

# Privacy Policy

This Privacy Policy (“**Policy**”) sets out the basis which *FirstCom Solutions Pte Ltd* (“**we**”, “**us**”, or “**our**”) may collect, use, disclose or otherwise process personal data if anyone decides to use our services and our website. This policy is in accordance with the Singapore Personal Data Protection Act (“**PDPA**”) and 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**

1. As used in this Policy:
  - “**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.
  - “**data intermediary**” means an organization which processes personal data on behalf of another organization (the data controller).
2. Depending on the nature of your interaction with us, some examples of personal data which we may collect from you include name, email address, telephone number, nationality and employment information.
3. Other terms used in this Policy shall have the meanings given to them in the PDPA (where the context so permits).

## **COLLECTION, USE AND DISCLOSURE OF PERSONAL DATA**

4. We collect data that you voluntarily provide to us when you enquire about our services via email, telephone or through our website. For a better experience while using our services, we may require you to provide us with certain personal data, including but not limited to your name, phone number, and email address. The information you provide will be handled according to this Privacy Policy.

You have choices regarding our collection, use or disclosure of your personal data. You have the right to object to the processing of your personal data and withdraw your consent in the manner described in clause 8. However, if you choose not to provide us with the personal data intended for the purpose(s) for which you have been notified, we may not be able to fulfil the said purpose(s).

We may collect, disclose or use your personal data pursuant to an exception under the Personal Data Protection Act or other written law such as during the following situations:

- To respond to an emergency that threatens your life, health and safety or of another individual; and
- Necessary in the national interest, for any investigation or proceedings

Any unsolicited personal data received by us will be returned to the sender immediately. If received by email or through our website, these unsolicited personal data will be deleted right away. If received by telephone, these will not be recorded.

If we are a Data Intermediary, we will ensure the limited processing of personal data to the purposes specified by the Data Controller and according to their instructions.

#### Cookies

Our website uses cookies to improve your browsing experience. These cookies are essential for the working of basic functionalities of our website and to help us analyse and understand how you use our website generally, recognize your repeat visits and preferences, as well as to measure and analyse traffic.

These cookies will be stored in your browser only with your consent. By clicking “Accept” on our cookie banner, or if you continue to explore our website without changing your cookie settings, you consent to the use of the cookies on our website. You also have the option to opt-out of these cookies by changing your cookie settings anytime. But opting out of some of the cookies may have an effect on your browsing experience.

5. 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) responding to, handling, and processing queries, requests, applications, complaints, and feedback from you;
  - (c) any other purposes for which you have provided the information; and
  - (d) any other incidental business purposes related to or in connection with the above.
6. 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.
7. The purposes listed in the above clauses may continue to apply even in situations where your relationship with us (for example, pursuant to your employment contract should you be hired) has been terminated or altered in any way, for a reasonable period thereafter (including, where applicable, a period to enable us to enforce our rights under a contract with you).

#### **WITHDRAWING YOUR CONSENT**

8. The consent that you provide for the collection, use and disclosure of your personal data will remain valid until such time it is being withdrawn by you in writing. You may withdraw consent and request us to stop collecting, using and/or disclosing your personal data for any or all of the purposes listed above by submitting your request

in writing or via email to our Data Protection Officer at the contact details provided below.

9. Upon receipt of your written request to withdraw your consent, we may require reasonable time (depending on the complexity of the request and its impact on our relationship with you) for your request to be processed and for us to notify you of the consequences of us acceding to the same, including any legal consequences which may affect your rights and liabilities to us. In general, we shall seek to process your request within ten (10) business days of receiving it.
10. Whilst we respect your decision to withdraw your consent, please note that depending on the nature and scope of your request, we may not be in a position to continue providing our goods or services to you and we shall, in such circumstances, notify you before completing the processing of your request. Should you decide to cancel your withdrawal of consent, please inform us in writing in the manner described in clause 8.
11. 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**

12. If you wish to make (a) an access request for access to a copy of the personal data which we hold about you or information about the ways in which we use or disclose your personal data, or (b) a correction request to correct or update any of your personal data which we hold about you, you may submit your request in writing or via email to our Data Protection Officer at the contact details provided below.
13. Please note that a reasonable fee may be charged for an access request. If so, we will inform you of the fee before processing your request.
14. We will respond to your request as soon as reasonably possible. In general, our response will be within thirty (30) calendar days. Should we not be able to respond to your request within thirty (30) calendar days after receiving your request, we will inform you in writing within thirty (30) calendar days of the time by which we will be able to respond to your request. If we are unable to provide you with any personal data or to make a correction requested by you, we shall generally inform you of the reasons why we are unable to do so (except where we are not required to do so under the PDPA).

#### **PROTECTION OF PERSONAL DATA**

15. 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~~, access control, password protection and disclosing personal data both internally and to our authorised third-party service providers and agents only on a need-to-know basis.
16. 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**

17. 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. We will take reasonable steps to ensure that the personal data we collect about you is accurate, complete, not misleading and kept up-to-date, taking into account its intended use. Where possible, we will validate the information provided by you using generally accepted practices and guidelines.

#### **RETENTION OF PERSONAL DATA**

18. 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.

19. 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. You may write to our DPO at the contact number below if you would like to know more about how we retain your personal data.

#### **TRANSFERS OF PERSONAL DATA OUTSIDE OF SINGAPORE**

20. We generally do not transfer your personal data to countries outside of Singapore. However, if we do so, we will obtain your consent for the transfer to be made and we will take steps to ensure that your personal data continues to receive a standard of protection that is at least comparable to that provided under the PDPA.

#### **DATA BREACH NOTIFICATION**

21. In the event a breach of security leading to accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, personal data, we shall promptly assess the impact and once assessed that it is a notifiable data breach, we shall report this breach within 3 calendar days to the Personal Data Protection Commission (PDPC). We will notify you when the data breach is likely to result in significant harm to you after our notification to PDPC. We may also notify other relevant regulatory agencies, where required.

If we are a Data Intermediary, we shall inform the Data Controller immediately of any data breach so they can promptly assess the impact and comply with their data breach notification obligation.

#### **DATA PROTECTION OFFICER**

22. 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:

**Name of DPO** : Lynn Wong

**Email Address** : [dpo@firstcom.com.sg](mailto:dpo@firstcom.com.sg)

**Contact Number**: 68484984

### **EFFECT OF POLICY AND CHANGES TO POLICY**

23. This Policy 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.
24. We may revise this Policy 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 Policy was last updated. Your continued use of our services constitutes your acknowledgement and acceptance of such changes.

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