



## **Roofop Ventures Pte Ltd and Group Companies (“RTV”)**

### **External Privacy Policy**

Updated as at 17 Oct 2018

#### **Overview and Scope**

Your personal data privacy is important to us and Roofop Ventures Pte Ltd and Group of Companies (“RTV”) is highly committed in respecting and managing your Personal Data collected in line with this Policy.

This Personal Data Privacy Policy sets out the collection, use and disclosure of your Personal Data. "Personal Data" means any data or information, whether true or not, about an individual who can be identified either (a) from that data; or (b) from that data and other information to which RTV is likely to have access to. Personal Data excludes Business Contact Information which means an individual's name, position name or title, business telephone number, business address, business electronic mail address or business fax number and any other similar information about the individual, not provided by the individual solely for his personal purposes.

#### **When and what kind of Personal Data do we collect?**

RTV may collect, use and disclose the following data about you:

1. If you enter into any contract with RTV or purchase any products/services from RTV;
2. When you provide Personal Data by filling in online or offline forms when applying for RTV's services or feedback, asking queries, requests and submissions;
3. If and when you contact RTV, we may keep a record of that correspondence including emails, online chat logs, communications through social media and telephone calls, you may make to us;
4. Details of your visits to our website including, but not limited to, cookies, location data, IP addresses, weblogs and other communication data, traffic data, and the originating domain name of a user's internet service provider, that you access;
5. If and when you respond to any of RTV's marketing promotions, newsletters and other publicity materials;
6. When you fill up job application forms to apply for a job at RTV;

RTV may collect the following kinds of Personal Data through the different channels mentioned above:

1. Name;



2. Date of Birth;
3. Business and Residential mailing addresses;
4. Email addresses;
5. Telephone numbers (Business and Mobile);
6. Nationality;
7. Bank account details, if necessary;
8. Photos and CCTV/videos;

Additionally, if you are applying for employment with RTV, RTV will collect the following:

1. Marital Status;
2. NRIC/Passport numbers;
3. Gender;
4. Race;
5. Emergency contact/Next of Kin or family information;
6. Academic qualifications, educational and employment history and professional qualifications, including testimonials and references;
7. Medical, legal and financial history;
8. Photos; and
9. Curricula Vitae, if any.

#### **What purposes does RTV Collect, Use and Disclose Personal Data?**

RTV may use the information we collect from you for any of the following purposes:

1. To perform or carry out RTV's obligations arising from any contracts entered into between you and us (i.e. when you request or purchase a product or service offered by RTV);
2. To enable RTV's subcontractors, third-party agents and service providers, to fulfil obligations/services as stipulated in your contract with RTV;
3. To handle requests and enquiries (including processing of payments and refunds, etc.);
4. To administer and update customer/client records in RTV's databases; monitoring and maintaining copies of customer/client records;
5. To facilitate the delivery, maintenance and enhancement of RTV's services, programmes and events;
6. To improve RTV's customer service through your feedback;
7. For statistical analysis, customer profiling and analysis of customers' preferences;



8. To plan, monitor, and enhance the provision of new services, projects, programmes and events;
9. For communications, marketing and publicity purposes;
10. For government, audit and other regulatory purposes;
11. For recruitment and evaluation purposes if you apply for a job with RTV (i.e. to determine job suitability);
12. For security, surveillance and monitoring purposes;
13. To process your enquiries and any and all other ancillary administrative purposes;
14. For internal reporting and/or accounting purposes; and
15. Purposes incidental to each or all of the above.

We may also contact you by any means of communication for which you have given us contact details, including but not limited to via email, telephone numbers, and post, for the purpose of getting your feedback or for providing you with information which we believe could be of interest to you or your organisation.

By your submission of your Personal Data to us, you consent to the onward disclosure of your Personal Data to these agents or service providers (as set out in no.2 of *“What purposes does RTV collect, use and disclose personal data?”*) and the processing of your Personal data by these agents or service providers.

