

Wee Hur Hospitality Pte Ltd (Reg No 201943047E) and its Related Bodies Corporate (Y Suites)

# Group Privacy Policy

Last updated February 2026

In this Privacy Policy, the expressions “Wee Hur Hospitality”, “**Y Suites**”, “we”, “us”, and “our” are a reference to Wee Hur Hospitality Pte Ltd (Reg No 201943047E) and its Related Bodies Corporate (**Y Suites**), including its operating partners.

We are committed to protecting your privacy and comply with:

- The Singapore Personal Data Protection Act 2012 (PDPA).
- The Australian Privacy Act 1988 (Cth) and the Australian Privacy Principles (APPs).
- The Hong Kong Personal Data (Privacy) Ordinance (PDPO).

These laws govern the way we collect, use, keep secure, and disclose your **personal information** and **personal data** (as defined in **Section 1**).

If you are a resident of the European Union and we collect **personal data** from you, then we are required to comply with the **GDPR** (these bolded terms are defined in **Section 13**).

The purpose of this Privacy Policy is to generally inform people of:

- How and when do we collect personal information and personal data.
- How we use and disclose personal information and personal data.
- How we keep personal information and personal data secure, accurate, and up-to-date.
- How you (as an individual) can access and correct your personal information and personal data; and
- How we will facilitate or resolve a privacy complaint.

If you have any concerns or complaints about the manner in which your personal information and personal data have been collected, used, or disclosed by us, we have put in place an effective mechanism and procedure for you to contact us so that we can attempt to resolve the issue or complaint. Please see **Section 12** for further details.

If you have any concerns or questions, please contact our Data Protection Officer at [tech@ysuites.co](mailto:tech@ysuites.co) or write to us at 39 Kim Keat Rd, Singapore 328814. Our Data Protection Officer will review your request and attempt to resolve any issues in accordance with the statutory timelines (e.g. 30 days for Singapore and 40 days for Hong Kong).

We recommend that you keep this information for future reference.

## **1. What is personal information?**

In this policy, the terms “Personal Information” (primarily used in Australia) and “Personal Data” (primarily used in Singapore and Hong Kong) are used interchangeably. They refer to any information or an opinion about an identified individual, or an individual who is reasonably identifiable:

- Whether the information or opinion is true or not; and
- Whether the information or opinion is recorded in a material form or not.

This includes, but is not limited to:

- **General Identifiers:** Your name, date of birth, nationality, and identification numbers (e.g. NRIC, FIN, or Passport numbers).
- **Contact Details:** Residential address, email address, and phone numbers.

- **Technical Data:** Information collected automatically through our website (e.g. IP addresses, device identifiers, and “cookies”).
- **Biometric Data:** Specific technical information relating to your physical characteristics which allow for your unique identification (e.g. facial images or fingerprints used for secure building access at our properties).
- **Financial Information:** Details required to process payments via our gateways (Stripe and Flywire).

## 2. The kinds of personal data collected, used, and disclosed by Y Suites

We will only use or disclose your personal data for the primary purposes for which it was collected or as consented to by you.

At or around the time we collect personal data from you, we will endeavor to provide you with a notice which details how we will use and disclose that specific information.

We set out some common collection, use, and disclosure instances in the table below. This includes data processed through our internal software and by our local operating partner in Australia and Hong Kong. Please note that we only collect information that is adequate, relevant, and not excessive for the purpose stated, in compliance with the Singapore PDPA, the Australian Privacy Principles, and the Hong Kong PDPO.

Purpose	Type of Information	Uses	Disclosures
Enquiries about investment or sales	<p>Information collected when you purchase our products or request information about the products and services we offer (e.g. investment opportunities with <b>Y Suites</b>, residency, or the purchase of our furniture and appliances packages and other products), including where applicable:</p> <ul style="list-style-type: none"> <li>• <b>Contact information:</b> Such as your name, Company name, address, billing address (if different to address), email address, phone numbers.</li> <li>• <b>Transaction Sales:</b> Such as: <ul style="list-style-type: none"> <li>○ Delivery information.</li> <li>○ Billing and account details.</li> <li>○ Payment card details.</li> </ul> </li> <li>• <b>Customer Service:</b> Information collected by our customer services department.</li> <li>• <b>Management Authority:</b> the personal data required to complete our Management Authority documentation for investors, including your banking and insurance details.</li> </ul>	<p>The types of uses we will make of personal data collected for this type of purpose include:</p> <ul style="list-style-type: none"> <li>• <b>Identity verification:</b> if required, the verification of your identity.</li> <li>• <b>Services:</b> the provision of our services to you including: <ul style="list-style-type: none"> <li>○ Using your personal data in order for you to use the products and services offered.</li> <li>○ Payment processing, including charging, credit card authorization, verification, and debt collection.</li> <li>○ Checks for financial standing and creditworthiness.</li> <li>○ To provide customer service functions, including handling customer enquiries and complaints and managing investor properties.</li> </ul> </li> <li>• <b>General administrative use:</b> <ul style="list-style-type: none"> <li>○ The use for the administration and management of <b>Y Suites</b>.</li> <li>○ The maintenance and development of our products and services, business systems, and infrastructure.</li> <li>○ In connection with the sale of any part of <b>Y Suites'</b> business or a company owned by <b>Y Suites</b> entity.</li> <li>○ To provide customer services to clients and for quality assurance purposes.</li> </ul> </li> </ul>	<p>The types of disclosures we will make of personal data collected for the type of purposes listed include, without limitation, to:</p> <ul style="list-style-type: none"> <li>• Third parties connected with the sales process including ecommerce, product suppliers, payment gateway providers, and financial institutions.</li> <li>• Service providers (including IT service providers and consultants) who assist <b>Y Suites</b> in providing our products and services.</li> <li>• Related bodies corporate of <b>Y Suites</b> (including related entities).</li> <li>• For investors: any applicable owner corporations, body corporate groups, and city councils.</li> <li>• Third parties in connection with the sale of any part of <b>Y Suites'</b> business or a company owned by a <b>Y Suites'</b> entity.</li> <li>• As required or authorized by law.</li> </ul>

