

Personal Data Protection Notice

Viewqwest Pte. Ltd. ("VQ") respects the privacy and confidentiality of all personal data in our possession or under our control. We have implemented policies and practices to better protect the collection, use, disclosure, storage, and other processing of personal data provided to us. Please read this Personal Data Protection Notice ("Notice") with any other policy notice we may provide on specific occasion to learn more about how VQ is committed to safeguarding the personal information provided to us.

Effective Date of this Notice: 9th July 2019. This Notice supplements the other notices and is not intended to override them.

1. Application of the Notice

This Notice is based on the Singapore Personal Data Protection Act 2012 ("PDPA") and all the associated regulations and guidelines as may from time to time be issued by the Personal Data Protection Commission ("PDPC") of Singapore. In jurisdictions outside of Singapore, VQ's practices may be subject to different or more restrictive local laws.

Please review this Notice carefully before providing us with any of your personal data.

2. Collection of Personal Data

For the purpose of carrying on the VQ's business, including registration and administration of VQ's related products and services, you may be requested to provide personal data such as, but not limited to the following, without which it may not be possible to satisfy your request:

- a. Full Name;
- b. Residential Address;
- c. Copy of identity card or Passport & Employment Pass;
- d. Payment details, including credit card and banking information;
- e. Contact details, including telephone number or email address
- f. Employment information;
- g. Latest income documentation;
- h. Latest billing proof of address (where applicable).

3. Use of Cookies

When you visit our website, we may assign your computer one or more "cookies." By accessing our website, you agree that we can place cookies on your device. A cookie is a small text file that contains information that can later be read by us to facilitate your access to our website, gather statistical data, and personalize your online experience. We currently use cookies on our website for purposes including, but not limited to, detecting your web browser's multimedia capabilities, tracking promotional advertisements that we have displayed to you, maintaining current login and purchase information on secure portions of the website and providing a unique identifier to your computer so that we can generate statistics regarding website usage. For more information, please refer to our [Cookie Policy](#).

4. Use of Personal Data Collected

VQ either currently uses or may in the future use your personal data for any purpose not prohibited by applicable law.

- a. Generally, we collect, use and disclose your Personal Data for the following purposes:
 - i. to respond to your queries and requests;
 - ii. to manage our administrative and business operations and complying with internal policies and procedures;
 - iii. to facilitate business asset transactions (which may extend to any mergers, acquisitions or asset sales) involving any of the Companies;
 - iv. to match any Personal Data held which relates to you for any of the purposes listed in this Data Protection Policy;
 - v. to resolve complaints and enquiries
 - vi. to conduct investigations relating to disputes, billing, suspected illegal activities or fraud;
 - vii. enforcing our rights against you;
 - viii. maintaining the safety and security of our premises with the use of security cameras.
 - ix. to analyse and manage any commercial risks
 - x. conducting identity or credit checks;
 - xi. developing new services or products;
 - xii. to monitor or record phone calls and customer-facing interactions for quality assurance, employee training, performance evaluation and identity verification purposes;
 - xiii. to meet or comply with any applicable rules, laws, regulations, codes of practice or guidelines issued by any legal or regulatory bodies which are binding on us (including but not limited to responding to regulatory complaints, disclosing to regulatory bodies and conducting audit checks, due diligence and investigations); and
 - xiv. Purposes which are reasonably related to any of the above purposes in this Clause 4a or for any other purpose which we may notify you at the time of obtaining your consent.

- b. If you have provided your Singapore telephone number(s) and have indicated that you consent to receiving marketing or promotional information via your Singapore telephone number(s), We may, from time to time, contact you using such Singapore telephone number(s) (including via voice calls, text, fax or other means) with information about our Products and Services or those products and services offered by our Preferred Partners (including discounts and special offers).

- c. In relation to particular Products and Services or in your interactions with us, we may also have specifically notified you of other purposes for which we collect, use or disclose your Personal Data. If so, we will collect, use and disclose your Personal Data for these additional purposes as well, unless we have specifically notified you otherwise.