The countries in which these third parties are located will depend on the circumstances. In the ordinary course of business we commonly disclose Personal Data to parties located in Singapore. RTV may also disclose or transfer out of the country personal data as permitted or required by law. In the event any cross-border transfer or disclosure is required, we will take steps to ensure that the recipient organisation will take reasonable measures in the protection of your personal data.

#### **Consent for the collection and use of my Personal Data**

You consent to the collection, use and disclosure of your Personal Data for the above mentioned purposes and agree to be bound by the obligations it imposes on you, when you accept this Privacy Policy. You accept this Privacy Policy when you continue to browse on RTV’s website.

In this regard, please note that it is on your part to ensure that all personal data submitted to us is complete, accurate, true and correct at the time of submission. Failure on your part to do so may result in our inability to provide you with products and services you have requested.

Please note that if you do not consent to any of the above business purposes, RTV may also be unable to meet the purposes for which the information was collected.



### **Does RTV disclose Personal Data to third parties?**

RTV may disclose your Personal Data to any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in the Companies Act (Cap. 50).

On occasion, RTV may use third party agents and service providers to assist us in the use of your Personal Data as set out in no.2 of *"What purposes does RTV collect, use and disclose personal data?"* You consent to such use of your Personal Data by continuing to browse on RTV's website.

RTV will not transfer Personal Data within or outside Singapore unless it is ensured that the Personal Data will be accorded a level of protection which is comparable to the protection under the PDPA.

### **For how long does RTV retain my Personal Data?**

RTV will cease to retain Personal Data, as soon as it is reasonable to assume that the purpose for collection of such personal data is no longer being served by such retention, and such retention is no longer necessary for legal or business purposes.

### **Does RTV use cookies to collect and use Personal Data?**

When you visit any of RTV's websites, RTV may collect or analyse anonymized information from which individual information will not be identified. The information collected may include the number of users and the amount of time they stay on our website, which countries they are from, and what mode of device they are currently using to view our website, as well as domain information that helps us to learn our client's profile, the frequency of viewing. We use this information to improve our website's content and navigation.

Some parts of this website may use cookies, which enable us to track usage patterns, enforce security, and offer you a customized content. A cookie is a small text file that our server places on your computer hard drive as a unique identifier.

Note that our cookies do not have an expiration date and do not collect personally identifiable information.

You may disable the use of cookies by selecting the appropriate settings on your browser. This may however result in you being unable to experience the full functionality of the websites.

### **How does RTV protect your Personal Data?**

The Personal Data that we hold about you will be stored on our servers located in Singapore and on cloud servers, some of which may be located in Bulgaria (either directly or through our service providers). RTV implements a variety of security measures to maintain the safety of your submitted information. All electronic storage and transmission of personal data is secured and stored on managed servers with controlled access and appropriate security technologies.



Although every reasonable effort has been made to ensure that all personal data will be so protected, RTV cannot be responsible for any unauthorised use or misuse of such information and from risks which are inherent in all internet communications.

Your Personal Data will only be disclosed for the express purpose of delivering the product or service requested and shall not be sold or disclosed to any other company for any other reason whatsoever without your consent.

### **Links to third party websites from RTV' website**

Our websites may contain links to other external websites, such as our business partners. We are not responsible for the privacy policies and practices of these websites taken care of by third-parties. We strongly encourage you to check the privacy policy of each website that you visit. Some of these third-party websites may have our logo or trademark acknowledged on their website. However, these websites are not operated and maintained by us. Please contact the owner of the respective websites should you have any questions on their privacy policies.

### **Access and Correction of Personal Data**

Please contact us via [hello@rtventure.com](mailto:hello@rtventure.com) should you wish to have access to or seek to update, correct or withdraw the consent to collect and use your Personal Data. Your email should identify yourself and state which Personal Data and information about its use and/or disclosure is requested.

### **Further Information**

If you are concerned about the handling of your Personal Data, or if you have any complaints or queries related to your Personal Data or our Privacy Policy, please contact RTV's Data Protection Officer ("DPO") at [hello@rtventure.com](mailto:hello@rtventure.com).

RTV reserves the right to change this Policy with or without notice from time to time.