

We at LES Singapore take our responsibilities under the Personal Data Protection Act 2012 (the “PDPA”) seriously. We also recognize the importance of the personal data you have entrusted to us and believe that it is our responsibility to properly manage, protect and process your personal data.

This Data Protection Policy is designed to assist you in understanding how we collect, use and/or disclose the personal data you have provided to us, as well as to assist you in making an informed decision before providing us with any of your personal data.

If you, at any time, have any queries on this policy or any other queries in relation to how we may manage, protect and/or process your personal data, please do not hesitate to contact our Data Protection Officer at “dataprotection@les-singapore.com”

1 INTRODUCTION TO THE PDPA

- 1.1 The term “personal data” means data, whether true or not, about an individual who can be identified from that data, or from that data and other information to which an organization has or is likely to have access. Common examples of personal data could include names, identification numbers, contact information, medical records, photographs and video images.
- 1.2 We will collect your personal data in accordance with the PDPA. In general, before we collect any personal data from you, we will notify you of the purposes for which your personal data may be collected, used and/or disclosed, as well as obtain your consent for the collection, use and/or disclosure of your personal data for the intended purposes.

2 PURPOSES FOR COLLECTION, USE & DISCLOSURE OF PERSONAL DATA

- 2.1 The personal data which we collect from you may be collected, used and/or disclosed for the following purposes :
 - (a) facilitating, processing, dealing with, administering, managing and/or maintaining your membership with us;
 - (b) communicating with you in respect of enquiries and/or sending information or materials relating to activities, events or news;
 - (c) dealing in any matters relating to the registration for activities or events, conduct of internal business and research purposes, to enhance and develop our websites, or any other activity carried out or organized by LES Singapore or Licensing Executives Society International;
 - (d) storing, hosting, backing up (whether for disaster recovery or otherwise) of your personal data, whether within or outside Singapore;
 - (e) complying with applicable law in administering and managing your relationship with LES Singapore

(collectively, the “Purposes”).

As the purposes for which we may/will collect, use, disclose or process your personal data depend on the circumstances at hand, such purpose may not appear above. However, we will notify you of such other purpose at the time of obtaining your consent, unless processing of your personal data without your consent is permitted by the PDPA or by law.

- 2.2 In order to conduct our business operations more smoothly, we may also disclose the personal data you have provided to us to our third party service providers, agents and/or our affiliates or related corporations, which may be sited outside of Singapore, for one or more of the above-stated Purposes. This is because such third party service providers, agents and/or affiliates or related corporations would be processing your personal data on our behalf for one or more of the above-stated Purposes.

3 SPECIFIC ISSUES FOR THE DISCLOSURE OF PERSONAL DATA TO THIRD PARTIES

- 3.1 We may disclose and transfer your personal data to our umbrella organization, the Licensing Executives Society International for the purpose of your registering, administering and maintaining your membership and/or facilitating your registration at international or other LES events.

- 3.2 Please note that we may disclose your personal data to third parties without first obtaining your consent in certain situations, including, without limitation, the following :

- (a) cases in which the disclosure is required based on the applicable laws and/or regulations;
- (b) cases in which the purpose of such disclosure is clearly in your interests, and if consent cannot be obtained in a timely way;
- (c) cases in which the disclosure is necessary to respond to an emergency that threatens the life, health or safety of yourself or another individual;
- (d) cases in which there are reasonable grounds to believe that the health or safety of yourself or another individual will be seriously affected and consent for the disclosure of the data cannot be obtained in a timely way, provided that we shall, as soon as may be practicable, notify you of the disclosure and the purposes of the disclosure;
- (e) cases in which the disclosure is necessary for any investigation or proceedings;
- (f) cases in which the personal data is disclosed to any officer of a prescribed law enforcement agency, upon production of written authorisation signed by the head or director of that law enforcement agency or a person of a similar rank, certifying that the personal data is necessary for the purposes of the functions or duties of the officer; and/or
- (g) cases in which the disclosure is to a public agency and such disclosure is necessary in the public interest.

3.3 The instances listed above at paragraph 3.2 are not intended to be exhaustive. For an exhaustive list of exceptions, you are encouraged to peruse the First and Second Schedules of the PDPA which is publicly available at <http://statutes.agc.gov.sg>.

4 REQUEST FOR ACCESS AND/OR CORRECTION OF PERSONAL DATA

4.1 You may request to access and/or correct the personal data currently in our possession at any time by submitting your request by email to dataprotection@les-singapore.com.

4.2 For a request to access personal data, we will provide you with the relevant personal data within a reasonable time from such a request being made.

4.3 For a request to correct personal data, we will undertake the following :

(a) we will correct your personal data as soon as practicable after the request has been made; and

(b) subject to paragraph 4.4, we will send the corrected personal data to every other organisation to which the personal data was disclosed by us within a year before the date the correction was made, unless that other organisation does not need the corrected personal data for any legal or business purpose.

4.4 Notwithstanding paragraph 4.3(b), we may, if you so consent, send the corrected personal data only to specific organisations to which the personal data was disclosed by us within a year before the date the correction was made.

4.5 Depending on the nature of the work required to process your access request, we may be required to charge you a reasonable fee for the handling and processing of your requests to access your personal data to recover administrative costs. Our Data Protection Officer will determine whether such a fee should be imposed on a case-by-case basis. Where such a fee is to be imposed, we shall provide you with a written estimate of the fee for your consideration. We shall only begin processing your access request upon receiving your agreement to the payment of the fee.

5 REQUEST TO WITHDRAW CONSENT

5.1 You may withdraw your consent for the collection, use and/or disclosure of your personal data in our possession or under our control at any time by submitting your request by email to dataprotection@les-singapore.com.

5.2 We will process your request within a reasonable time from such a request for withdrawal of consent being made and will advise you of the consequences of your withdrawal at the time. Thereafter, we will thereafter refrain from collecting, using and/or disclosing your personal data in the manner stated in your request.

6 ADMINISTRATION AND MANAGEMENT OF PERSONAL DATA

- 6.1 In order to keep your personal data current, complete and updated, please update us if there are any changes to your personal data.
- 6.2 We will take commercially reasonable efforts to take appropriate precautions and preventive measures to ensure that your personal data is adequately protected and secured. However, we cannot assume responsibility for any unauthorized use of your personal data by third parties which are attributable to factors beyond our control.
- 6.3 We will also take commercially reasonable efforts to ensure that the personal data in our possession or under our control is destroyed and/or anonymized as soon as it is reasonable to assume that (i) the purpose for which that personal data was collected is no longer being served by the retention of such personal data; and (ii) retention is no longer necessary for any other legal or business purposes.

7 UPDATES ON DATA PROTECTION POLICY

- 7.1 As part of our efforts to ensure that we properly manage, protect and process your personal data, we will be reviewing our policies, procedures and processes from time to time.
- 7.2 We reserve the right to amend the terms of this Data Protection Policy at our absolute discretion. Any amended Data Protection Policy will be posted on our website and can be viewed at www.les-singapore.com.
- 7.3 You are encouraged to visit the above website from time to time to ensure that you are well informed of our latest policies in relation to personal data protection.

Last Updated on [12 July 2021]