Purpose	Type of Information	Uses	Disclosures
Residents	<ul style="list-style-type: none"> <li>• <b>Contact and identifying information:</b> <ul style="list-style-type: none"> <li>○ Such as your name, date of birth, address, email address, phone numbers, nationality, gender.</li> <li>○ Alternative Contact (Emergency contact name, phone number, email address).</li> <li>○ Bank account, credit or debit card details.</li> <li>○ Details of required primary identification information (such as a current driver’s license, passport, etc.).</li> </ul> </li> <li>• <b>Biometric data</b> (e.g. facial images or templates for secure building access)</li> <li>• <b>Visa information</b></li> <li>• <b>Medical conditions</b></li> <li>• <b>Background and immigration check:</b> information obtained from you or third parties to perform background checks.</li> <li>• <b>Enrolment information:</b> such as your university course information and student number, confirmation of enrolment, and a receipt from your university confirming your tuition fees have been paid.</li> <li>• <b>Technical &amp; system data</b></li> </ul>	<ul style="list-style-type: none"> <li>• <b>Identity verification:</b> if required, the verification of your identity and proof of residency and student status in Australia.</li> <li>• <b>Resident application:</b> the consideration and processing of your accommodation application and associated lease and bond documentation.</li> <li>• <b>Term of residency:</b> to conduct room inspections and collect personal belongings from the premises at the end of your residency, and to ensure the safety of all residents at any given time.</li> <li>• <b>Resident activities and events:</b> collection of your personal data to facilitate your participation in <b>Y Suites’</b> various resident activities and events.</li> <li>• <b>Payments and purchases:</b> the processing of any payments and refunds, credit card authorizations, verifications, and debt collection, if applicable.</li> <li>• <b>General administrative and security use:</b> <ul style="list-style-type: none"> <li>○ The use for security and safety purposes, including the use of your details in a medical emergency or as lawfully directed or required by a government body.</li> <li>○ The use for the administration and management of <b>Y Suites</b>.</li> <li>○ The maintenance and development of our products and services, business systems, and infrastructure.</li> <li>○ In connection with the sale of any part of <b>Y Suites’</b> business or a company owned by <b>Y Suites’</b> entity.</li> </ul> </li> <li>• To provide customer services to clients and for quality assurance purposes.</li> </ul>	<p>We may disclose this type of personal data to:</p> <ul style="list-style-type: none"> <li>• Our contractors, agents, and third-party providers who undertake billing, credit, caretakers, security, maintenance, and utilities services on our behalf.</li> <li>• Investors in the property that you are leasing from us.</li> <li>• Third party providers who assist us in providing our products and services to you.</li> <li>• Internal technical developers and related corporate entities.</li> <li>• Third parties, such as external debt recovery agents, court or other entities to which we are required by law to disclose personal data.</li> <li>• Government and regulatory authorities, including but not limited to: <ul style="list-style-type: none"> <li>○ In Australia: Department of Home Affairs (Immigration), federal and state education departments, the Australian Federal Police (for criminal checks), and tribunals such as the Victorian Civil and Administrative Tribunal (VCAT).</li> <li>○ In Singapore: The Ministry of Manpower (MOM), the Immigration &amp; Checkpoints Authority (ICA), and the Ministry of Education (MOE).</li> <li>○ In Hong Kong: The Immigration Department, the Education Bureau (EDB), and the Hong Kong Police Force.</li> </ul> </li> </ul>

