



**PAFA Financial Advisory Pte Ltd**

**Privacy Policy**

22 November 2023

# **PRIVACY POLICY**

## **Introduction**

At PAFA Financial Advisory Pte Ltd, we respect the privacy and confidentiality of the personal data of our customers, partners, associates, and others whom we interact with while providing our services. We are committed and have implemented policies, practices, and processes to safeguard the collection, use, disclosure, and storage of the personal data you provide us, in compliance with the Singapore Personal Data Protection Act (PDPA) 2012.

We have developed this Privacy Policy to assist you in understanding how we collect, use, disclose, process, protect and store / retain your personal data that is in our possession.

Personal data refers to any information that can uniquely identify an individual person:

- On its own or
- When combined with other information. Under the PDPA, business contact information (eg. business 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.

## **How We Collect Your Personal Data**

We generally collect your personal data through the following methods / channels:

- When you wish to know about our products or services.
- When you leave your contact details online via our social media such as Blog, Facebook, Twitter, etc.
- When you indicate you wish to have follow-up with an agent.
- When you sign up for a product or service.
- When you respond to a marketing call for a new product or service.
- When you send in your job application form.
- When you attend Webinars / Seminars via online platform where you need to register for attendance.

## **Types of Personal Data We Collect About You**

The types of personal data we collect about you may include:

- Personal Contact Information (Name, Address, Phone Number, Email Address).

- Personal Details (Name, Gender, Date of Birth, Country of Birth, Country of Residence, Citizenship, Race / Ethnicity).
- Family Background and Details.
- Education and Professional Qualifications.
- Employment Details & History.
- Criminal Background / Past Offences.
- Medical Details / Health Information.
- Photos & Video Footage.
- Academic History.
- Financial Information.

### **How We Use Your Personal Data**

We use the personal data we have collected for one or more of the following purposes:

- Provide updates on changes / notifications.
- Conduct credit checks, screenings or due diligence checks as may be required under applicable laws / regulations.
- Provide information to regulators / affiliates / partners / associates about your credit worthiness.
- Provide information to affiliates / partners / associates about your transaction.
- Process and administer insurance claims.
- Determine your financial status.
- Servicing of policies and accounts
- Underwrite policies.
- Provide financial and advisory services.
- Offer you other insurance and financial services products that may suit your needs.
- Seek professional advice, including legal advice.
- Monitor and maintain a copy of your record of academic achievement (including all information arising from investigations of misconduct)
- Process applications, registrations, or enquiries.

- Conduct surveys relating to products and services.
- For marketing, promotions, and customer relationship management.
- Conduct market research and analysis.
- Conduct needs analysis and requirements.
- Provide information on events, conferences, seminars, or workshops.
- Conduct telemarketing activities.
- Conduct joint marketing with other companies and service providers.
- Analyze sales and marketing data.
- Send latest product announcements, updates, and upcoming events.
- Notify you about products, services, or promotions.
- Notify you about enhancements to our services.
- Provide information about products and services.
- Benefits & compensation management
- Recruitment & Selection
- Payroll processing
- Personnel management
- Staff Appraisals
- Training & career development
- Processing & administration of employment records
- Comply with legal obligations and regulatory requirements.
- Manage and improve our business and operations to serve you better.
- Fulfil requests for products and services.
- Send information and updates.
- Verify your identity, and process orders and applications for services.
- Provide customer service and support.
- Investigate complaints, claims and disputes.
- Detect and protect against error, fraud, or other criminal activities.

- Internal purposes for accounting, auditing, and booking.
- Help improve products and services.
- Process payment for products and services.
- Update records in our database.
- Carry out our obligations arising from any contracts entered between you and us.
- Enforce obligations owed to us.
- Respond to inquiries and provide customer services.
- Process contract renewals and upgrades.
- Develop, enhance, market, and provide products and services.
- Enforce terms and conditions of use.
- Analyze risk and business results.
- Process and administer employment records.
- Develop new applications, products, and services.
- Provide information to subsidiaries or partners that perform services.
- Delivery of products and services
- Customer care and account management
- Billing and payment processing
- Analyze the use of our products, services, and sites.
- Obtain opinions and comments about products and services.
- Enhance customer experience.
- Respond to queries and feedback.
- Protect against or identify possible fraudulent transactions.
- Conduct risk assessment.
- Pass information about you to our representatives and associates to carry out services.
- Process applications and registration
- Account payables / receivables
- Sales commissions

- Claims & disbursements
- Income tax returns
- Improve site and service performance and delivery.
- Analyze website visits.
- Protect the security or integrity of our websites and our business.
- Manage website and social media platforms.
- Ensure content is presented in the most effective manner.

### **Who We Disclose Your Personal Data To?**

We may disclose some of the personal data we have collected to the following entities, organizations and third parties outside to fulfill our services to you:

- Banks and Finance Companies (Mortgage Referrals)
- Insurance Companies
- Investment Platforms
- Various Law Enforcement Agencies for Security, Customs, and Immigration Purposes
- Regulatory Authorities (eg. MAS, PDPC, IRAS, etc.)
- Delivery, Freight and Courier Services
- Email Vendors
- Other Contracted Service Providers
- Conference Organizers
- Payroll Processing Services
- Media and Other Publications
- Sales Associates
- Business Partners
- Financial Advisors
- External Parties (Recruiters, Auditors & Lawyers)
- Complainants
- Employees / Staff

- Next-of-Kin / Guardians
- Planning Research & Development Providers
- Information Technology Service Providers
- Legal Services
- IT Support for Web Sites
- Webhosting Companies
- Outsourcing Vendors / Agencies
- Third Party Vendors / Agencies

Where required to do so by law, we may disclose personal data about you to the relevant authorities or to law enforcement agencies.

