

Privacy Policy (Updated on 27 Jan 2015)

## A) GENERAL DATA PROTECTION POLICY

Talenox Pte Ltd (“Talenox”) takes our responsibilities under Singapore’s Personal Data Protection Act 2012 (the “PDPA”) seriously. We recognize the importance of safeguarding the personal data you have provided us and it is our responsibility to properly manage, protect and process your personal data.

This Data Protection Policy is designed to assist you in understanding how we collect, use, disclose and/or process the personal data you have provided to us, as well as to assist you in making an informed decision before providing us with any of your personal data.

If you, at any time, have any queries on this policy or any other queries in relation to how we may manage, protect and/or process your personal data, please do not hesitate to contact our Service Support Officer at 94360439 or email [sebastian@talenox.com](mailto:sebastian@talenox.com).

### 1 INTRODUCTION TO THE PDPA

1.1 “Personal Data” is defined under PDPA to mean 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 organization has or is likely to have access.

1.2 We will collect your personal data in accordance with the PDPA either directly from you or your authorized representatives, and/or through our third party service providers (e.g. partners, resellers). We will notify you of the purposes for which your personal data may be collected, used, disclosed and/or processed, as well as obtain your consent for the collection, use, disclosure and/or processing of your personal data for the intended purposes, unless an exception under the law permits us to collect and process your personal data without your consent.

### 2 PURPOSES FOR COLLECTION, USE, DISCLOSURE AND PROCESSING OF PERSONAL DATA

2.1 The personal data which we collect from you may be collected, used, disclosed and/or processed for various purposes, depending on the circumstances for which we may/will need to process your personal data, which include but are not limited to:

- (a) Facilitating Talenox’s provision of the products and services which you use
- (b) Communicating with you on your enquiries, and/or sending you marketing, advertising and promotional information and materials relating to products and/or services that we, our partners and/or third party organizations with whom we are collaborating, may be selling or marketing.
- (c) Administrative matters on your product and/or service purchases and/or subscriptions, managing your accounts, processing your sign-ups/registrations for mailing lists, etc.
- (d) Conducting market research and customer satisfaction surveys; and
- (e) Any other purposes that we notify you of at the time of obtaining your consent. (collectively, the “Purposes”)

As the purposes for which we may/will collect, use, disclose or process your personal data depend on the circumstances at hand, such purpose may not appear above. However, we will notify you of such other purpose at the time of obtaining your consent, unless processing of your personal data without your consent is permitted by the PDPA or by law.

2.2 In order to conduct our business operations more smoothly and to fulfill the above-said Purposes, we may also be disclosing the personal data you have provided to us to our third party service providers, and/or our affiliates or related corporations, and/or other third parties whether sited in Singapore or outside of Singapore, for one or more of the above-stated Purposes. Such third party service providers, agents and/or affiliates or related corporations and/or other third parties would be processing your personal data either on our behalf or otherwise, for one or more of the above-stated Purposes.

### 3 SPECIFIC ISSUES FOR THE DISCLOSURE OF PERSONAL DATA TO THIRD PARTIES

3.1 We respect the confidentiality of the personal data you have provided to us.

3.2 In that regard, we will not disclose your personal data to third parties without first obtaining your consent permitting us to do so. However, please note that we may disclose your personal data to third parties without first obtaining your consent in certain situations, including, without limitation, the following:

- (a) cases in which the disclosure is required or authorized based on the applicable laws and/or regulations;
- (b) cases in which the purpose of such disclosure is clearly in your interests, and if consent cannot be obtained in a timely way;
- (c) cases in which the disclosure is necessary to respond to an emergency that threatens the life, health or safety of yourself or another individual;
- (d) cases in which the disclosure is necessary for any investigation or proceedings;
- (e) cases in which the personal data is disclosed to any officer of a prescribed law enforcement agency, upon production of written authorization signed by the head or director of that law enforcement agency or a person of a similar rank, certifying that the personal data is necessary for the purposes of the functions or duties of the officer;
- (f) cases in which the disclosure is to a public agency and such disclosure is necessary in the public interest; and/or
- (g) where such disclosure without your consent is permitted by the PDPA or by law.

3.3 The instances listed above at paragraph [3.2] are not intended to be exhaustive. For more information on the exceptions, you are encouraged to peruse the Second, Third and Fourth Schedules of the PDPA which is publicly available at <http://statutes.agc.gov.sg>.

3.4 Where we disclose your personal data to third parties with your consent, we will employ our best efforts to require such third parties to protect your personal data.

#### 4 REQUEST FOR ACCESS AND/OR CORRECTION OF PERSONAL DATA

4.1 You may request to access and/or correct the personal data currently in our possession or control by submitting a written request to us. We will need enough information from you in order to ascertain your identity as well as the nature of your request, so as to be able to deal with your request. Hence, please submit your written request to [sebastian@talenox.com](mailto:sebastian@talenox.com).

4.2 For a request to access personal data, once we have sufficient information from you to deal with the request, we will seek to provide you with the relevant personal data within 30 days. Where we are unable to respond to you within the said 30 days, we will notify you of the soonest possible time within which we can provide you with the information requested. Note that the PDPA exempts certain types of personal data from being subject to your access request.