Purpose	Type of Information	Uses	Disclosures
Marketing, testimonials, surveys, and competitions	<ul style="list-style-type: none"> <li>• <b>Contact information:</b> Such as your name, email address, current postal and residential addresses, phone numbers, country of residents (and, if applicable, age).</li> <li>• <b>Website enquiries:</b> Such as your name, email address, phone number, and any information you provide to us as part of your message.</li> <li>• <b>Social media activity:</b> Including “likes”, comments posted, any of your oppositions or feedback, photos posted or uploaded and other information pertaining to your social media activities which concern, or relate, to <b>Y Suites</b>.</li> <li>• <b>Competitions and surveys:</b> Any personal data you include in any survey answers or competition entries you send to us.</li> <li>• <b>Contact details and testimonials:</b> If you agree to be engaged for testimonial purposes for inclusion in our promotional material, your photograph, name, testimonial, and any other personal data you disclose on our Consent to Release Image or Recording Form and in any recordings themselves.</li> <li>• <b>Technical &amp; website data:</b> Such as IP addresses, browser types, device identifiers, and cookie data</li> </ul>	<ul style="list-style-type: none"> <li>• <b>General marketing, surveys, and consumer analytics:</b> Using your personal data: <ul style="list-style-type: none"> <li>• To aggregate with other information and to then use it for marketing and consumer analytics.</li> <li>• To offer you updates on products, events or information that may be interesting to you.</li> <li>• For marketing and promotional activities by us (including by direct mail, SMS, and email) such as our email alerts, product awareness information, and newsletters.</li> </ul> </li> <li>• <b>Competitions</b> <ul style="list-style-type: none"> <li>• To facilitate your participation in our competitions.</li> <li>• To offer you updates on products, events or information that may be of interest to you.</li> </ul> </li> <li>• <b>Online accounts or social media:</b> If you participate in our social media platforms (such as Facebook) and you provide us with your personal data, we will use it for: <ul style="list-style-type: none"> <li>• Adding account holders to the marketing database.</li> <li>• Customer service-related contact.</li> <li>• Responding to social media messages.</li> <li>• Fulfilling social media platform rules.</li> </ul> </li> <li>• <b>Security and functionality of our website:</b> To monitor performance and optimize the booking journey on our platform.</li> </ul>	<ul style="list-style-type: none"> <li>• We may disclose your personal data to third parties connected with the marketing process who assist us in providing our products and services to you.</li> <li>• Website hosting providers, IT security partners, and analytics service providers.</li> <li>• All other personal data you provide to us as part of your engagement may be disclosed as follows: <ul style="list-style-type: none"> <li>• Service providers (including IT service providers and consultants) who assist <b>Y Suites</b> in providing our products and services.</li> <li>• Related bodies corporate of <b>Y Suites</b> (including related entities).</li> <li>• Third parties in connection with the sale of any part of <b>Y Suites</b>’ business or a company owned by a <b>Y Suites</b>’ entity.</li> </ul> </li> <li>• We will also disclose your personal data as required or authorized by law.</li> </ul>

Purpose	Type of Information	Uses	Disclosures
Human resources	<ul style="list-style-type: none"> <li>• <b>Contact information:</b> Such as your name, email address, current postal and residential address, phone numbers, next of kin contact details.</li> <li>• <b>Employee record information</b></li> <li>• <b>Identifying information:</b> Such as your gender, nationality, photo, passport or birth certificate, residency details, date of birth.</li> <li>• <b>CV, resume or application related information:</b> Such as the details, provided in your resume or CV, your eligibility to work in Australia, your education, previous employment details, professional memberships or trade qualifications.</li> <li>• <b>Tax, superannuation, and payroll information:</b> Such as your Tax File Number and ATO Declaration, Superannuation details, and financial institution details.</li> <li>• <b>Background check information:</b> Information obtained from you or third parties to perform background checks.</li> <li>• <b>Medical or health information:</b> Information you voluntarily provide to us in relation to your capacity to undertake your role or such other information which may be related to an incident which has occurred during the course of your employment.</li> <li>• <b>Performance-related information:</b> Pre-employment testing and other information collected by <b>Y Suites'</b> systems in the course of the employee or contractor's engagement with <b>Y Suites</b>.</li> <li>• <b>Information collected from referees</b></li> <li>• <b>Security information:</b> Such as CCTV footage and photographs taken on our premises.</li> </ul>	<ul style="list-style-type: none"> <li>• <b>Background check information:</b> Utilizing the information collected for the purpose of assessing candidate suitability for the role, including by obtaining: <ul style="list-style-type: none"> <li>• Verification of your identity and age.</li> <li>• Criminal history check in Australia.</li> <li>• Background checks including publicly available information including LinkedIn or other social media platforms.</li> <li>• Working with Children checks in Australia.</li> <li>• Confirmation of eligibility to work in Australia.</li> <li>• Confirmation of education and qualifications.</li> <li>• Confirmation of previous employment.</li> <li>• Consideration regarding medical leave.</li> </ul> </li> <li>• <b>Administration and performance monitoring use:</b> Utilizing the information collected for the purpose of: <ul style="list-style-type: none"> <li>• Dealings related to the employer/employee relationship or contractor relationship is prospective, current, or past.</li> <li>• Use of such information to monitor systems, performance and time usage, and internet usage.</li> <li>• The use of your personal data collected in the administration and management of <b>Y Suites</b>.</li> <li>• In connection with the sale of any part of <b>Y Suites'</b> business or a company owned by a <b>Y Suites'</b> entity.</li> </ul> </li> </ul>	<p>We may disclose your personal data to:</p> <ul style="list-style-type: none"> <li>• Relevant superannuation company.</li> <li>• Government agencies and statutory bodies as required by law, including: <ul style="list-style-type: none"> <li>• The Australian Taxation Office (ATO), Services Australia (Centrelink), and the Child Support Agency.</li> <li>• The Inland Revenue Authority of Singapore (IRAS) and the Central Provident Fund (CPF) Board.</li> <li>• The Hong Kong Inland Revenue Department (IRD) and the Mandatory Provident Fund (MPF) Schemes Authority.</li> </ul> </li> <li>• Relevant insurers and worker's compensation organizations, such as: <ul style="list-style-type: none"> <li>• Australia: WorkCover or equivalent state-based insurers.</li> <li>• Singapore: The Ministry of Manpower (MOM) and designated insurers under the Work Injury Compensation Act (WICA).</li> <li>• Hong Kong: Authorized insurers and the Labor Department under the Employees' Compensation Ordinance.</li> </ul> </li> <li>• Third party referees provided by you in connection with an application made to <b>Y Suites</b>.</li> <li>• Service providers (including IT service providers and payroll providers), if any.</li> <li>• Recruitment agents used in connection with your application with us.</li> <li>• Third parties in connection with the sale of any part of <b>Y Suites'</b> business or a company owned by a <b>Y Suites'</b> entity.</li> <li>• Third party parties in connection with obtaining background checks, pre-employment screening.</li> <li>• Financial institutions for payroll purposes.</li> <li>• As required or authorized by law.</li> </ul>