## **How We Manage the Collection, Use and Disclosure of Your Personal Data**

### Obtain Consent

Before we collect, use, or disclose your personal data, we will notify you of the purpose on why we are doing so. We will obtain written confirmation from you on your expressed consent. We will not collect more personal data than is necessary for the stated purpose.

We will seek fresh consent from you if the original purpose for the collection, use or disclosure of your personal data has changed.

Under certain circumstances, we may assume deemed consent from you when you voluntarily provide your personal data for the stated purpose (eg. when you apply for a job with us using our job application forms).

We may rely on exceptions to the need for consent under the PDPA for the collection, use or disclosure of your personal data under the following circumstances:

- The personal data is publicly available.
- The personal data is disclosed by a public agency or disclosed to a public agency.
- The personal data is necessary for any investigation or proceedings.
- The personal data is necessary for evaluative purposes (eg. determining the suitability of a job applicant for the job applied for).
- The personal data is necessary for the purpose of managing or terminating an employment relationship.
- The personal data is necessary for a business asset transaction.

### Withdrawal of Consent

If you wish to withdraw consent, you should give us reasonable advance notice. We will advise you of the likely consequences of your withdrawal of consent (eg. without your personal contact information, we may not be able to inform you of future services offered by us).

Your request for withdrawal of consent can take the form of an email or letter to us.

### Use of Cookies

We use “cookies” to collect information about your online activity on our website. A cookie is a small text file created by the website that is stored in your computer to provide a way for the website to recognize you and keep track of your preferences.

The cookie makes it convenient for you such that you do not have to retype the same information again when you revisit the website or in filling electronic forms.

Most cookies we use are “session cookies”, which will be deleted automatically from the hard disk of your computer at the end of the session.

You may choose not to accept cookies by turning off this feature in your web browser. Note that by doing so, you may not be able to use some of the features and functions in our web applications.

### Third Party Consent

If you do a transaction with us on behalf of another individual that will require you to provide that individual’s personal data to us, you must ensure that this individual has given his / her expressed consent to provide his / her personal data to us through you. We will require you to get written confirmation from this individual that he / she has indeed given his / her expressed consent to you for us to collect, use or disclose his / her personal data.

### **How We Ensure the Accuracy of Your Personal Data**

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

From time to time, we may do a data verification exercise for you to update us on any changes to the personal data we hold about you. If we are in an ongoing relationship with you, it is important that you update us of any changes to your personal data (such as a change in your mailing address).

### **How We Protect Your Personal Data**

We have implemented appropriate information security and technical measures (such as data encryption, firewalls, and secure network protocols) to protect the personal data we hold about you against loss; misuse; destruction; unauthorised alteration / modification, access, disclosure; or similar risks.

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



When we engage third party data processors to process personal data on our behalf, we will ensure that they provide sufficient guarantees to us, and have implemented the necessary organisational and technical security measures and have taken reasonable steps to comply with these measures.

### **How We Retain Your Personal Data**

We have a documented retention policy that keeps track of the retention schedules of the personal data you provide us, in paper or electronic forms. We will not retain any of your personal data when it is no longer needed for any business or legal purposes.

We will dispose of or destroy such documents containing your personal data in a proper and secure manner when the retention limit is reached.

### **How You Can Access and Make Correction to Your Personal Data**

You may write to us to find out how we have been using or disclosing your personal data over the past 1 year. Before we accede to your request, we may need to verify your identity by checking your NRIC or other legal identification document.

We will respond to your request as soon as possible, or within 30 days from the date we receive your request. If we are unable to do so within the 30 days, we will let you know and give you an estimate of how much longer we require. We may also charge you a reasonable fee for the cost involved in processing your access request.

If you find that the personal data, we hold about you is inaccurate, incomplete, misleading, or not up to date you may ask us to correct the data. Where we are satisfied on reasonable grounds that a correction should be made, we will correct the data as soon as possible, or within 30 days from the date we receive your request.

### **Transfer of Personal Data**

Where there is a need to transfer your personal data to another country outside Singapore, we will ensure that the standard of the 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.

### **Ways to Contact Us**

If you have any query or feedback regarding this Policy, or any complaint you have relating to how we manage your personal data, you may contact our Data Protection Officer at:

Contact Number: +65 6028 9882 / +65 6028 9880

Email Address: [DPO@PAFAdvisory.com](mailto:DPO@PAFAdvisory.com)

Address: 51 Goldhill Plaza #16-05 Singapore 308900

Any query or complaint should include, at least, the following details:

- Your full name and contact information.
- Brief description of your query or complaint.
- What outcome you would like out of our investigations.

We treat such queries and feedback seriously and will deal with them confidentially and within reasonable time.

We will require all complainants to write in formally before any investigations can be carried out.

### **Changes and Updates**

Any changes or updates to this Policy take effect when they are posted on our website. Please do visit our website periodically.