

SCCCI Personal Data Protection Policy

At SCCCI, we are committed to protecting and safeguarding the personal data we collected from you.

This Personal Data Protection Policy describes the types of personal data we collect from our operations. The Policy also sets forth how we use this data, provide other details about our personal data practices, and explains how to contact us if you have any questions or concerns.

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A. Our Obligations:

1. Consent Obligation

SCCCI only collects, uses or discloses personal data of which you have given your consent.

SCCCI allows you to withdraw consent, with reasonable notice, and shall inform you of the likely consequences of withdrawal. Upon withdrawal of consent to the collection, use or disclosure for any purpose, SCCCI shall cease such collection, use or disclosure of your personal data.

2. Purpose Limitation Obligation

SCCCI may collect, use or disclose your personal data for the purposes that you would consider appropriate in the circumstances and for which you have given consent.

SCCCI may not, as a condition of providing a service, require you to consent to the collection, use or disclosure of your personal data beyond what is reasonable to provide that service.

3. Notification Obligation

SCCCI shall notify you of the purposes for which SCCCI is intending to collect, use or disclose your personal data on or before such collection, use or disclosure of personal data.

4. Access and Correction Obligation

Upon request, your personal data and information about the ways in which your personal data has been or may have been used or disclosed within a year before the request should be provided. However, SCCCI is prohibited from providing you access if the provision of the personal data or other information could reasonably be expected to:

- cause immediate or grave harm to your safety or physical or mental health;
- threaten the safety or physical or mental health of another individual;
- reveal personal data about another individual;
- reveal the identity of another individual who has provided the personal data, and the individual has not consented to the disclosure of your identity; or
- be contrary to national interest.

SCCCI shall correct any error or omission in your personal data upon your request. Unless SCCCI is satisfied on reasonable grounds that the correction should not be made, SCCCI should correct the personal data as soon as practicable and send the corrected data to other organisations to which the personal data was disclosed within a year before the correction is made, or with your consent, only to selected organisations.

5. Accuracy Obligation

SCCCI shall make reasonable effort to ensure that personal data collected by or on behalf of SCCCI is accurate and complete. If it is likely to be used to make a decision that affects you, or if it is likely to be disclosed to another organisation.

6. Protection Obligation

SCCCI shall make reasonable security arrangements to protect the personal data that SCCCI possesses or controls to prevent unauthorised access, collection, use, disclosure or similar risks.

7. Retention Limitation Obligation

SCCCI shall cease retention of personal data or remove the means by which the personal data can be associated with particular individuals when it is no longer necessary for any business or legal purposes.

8. Transfer Limitation Obligation

SCCCI shall transfer personal data to another country only according to the requirements prescribed under the regulations, to ensure that the standard of protection provided to the

personal data so transferred will be comparable to the protection under the PDPA, unless exempted by the Personal Data Protection Commission.

9. Openness Obligation

SCCCI shall make information about SCCCI's data protection policies, practices and complaints process available on request.

B. Collection of Personal Data

The types of Personal Data we collect essentially depend on the purpose of collection. Thus depending on the purpose of collection, the Personal Data collected may be in the form of:

- a. Name.
- b. Date of birth.
- c. Gender.
- d. NRIC / passport.
- e. Contact Information, address.
- f. Nationality.
- g. Race.
- h. Photograph.
- i. Education.
- j. Income.
- k. Feedback, performance review.
- l. Employment records.
- m. Family records.
- n. References.
- o. Banking particulars, credit card details.
- p. Information on tax and CPF.
- q. Sensitive information such as criminal record, religion, health etc
- r. Such other information as may be required for specific reasons.

C. Purpose of Collection

The Personal Data as provided/furnished by you to SCCCI or collected by SCCCI from you or through such other sources as maybe necessary for the fulfillment of the purposes (“**collected**”) at the time it was sought or collected, will be used for such purpose and or for the following reasons (collectively “**Purposes**”):

- a. Assessing application for membership [Personal Data collected maybe in the form of B(a) – (r) or part thereof].
- b. Assessing application for employment [Personal Data collected maybe in the form of B(a) – (r) or part thereof].
- c. Assessing application for council election [Personal Data collected maybe in the form of B(a) – (r) or part thereof].
- d. Communicating with its member [Personal Data collected maybe in the form of B(a) – (e), (r) or part thereof].