Purpose	Type of Information	Uses	Disclosures
Investors and owners	<ul style="list-style-type: none"> <li>• <b>Contacts and identifying information:</b> <ul style="list-style-type: none"> <li>• Such as your name, date of birth, address, billing address, email address, phone and fax numbers.</li> <li>• Bank account, credit or debit card details.</li> <li>• Details of required primary identification information (such as a current driver’s license, passport, etc.).</li> </ul> </li> <li>• <b>Transaction Sales:</b> Such as: <ul style="list-style-type: none"> <li>• Delivery information.</li> <li>• Billing and account details.</li> <li>• Payment card details.</li> </ul> </li> <li>• <b>Customer Service:</b> Information collected in connection by our customer services department.</li> </ul>	<ul style="list-style-type: none"> <li>• <b>Investor Application:</b> using your personal data to consider and process your application to become a <b>Y Suites</b> investor, and to process payments should your application be successful.</li> </ul>	<ul style="list-style-type: none"> <li>• Third parties connected with the marketing process who assist us in providing our products and services to you.</li> <li>• Third parties that assist with our mailing list distribution.</li> <li>• The parties listed in the Disclosure column for “<i>Enquiries about investment and sales</i>”.</li> </ul>

### **3. How Y Suites collects and holds personal data**

#### **3.1 Collection generally**

As much as possible or unless provided otherwise in this Privacy Policy or a notification, we will collect your personal data directly from you. This includes information you provide when using our website, internal systems, or when communicating with our team members.

When you engage in certain activities, such as by submitting an online enquiry or participating in one of our surveys, we may ask you to provide certain information. It is completely optional for you to engage in these activities.

Depending upon the reason for requiring the information, some of the information we ask you to provide may be identified as mandatory or voluntary. If you do not provide the mandatory information or any other information, we require in order for us to provide our products or services to you, we may be unable to provide our products or services to you in an effective manner, or at all.

#### **3.2 Other collection types**

We may also collect personal data about you from other sources, such as local operating partners, automated systems and APIs, payment gateways, referees, government agencies, and other third parties. Some examples of these alternative collection events are:

- (a) When we collect personal data about you if we are required to conduct a personal criminal check, credit check, or personal referee checks; or
- (b) When we collect personal data about you from publicly available sources including but not limited to, court judgments, directorship and bankruptcy searcher, Australia Pos, White Pages directory, and social media platforms (such as Facebook, Twitter, Google, Instagram, LinkedIn, etc.).

#### **3.3 Notification of collection**

If we collect details about you from someone else, we will, whenever reasonably possible, make you aware that we have done this and why, unless special circumstances apply, including as described in items (a) to (d) below. For residents in Hong Kong, we provide a specific notice (Personal Information Collection Statement) at or before the time of collection via our website, which outlines the mandatory or voluntary nature of the data requested and the specific classes of third parties we may share that data with.