- d. You have a choice to withdraw your consent for receiving marketing or promotional materials/communication. To do so, you may contact us using the contact details in Clause 6 below

5. Disclosure of Personal Data

All personal data held by VQ will be kept confidential but VQ may, where such disclosure is necessary to satisfy the purpose, or a directly related purpose, for which the data was collected provide such information to the following parties:

- a. Any subsidiaries, holding companies, associated companies, or affiliates of, or companies controlled by, or under common control with VQ;
- b. Any person or company who is acting for or on behalf of VQ, or jointly with VQ, in respect of the purpose or a directly related purpose for which the data was provided;
- c. Any financial institutions, charge or credit card issuing companies, credit bureau, or collection agencies necessary to establish and support the payment of any services being requested.

6. Withdrawal of Consent

- a. For direct marketing purposes
You have the right to opt out of receiving such marketing information. You can do so by writing, calling or sending us an e-mail to cs@viewqwest.com or +65 3102 0000. If you do not exercise your right to opt out of receiving such marketing information, you will be considered to have consented to the receiving of such marketing information and we may continue to provide such marketing information to you.
- b. To collect, use, disclose or retain personal data:
If you do not wish us to use or disclose your Personal Data for any of the above purposes, you may withdraw your consent at any time by giving written notice to us pursuant to the Personal Data Protection Act 2012. However, depending on the circumstances and the nature or extent of your withdrawal, the withdrawal of your consent may result in us not being able to provide services to you and we may terminate your Account.
- c. For Personal Data provided by a third party
Please note that if your Personal Data has been provided to us by a third party (e.g. a referrer), you should contact that organisation or individual to make such queries, complaints, and access and correction requests to us on your behalf.

If you withdraw your consent to any or all use of your Personal Data, depending on the nature of your request, we may not be in a position to continue to provide the Products and Services to you or administer any contractual relationship that is already in place, which in turn may result in the termination of any agreements that you have with us, resulting in you being in breach of your contractual obligations or undertakings. ViewQwest's legal rights and remedies in such event are expressly reserved.

7. Access and Correction of Personal Data

If you wish to access, update or otherwise change or remove any information that you provided us, please complete the [Personal Data Request Form](#) and contact us at dpo@viewqwest.com.

8. Accuracy of Personal Data

VQ keeps personal data as accurate, complete and up-to-date as necessary, taking into account its use and the interests of our customers. Where possible, we will validate data provided using generally accepted practices and guidelines. This includes the requests to see original documentation before we may use the personal data such as with Personal Identifiers and/or proof of address.

9. Protection of Personal Data

VQ protects personal data against loss or theft, as well as unauthorized access, disclosure, copying, use or modification with security safeguards appropriate to the sensitivity of the personal data, regardless of the format in which it is held.

We use various methods to safeguard personal data. They include:

- a) Physical measures: locked filing cabinets, restriction of access to offices and alarm systems.
- b) Technical measures: passwords and encryption, using generally industry best practices.
- c) Administrative measures: confidentiality agreements, limiting access on a need-to-know basis, staff training and security clearances.

Online security is also a priority. VQ incorporates security measures such as encryption and authentication tools to protect personal data from unauthorized use. Firewalls are utilized to protect our servers and network from unauthorized users accessing and tampering with files and other information that we store.

10. Retention of Personal Data

VQ will retain your personal data only for as long as the purposes for which such data is collected or used (as notified to you) continuously, or where necessary for our legal or business purposes. Thereafter, VQ will delete or destroy the personal data, or remove the means by which the data can be associated with you.

11. Transfer of Personal Data Outside of Singapore

We operate our website in Singapore and we may transfer personal data to our affiliates outside of Singapore. We have taken steps to ensure that appropriate levels of protection necessary to maintain the security and integrity of your personal data are in place and that any transferred data is processed only in accordance with the PDPA and any other applicable law.

12. Changes in the Notice

We reserve the right to modify or change this Notice at any time. The Effective Date, as stated above, indicates the last time this notice was materially revised. If we make material changes in the Notice, we will post any changes on this page. We encourage you to review this page periodically to understand our notice regarding the collection and use of your personal data.

Contact Us

For questions regarding this Notice or enquiries for , please contact us below.

Data Protection Officer

Eng Zhenyu

dpo@viewqwest.com