

## Data Protection Policy

### Statement & Registration

We at InsightzClub take our responsibilities under the Personal Data Protection Act 2012 (the “PDPA”) seriously. We also recognize the importance of the personal data you have entrusted to us and believe that it is our responsibility to properly manage, protect and process your personal data.

As part of the consumer insights/data industry relies wholly on the information it collects and the management of that information is an important business asset, InsightzClub regards the lawful and correct treatment of personal data as very important to successful operations and to maintaining confidence between those with whom we deal and ourselves. This Data Protection Policy is designed to assist you in understanding how we collect, use and/or disclose 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 Data Protection Officer (the “DPO”) at:

Padmanabhan – [contactus@insightzclub.com](mailto:contactus@insightzclub.com)

### Administration and Management of Personal Data

- observes fully the conditions regarding the collection and use of personal data;
- collects and processes appropriate personal data and only to the extent that it is needed to fulfil operational needs or to comply with legal requirement;
- takes appropriate measures to keep your personal data accurate, complete and updated;
- takes commercially reasonable efforts to ensure that the 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;
- respects the access and correction rights afforded to individuals under the PDPA;
- takes commercially reasonable efforts to take appropriate pre-cautions and preventive measures 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;
- ensures that personal data is not transferred abroad without suitable safeguards.

We are committed to ensuring that your personal data is secure. In order to prevent unauthorised access, disclosure or other similar risks, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the personal data we collect. We will use all reasonable efforts to safeguard your personal information. Where personal data is collected over

the internet, you should be aware that the use of the Internet is not entirely secure and for this reason we cannot guarantee the security or integrity of any personal information which is transferred from you or to you via the Internet.

### **Introduction to the PDPA**

“**Personal Data**” is defined under the 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. Common examples of personal data could include names, identification numbers, contact information, medical records, photographs and video images.

We will collect your personal data in accordance with the PDPA. In general, before we collect any personal data from you, we will notify you of the purposes for which your personal data may be collected, used and/or disclosed, as well as obtain your consent for the collection, use and/or disclosure of your personal data for the intended purposes.

### **Nature of work - provision of market, opinion polls and general business**

#### **Type/classes of information processed**

The types of personal data that we collect, use, disclose and/or process may include:

- personal details (only in few select cases)
- family details
- lifestyle and social circumstances
- financial details
- employment and education details
- goods or services provided
- We also process sensitive classes of information that may include:
  - physical or mental health details
  - racial or ethnic origin

#### **Who the information is processed about**

We collect, use, disclose and/or process personal data of:

- survey respondents
- employees
- advisers, consultants and other professional experts

#### **Description of processing**

The following is a broad description of the way InsightzClub may process your personal data.

#### **Reasons/purposes for the collection, use and disclosure of personal data**

The personal data which we collect from you may be collected, used, disclosed and/or processed by InsightzClub for the following purposes:

- conducting market, opinion polls

- maintaining our own accounts and records

(collectively, the “**Purposes**”).

### **Who the information may be shared with**

#### Disclosure to third parties with your consent

In order to conduct our business operations more smoothly, we may also be disclosing the personal data you have provided to us to our third party service providers, agents and/or our affiliates or related corporations, which may be sited outside of Singapore, for one or more of the above-stated Purposes. This is because such third party service providers, agents and/or affiliates or related corporations would be processing your personal data on our behalf for one or more of the above-stated Purposes. We will endeavour to provide adequate supervision over the handling and administration of your personal data by such third parties, as well as to provide for adequate forms of protection over such personal data.

#### Disclosure to third parties without your consent

We respect the confidentiality of the personal data you have provided to us. We will not disclose any of your personal data to any third parties without first obtaining your express 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 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 there are reasonable grounds to believe that the health or safety of yourself or another individual will be seriously affected and consent for the disclosure of the data cannot be obtained in a timely way, provided that we shall, as soon as may be practicable, notify you of the disclosure and the purposes of the disclosure;
- (e) cases in which the disclosure is necessary for any investigation or proceedings;
- (f) cases in which the personal data is disclosed to any officer of a prescribed law enforcement agency, upon production of written authorisation 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; and/or
- (g) cases in which the disclosure is to a public agency and such disclosure is necessary in the public interest.

The instances listed above are not intended to be exhaustive. For an exhaustive list of exceptions, you are encouraged to peruse the Second, Third and Fourth Schedules of the PDPA which is publicly available.

### **Handling Subject Access Requests (SARs) and Correction Requests**

You may request to access and/or correct the personal data currently in our possession at any time by submitting your written request through the following methods :

- (a) E-mail : [contactus@InsightzClub.com](mailto:contactus@InsightzClub.com)
- (b) Office address : #03-01, 50 Scott Road, Singapore 228242

For a request to access personal data, we will provide you with the relevant personal data within a reasonable time from such a request being made. The written request for access to personal data should include enough information to enable InsightzClub to clearly identify the person making the request and to identify exactly what information the data subject is requesting so that information can be found.

InsightzClub receives very few SARs from respondents as InsightzClub rarely collects such personal level details.

For a request to correct personal data, we will undertake the following :

- (a) we will correct your personal data as soon as practicable after the request has been made; and
- (b) unless otherwise consented to by you (explained further below), we will send the corrected personal data to every other organisation to which the personal data was disclosed by us within a year before the date the correction was made, unless that other organisation does not need the corrected personal data for any legal or business purpose.

As mentioned above, we may, if you so consent, send the corrected personal data only to specific organisations to which the personal data was disclosed by us within a year before the date the correction was made.

We will also be charging you a reasonable fee for the handling and processing of your requests to access and/or correct your personal data.

### **Updates on Data Protection Policy**

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.