Generally speaking, we will not tell you when we collect personal data about you in the following circumstances:

- (a) Where you are listed as an emergency contact for one of our residents;
- (b) Where information is collected from any personal referee you have listed on any application form (including any employment application) with **Y Suites**;

- (c) Where information is collected from publicly available sources including but not limited to court judgments, directorship and bankruptcy searches, social media platforms (such as Facebook, Twitter, Google, Instagram, etc.); or
- (d) As otherwise required or authorized by law.

### **3.4 Unsolicited personal data**

In the event we collect personal data from you, or a third party, in circumstances where we have not requested or solicited that information (known as unsolicited information), and it is determined by **Y Suites** (in its absolute discretion) that the personal data is not required, we will destroy the information or ensure that the information is de-identified.

In the event that the unsolicited information or personal data collected is in relation to potential future employment with **Y Suites**, such as your CV, resume or candidacy related information, and it is determined by **Y Suites** (in its absolute discretion) that it may consider you for potential future employment, **Y Suites** may keep the personal data on its human resource records.

### **3.5 How we hold your personal data**

Once we collect your personal data, we will either hold it securely and store it on infrastructure owned or controlled by us, or with a third party service providers. We take reasonable steps to ensure these providers comply with the *Privacy Act 1988* (Cth), the Singapore PDPA, and the Hong Kong PDPO as applicable.

We provide more general information on our security measures in **Section 10 (Data security and quality)**.

### **3.6 Cookies and IP addresses**

If you use our website, we may utilize cookies and similar technologies (including through Google Analytics and website analytics). While a cookie often identifies a service provider or computer rather than a person, we may aggregate this with other personal data we hold about you to improve our services and personalize your experience. We also gather IP addresses to assist with the operational performance of our systems and to resolve support issues.

**Y Suites** extends the same privacy protection to your personal data, whether gathered via cookies or from other sources, as detailed in this Privacy Policy.

You can set your browser to notify you when you receive a cookie and this will provide you with an opportunity to either accept or reject it in each instance. However, if you disable cookies, you may not be able to access certain areas of our websites or take advantage of the improved website experience that cookies offer.

## **4. Uses and disclosures of personal data**

### **4.1 Use and disclosure details**

We provide a detailed list at **Section 2** of some common uses and disclosures we make regarding the personal data we collect.

#### **4.2 Other uses and disclosures**

We may also use or disclose your personal data and in doing so we are not required to seek your additional consent:

- (a) When it is disclosed or used for a purpose related to the primary purposes of collection detailed above and you would reasonably expect your personal data to be used or disclosed for such a purpose;
- (b) For business improvement purposes (Singapore residents only), such as enhancing our operational efficiency, developing new features for our proprietary systems, and improving our hospitality products and services;
- (c) For research purposes, provided the data is used to produce aggregated insights and you are not personally identifiable;
- (d) If we reasonably believe that the use or disclosure is necessary to lessen or prevent a serious or imminent threat to an individual's life, health or safety, or to lessen or prevent a threat to public health or safety;
- (e) If we have reason to suspect that unlawful activity has been, or is being engaged in; or;
- (f) If it is required or by authorized by law.

#### **4.3 Use and disclosure procedures**

In the event we propose to use or disclose such personal data other than for reasons set out in the above tablet at **Section 2** or as otherwise outlined in this Privacy Policy, we will first notify you or seek your consent prior to such disclosure or use.

Your personal data is disclosed to these organizations or parties only in relation to the products or services we provide to you. This includes our local operating partners, payment gateway providers, and website hosting services.

We take such steps as are reasonable to ensure that these organizations or parties are aware of the provisions of this Privacy Policy and enter into data processing agreements where required by law to protect your information.

#### **4.4 Communications and marketing opt-out**

We provide you with the opportunity to control how we communicate with you for marketing purposes:

- (a) Opt-out: if you no longer wish to receive marketing communications, you should contact us via the details set out at the top of this document or use the "unsubscribe" facility in our communications. We will ensure the relevant communication ceases promptly and without charge.
- (b) Detailed procedures: For specific information on how we manage direct marketing, including the express opt-in requirements for Hong Kong residents, please see **Section 6** below.

## 5. Sensitive Information

### 5.1 Sensitive information generally

Sensitive information is a subset of personal data. It includes information about an individual's racial or ethnic origin, political opinions, religious beliefs, criminal record, health information, and biometric data (including facial templates or identifiers used for automated verification or property access).

### 5.2 Collection and use of sensitive information

Given the nature of our business (student accommodation), we require the collection of certain sensitive information to ensure resident safety, comply with education provider requirements, or process employment applications. We do not collect sensitive information without your express consent.

The type of sensitive information we may collect about you is dependent on the services provided to you by **Y Suites** and will be limited to the purpose(s) for which it is collected. We set out some types of sensitive information we may collect about you in the “Residents” and “Human resources” sections of the table at **Section 2** above.