4.3 For a request to correct personal data, once we have sufficient information from you to deal with the request, we will:

(a) correct your personal data within 30 days. Where we are unable to do so within the said 30 days, we will notify you of the soonest practicable time within which we can make the correction. Note that the PDPA exempts certain types of personal data from being subject to your correction request as well as provides for situation(s) when correction need not be made by us despite your request; and

(b) subject to paragraph [4.4], we will send the corrected personal data to every other organization to which the personal data was disclosed by Talenox within a year before the date the correction was made, unless that other organization does not need the corrected personal data for any legal or business purpose.

4.4 Notwithstanding paragraph [4.3(b)], we may, if you so consent, send the corrected personal data only to specific organizations to which the personal data was disclosed by us within a year before the date the correction was made.

4.5 We will also be charging you a reasonable fee for the handling and processing of your requests to access your personal data. We will provide you with a written estimate of the fee we will be charging. Please note that we are not required to respond to or deal with your access request unless you have agreed to pay the fee.

#### 5 REQUEST TO WITHDRAW CONSENT

5.1 You may withdraw your consent for the collection, use and/or disclosure of your personal data in our possession or under our control by submitting your request to [sebastian@talenox.com](mailto:sebastian@talenox.com).

5.2 We will process your request within a reasonable time from such a request for withdrawal of consent being made, and will thereafter not collect, use and/or disclose your personal data in the manner stated in your request.

5.3 However, your withdrawal of consent could result in certain legal consequences arising from such withdrawal. In this regard, depending on the extent of your withdrawal of consent for us to process your personal data, it may mean that we will not be able to continue with your existing relationship with us.

## 6 ADMINISTRATION AND MANAGEMENT OF PERSONAL DATA

6.1 We will take reasonable efforts to ensure that your personal data is accurate and complete, if your personal data is likely to be used by Talenox to make a decision that affects you, or disclosed to another organization. However, this means that you must also update us of any changes in your personal data that you had initially provided us with. We will not be responsible for relying on inaccurate or incomplete personal data arising from your not updating us of any changes in your personal data that you had initially provided us with.

6.2 We will also put in place reasonable security arrangements to ensure that your personal data is adequately protected and secured. Appropriate security arrangements will be taken to prevent any unauthorized access, collection, use, disclosure, copying, modification, leakage, loss, damage and/or alteration of your personal data. However, we cannot assume responsibility for any unauthorized use of your personal data by third parties which are wholly attributable to factors beyond our control.

6.3 We will also put in place measures such that your personal data in our possession or under our control is destroyed and/or anonymized as soon as it is reasonable to assume that (i) the purpose for which that personal data was collected is no longer being served by the retention of such personal data; and (ii) retention is no longer necessary for any other legal or business purposes.

6.4 Where your personal data is to be transferred out of Singapore, we will comply with the PDPA in doing so. In this regard, this includes us obtaining your consent unless an exception under the PDPA or law applies, and taking appropriate steps to ascertain that the foreign recipient organization of the personal data is bound by legally enforceable obligations to provide to the transferred personal data a standard of protection that is at least comparable to the protection under the Act. This may include us entering into an appropriate contract with the foreign recipient organization dealing with the personal data transfer or permitting the personal data transfer without such a contract if the PDPA or law permits us to.

## 7 COMPLAINT PROCESS

7.1 If you have any complaint or grievance about how we are handling your personal data or about how we are complying with the PDPA, we welcome you to contact us with your complaint or grievance.

7.2 Please contact us through one of the following methods with your complaint or grievance:

(a) Singapore telephone number: +65 9436 0439

(b) E-mail: [sebastian@talenox.com](mailto:sebastian@talenox.com)

7.3 We will certainly strive to deal with any complaint or grievance that you may have speedily and fairly.

## 8 UPDATES ON DATA PROTECTION POLICY

8.1 As part of our efforts to ensure that we properly manage, protect and process your personal data, we will be reviewing our policies, procedures and processes from time to time.

8.2 We reserve the right to amend the terms of this Data Protection Policy at our absolute discretion. Any amended Data Protection Policy will be posted on our website and can be viewed at [www.talenox.com](http://www.talenox.com).

8.3 You are encouraged to visit the above website from time to time to ensure that you are well informed of our latest policies in relation to personal data protection.

## B) COOKIE POLICY

1. Please note that we use cookies on our website. Cookies are text files that we put on your computer and they store/record information about your visit to and use of the website. Cookies can compile information about your browsing habits and can also enhance your browsing experience. For more information on cookies, please refer to [www.aboutcookies.org](http://www.aboutcookies.org). We set out below more details about the cookies we use. You can of course disable cookies.

2. We use cookies for the following purposes:

- (a) to improve your user experience on this website;
  - (b) to remember your preferences;
  - (c) to help us understand how this website is performing;
  - (d) to monitor traffic to the website;
  - (e) to enable this website to function properly;
- (collectively the “Purposes”)

3. You can control cookies through your web browser settings. This allows you to determine which cookies to allow and which to refuse. If you disallow the use of cookies on our website, please note that you may not be able to access the full range of functions that our website offers.

4. Personal data (if any) that we collect from you through cookies may be passed to our third party service providers, whether located in Singapore or elsewhere, for one or more of the Purposes, for managing and/or administering our website, or for the purpose of data hosting/storage/backup.

5. Your use of our website constitutes consent by you to our use of cookies and to the matters set out herein.