

## PERSONAL DATA PROTECTION NOTICE

This Personal Data Protection Notice (“Notice”) describes how CTC Global Pte Ltd (hereafter CTC SG) (a company incorporated under the laws of Singapore with its place of business at 315 Alexandra Road #02- 01, Sime Darby Business Center, Singapore 159944) uses your Personal Data.

By engaging CTC SG to provide services, or upon your application to become our vendor, or by interacting with CTC SG either at our events, conferences, seminars, talks, roadshows or otherwise, or by using the CTC SG website [www.ctc-g.com.sg](http://www.ctc-g.com.sg) (“Website”), you consent to the processing of your Personal Data by CTC SG and all persons involved in the provision of services by CTC SG.

In the event of any conflict between the English and other language versions, the English version shall prevail. CTC SG shall have the right to modify, update or amend the terms of this Notice at any time by placing the updated Notice on its Website. By continuing to communicate with CTC SG or by continuing to use CTC SG’s services following the modifications, updates or amendments to this Notice shall signify your acceptance of such modifications, updates, or amendments.

### Collection of Personal Data

1. “Personal Data” means information about you which you have provided to CTC SG, such as your name, address, telephone number, NRIC, email address, your personal preferences, biometric data such as your facial features and/or fingerprints, particulars of your spouse or family members and bank account information and any information which may identify you, your spouse or family members that has been or may be collected, stored, used and processed by CTC SG from time to time. Personal Data may be both electronic and non-electric data.

2. In addition to the Personal Data you provide to CTC SG directly (i.e. during your communications with CTC SG and/or when you engage CTC SG to provide services and/or through recruitment process), CTC SG may also collect your Personal Data from a variety of sources, including without limitation directly from you, and/or at any events, conferences, seminars or talks whether or not organized or sponsored by CTC SG and/or from the cookies used on the Website and/or during your visit to CTC SG Offices.

3. The provision of your Personal Data is voluntary. However, if you do not provide your Personal Data, CTC SG may not be able to (i) communicate with you; (ii) provide you the services you require or (iii) if applicable, access certain sections of the Website where log in is required.

### **Purposes of Processing**

4. CTC SG may use and process your Personal Data for the purposes relating to the services you have requested and for the business activities of CTC SG which shall include, without limitation:-

- a) to communicate with you;
- b) to perform CTC SG's obligations in respect of any contract entered with you, or to perform any services requested by you;
- c) for internal administrative purposes, such as auditing, data analysis, database records;
- d) carrying out due diligence or other monitoring or screening activities (including background checks) in accordance with legal or regulatory requirement or risk management procedures required by law or put in place by us;
- e) to provide information to regulatory and governmental authorities in order to comply with statutory and government requirements;
- f) for CTC SG to comply with its obligations under law;

and you agree and consent to CTC SG using and processing your Personal Data in the manner as identified in this Notice.

### **Other purposes**

5. CTC SG may also use and process your data for other purposes such as:-

- a) to send you materials such as newsletters, articles as well as other updates;
- b) to distribute information or details of events, seminars, conferences and talks which may of interest to you;
- c) to send as potential referees to (i) suppliers, vendors; and (ii) potential customers who request for referees of past work in Requests for Proposals, tenders, submissions; by way of email or mail.

6. If you do not consent to CTC SG processing your Personal Data for the purposes listed in Section 5, please notify CTC SG using the contact details stated in Section 9 below.

## **Transfer of Personal Data**

7. As CTC SG's information technology storage facilities and servers may be located in other jurisdictions, your Personal Data may be transferred to, stored, used and processed in a jurisdiction other than Singapore. Further, your personal data may be transferred out of Singapore for the purposes as described in Section 5(c) where such potential customers are located outside of Singapore. You understand and consent to the transfer of your Personal Data out of Singapore as described herein.

## **Disclosure to Third Parties**

8. CTC SG may engage other companies, service providers or individuals to perform functions on CTC SG's behalf, and consequently may provide access or disclose to your Personal Data to the third parties third parties as may be reasonably necessary, such as those listed below (not exhaustive):

- a) CTC SG's partners and advertisers, which include parties whom CTC SG collaborates with for certain projects, events, programs and activities;
- b) service providers, including other IT service providers for infrastructure, software and development work;
- c) banks and financial institutions;
- d) CTC SG's partners, advertisers, event companies or sponsors who may communicate with you to market their products, services, events or promotions;
- e) any professional advisors and external auditors, including legal advisors, financial advisors and consultants;
- f) regulatory and governmental authorities in order to comply with statutory and government requirements; and
- g) Other entities affiliated with CTC SG.

## **Access & Correction Requests and Inquiries**

9. Subject to any exceptions under applicable laws, you may at any time hereafter request for access to, or for correction or rectification of your Personal Data or limit the processing of your Personal Data, or seek further information from CTC SG by contacting the Data Protection Officer at the following addresses:-

CTC Global Pte Ltd  
315 Alexandra Road #02-01  
Sime Darby Business Center

Singapore 159944.

Tel: +65 6701 1600 (General Line)

Email: corpcomm@ctc-g.com.sg

10. In respect of your right to access and/or correct your Personal Data, CTC SG has the right to refuse your requests to access and/or make any correction to your Personal Data for the reasons permitted under law, such as where the expense of providing access to you is disproportionate to the risks to your privacy and/or granting access would infringe another person's privacy.

11. Depending on the scope and the nature of the work required to process your access request, we may be required to impose a fee to recover our administrative costs in accordance with the requirements of the Personal Data Protection Act 2012 (No. 26 of 2012) (the "PDPA").

#### **Protection of Personal Data**

12. CTC SG shall make reasonable security arrangements to protect Personal Data in its and their possession and/or under its and their control in order to prevent unauthorized access, collection, use, disclosure, copying, modification, disposal similar risks. Such arrangements include the following (not exhaustive):

- a) Ensuring all documents that contain personal particulars are regarded as confidential documents;
- b) Storing confidential documents in locked file cabinet(s) when not in use;
- c) Restricting employee access to confidential documents on a need-to-know basis;
- d) Ensuring computer networks are secured;
- e) Installing appropriate computer security software and using suitable computer security settings assigned by the MIS Department;
- f) Properly disposing the Personal Data that are not to be recycled or reused (e.g. shredding); and
- g) Updating computer security and IT equipment regularly.

#### **Retention of Personal Data**

13. We will cease to retain personal data, as soon as it is reasonable to assume that the purpose for collection of such personal data is no longer being served by such retention, and such retention is no longer necessary for legal or business purposes. In general, our policy for retention period is 7 years.

## **Modifications**

14. We reserve the right to modify or amend this notice at any time. Any updated versions of this notice will be posted on our Website. We encourage you to check the latest version of this notice regularly.

## **Governing Law**

15. This notice shall be governed in all respects by the laws of Singapore. For more information about Personal Data Protection, please refer to the PDPA (<https://sso.agc.gov.sg/Act/PDPA2012>) or visit the Personal Data Protection Commission's website at <http://www.pdpc.gov.sg>.

[Last updated: February 2022]