

## **iShine Cloud Personal Data Protection and Privacy Policy**

iShine Cloud places great importance on the confidentiality, privacy and protection of personal data. This policy sets out the way we handle personal data provided to us.

### **1. What We Collect**

1.1 We collect and use personal data necessary to conduct our business with you. The types of data we collect may include, but is not limited to:

- a) Full name
- b) Identity document number e.g. NRIC, FIN, passport number
- c) Photographs or video images from which an individual can be clearly identified
- d) Mobile or residential telephone number
- e) Personal E-mail address
- f) Residential address
- g) Nationality
- h) Date of Birth
- i) Thumbprint or DNA profile
- j) Audio recording

### **2. When We Collect**

- 2.1 When you attend our corporate events or respond to our programmes, contests or survey.
- 2.2 When your image is captured by our photographers or videographers at our events.
- 2.3 When you apply for a job with us.
- 2.4 When you provide feedback or contact customer service officers.
- 2.5 When you use our products or services.

### **3. Purposes for Collection, Use and Disclosure of Your Personal Data**

- 3.1 iShine Cloud collects data only for the specified purpose(s). Where the data is used for communicating product-related information, we operate on opt-in basis, and within the scope of consent.
- 3.2 To send you information, promotions, updates and marketing and advertising material. We do not make cold calls or use any third-party contact lists for communicating product-related information.
- 3.3 To provide services to you.

- 3.4 To respond to your requests and queries.
- 3.5 To enforce our rules and regulations, contractual and legal rights and obligations.
- 3.6 To ensure security for our premises.
- 3.7 To facilitate the employment of staff member by iShine Cloud.
- 3.8 To comply with the law, any requests from law enforcement and regulatory officials, or orders of court.
- 3.9 To process payment transactions.
- 3.10 Conducting surveys, focus groups discussion and to obtain feedback
- 3.11 Towards any other purpose of use for which we have obtained your consent, express or implied.
- 3.12 We may disclose your personal data to third party service providers, agents and other organisations we have engaged to perform any of the aforementioned purposes for us.

#### **4. Protection of Your Personal Data**

- 4.1 All data is handled in accordance with data protection laws to ensure that your personal data is adequately protected and secured.
- 4.2 All iShine Cloud staff members are trained in the proper handling and protection of personal data.
- 4.3 All iShine Cloud vendors and suppliers are obligated to abide by our data privacy and protection policies.
- 4.4 iShine Cloud will not reveal details of your personal data to any other person unless we have your permission or is required under a legal obligation or any other duty to do so.
- 4.5 Access to your personal data is on a need-to-know basis.

#### **5. Accuracy of Your Personal Data**

- 5.1 We generally rely on personal data provided by you (or your authorised representative). In order to ensure that your personal data is current, complete and accurate, please update us if there are changes to your personal data by informing our Data Protection Officer in writing or via email at the contact details provided below.

#### **6. Retention of Your Personal Data**

- 6.1 iShine Cloud will retain such personal data in accordance with respective business needs and/or legal requirements.

- 6.2 iShine Cloud will securely dispose of or anonymise personal data which it can reasonably determine is no longer needed.

## **7. Withdrawal of Your Consent**

- 7.1 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. You may withdraw consent and request us to stop using and/or disclosing your personal data for any or all of the purposes listed above by submitting your request in writing or via email to our Data Protection Officer at the contact details provided below.
- 7.2 Upon receipt of your written request to withdraw your consent, we may require reasonable time (depending on the complexity of the request and its impact on our relationship with you) for your request to be processed and for us to notify you of the consequences of us acceding to the same, including any legal consequences which may affect your rights and liabilities to us. In general, we shall seek to process your request within ten (10) business days of receiving it.
- 7.3 Whilst we respect your decision to withdraw your consent, please note that depending on the nature and scope of your request, we may not be in a position to continue providing our goods or services to you and we shall, in such circumstances, notify you before completing the processing of your request. Should you decide to cancel your withdrawal of consent, please inform us in writing in the manner described in clause 7.1 above.
- 7.4 Please note that withdrawing consent does not affect our right to continue to collect, use and disclose personal data where such collection, use and disclose without consent is permitted or required under applicable laws.

## **8. Access To and Correction of Your Personal Data**

- 8.1 If you wish to make (a) an access request for access to a copy of the personal data which we hold about you or information about the ways in which we use or disclose your personal data, or (b) a correction request to correct or update any of your personal data which we hold about you, you may submit your request in writing or via email to our Data Protection Officer at the contact details provided below.
- 8.2 Please note that a reasonable fee may be charged for an access request. If so, we will inform you of the fee before processing your request.
- 8.3 We will respond to your request as soon as reasonably possible. Should we not be able to respond to your request within thirty (30) days after receiving your request, we will inform you in writing within thirty (30) days of the time by which we will be able to respond to your request. If we are unable to provide you with any personal data or to make a correction requested by you, we shall generally inform you of the reasons why we are unable to do so (except where we are not required to do so under the PDPA).

## **9. Transfer of Your Personal Data Out of Singapore**

- 9.1 iShine Cloud may transfer, store and/ or process your personal data by a party outside of Singapore.

- 9.2 We will ensure that the party receiving, storing and/ or processing your personal data outside of Singapore protects your personal data at a standard at least comparable to the protection under the Personal Data Protection Act (“PDPA”).
- 9.3 We will ensure that the party coming in contact with your personal data outside Singapore:
- a) Complies with the PDPA, all applicable laws and regulations; and
  - b) Takes appropriate measures to ensure such compliance by implementing the necessary data protection.

## **10. Collection, Use or Disclosure of Your NRIC Numbers (or Copies of NRIC) and Retention of Your Physical NRIC**

- 10.1 iShine Cloud is generally not allowed to collect, use or disclose NRIC numbers (or copies of NRIC). We may do so only in the following specified circumstances:
- a) We may collect, use or disclose your NRIC number (or copy of NRIC) without your consent if it is required under the law; and
  - b) Where we find it necessary to accurately establish or verify the identity of you to a high degree of fidelity, we may collect, use or disclose your NRIC number with notification and consent.
- 10.2 The treatment for NRIC numbers also applies to Birth Certificate numbers, Foreign Identification Numbers (“FIN”), Work Permit numbers and passport numbers.
- 10.3 iShine Cloud should generally not retain your physical NRIC unless the retention of the physical NRIC is required under the law. The treatment for retention of physical NRIC applies to other identification documents containing the NRIC numbers or other national identification numbers (e.g. driver’s license, passport and work pass).

## **11. Data Protection Officer**

- 11.1 You may contact our Data Protection Officer if you have any enquiries or feedback on our personal data protection policies and procedures, or if you wish to make any request, in the following manner:
- a) Written mail: iShine Cloud Limited, 210 Middle Road, #01-01 Singapore 188994
  - b) Email: [jscdpo@ishinecloud.sg](mailto:jscdpo@ishinecloud.sg)

## **12. Update**

- 12.1 iShine Cloud reserves the right to amend this Personal Data Protection and Privacy Policy at any time by posting such changes on our Corporate Website.

(Updated as at 1 Nov 2021)