

## PRIVACY POLICY

This website and associated websites, mobile or web applications, and digital platforms (“**Sites**”) relating to [SFF](#), [SWITCH](#) and other related activities and events (“**Events**”) are managed by SingEx-Sphere Holdings Pte. Ltd., its related corporations and its associates (“**Group**”) and/or its community (collectively the “**Community**”), which includes but is not limited to event managers, event organisers, exhibitors, partners, participants and sponsors.

**By continuing to browse our Sites and/or participating in our Events and/or the Community, you agree to our Terms of Service, Privacy Policy and Cookie Policy available at our Sites and <https://singex.com/>.**

We respect your privacy and are committed to safeguarding the Personal Data that you provide to us. This Privacy Policy helps you understand your rights over your Personal Data as well as how we collect, use, process, transfer, retain and secure it. Here, you can find out about:

- [Personal Data we collect](#)
- [Purposes for the collection, use and disclosure of Personal Data](#)
- [How we protect, maintain and retain Personal Data](#)
- [How you can access and correct your Personal Data](#)
- [Withdrawing your consent and deleting your Personal Data](#)

Please ensure that you have read and understood this Privacy Policy. If you do not agree with any of these terms, please discontinue your access to or use of our Sites, contents, products and services. We may update this Privacy Policy from time to time by publishing it on our Sites and <https://singex.com/> with the date of update. If we make material changes to this Privacy Policy, we will notify you specifically if required by law.

Please contact us at [dataprotectionofficer@singex.com](mailto:dataprotectionofficer@singex.com) if you have any questions, comments, requests or complaints regarding this Privacy Policy.

**Last Updated: 17 November 2020**

### COLLECTION OF PERSONAL DATA

- 1 By providing us with your Personal Data, whether via accessing or using our Sites, participating in our Events and/or the Community, through any other form of interaction or otherwise, you are deemed to have agreed to the terms of this Privacy Policy. This Privacy Policy supplements but does not supersede any other consent(s) provided by you to us in respect of your Personal Data.
- 2 “**Personal Data**” refers to data, whether true or not, about an individual who can be identified from that data; or from that data and other information to which an organisation has or is likely to have access. In relation to our activities in the UK or EU, Personal Data includes data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation, criminal convictions and offences (insofar as such information is capable of identifying individuals either directly or indirectly).
- 3 Depending on the nature of your interaction with us, we may request and collect the following information from you:
  - (a) full name;
  - (b) business or residential address;
  - (c) contact details, for example, telephone numbers and/or email addresses;
  - (d) your profile photograph or video;
  - (e) where applicable, identification verification information, payment details, including credit card and banking information; and/or
  - (f) other information you disclose to us.

## PRIVACY POLICY

- 4 We may also collect information from you automatically through cookies or similar technology, such as:
- (a) technical information (for example, your internet protocol addresses, browsing history, mobile carrier, time zone settings, identifiers for advertising purposes, the version of the app you are using, and the device you are using to access or use our Sites such as the model of your device, the device system, network type, device ID, your screen resolution and operating system);
  - (b) behavioural information regarding your use of our Sites (for example, preferences you set for ease of use and accessibility of our Sites, how you engage with our Sites, including how you interact with content we show to you, the advertisements you view, videos you watch and problems encountered).

For more information on how we use cookies, please refer to our Cookie Policy available at our Sites and <https://singex.com/>.

- 5 Where any Personal Data of a third party (for example, information of your family members or employees) is provided by you to us for any particular purpose, you must seek his or her appropriate consent before you provide us with such Personal Data.