### 5.3 Use for marketing

We do not use sensitive information to send you Direct Marketing Communications without your express consent.

## 6. Direct Marketing

### 6.1 Express informed consent

You give your express and informed consent to us using your personal data set out in:

- (a) The “*Enquiries about investment and sales*” section; and
- (b) The “*Marketing, testimonials, surveys, and competitions*” section,

of the table at **Section 2** of this document above to provide you with information and to tell you about your products, services or events, or any other direct marketing activity (including third party products, services, and events) which we consider may be of interest to you, whether by post, email or SMS (**Direct Marketing Communications**).

### 6.2 Specific requirements for Hong Kong residents

For residents of Hong Kong, we strictly adhere to a policy of express opt-in consent for direct marketing. If we have not yet implemented or obtained your explicit consent via an opt-in mechanism (such as a checkbox on our website), we will not use your personal data for direct marketing purposes.

### 6.3 Inferred consent and reasonable expectations of direct marketing (Australia and Singapore only)

For residents in Australia and Singapore, if you have provided inferred or implied consent (e.g. not opting out where an opt-out opportunity has been provided to you) or if

it is within your reasonable expectation that we send you Direct Marketing Communications given the transaction or communication you have had with us, then we may also use your personal data for the purpose of sending you Direct Marketing Communications which we consider may be of interest to you.

#### **6.4 Opt-out**

If at any time you do not wish to receive any further Direct Marketing Communications from us or other under this **Section 6**, you may ask us not to send you any further information about products or services and do not disclose your information to other organizations for that purpose. You may do this at any time by using the “unsubscribe” facility included in the Direct Marketing Communication or by contacting us via the details set out at the top of this document. We will process your opt-out request promptly and without charge.

### **7. Credit Information and our Credit Reporting Policy**

#### **7.1 Credit information generally**

Privacy Law regulates the use and disclosure of credit information, which applies in relation to the provision of both consumer credit and commercial credit. This includes the Privacy Act (Australia), the PDPA and Credit Bureau Act (Singapore), and the Code of Practice on Consumer Credit Data (Hong Kong).

#### **7.2 Credit information and Y Suites**

We provide credit in the form of deferred payment for accommodation. We use your credit-related information (such as payment history and internal creditworthiness assessments) to manage your account and ensure the financial security of our properties. We do not currently disclose credit information to external credit reporting bodies for the purpose of "pre-screening" or marketing.

#### **7.3 Storage and security**

We store credit-related information with the same high level of security as your other personal data. You have the right to access or correct this information by contacting our Data Protection Officer as detailed in **Section 11**.

#### **7.4 External agencies**

If your account falls significantly into arrears, we may disclose your information to debt collection agencies or legal advisors in accordance with local laws in Australia, Singapore, or Hong Kong.

### **8. Anonymity and pseudo-anonymity**

#### **8.1 General practice**

Our general practice is not to permit individuals to deal with us on an anonymous basis or through the use of a pseudonym. Generally, your personal data is required in order to

provide you with our products and services, verify your identity for safety and security purposes, or to resolve any issue you may have.

## **8.2 When anonymity is permitted**

We recognize that in certain limited circumstances, it may be possible for you to interact with us without identifying yourself. For example, you may make general enquiries about our room availability or pricing via our website or social media without providing your full name.

## **8.3 When identification is required**

Identification is mandatory for the following activities:

- (a) **Booking and residency:** To enter into a residential agreement and for us to manage your stay, we must verify your identity and, in some cases, your student status and right to reside in the country (e.g. Australia or Hong Kong).
- (b) **Financial transactions:** To process payments through our payment gateways, or to assess creditworthiness.
- (c) **Building access:** To provide secure access to our properties (including via biometric systems), we must link the access credentials to an identified resident.
- (d) **Legal requirements:** Where we are required or authorized by law (such as the Singapore PDPA, Hong Kong PDPO, or Australian Privacy Act) to deal only with identified individuals.

## **9. Cross Border Disclosure**

### **9.1 Cross border disclosures**

As an operator, **Y Suites** processes and stores data across multiple jurisdictions. Any personal data collected and held by **Y Suites** may be disclosed or transferred to, and held at, a destination outside of the country where it was originally collected. These locations include, but are not limited to:

- **Singapore:** Where our head office and centralized management systems are located.
- **Australia and Hong Kong:** Where our properties are located and local operations are conducted.
- **Other global locations:** Where our third-party service providers may maintain cloud servers.

Personal data may also be processed by staff or by other third parties operating outside your home country who work for us or for one of our suppliers, contractors, or agents.

### **9.2 Standards of protection**

We take the security of your personal data seriously. Before we transfer your personal data across borders, we take reasonable steps to ensure that the recipient is subject to a law, binding scheme, or contract which provides a standard protection that is comparable to or higher than the requirements of:

- The Australian Privacy Act 1988 (Cth);
- The Singapore Personal Data Protection Act (PDPA); and
- The Hong Kong Personal Data (Privacy) Ordinance (PDPO).

