

PRIVACY POLICY

This website and our associated websites, mobile or web applications and digital platforms (“**Sites**”) accessed by your computer browser or mobile application are managed by SingEx Holdings Pte. Ltd. and/or its subsidiaries and affiliated companies.

By continuing to browse our Sites, you agree to our [Cookie Policy](#), [Terms of Service](#) and [Privacy Policy](#).

We respect the privacy of all of our clients, partners, participants, suppliers and visitors, and are committed to safeguarding the Personal Data that you provide to us. This Privacy Policy (“**Policy**”) aims to help you understand your rights over your Personal Data as well as learn about how we collect, use, process, transfer, retain and secure (“**Use**”) it. It is your responsibility to ensure that you have read and understood this Policy and any accompanying risks, obligations and responsibilities.

1. APPLICATION OF POLICY

- 1.1. Please read this Policy so that you know and understand the purposes for which we Use your Personal Data.
- 1.2. This Policy supplements but does not supersede nor replace any other consents you may have previously provided to us in respect of your Personal Data. This Policy does not affect any rights which we may have at law in connection with the Use of your Personal Data.
- 1.3. By providing us with your Personal Data, whether via registering for our event(s), using our Sites, through any other form of interaction or otherwise, you are deemed to have agreed to the terms of this Policy, our [Cookie Policy](#) and our [Terms of Service](#).

2. COLLECTION OF PERSONAL DATA

- 2.1. “**Personal Data**” refers to any data of an individual who can be identified from that data, or in combination with any other information.

You may be requested to provide your Personal Data in relation to our events, and depending on the nature of your interaction with us, this may include the following examples (including but not limited to):

- (a) full name;
 - (b) business or residential address;
 - (c) identification verification document(s);
 - (d) payment details, including credit card and banking information; and/or
 - (e) contact details, including telephone number(s) and/or email addresses.
- 2.2. In relation to our activities in the European Union, Personal Data shall also include Personal 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, internet protocol addresses and cookie identifiers (insofar as such information is capable of identifying individuals either directly or indirectly).
 - 2.3. Where any Personal Data of a third party (for example, information of your family members, employees) is provided by you for any particular purpose, you undertake and represent that the appropriate consent(s) have been obtained by you before you provide us with such Personal Data.

3. USE OF PERSONAL DATA COLLECTED

- 3.1. Any Personal Data provided by you to us may be disclosed, shared among ourselves and used for the following purposes (where relevant):

- (a) send you information, updates, invitations, marketing and advertising materials and information in relation to our activities and events (including future editions) and any of our other products and services, as detailed below in the paragraph (Marketing);
- (b) program specific uses, including but not limited to:
 - (i) call for speakers;
 - (ii) conferences;
 - (iii) digital applications and platforms (including our mobile and web applications such as SFF x SWITCH Go);
 - (iv) media requests;
 - (v) podcast programming;
 - (vi) exhibitions;
 - (vii) business match making; and
 - (viii) networking events.
- (c) process your personal particulars and/or to contact you with regard to any competitions, promotions, special offers, marketing and lucky draws etc. in relation to our events;
- (d) process your personal particulars to facilitate any payment;
- (e) maintain the safety and security of our premises with the use of security cameras;
- (f) solicit your comments via feedback or survey;
- (g) compile data and conduct statistical or demographic analysis;
- (h) process and respond to your requests and queries;
- (i) update our records;
- (j) facilitate the provision of services by our third party vendors, service providers and professional advisors;
- (k) facilitate any proposed/actual business assignments or transfers in any of our rights/obligations in relation to your Personal Data;
- (l) send to insurance companies to process claims;
- (m) compliance with our internal policies/procedures and any applicable laws, rules and regulations, codes of practice, guidelines and any other legal purposes;
- (n) comply with a court order, other legal processes or other legal requirements of any governmental authority (including detecting, investigating and preventing any crime, offence or breach);
- (o) allow us to use your Personal Data in any other ways for which we have notified you and obtained your consent accordingly.

We will not Use your Personal Data for purposes which are not stated above or for which we have not obtained your consent. If we wish to Use your Personal Data for another purpose not covered above, we will seek your prior consent.

- 3.2. 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 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 services to you, managing the relationship between ourselves and you, and facilitating internal business purposes and administrative purposes. In some cases, the provision and processing of your Personal Data may be a statutory and/or contractual requirement, or may be necessary in order to perform any contract you have agreed with us or perform services that you have requested.
- 3.3. By participating in our events, you consent to being photographed, filmed and recorded as a participant of the Event, and consent to the use of any such film, image or recording for public transmission. We shall have the right to allow any authorised or official photographers and/or videographers into the Event venue for photography and/or videography for future advertising and promotional purposes without your prior permission. We reserve the right to use images taken at the Event with your photograph, name, image, likeness, voice, biography and abstract in any media (including publication within and outside Singapore) and for any purpose (including marketing materials) without identification, compensation or payment of any kind.

3.4. Marketing

- (a) When you submit certain forms at our Sites or participate in our events, you may opt-in to receive marketing materials, our event collaterals as well as industry news and updates from us. If you opt to receive such information, we will use your email address, telephone number and/or other contact details to inform you of such information to the extent permitted by applicable laws. We may also disclose your email address to our partners and marketing agents for the purposes of carrying out the above marketing activities on our behalf to the extent permitted by applicable laws.
- (b) If you wish to opt out of receiving forms of communication from us such as marketing emails, or if you wish for us to stop sharing your personal information with third parties for those parties' direct marketing purposes, please email dataprotectionofficer@singex.com with your request.

