NTUC Income Enterprises Pte Ltd Privacy Policy

Last Updated: 30 June 2014

Introduction

NTUC Income Enterprises Pte Ltd (NIE) recognizes its responsibilities in relation to the collection, usage, disclosure, storage and transfer of personal data under the Personal Data Protection Act ("PDPA").

Personal data will be collected only for lawful and relevant purposes and reasonable steps will be taken to ensure that personal data held by NIE is accurate. NIE will take reasonable steps to protect the personal data and to avoid unauthorized access.

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We at NIE place the privacy interests of our customers high in our priorities. We are committed to protecting the privacy, confidentiality, accuracy and security of the personal data provided to us. Our Privacy Policy tells you how we collect, use, disclose, store and transfer your personal data. All our employees are required to comply with our Privacy Policy when they carry out their daily activities.

Personal Data We Collect

Under PDPA, personal data is defined as information about an individual who can be identified from that data; or from that data and other information to which the organization has or is likely to have access.

As we provide Referral Services, we require certain personal information from you for the purpose of offering suitable services to you. Personal data collected about you and your family members may include:

General identification and contact information

• Name, address and telephone number, , gender,

Identification numbers issued by government agencies

NRIC, Passport, FIN No.

How we use the personal data (Purpose & Notification Obligation)

We may collect and use the personal data to:

- identify you
- communicate effectively with you
- evaluate process, facilitate or administer your request to provide referral services
- provide you with ongoing services and respond to your inquiries or instructions
- conduct research and statistical analysis
- coach employees and monitor for quality assurance
- inform you of our philanthropic and charity initiatives, i.e. OrangeAid, including soliciting donations, acknowledging donations, and facilitating tax exemption
- comply with all applicable laws, including reporting to regulatory and industry entities

We will only collect and use personal data in an open, fair and lawful way that is necessary for the purposes identified by us above.

Releasing Your Data to Others (Transfer Out)

We may disclose the personal data to third parties:

- service providers to provide the services requested
- regulators, law enforcement and government agencies

We will only disclose the personal data as it is reasonably required for the purposes stated above and the data is limited to information necessary for us and these third parties to do the work. These parties are also required to comply with the PDPA.

Obtaining Your Consent (Consent Obligation)

We will only collect, use, disclose, store and transfer personal data for the above purposes with your consent or as allowed or required by law. We will tell you why we need your personal data before or at the time we collect it.

You can give your consent expressly or impliedly. Your expressed consent can be given to us in writing, verbally (e.g. through our call centre) or electronically (e.g. through our website). Your implied consent can be given to us from your action or nature of dealings.

Withdrawing Your Consent

You may refuse or withdraw your consent for us to collect, use or disclose your personal data by giving us reasonable notice so long as there are no legal or contractual restrictions preventing you from doing so.

But if you withdraw consent for us to use the personal data, it will affect our ability to provide you with the referral service that you asked for. Withdrawing such consent will require you to cancel your request.

Using Information for Marketing Purposes

The information you supply will <u>not</u> be used by us for marketing purposes. However, if you wish to keep you posted on any new services or promotions, simply contact us to let us know.

Accuracy

We will take all reasonable efforts to ensure that your personal data collected by us or on our behalf is accurate and complete.

Your Rights of Access & Correction

Under the PDPA, you have the right to request access to any personal data of yours that we have, and know how it is being used and disclosed for the last 12 months to the extent your right is allowed by law. However, you may be charged a reasonable fee for every request for such access.

You also have the right to request correction of your personal data.

Protecting Your Personal Data (Security)

We protect your personal data from unauthorized access, collection, use, disclosure, copying, modification or disposal by having physical, technological and organizational safeguards in place that are appropriate to the sensitivity of the data.

All our staff and service providers who act on our behalf must comply with our privacy policies and practices and can only access your data to do their jobs.

Retention

We will keep your personal data only for as long as it is needed for the purposes for which it was collected and as required for business or legal purposes. Once your personal data is no longer required for these purposes, we will destroy, erase or make anonymous the data.

Additional Information We May Collect

Use of Cookies

We may also receive and store certain types of information whenever you interact with us on our corporate website. Through the use of "cookies", which are small text files placed on your computer by websites, we are able to collect non-personal information such as your IP address, browser type, domain names, access times and referring website addresses. We use the information collected for the following purposes:

- Keeping count of return visits to our website;
- Accumulating and reporting anonymous, aggregate, statistical information on websites and advertisement usage;
- Determining which features on our website that users like best;
- Saving your password so you do not have to re-enter each time you visit our website.

The cookies used on our website will not collect your personal information unless you specifically provide us with the information. You may opt to disable cookies or prevent your browser from accepting new cookies through your browser settings. If you choose not to allow us to place a cookie on your computer, this may restrict your ability to perform certain transactions, use certain services or access certain content on our website.

Third Party Advertisement Servers

Some of our advertisers use third-party companies to serve their advertisements on our websites, and in some cases, in our HTMLformatted newsletters. Often, these third-party advertising companies employ cookies and web bug technologies to measure advertisement effectiveness. We do not disclose any personal, identifiable information to them as part of this relationship. Use of their tracking technology is subject to their own privacy policies. We are not responsible for the privacy practices of these third parties and you should refer to their privacy policies to find out about their practices.

Contacting Us

If you have any concern, query or complaint about our personal data protection policies and practices or wish to request access to, update or correct your personal data, please contact:

The Data Protection Officer NTUC Income Centre, 75 Bras Basah Road, Singapore 189557 General Hotline: 63INCOME / 6788 1777

Email: DPO@income.com.sg

Changes to this Privacy Policy

We review this Privacy Policy regularly and reserve the right to make changes at any time to take into account of changes in our business and legal requirements.

We will place updates and our revised Privacy Policy on our website. If the changes are significant and reduces your rights under this Privacy Policy, we will notify you on this website. Any changes will be effective 30 days following the date on which this Privacy Policy is revised and posted on our website.