# **Privacy Policy**

#### How do we use the personal information?

We may use personal information for the following purposes:

#### 1. To verify your identity and establish and manage your account

As part of providing services, or information about our services, to you, we will need to verify your identity to set you up as a customer and we will need to use those details in order to effectively manage your account with us to ensure that you are getting the best possible service from us. This may include third parties carrying out credit or identity checks on our behalf. It is not only in our legitimate interest to do so but the use of your personal information in this way is necessary for us to know who you are as we have a legal obligation to comply with certain Know Your Customer regulatory obligations.

# 2. To provide you with products and services, or information about our products and services, and to review your ongoing needs

Once you open an account with us, or subscribe to an update or webinar, we will need to use your personal information to perform our services and comply with our obligations to you. It is also in our legitimate interests to ensure that we are providing the best products and services so we may periodically review your needs to ensure that you are getting the benefit of the best possible products and services from us.

#### 3. To form a profile about you

We may from time to time use personal information about you to form profiles about you so that we can understand you and provide the very best products and services we can. We may also make decisions about you through automated profiling or automated credit checks which may affect your ability to use our services. We may need to do this either to perform our legal obligations or because it is in our legitimate interest to use your personal information in such a way.

#### 4. To investigate or settle enquiries or disputes

We may need to use personal information collected from you to investigate issues and/or settle disputes with you as it is in our legitimate interests to ensure that issues and/or disputes get investigated and resolved as quickly and efficiently as possible.

# 5. To comply with applicable law, court order, other judicial process, or the requirements of any applicable regulatory authorities

We may need to use your personal information to comply with applicable law, court order or other judicial process, or the requirements of any applicable regulatory authority. We do this not only to comply with our legal obligations but because it may also be in our legitimate interest to do so.

## 6. To provide references about you

From time to time, third parties, such as credit agencies may approach us to provide a credit reference about you for credit and identity checks. It may be in our legitimate interest to comply with our legal obligations or we may be obliged to provide such a reference in order to comply with a legal obligation. However, if we are unsure, we will speak to you first before providing any reference.

#### 7. Data analysis

Our web pages and e-mails may contain web beacons or pixel tags or any other similar type of data analysis tools which allow us to track receipt of correspondence and to count the number of users that have visited our webpage or opened our correspondence. Where your personal information is completely anonymised, we do not require a legal basis as the information will no longer constitute personal information. However, where your personal information is not in an anonymised form, it is in our legitimate interest to continually evaluate that personal information to ensure that the products and services we provide are relevant to the market.

We use cookies for web analytics. Disabling cookies in your browser will not affect your user experience.

We may also partner with selected third-party vendors such as Google Analytics, Facebook Pixel, and others to allow tracking technologies and remarketing services on the Website through the use of first party cookies and third-party cookies, to, among other things, analyse and track users' use of the Website, determine the popularity of certain content and better understand online activity. By accessing the Website, you consent to the collection and use of your information by these third-party vendors. We do not transfer personal information to these third-party vendors.

You should be aware that getting a new computer, installing a new browser, upgrading an existing browser, or erasing or otherwise altering your browser's cookies files may also clear certain optout cookies, plug-ins, or settings.

#### 8. Marketing by us

We may use your personal information to send you marketing communications by email or phone or other agreed forms (including social media campaigns) to ensure that you are always kept up to date with our latest products and services. Where we send you marketing communications, we will either do so as it is in our legitimate interest or with your consent.

# 9. Internal business purposes and record keeping

We may need to process your personal information for internal business and research purposes

and record keeping purposes. Such processing is in our own legitimate interests and is required in order to comply with our legal obligations. This may include any communications that we have with you in relation to the services we provide to you and our relationship with you. We will also keep records to ensure that you comply with your obligations under any contract you have entered with us.

#### 10. Corporate restructuring

If we undergo a corporate restructure or part or all of our business is acquired by a third party, we may need to use your personal information in association with that restructure or acquisition. Such use may involve disclosing your details as part of a due diligence exercise. It is our legitimate interest to use your information in this way provided we comply with any legal obligation we have to you.

### 11. Security

If you enter any of our premises, we may record your image on our CCTV for security reasons. We may also take your details to keep a record of who has entered our premises on any given day. It is in our legitimate interest to do this to maintain a safe and secure working environment.

## 12. The personal information we hold about you

The information about any rights that might be available to you in relation to the personal information we hold about you is set out below.

#### 13. Access

If you ask us, we will confirm whether we are processing your personal information and, if so, provide you with a copy of that personal information (along with certain other details). If you require additional copies, we may need to charge a reasonable administration fee in accordance with applicable laws and regulations.

#### 14. Rectification

If the personal information we hold about you is inaccurate or incomplete, you are entitled to have it rectified. If we have shared your personal information with others, we will let them know about the rectification where possible. If you ask us, where possible and lawful to do so, we will also tell you who we have shared your personal information with so that you can contact them directly.

#### 15. Contact us

If you would like to receive information about the personal data we have in relation to you, to update such personal data or to withdraw any consent you have provided to us previously, please contact our Data Protection Officer by email at contact@thefirm.sg.