



## MAVENTREE TECHNOLOGY PTE LTD

### PRIVACY NOTICE

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MavenTree Technology Pte Ltd ("MavenTree") respect the privacy of our customers, users and visitors, and are committed to safeguarding the personal information you provide to us.

Please read this Privacy Notice ("Policy") to understand how MavenTree collects, uses, and protects your personal information.

#### 1. Application of Policy

This Policy is based on the Singapore Personal Data Protection Act 2012 and all the associated regulations and guidelines which may from time to time be issued by the Personal Data Protection Commission of Singapore.

This Policy applies to all data in any form about an individual who can be identified from that data which are in our possession or under our control for the purposes of and in connection with our contractual duties and provision of our services.

Under the Singapore Personal Data Protection Act 2012, business contact information (e.g., name, business address, business telephone number) is not considered as personal data so long as it is used strictly for business-to-business (B2B) transactions.

#### 2. Collection of Personal Data

We collect data that you voluntarily provide to us (primarily business contact information such as your name, job title, company name, company address, company contact number and company e-mail address) when you enquire about our services via email, telephone or through our website. The information you provide will be handled according to this 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 a manner described in clause 5 below.

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.

In general, subject to the applicable exceptions permitted in the Singapore Personal Data Protection Act 2012, before we collect the above 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.

If you choose not to provide us with the personal data described in this Policy, we may not be able to fulfil our contractual duties towards you or facilitate your request or provide the service to you.



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#### Cookies

Our website uses cookies to improve your browsing experience. The cookies that are categorized as necessary are stored on your browser as they are essential for the working of basic functionalities of the website. We also use third-party cookies that 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 site without changing your cookie settings (link provided in the cookie banner), you consent to the use of 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 these cookies may influence your browsing experience.

#### Links

Our website may contain links to other sites. MavenTree is not responsible for the privacy practices of such other sites. We encourage our users to be aware when they leave our site and to read the privacy statements of each web site that collects personally identifiable information. This Policy statement applies solely to information collected by this web site.

#### 3. Use of Personal Data Collected

Any Personal Data provided by you to us may be used for the following purposes:

- Process and respond to your requests and queries.
- Send you information, updates, invitations, marketing and advertising materials and information in relation to the services and products by MavenTree and its partners.
- Update our records.
- Process your personal particulars to facilitate any payment.
- Compile data and conduct statistical or demographic analysis.
- Solicit and record your opinion/feedback via surveys and requests for feedback (if you consent to participating).
- Comply with a court order, other legal processes, or other legal requirements of any governmental authority (including detecting, investigating and preventing any crime, offence or breaches).
- Comply with our internal policies/procedures and any applicable laws, rules and regulations, codes of practice, guidelines, and any other legal purposes; and
- Allow us to use your Personal Data in any other ways for which we have notified you and obtained your consent accordingly.

#### 4. Disclosure of Personal Data

All Personal Data held by us will be kept confidential, but we may, where such disclosure is necessary to satisfy the purpose, or a directly related purpose for which the Personal Data was collected as described in section 2 and section 3 above, provide such information to the following parties:



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- Any person or company who is acting for, jointly or on our behalf, in respect of the purpose or a directly related purpose for which the Personal Data was provided.
- Any government authority in compliance with any applicable laws, rules and regulations, codes of practices, guidelines, court order, other legal processes or requirements.

#### 5. Withdrawal of Consent

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.

Should you wish to withdraw your consent and request us to stop using and/or disclosing your personal data for any or all of the purposes listed in section 3 and 4 by submitting your request to our Data Protection Officer, at [dpo@maventree.sg](mailto:dpo@maventree.sg)

Upon receipt of your request to withdraw your consent, we may need to contact you for clarification if your request is deemed incomplete or unclear in any way.

Please understand that your withdrawal of consent for purposes necessary for MavenTree to fulfil its contractual duties towards you or facilitating your request or providing our services to you may carry consequences. We will review and inform you on the consequences of the withdrawal prior to processing your request.

We seek to process your withdrawal request within 10 business days after verification of your identity. Should we require more time, we will inform you of the time by which we can fully address your withdrawal notice.

#### 6. Access and Correction of Personal Data

If you wish to access, update or otherwise change or remove any information that you have provided to us, you may send your request to our Data Protection Officer at [dpo@maventree.sg](mailto:dpo@maventree.sg).

An administration fee may be charged for the handling and processing of your request to access your personal data. If so, we will inform you of the fee beforehand.

We seek to process such access and correction request within 30 calendar days after verification of your identity. Should we require more time, we will inform you of the time by which we can fully address your request.

#### 7. Accuracy of Personal Data

We take reasonable steps to ensure that the personal data we collect about you is accurate, complete, not misleading and kept up to date, considering its intended use.

Where possible, we will validate the Personal Data provided by you using generally accepted practices and guidelines.

If we are in an ongoing relationship with you, it is important that you update us of any changes to your business contact information.



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#### 8. Protection of Personal Data

We employ appropriate administrative, physical, technical, and organizational security measures to help protect your personal data against loss and to guard against unauthorised access, disclosure, copying, use or modification, regardless of the format in which it is held.

We have also put in place reasonable and appropriate organisational measures to maintain the confidentiality and integrity of your information and will only share the same with authorised persons on a 'need to know' basis.

#### 9. Retention of Personal Data

We will retain your Personal Data only for as long as the purposes for which such data is collected or used (as notified to you) continues, or where necessary, for our legal or business purposes.

We will dispose of or destroy/delete documents containing your personal data in a secure manner when the retention limit described in our Retention Policy is reached or as soon as it is reasonable to assume that the permitted purpose is no longer being served by their retention.

Any unsolicited personal data received by us will not be retained. 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. For any unsolicited personal data that you have provided as part of any document submitted to us, we will mask the unsolicited data before using, disclosing and/or retaining the said document.

#### 10. Transfer of Personal Data

We do not transfer personal data outside of Singapore.

Where there is a need to transfer your information to another country outside Singapore, we will ensure that the standard of data protection in the recipient country is comparable to that of Singapore's PDPA. If this is not so, we will enter into a contractual agreement with the receiving party to accord similar levels of data protection as those in Singapore.

#### 11. Data Breach Notification

In an event of a breach security leading to accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, personal data, we shall promptly assess the impact. 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.



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#### 12. Changes to Policy

We reserve the right to modify or change this Policy at any time and will place such amendments on this website.

This Policy applies in conjunction with contractual clauses and consent clauses that apply in relation to the collection, use and disclosure of your personal data by us. Your continued use of our services constitutes your acknowledgement and acceptance of this Policy and any such changes.

#### 13. Contact Us

If you have any questions or feedback regarding this Policy or would like to know how we manage your personal data or retain and dispose them, you may contact our Data Protection Officer at [dpo@maventree.sg](mailto:dpo@maventree.sg).

If you have any complaint relating to how we manage your personal data or request related to your personal data or would like to exercise any of your data protection rights, you may ~~may~~ contact our Data Protection Officer at [dpo@maventree.sg](mailto:dpo@maventree.sg).

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