### 9.3 Provision of informed consent

By submitting your personal data to **Y Suites**, you expressly agree and consent to the disclosure, transfer, storing, or processing of your personal data outside of your country of residence. In providing this consent, you understand and acknowledge that:

- While some countries may not have the same statutory privacy protections as your home jurisdiction, we use contractual clauses and security measures to protect your data.
- Under the Australian Privacy Act, by providing this consent, **Y Suites** is not required to ensure that the overseas recipient does not breach the Australian Privacy Principles, although we still take all reasonable steps to ensure they handle your data securely.
- For Singapore and Hong Kong residents, we ensure that any overseas transfer is necessary for the performance of our contract with you (e.g. processing your booking) or is done with your express consent.

### 9.4 If you do not consent

If you do not agree with the cross-border disclosure of your personal data by **Y Suites**, we may be unable to provide our services to you, as our booking systems and payment gateways depend on global cloud infrastructure to function effectively.

## 10. Data security and quality

### 10.1 Y Suites' general security

We have implemented appropriate technical and organizational measures to secure and protect your personal data from unauthorized access, use, disclosure, alteration, or destruction. While we take every reasonable precaution, no method of transmission over the internet or electronic storage is 100% secure, and we cannot guarantee absolute security against malicious third-party activity or human error.

To protect your data, we take the following steps:

- System security:** We use encryption and secure API connections to protect data transmitted between our website, systems, and payment gateways.
- Access control:** We restrict access to personal data to authorized employees and contractors on a strict “need-to-know” basis.
- Monitoring:** We perform regular security reviews of our digital infrastructure to identify and mitigate potential vulnerabilities.
- Physical security:** We maintain physical security measures at our properties and offices to prevent unauthorized access to hard-copy records.
- Data minimization and retention:** We take reasonable steps to ensure that personal data is accurate, complete, and up-to-date. We will destroy or permanently de-

identify personal data once it is no longer required for its original purpose or for legal/business necessity in Australia, Singapore, or Hong Kong.

## **10.2 Data breach notification**

In the event of a data breach that is likely to result in serious harm to you (Australia) or is a “notifiable data breach” under Singapore or Hong Kong regulations, we will notify you and the relevant regulatory authorities (such as the OAIC in Australia or the PDPC in Singapore) in accordance with our statutory obligations.

## **10.3 Accuracy**

The accuracy of personal data depends largely on the information you provide to us. To ensure we can provide our services effectively, we recommend that you:

- (a) Notify us immediately if there are any errors in your personal data; and
- (b) Keep us updated with changes to your contact details, name, or residency status.

We provide information about how you can access and correct your personal information in **Section 11**.

## **11. Access to and correction of your personal data**

### **11.1 Your rights of access and correction**

You are entitled to request access to any personal data relating to you which we hold. You are also entitled to request that we correct or update such information if it is inaccurate, out-of-date, incomplete, irrelevant, or misleading.

### **11.2 How to make a request**

If you would like access to or correct any records of personal data we have about you, please contact us via the details set out at the top of this document. To protect your privacy, we will require you to verify your identity before granting access or making changes to your records.

### **11.3 Our response and timelines**

We will respond to your request within a reasonable timeframe and in accordance with the local laws of your jurisdiction:

- Australia: We will generally respond within 30 days
- Singapore: We will respond within 30 days. If we are unable to do so, we will inform you in writing of the time by which we can respond.
- Hong Kong: We will respond within the statutory period of 40 days.

### **11.4 Exceptions and fees**

In some exceptional circumstances provided by law (such as where the request is frivolous, affects the privacy of others, or relates to existing legal proceedings), we may be unable to provide access to some or all of your personal data. If we refuse your request, we will provide you with a written explanation.

We generally do not charge a fee for making a request; however, we reserve the right to charge a reasonable administrative fee for searching for and providing access to your information, as permitted by the Singapore PDPA and Hong Kong PDPO. We will notify you of any such fee before processing your request.

## **12. Resolving Privacy Complaints**

### **12.1 Complaints generally**

We have put in place an effective mechanism and procedure to resolve privacy complaints. We will ensure that all complaints are dealt with in a reasonably appropriate timeframe so that any decision is made expeditiously and in a manner that does not compromise the integrity or quality of the outcome.

### **12.2 Contacting Y Suites regarding complaints**

If you have any concerns or complaints about the manner in which we have collected, used, disclosed, or store your personal data, please contact us:

Email: [tech@ysuites.co](mailto:tech@ysuites.co)

Address: 39 Kim Keat Rd, Singapore 328814

Please mark your correspondence to the attention of the Data Protection Officer.