- e. Providing services, to process billing / payment transactions [Personal Data collected maybe in the form of B(a) - (g), (o), (r) or part thereof].
- f. Responding to an individual's inquiries [Personal Data collected maybe in the form of B(a), (d), (e), (r) or part thereof, depending on the nature of the inquiries].
- g. Administering participation in any programme/event/activity organised by SCCCI [Personal Data collected maybe in the form of B(a) - (h), (r) or part thereof, and may also include B(o) if any payment is required].
- h. For marketing and promotional activities, market surveys, trend and statistical analysis [Personal Data collected maybe in the form of B(a) - (k), (r) or part thereof].
- i. For finance activities [Personal Data collected maybe in the form of B(a) - (f), (j), (l), (n), (o), (r) or part thereof].
- j. For credit assessments, financial and background investigation as and when deemed necessary [Personal Data collected maybe in the form of B(a) – (r) or part thereof].
- k. For the maintenance and upkeep of internal records, filing and operations [Personal Data collected maybe in the form of B(a) – (h), (k), (o), (r) or part thereof].
- l. For meeting any legal or regulatory requirements relating to our provision of services and to make disclosure under the requirements of any applicable law, regulation, direction, court order, by-law, guideline, circular, code applicable to us or our affiliates [Personal Data collected maybe in any form as required by the requirements].
- m. To enter into the necessary agreement and/or contract [Personal Data collected maybe in the form of B(a) – (r) or part thereof].
- n. For handling the report for lost item, customer complaints and taking appropriate action relating thereto [Personal Data collected maybe in the form of B(a) – (g), (h), (k), (o), (r) or part thereof].
- o. For security and crime prevention purposes, risks management, safeguarding SCCCI in the event of any claim, litigation, suits etc [Personal Data collected maybe in the form of B(a) – (r) or part thereof].
- p. For any other grounds or reasons [Personal Data collected will correspond to such grounds or reasons]

Please note that it is necessary for an individual to provide us with your accurate personal data. Failure to do so may result in us being unable to process and/or use your personal data in relation to the Purposes.

D. Consent and Right to Withdraw Consent

You shall be invited to express consent to SCCCI collecting, using and disclosing your personal data for the purposes of membership soliciting, research activities and future event notification and publicity as well as SCCCI's news dissemination.

By so indicating your acceptance of the terms of this Policy, you shall be deemed to have expressly consented to the processing of your Personal Data by SCCCI or any of our authorized staff, partners and/or contractors for the Purposes outlined in B above.

Notwithstanding anything to the contrary, you may at any time withdraw your consent to SCCCI processing any Personal Data of yours or to any part or portion of the processing by sending to SCCCI at the address set out below a written notice of withdrawal and within the period prescribed under the Act. SCCCI shall take all necessary measures to give effect to your withdrawal of consent, to the extent that such withdrawal does not conflict with any of SCCCI's other legal obligations.

E. Rights of Access

You may at any time hereafter make written inquiries, complaints and request for access to, or correction of, your Personal Data or limit the processing of your Personal Data by submitting such written request to the Personal Data Protection Officer of SCCCI via e-mail to dpo@sccci.org.sg or post it to the address as set out below:

Postal:

Data Protection Officer
Singapore Chinese Chamber of Commerce & Industry
47 Hill Street #09-00
SCCCI Building
Singapore 179365

Any Personal Data retained by us shall be destroyed and/or deleted from our records and system in accordance with our retention policy in the event such data is no longer required for the said Purposes.

F. Disclosure of Personal Data

The Personal Data provided to us shall be kept confidential however, we may disclose your Personal Data to the following parties:

- a. Within the SCCCI Family that includes SCCCI's subsidiaries, our business partners and our affiliates that provide related services in connection with our services;
- b. Our auditors, consultants, lawyers, accountants or other financial or professional advisers appointed in connection with our services;
- c. Our third party service providers, third party management companies, sub-contractors or other parties as may be deemed necessary by us to facilitate your dealings with us;
- d. Our appointed service providers in fulfilling our services; and
- e. Any persons, government agencies, statutory authorities and/or industry regulators, whom we are compelled or required to do so pursuant to any law

Third parties are legally tasked with processing your Personal Data in line with principles specified by SCCCI and may not use it for any other purposes. Third parties are also held responsible for securing your Personal Data at an appropriate level of security in relation to applicable data protection laws and widely accepted industry standards.

SCCCI reserves its right to use or disclose any data as needed to satisfy any law, regulation or legal request, to protect the integrity of the Online Service, to fulfill your requests, or to cooperate in any law enforcement investigation or an investigation on a matter of public safety.

G. Security, Storage and Duration of Data Retention

SCCCI is committed to ensuring that your Personal Data is secure, and in connection therewith, suitable processes and procedures have been put in place to ensure that all Personal Data collected by us shall be stored and/or filed in such manner as to ensure that the Personal Data maintains its accuracy, integrity, remains confidential, is protected against loss, misuse, modification and unauthorised or accidental access, disclosure, alteration, destruction or manipulation.

SCCCI shall store and/or retain all Personal Data only for as long as required for the fulfillment of the purposes stated in B above or pursuant to any legal obligation imposed upon SCCCI in its operation of the Services or by virtue of any applicable law that may from time to time be in force.

