

# SMEPAYROLL™

## Personal Data Protection - People Central

### 1. PDPA INTRODUCTION

1.1 “Personal Data” is defined by the PDPA as 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 only 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 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 we collect may be used, disclosed and/or processed for various purposes, depending on the circumstances, which include but are not limited to:

Administrative matters on your product, service purchases and/or subscriptions, managing your accounts, processing your signups/registrations for mailing lists, etc.

Facilitating SMEPayroll's ability to provide you with the products and services which you use.

Communicating with you on your inquiries, and/or sending you marketing, and/or promotional information and materials relating to products and/or services that we may be selling or marketing.

Conducting market research and/or customer satisfaction surveys; and

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 collect, use, disclose or process your personal data depend on the circumstances at hand, the purposes above are not an exhaustive list. However, we will notify you of any 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 for us to run our business operations more efficiently and to fulfill the above-said Purposes, we may disclose your personal data 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 that the personal data you have provided us is confidential. With that in mind, we will not disclose your personal data to other third parties without obtaining your permission first.

3.2 However, we may disclose your personal data to other third parties without obtaining your permission first in certain situations which include but are not limited to:

Situations in which the disclosure is required or authorized based on the law and/or regulations and/or permitted by the PDPA or law

Situations in which the disclosure is necessary to respond to an emergency that threatens the life, health or safety of any individual;

Situations in which the disclosure is compulsory for any investigation or proceedings

Situations in which the personal data is disclosed to an 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

Situations in which the disclosure is to a public agency and such disclosure is necessary in the public interest;

3.3 If we disclose your personal data to third parties with your consent, we will ensure the best efforts are taken said 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 your personal data that is in our possession by submitting a written request to us. Please submit your request below.

4.2 When you make a request to access your personal data, we will request certain information from you in order to determine your identity with certainty. Once we have sufficient information, we will seek to provide you with the relevant personal data within 30 days. Please note that the PDPA exempts certain types of personal data from being subject to your request to access it.

4.3 When you make a request to correct your personal data we will request certain information from you in order to determine your identity with certainty. Once we have sufficient information, we will seek to correct your personal data within 30 days. If we are unable to make the correction within 30 days, we will notify you of the earliest time within which we can make the correction. Please note that the PDPA exempts certain types of personal data from being subject to your request to correct it.

4.4 There will be a reasonable charge for the handling and processing of your requests to access and/or correct your personal data. We will provide you a written estimate of the charges, and we are not required to respond to or deal with your request unless you have agreed to pay the charge.

## 5. REQUEST TO WITHDRAW CONSENT

5.1 You may withdraw your consent for the collection, use, disclosure and/or processing of your personal data that is currently under our possession. Please do so by submitting your request below.

5.2 We will try to process your request within 30 days of which your request for withdrawal of consent was made. If we are unable to make the withdrawal within 30 days, we will notify you of the earliest time within which we can make the withdrawal. After this, we will not collect, use and/or disclose your personal data in the manner stated in your request.

5.3 However, please note that withdrawal of consent could result in certain legal consequences arising from such withdrawal. 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 If your personal data is to be used by SMEPayroll to take a decision that affects you, or disclosed to a third party organization, we will take efforts to ensure that it is accurate and complete. However, this means that you should update us of any changes to the personal data that you had initially provided us. We will not be responsible for personal data that is inaccurate due to your not updating us about the changes to the personal data you had initially provided us.

6.2 We will also ensure that your personal data is adequately protected and secured. We will place reasonable security arrangements to prevent any unauthorized access, collection, use, alteration, disclosure, loss, and/or damage to your personal data. However, we do not take responsibility for unauthorized access or use of your personal data by third parties that are wholly due to factors that are beyond our control. We will notify you without undue delay as soon as a data breach is confirmed, if any.

6.3 If your personal data is to be transferred outside of Singapore, we will comply with the PDPA laws in this matter, including

Obtaining your consent, unless an exception under the PDPA or the law permits us to do so otherwise

Taking the necessary steps to ensure that the foreign organization receiving your data is legally bound by enforceable laws that require them to maintain a standard of protection that is comparable to the protection under the PDPA

## 7. UPDATES OF DATA PROTECTION POLICY

7.1 In our efforts to ensure that we manage and protect your personal data properly, we will actively review our policies and procedures from time to time. We reserve the right to change the terms of this Data Protection Policy at our discretion. The latest policy will be updated and available on our website.

## 8. COOKIE POLICY

8.1 In our efforts to improve your browsing experience, we use cookies on our website. These cookies are text file that store or record information about your use of our website.

8.2 These cookies help us collect information about your browsing habits, and improve your browsing experience, remember your preferences, understand our website performance.

8.3 You can control which cookies you want to allow or disallow via your web browser's settings. If you disallow the cookies on our website, you should note that you might not be able to access the full range of functions that our website offer.

8.4 Personal data (if any) that we collect via cookies may be passed onto third party service providers, for one of more of the purposes listed in 8.2, for managing and administering our website, or for the purpose of data hosting, storage or back up.

8.5 Your usage of our website constitutes consent by to our use of Cookie Policy.