### **12.3 Steps we take to resolve a complaint**

In order to resolve a complaint, we:

- (a) Will liaise with you to identify and define the nature and cause of the complaint;
- (b) May request that you provide the details of the complaint in writing;
- (c) Will keep you informed of the likely time within which we will respond to your complaint (generally within 30 days); and
- (d) Will inform you of the legislative basis (if any) of our decision in resolving such complaint.

### **12.4 Escalation to regulatory authorities**

If you are not satisfied with our response or the manner in which we have handled your complaint, you may contact the relevant privacy regulator in your jurisdiction:

- Australia: The Office of the Australian Information Commissioner (OAIC) at [www.oaic.gov.au](http://www.oaic.gov.au).
- Singapore: The Personal Data Protection Commission (PDPC) at [www.pdpc.gov.sg](http://www.pdpc.gov.sg).
- Hong Kong: The Office of the Privacy Commissioner for Personal Data (PCPD) at [www.pcpd.org.hk](http://www.pcpd.org.hk).

### **12.5 Register of complaints**

We will keep a record of the complaint and any action taken in a secure Register of Complaints.

## **13. GDPR**

### 13.1 Application

If you are a resident of the European Union (EU) or the United Kingdom (UK), the additional provisions in this **Section 13** apply to you in accordance with the General Data Protection Regulation (GDPR) and the UK GDPR.

### 13.2 Definitions

In this section, the following defined terms have the associated meanings:

- (a) **Data subject** has the meaning given to that term in the GDPR.
- (b) **GDPR** means Regulation (EU) 2016/679 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, and repealing Directive 95/46/EC; and
- (c) **Personal data** has the meaning given to that term in the GDPR. More generally (and without limiting the definition in the GDPR), it means any information relating to an identified or identifiable natural person (i.e. by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that person). Of the data subjects whose data is processed for the purposes of the provision of our student accommodation and support services.

### 13.3 GDPR obligations

Under the GDPR, **Y Suites** is considered a “Data Controller”. We determine the purposes and means of processing your personal data for student accommodation and related services. We have implemented appropriate technical and organizational measures – including secure API integrations – to ensure processing complies with the GDPR.

### 13.4 Lawful basis for processing

We process your personal data only where we have a lawful basis to do so, which typically includes:

- (a) Performance of a contract: To process your booking and manage your residency.
- (b) Legal obligation: To comply with tax, immigration, or safety laws in Australia, Singapore, or Hong Kong.
- (c) Legitimate interests: For business improvement, security, and internal administration, provided these do not override your rights.
- (d) Consent: Where you have given explicit consent (e.g. for direct marketing).

### 13.5 Your data subject rights

In addition to your rights of access and correction as set out in **Section 11**, you may exercise the following rights:

- (a) Erasure (Right to be Forgotten): You may request the deletion of your personal data where it is no longer necessary for the purposes for which it was collected, or where you withdraw your consent.
- (b) Restriction of processing: You may request that we limit how we use your data in certain circumstances (e.g. if you contest the accuracy of the data).

- (c) Data portability: You may request a copy of your personal data in a structured, commonly used, and machine-readable format to be transferred to you or a nominated third party.
- (d) Right to object: You may object to the processing of your data for direct marketing or on grounds relating to your particular situation.

### **13.6 International transfers**

Your data is transferred outside the European Economic Area (EEA) to our offices and servers in Singapore, Australia, and Hong Kong. We ensure these transfers are protected by standard contractual clauses or other mechanism that provide an adequate level of protection.

### **13.7 Exercising your rights & complaints**

To exercise these rights, please contact us at [tech@ysuites.co](mailto:tech@ysuites.co). we will respond to your request within one month. You also have the right to lodge a complaint with a relevant Supervisory Authority in the EU or UK.

## **14. Consent, modifications, and updates**

### **14.1 Interaction of this Policy with contracts**

This Privacy Policy is a compliance document prescribed by law rather than a standalone legal contract. However, certain contracts (such as residential agreements, employment contracts, or partnership agreements with our local operating partners) may incorporate all or part of this Privacy Policy. In such instances:

- (a) Certain sections or paragraphs in this policy may create contractual obligations on the other party to ensure they handle data in accordance with **Y Suites'** standards; and
- (b) The consents provided in this policy became contractual terms provided by the other party to **Y Suites**.

### **14.2 Acknowledgement**

By using our website, interacting with our systems, or purchasing a product or service from **Y Suites**, you acknowledge and agree:

- (a) To provide the consents given by you in this Privacy Policy; and
- (b) That you have been informed of all the matters contained in this Privacy Policy, including the cross-border transfer of data between Singapore, Australia, and Hong Kong.

### **14.3 Modifications and updates**

We reserve the right to modify our Privacy Policy to reflect changes in our business tech stack, regional expansion, or legal requirements. We will take reasonable steps to notify you of significant changes, such as by posting a prominent notice on our website or contacting you directly.

If you do not agree to the changes, please notify us. Continued use of our services or website following such changes will be deemed as your acceptance of the revised Privacy Policy.