### PURPOSES FOR THE COLLECTION, USE AND DISCLOSURE OF PERSONAL DATA

- 6 Personal Data may be collected, disclosed and shared within the Group and among the Community, across our Events and Sites, and may be used for the following purposes:
- (a) performing obligations in the course of or in connection with our provision of the products and/or services requested by you;
  - (b) verifying your identity;
  - (c) sending you information, updates, invitations, feedback/surveys, competitions, promotions, lucky draws, marketing and advertising materials, information about our (online) activities and sessions, local and global events, exhibitions and conferences, open community platforms, industry developments, business matching, call for speakers, collaboration projects and any of our other products and services, in accordance with the below paragraph (Marketing);
  - (d) providing you with effective and dynamic digital platforms (on our mobile and web applications) to:
    - improve, promote and develop our platforms;
    - allow you to participate in interactive features of our platforms;
    - enable you to share user content and interact/socialise with other users;
    - provide you with user support and administering our platforms;
    - ensure your safety and security; and/or
    - personalising the content you receive and providing you with tailored content on our platforms regarding our products and services that will be of interest to you;
  - (e) processing and responding to your requests, queries including media requests, applications, complaints and feedback from you;
  - (f) processing your personal and credit card/bank account information to process your registration and fulfil your purchases and orders;
  - (g) maintaining the safety and security of our premises (for example, with the use of security cameras) and our online community platforms;
  - (h) improve, enhance or develop our goods or services, or methods or processes for our operations including compiling data and conducting statistical, demographic and data analysis;
  - (i) facilitating the provision of services by our third party vendors, service providers, insurance providers and professional advisers;
  - (j) facilitating any proposed or actual business assignments or transfers in any of our rights or obligations in relation to your Personal Data;
  - (k) enforce our terms and conditions, guidelines and policies including our Terms of Service available at our Sites and <https://singex.com/>;

## PRIVACY POLICY

- (l) complying with our internal policies and procedures, and any applicable laws, rules and regulations, codes of practice, guidelines, court order, legal processes or other legal requirements of any governmental authority;
- (m) allowing us to use your Personal Data in any other ways for which we have notified you and obtained your consent accordingly;
- (n) any other purposes which you have provided the information for or we reasonably deem you have consented to; and
- (o) any other legitimate business or interest purposes relating to or in connection with the above.

### Photography, Videography and Screen Recordings

- 7 By participating in our Events and/or the Community, or accessing or using our products and services including when you join any online sessions or webinars managed by any member of the Community, you consent to be photographed, filmed and/or recorded by the Community, and you consent to the use of any such film, image or recording for public transmission, including for advertising and promotional purposes. We may use images taken or videos recorded at our Events and any screenshot or screencast of any online session or webinar with your photograph, name, image, likeness, voice, biography and abstract in any media (including publication within and outside Singapore) and for any purpose without identification, compensation or payment of any kind.

If you do not agree to being photographed, filmed or recorded, please do not allow yourself to do so, for example by not participating in any online session or webinar, or turning off your microphone and webcam, and inform us and the relevant host/organiser accordingly.

### Marketing

- 8 When you submit certain forms within our Sites or participate in our Events and/or the Community, you may opt-in to receive marketing materials, event collaterals as well as industry news and updates from us. If you opt-in to receive such information, we may use your email address, telephone number and/or other contact details to inform you of such information to the extent permitted by applicable law. We may also disclose your email address and/or other contact details to our partners and marketing agents to carry out the above marketing activities on our behalf.

### Legal basis for processing for residents or nationals of the UK, EU or European Economic Area (EEA)

- 9 We are the controller of Personal Data only when we collect it and determine the purposes and means of processing that Personal Data. Generally, we use your Personal Data for one or more of the specific purposes identified in this Privacy Policy based on your consent obtained. The legal basis for our use of your Personal Data could also be that it is necessary for the legitimate interests pursued by us or a third party. These legitimate interests include providing our products and services to you, managing the relationship between ourselves and you, and facilitating internal business and administrative purposes. In some cases, the provision and processing of your Personal Data may be a statutory and/or a contractual requirement.
- 10 We may share your business contact, profiles and preferences within the Group and with the Community including our partners to keep you connected with the Community and updated on all our Events, e.g., [CAREhab](#), [Interchange](#), [IoT Asia](#), [ITAP](#), [SITEX](#), [SFF](#) and [SWITCH](#).
- 11 If you have previously opted in and wish to opt-out of receiving forms of marketing communication from us, please see the procedure at [Withdrawal of Consent and Deletion of Personal Data](#) below.

### DISCLOSURE OF PERSONAL DATA TO THIRD PARTIES

- 12 All Personal Data held by us will be kept confidential, but we may, where such disclosure is necessary to satisfy the purpose, or a directly-related purpose for which your Personal Data was

## PRIVACY POLICY

collected (such as those identified above), disclose and provide such information to the following persons who may be located in Singapore or elsewhere:

- (a) any person or company who is acting for, jointly or on our behalf, in respect of the purpose or a directly-related purpose for which your Personal Data was provided;
  - (b) third party service providers who process your Personal Data (including any third party service provider which hosts or manages data from our Sites and any analytics provider which assists us to enhance our Sites);
  - (c) our marketing agents such as advertisers and third-party measurement companies, to build the Community, for example, to perform business matching and updating the Community on our digital platforms, online sessions and activities, global events and roadshows, and industry developments;
  - (d) our lawyers, auditors and other professional advisors;
  - (e) payment gateways, credit card issuing companies, credit bureau, or collection agencies necessary to establish and support the payment of any products and/or services due or requested;
  - (f) third parties, in the event that we sell or buy any business or assets or if we sell, buy, merge, are acquired by, or partner with other companies or businesses, or sell some or all of our assets; and
  - (g) government authorities, law enforcement agencies, regulators, and their representatives in compliance with applicable law, rules and regulations, codes of practices, guidelines, court orders and other legal processes or requirements to:
    - (i) comply with any legal obligation, process or request;
    - (ii) enforce our Terms of Service available at our Sites and <https://singex.com/> and other agreements, policies and standards, including investigation of any potential violation thereof;
    - (iii) detect, prevent or otherwise address security, fraud or credit issues; or
    - (iv) protect the rights and property, as well as enhancing the security and safety of us, users of our Sites, yourself and your organisation, third parties and the public as required or permitted by law;
  - (h) other persons for purposes permitted by law.
- 13 You may, in your personal or domestic capacity, request us to port and transmit Personal Data relating to your user activity data or user-provided data we have collected from you, in a structured, commonly used and machine-readable format to another third party with a presence in Singapore, for the purpose of such third party providing goods or services to you, subject to exclusions and restrictions under law.
- 14 Our business may require us to transfer your Personal Data to countries outside of Singapore including to countries that may not provide the same level of data protection as your home country. We will take appropriate steps to ensure that recipients of your Personal Data are bound to duties of confidentiality and we implement measures such as standard contractual clauses.
- 15 If your profile is public, your information may be visible to anyone on our Sites and may also be accessed or shared by other users as well as third parties such as search engines, content aggregators and news sites.
- 16 While we take reasonable care in our selection of our service providers, we are only responsible for our own compliance with privacy and Personal Data protection laws.

## PROTECTION OF PERSONAL DATA

- 17 We will use reasonable technical, administrative and physical measures to protect your Personal Data.
- 18 While we attempt to safeguard your Personal Data, no method of transmitting or storing electronic information is ever completely secure, and thus we make no warranty, express, implied, or otherwise, that your Personal Data will never be used in a manner by others that is inconsistent with this Privacy Policy.

## PRIVACY POLICY

- 19 We shall not liable for any damages (whether consequential, direct, incidental, indirect, punitive, special or otherwise) arising out of, or in any way connected with, any third party's use of your Personal Data, regardless of whether such damages are based on contract, tort or other theories of liability, to the extent permitted by law.

### RETENTION OF PERSONAL DATA

- 20 We will retain your Personal Data only for as long as the purposes for which such data is collected or used (as notified to you) continues, or where necessary, for our legal or business purposes. Where we no longer require your Personal Data for those purposes, we will cease to retain such Personal Data.

### ACCESS & CORRECTION OF PERSONAL DATA

- 21 We will keep all Personal Data collected as accurate, complete and up-to-date as necessary, taking into account its intended use and the interests of the Group and the Community. Where possible, we will validate the Personal Data using generally accepted practices and guidelines.
- 22 You have the right to access, correct and update your Personal Data at any time. If you wish to exercise your rights, please contact us at [dataprotectionofficer@singex.com](mailto:dataprotectionofficer@singex.com).

### WITHDRAWAL OF CONSENT AND DELETION OF PERSONAL DATA

- 23 You have the right to withdraw your consent from receiving marketing information or any consent you have previously provided in relation to your Personal Data, or request that we delete your Personal Data at any time. If you wish to exercise your rights, please contact us at [dataprotectionofficer@singex.com](mailto:dataprotectionofficer@singex.com). Depending on the extent of your request and the purposes for which your Personal Data was collected for, we may no longer be able to provide or continue providing certain products or services to you. Please note that we may need to contact you for further clarification.
- 24 Residents or nationals of the UK, EU and European Economic Area (EEA) may request we stop processing and just store your Personal Data we hold about you where:
- you believe your Personal Data is not accurate for the period it takes for us to verify whether your Personal Data is accurate;
  - we wish to erase your Personal Data for compliance with applicable law but you want us to just store it instead;
  - we wish to erase your Personal Data as it is no longer necessary for our purposes but you require it to be stored for the establishment, exercise or defence of legal claims; or
  - you have objected to us processing your Personal Data on the basis of our legitimate interest and you wish us to stop processing your Personal Data while we determine whether there is an overriding interest in us retaining your Personal Data.