

EFES Consultancy Data Protection Notice

This Data Protection Notice (“**Notice**”) sets out the basis which EFES Consultancy and its Singapore subsidiaries (collectively “EFES Consultancy”, “**we**”, “**us**”, or “**our**”) may collect, use, disclose or otherwise process personal data of our customers in accordance with the Personal Data Protection Act (“**PDPA**”).

This Notice applies to personal data in our possession or under our control, including personal data in the possession of organisations which we have engaged to collect, use, disclose or process personal data for our purposes.

PERSONAL DATA

1. As used in this Notice:

“**clients**” means an individual who (a) has contacted us through any means to find out more about any services we provide, or (b) may, or has, entered into a contract with us for the supply of any services by us; and

“**personal data**” means data, whether true or not, about a client who can be identified: (a) from that data; or (b) from that data and other information to which we have or are likely to have access.

2. Depending on the nature of your interaction with us, some examples of personal data which we may collect from you include name, identification numbers such as NRIC, FIN, work permit and birth certificate, residential address, email address, telephone number, nationality, gender, date of birth and marital status.
3. Other terms used in this Notice shall have the meanings given to them in the PDPA (where the context so permits).

COLLECTION, USE AND DISCLOSURE OF PERSONAL DATA

4. We collect the Personal Data of EFES Consultancy’s clients, partners, associates, consultants, service providers and/or third parties (e.g. shareholders) through:
 - Letters of engagement / agreements for EFES Consultancy’s services (including Payroll Services, Accounting Services, Tax Services, Share Registry Services, Employee Share Plans and Corporate Secretarial Services)
 - Your contact details when you visit our websites or online services
 - Requests informing us to update the Personal Data that is maintained by us
 - Any enquiries, feedback or complaints concerning our products and services
 - Visits to EFES Consultancy’s office premises

5. Pending on the services provided by EFES Consultancy, we may collect the following Personal Data: (to review)
 - Personal contact information and particulars (NRIC / FIN No. / Passport No., Name, Gender, Date of birth, Citizenship, Race, Address, Phone No., Email address)
 - Personal Income
 - Financial information
 - Employment pass status
 - Passwords and accounts accessed
6. We use the Personal Data collected for the following purposes:
 - Provide payroll, tax, corporate secretarial, share registry and employee share plan services
 - Conduct needs analysis and requirements (where applicable)
 - Conduct market research and analysis (where applicable)
 - Comply with legal obligations and regulatory requirements as part of the services provided
 - Prepare and submit tax returns to IRAS
 - Follow-up on enquiries, feedback and complaints
 - Record movement of visitors and service providers to EFES Consultancy's premises for security purposes.
7. We may collect, disclose or use your personal data pursuant to an exception under the Personal Data Protection Act or other written law such as when deemed necessary in the national interest or for any investigation or proceedings or audits.
8. We may disclose some of the Personal Data collected to the following organisations outside EFES Consultancy:
 - Government agencies and regulatory authorities
 - CDP
 - Regional offices
 - Mailing houses, freight and courier services
 - Payroll processing service providers
 - Financial service provider and our professional advisers such as auditors and/or lawyers
9. We generally do not collect your personal data unless (a) it is provided to us voluntarily by you directly or via a third party who has been duly authorised by you to disclose your personal data to us (your "**authorised representative**") after (i) you (or your authorised representative) have been notified of the purposes for which the data is collected, and (ii) you (or your authorised representative) have provided written

consent to the collection and usage of your personal data for those purposes, or (b) collection and use of personal data without consent is permitted or required by the PDPA or other laws. We shall seek your consent before collecting any additional personal data and before using your personal data for a purpose which has not been notified to you (except where permitted or authorised by law).

10. We may collect and use your personal data for any or all of the following purposes:

- (a) performing obligations in the course of or in connection with our provision of the goods and/or services requested by you;
- (b) verifying your identity;
- (c) responding to, handling, and processing queries, requests, applications, complaints, and feedback from you; and
- (d) processing payment or credit transactions.

11. We may disclose your personal data:

- (a) where such disclosure is required for performing obligations in the course of or in connection with our provision of the goods and services requested by you; or
- (b) to third party service providers, agents and other organisations we have engaged to perform any of the functions with reference to the above mentioned purposes.

12. The purposes listed in the above clauses may continue to apply even in situations where your relationship with us (for example, pursuant to your employment contract should you be hired or service agreements in the provision of our services) has been terminated or altered in any way, for a reasonable period thereafter (including, where applicable, a period to enable us to enforce our rights under a contract with you).

