

SINGAPORE OFFICE

Data Protection Notice

This Data Protection Notice (“Notice”) sets out the basis which Advancy Singapore (“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

As used in this Notice:

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

“personal data” means data, whether true or not, about a customer 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.

Depending on the nature of your interaction with us, some examples of personal data which we may collect from you include name, residential address, email address and date of birth.

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

We generally collect your personal data only when: (a) you or your authorized representative voluntarily provide it after being informed of its purpose and giving consent, or (b) collection without consent is permitted or required by law. We will seek your consent before collecting additional data or using your data for purposes not previously notified, unless authorized by law.

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;
- (d) managing your relationship with us;

- (e) processing payment or credit transactions;
- (f) complying with any applicable laws, regulations, codes of practice, guidelines, or rules, or to assist in law enforcement and investigations conducted by any governmental and/or regulatory authority;
- (g) any other purposes for which you have provided the information;
- (h) transmitting to any unaffiliated third parties including our third-party service providers and agents, and relevant governmental and/or regulatory authorities, whether in Singapore or abroad, for the aforementioned purposes; and
- (i) any other incidental business purposes related to or in connection with the above.

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.

WITHDRAWING YOUR CONSENT

Your consent for the collection, use, and disclosure of personal data remains valid until withdrawn in writing. To withdraw consent, you may submit a written or email request to our Data Protection Officer at the provided contact details. We may require reasonable time (up to 30 business days) to process your request and inform you of its consequences, including any legal or service-related impacts.

While we respect your decision, withdrawing consent may affect our ability to provide goods or services, and we will notify you if this is the case. If you wish to cancel your withdrawal, please inform us in writing. Note that withdrawing consent does not affect our right to collect, use, or disclose personal data as permitted by law.

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

To request access to or correction of your personal data, please contact our Data Protection Officer in writing or via email at the provided contact details. A reasonable fee may apply for access requests, and we will inform you of the fee before processing.

We aim to respond within 30 business days. If more time is needed, we will notify you of the expected timeline. If we are unable to provide the requested data or make corrections, we will generally explain the reasons, unless exempted under the PDPA.

PROTECTION OF PERSONAL DATA

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.

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

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

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.

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

Your personal data may be transferred outside Singapore for purposes outlined in this Data Protection Notice, including storage on external servers or sharing with related corporations, business units, and third-party providers. Employees of Advancy Singapore located in other countries may access this data for business operations using authorized IT equipment that meets strict security requirements. All employees receive training to ensure secure and compliant data handling.

We are committed to protecting your data during international transfers by taking steps to ensure it meets applicable data protection standards, such as contractual agreements or binding corporate rules. For more details, contact our Data Protection Officer via the provided contact details.

DATA PROTECTION OFFICER

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:

Martina Troppmair

advancy_singapore@resguard-solutions.com

Or

dpsingapore@advancy.com

EFFECT OF NOTICE AND CHANGES TO NOTICE

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.

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.