H. Exceptions and Exclusion of Liability

Notwithstanding the foregoing provisions, SCCCI reserves the right to refuse to entertain any request for withdrawal of consent, access or correction in the following circumstances:

- Where there is an insufficiency of information provided by any party making a request to enable SCCCI to positively locate or identify the Personal Data in question;
- Where there is reasonable doubt surrounding the identity of the person making the request or where SCCCI feels that the requesting party is not in fact the owner or the subject of the Personal Data in question and is not lawfully entitled to make any requests in relation to the Personal Data;
- Where permitting access or correction would be tantamount to a violation of an order of Court;
- In requests for access or for correction (excluding instances of withdrawal of consent):
 - a) where the burden or expense of entertaining the request for access or correction is disproportionate to the risk to the privacy of the party making a request;
 - b) where compliance with the request would involve the unauthorised disclosure of Personal Data belonging to a third party;
 - c) where compliance would result in the disclosure of confidential commercial information; or
 - d) where access is regulated by another law

In the area of Personal Data protection, SCCCI shall not be liable for any purported violation, breach or non-compliance with any precepts of privacy or the protection of Personal Data in the following instances:

- Where an act of nature or event outside the control of SCCCI results in the damage or malfunction or destruction in any equipment or machinery used to secure, store or process Personal Data;
- Where Personal Data is readily available or able to be found in the public domain; and
- Where despite SCCCI's best efforts, there is unauthorised access, modification, alteration, misuse, tampering or abuse of Personal Data caused by the malicious or fraudulent or

criminal acts or conduct of a third party not being under the control or direction of SCCCI.

I. Integrity of Personal Data

You are responsible for ensuring that the Personal Data you provide us is accurate, complete and not misleading and that such Personal Data is kept up to date. We may request your assistance to procure the consent of third parties whose Personal Data is provided by you to us and you agree to use your best endeavours to do so.

J. Transferring and Sharing of Personal Data

It may be necessary, if so required for any of the Purposes to transfer your Personal data outside of Singapore or to disclose your personal data to our related subsidiaries, business partners, affiliates, associates, service providers and/or relevant authorities, who may be located within or outside Singapore. Save for the foregoing, your personal data will not be knowingly transferred to any place outside Singapore or be knowingly disclosed to any third party.

SCCCI also does not sell, transfer or disclose personal information to third parties outside the SCCCI Family. The SCCCI Family includes our subsidiaries, our affiliates and our service vendors. However, with your permission, we will, on occasion send marketing information on behalf of our business partners or associates about products or services they provide that may be of interest to you. You may be asked if you wish to receive marketing materials from SCCCI's partners or associates. If you elect to receive such materials, SCCCI will not share your personal information with such partners or associates but rather will send an e-mail on behalf of the partners or associates.

K. Protection of Personal Data in SCCCI's Possession

SCCCI shall limit the collection and use of personal information to what is necessary to administer its services and to deliver superior service to you. To serve you better, SCCCI may combine the information which you have given to us through our website or other channels.

SCCCI shall protect the confidentiality of all personal information which you have shared with us. In cases where we share personal information with our subsidiaries, partners or affiliates, we will protect that personal information with a strict confidentiality as stated in our agreement. Companies hired by us to provide support services or to act as our agent must conform to our privacy standards.

SCCCI corporate policies stipulate that any staff with access to confidential customer information is not permitted to use or disclose such information except for business purposes. All staff are required to safeguard such information as specified in their confidentiality agreements with SCCCI.

In all cases, your personal information is protected by a strictly confidentiality agreement. We do not allow any non-affiliated company to retain your personal information any longer than it is necessary to provide you with the service or information unless you have granted us permission to do so.

Staff of SCCCI shall sign the Confidentiality Clause to undertake not to misuse or disclose personal data in their possession during their cause of work and to take every precaution to ensure all personal data under their possession are being kept confidential at all times.

L. Language

This Policy is issued in English and Chinese languages. In the event of any inconsistency, the English language version of this Policy shall prevail.

M. Changes to the Personal Data Protection Policy

This Personal Data Protection Policy is effective as of July 2014. From time to time, it may be necessary for SCCCI to change this policy. If we change our policy, we will post the revised version on our corporate website, so we suggest that any interested person check for the most up-to-date version of our personal Data Protection Policy online.

N. Governing Law

This Data Protection Policy shall be governed in all respects by the laws of Singapore.

O. SCCCI Do-Not-Call Policy

We respect the Do Not Call Registry, which allows individuals to opt-out of receiving marketing messages by registering their Singapore phone numbers.

You are advised to manage your preference on how SCCCI and its partners, associates or vendors contact you on marketing activities by selecting your preferred contact mode. Marketing Activities include invitations to SCCCI's events and activities, etc.

If you do not wish to receiving any marketing messages from us, you could inform us by one simple way:

- SMS "DNC" to mobile number: 98206807

Please note:

- a) Any change request will take 60 days to come into effect.
- b) Your status will remain valid until you change it again.
- c) Your consent on SCCCI DNC will override the National DNC, regardless of which is submitted first.

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