have any requests regarding the abovementioned, please contact us using the contact details below. If we do not grant your request, we will inform you about the reason why. Leaseweb APAC may choose to charge the individual a reasonable fee for access to its Personal Data about the individual to recover the incremental costs of responding to the access request (e.g. the cost of producing a physical copy of the Personal Data for the individual requesting it).

CONSENT AND WITHDRAWAL OF CONSENT

You are entitled to withdraw your consent at any time by opting out from the direct marketing messages. Upon receipt of your opt-out request, we will opt you out from the direct marketing messages list.

STATEMENT CHANGES

Leaseweb APAC reserves the right to change the Privacy statement, and will post any revisions on the Leaseweb website www.leaseweb.com. Leaseweb APAC advises you to check this page regularly to see if any changes have been implemented.

CONTACT INFORMATION

If you have any requests, questions or suggestions about Leaseweb APAC's privacy practices, please send an email to privacy@sg.leaseweb.com.

LeaseWeb Asia Pacific Pte. Ltd., private company with limited liability, incorporated under the laws of Singapore with UEN 201332642C, and having its visiting address at 11 Collyer Quay, The Arcade #16-02 049317, Singapore.