3.5. When you visit our Sites, we may collect information from you automatically through cookies or similar technology. For more information on how we use cookies, please refer to our [Cookie Policy](#).

3.6. Legal basis for Processing for Residents or Nationals of UK or EU

Our legal basis to process Personal Data of residents or nationals of the UK or EU includes processing that is:

- (a) necessary for the performance of the contract between ourselves and you (for example, to provide you with the products and/or services you request and to identify and authenticate you); necessary to comply with legal requirements (for example, to comply with applicable accounting rules and to make mandatory disclosures to law enforcement);
- (b) necessary for our legitimate interests (for example, to manage our relationship with you and to improve our products and/or services); and
- (c) based on your consent (for example, to communicate with you about our products and/or services and provide you with marketing information), which may subsequently be withdrawn at any time without affecting the lawfulness of processing based on consent before its withdrawal.

4. DISCLOSURE OF PERSONAL DATA

4.1. 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 collected, provide such information to the following parties 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 (including any third party service provider which hosts or manages data from our Sites who processes your Personal Data on our behalf;
- (c) our marketing agents;
- (d) our lawyers, auditors and other professional advisors;
- (e) our agents or subcontractors acting on our behalf;
- (f) any financial institutions, charge or credit card issuing companies, credit bureau, or collection agencies necessary to establish and support the payment of any services due or requested; and
- (g) any government authority in compliance with any applicable laws, rules and regulations, codes of practices, guidelines, court order and other legal processes or requirements.

4.2. We may share your Personal Data with people within our organisation, including people within our group companies, who have a "need to know" that data for business or legal reasons.

- 4.3. We may share your Personal Data with other third parties that are not described above. When we do so we will aggregate, anonymise, or de-identify the information so that a third party would not be likely to link the data to you, your computer, or your device.
- 4.4. 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 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.

5. ACCURACY OF PERSONAL DATA

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 our customers and visitors. Where possible, we will validate the Personal Data provided by using generally accepted practices and guidelines.

6. PROTECTION OF PERSONAL DATA

- 6.1. We use reasonable technical, administrative, and physical measures to protect your Personal Data. When Personal Data is shared, we will take a reasonable approach to prevent the unauthorised use of the Personal Data.
- 6.2. Please note, however, that 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 that is inconsistent with this Policy.
- 6.3. In no event shall we be liable for any damages (whether consequential, direct, incidental, indirect, punitive, special or otherwise) arising out of, or in any way connected with, a third party's unauthorised Use of your Personal Data, regardless of whether such damages are based on contract, strict liability, and also regardless of whether such damages are based on contract, strict liability, tort or other theories of liability, and also regardless of whether we are given actual or constructive notice that damages were possible, except as provided under applicable laws.

7. RETENTION OF PERSONAL DATA

- 7.1. 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.
- 7.2. For Residents or Nationals of the UK or EU:
 - (a) You may request that we erase your Personal Data we hold about you in the following circumstances:
 - (i) you believe that it is no longer necessary for us to hold your Personal Data;
 - (ii) we are processing your Personal Data on the basis of your consent and you wish to withdraw your consent and there is no other ground under which we can process the Personal Data;
 - (iii) we are processing your Personal Data we hold about you on the basis of our legitimate interest and you object to such processing;
 - (iv) you no longer wish us to use your Personal Data in order to inform you of competitions, promotions, special offers, marketing and lucky draws etc.; or
 - (v) you believe your Personal Data is being unlawfully processed by us.
 - (b) You may request us to stop processing your Personal Data we hold about you other than for storage purposes in the following circumstances:
 - (i) you believe your Personal Data is not accurate, for the period it takes for us to verify whether your Personal Data is accurate;

- (ii) 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
- (iii) 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 whilst we determine whether there is an overriding interest in us retaining your Personal Data.

Please note, however, that if we stop processing your Personal Data, we may use it again if there are valid grounds under data protection law for us to do so (for example, for the defence of legal claims or for another's protection).

8. WITHDRAWAL OF CONSENT

Should you wish to withdraw your consent from receiving marketing information and/or surveys, you may send us a request for the Consent Withdrawal Form to dataprotectionofficer@singex.com. Please note that we can only process Consent Withdrawal Forms that are properly filled up and may need to contact you for clarification if such forms are deemed to be incomplete or unclear in any way.

9. DATA SUBJECT RIGHTS – ACCESS, UPDATE AND DELETION OF PERSONAL DATA

You have the right to access, update or request that we delete your Personal Data at any time. If you wish to exercise your rights, or if you have other questions, comments or concerns about our privacy and data protection practices, please contact us at dataprotectionofficer@singex.com.

10. SEVERAL OBLIGATION

Please note that our liability hereunder is several and each party shall not be liable for the respective privacy breaches of the other party.

11. CHANGES TO THIS POLICY

We reserve the right to change this Policy at any time by posting the updated Policy here along with the date on which the Policy was changed. If we make material changes to this Policy that affect the way we Use your Personal Data, we will update this Policy and notify you specifically if required by law.

12. CONTACT US

For any questions regarding this Policy, or to withdraw consent, or to access and/or correct your Personal Data, please contact us at dataprotectionofficer@singex.com.

Last Updated: 1 June 2020