WITHDRAWING YOUR CONSENT

13. The consent that you provide for the collection, use and disclosure of your personal data will remain valid until such time it is being withdrawn by you in writing. You may withdraw consent and request us to stop collecting, using and/or disclosing your personal data for any or all of the purposes listed above by submitting your request in writing or via email to our Data Protection Officer at the contact details provided below.

14. Upon receipt of your written request to withdraw your consent, we may require reasonable time (depending on the complexity of the request and its impact on our relationship with you) for your request to be processed and for us to notify you of the consequences of us acceding to the same, including any legal consequences which may affect your rights and liabilities to us. In general, we shall seek to process your request within thirty (30) business days of receiving it.

15. Whilst we respect your decision to withdraw your consent, please note that depending on the nature and scope of your request, we may not be in a position to continue providing our goods or services to you and we shall, in such circumstances, notify you before completing the processing of your request. Should you decide to cancel your withdrawal of consent, please inform us in writing in the manner described in clause 12 above.

16. Please note that withdrawing consent does not affect our right to continue to collect, use and disclose personal data where such collection, use and disclose without consent is permitted or required under applicable laws.

ACCESS TO AND CORRECTION OF PERSONAL DATA

17. If you wish to make (a) an access request for access to a copy of the personal data which we hold about you or information about the ways in which we use or disclose your personal data, or (b) a correction request to correct or update any of your personal data which we hold about you, you may submit your request in writing or via email to our Data Protection Officer at : [pdpo@EFES Consultancylimited.com](mailto:pdpo@EFESConsultancylimited.com)
18. Please note that a reasonable fee may be charged for an access request. If so, we will inform you of the fee before processing your request.
19. We will respond to your request as soon as reasonably possible. In general, our response will be within thirty (30) days. Should we not be able to respond to your request within thirty (30) days after receiving your request, we will inform you in writing within thirty (30) days of the time by which we will be able to respond to your request. If we are unable to provide you with any personal data or to make a correction requested by you, we shall generally inform you of the reasons why we are unable to do so (except where we are not required to do so under the PDPA).

PROTECTION OF PERSONAL DATA

20. To safeguard your personal data from unauthorised access, collection, use, disclosure, copying, modification, disposal or similar risks, we have introduced appropriate administrative, physical and technical measures such as up-to-date antivirus protection, encryption, use of privacy filters, and disclosing personal data both internally and to our authorised third party service providers and agents only on a need-to-know basis.
21. You should be aware, however, that no method of transmission over the Internet or method of electronic storage is completely secure. While security cannot be guaranteed, we strive to protect the security of your information and are constantly reviewing and enhancing our information security measures.

ACCURACY OF PERSONAL DATA

22. We generally rely on personal data provided by you (or your authorised representative). In order to ensure that your personal data is current, complete and accurate, please update us if there are changes to your personal data by informing our Data Protection Officer in writing or via email at the contact details provided below.

RETENTION OF PERSONAL DATA

23. We may retain your personal data for as long as it is necessary to fulfil the purpose for which it was collected, or as required or permitted by applicable laws.
24. We will cease to retain your personal data, or remove the means by which the data can be associated with you, as soon as it is reasonable to assume that such retention no longer serves the purpose for which the personal data was collected, and is no longer necessary for legal or business purposes.

TRANSFERS OF PERSONAL DATA OUTSIDE OF SINGAPORE

25. We generally do not transfer your personal data to countries outside of Singapore. However, if we do so, we will put in the necessary contractual arrangements with the overseas recipient for the transfer to be made, and we will take steps to ensure that your personal data continues to receive a standard of protection that is at least comparable to that provided under the PDPA.

DATA PROTECTION OFFICER

26. You may contact our Data Protection Officer if you have any enquiries or feedback on our personal data protection policies and procedures, or if you wish to make any request, in the following manner:

Name of DPO : Jonathan Loy
Contact No. : +65 6536 5355
Email Address : pdpo@EFES Consultancylimited.com

EFFECT OF NOTICE AND CHANGES TO NOTICE

27. This Notice applies in conjunction with any other notices, contractual clauses and consent clauses that apply in relation to the collection, use and disclosure of your personal data by us.
28. We may revise this Notice from time to time without any prior notice. You may determine if any such revision has taken place by referring to the date on which this Notice was last updated. Your continued use of our services constitutes your acknowledgement and acceptance of such changes.
29. This Data Protection Notice and your use of our services shall be governed in all respects by the laws of Singapore.
30. We may from time to time update this Data Protection Notice to ensure that it is consistent with our future developments, industry trends and/or changes in legal or regulatory requirements. Changes to this Data Protection Notice take effect when they are posted on our website.