

PRIVACY NOTICE (EXTERNAL)

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FORENSIGHTS PTE. LTD. — PRIVACY NOTICE

Who We Are

ForenSights Pte. Ltd. ("ForenSights", "we", "us", "our") is a Singapore-incorporated company providing behavioural risk intelligence, cyber psychology, and AI-enabled risk assessment services. Our registered address is 450 Alexandra Road, #11-01G, UE BizHub West, Singapore 119960. We are committed to protecting your personal data in accordance with the Singapore Personal Data Protection Act 2012 ("PDPA") and its subsequent amendments.

For data protection matters, contact our Data Protection Officer (DPO):

- Name: Whistine Chai
- Email: dpo@forensights.com
- Address: 450 Alexandra Road, #11-01G, UE BizHub West, Singapore 119960

1. Personal Data We Collect

We collect personal data only for legitimate, specified purposes.

From individual service recipients and research participants:

- **Identity data:** full name, NRIC/passport number (only if strictly required), date of birth
- **Contact data:** email address, telephone number, mailing address
- **Professional data:** job title, employer, industry, professional credentials
- **Behavioural and psychological data:** assessment responses, cognitive and behavioural profiling outputs, risk indicator data
- **Technical data:** IP address, browser type, device identifiers, usage logs
- **Communications data:** records of correspondence with us

From corporate clients and their representatives:

- **Business contact information** of authorised representatives
- **Organisational data** provided under service agreements
- **Data relating to employees or personnel** submitted by clients under a Data Processing Agreement

NOTE: ForenSights processes behavioural and psychological assessment data, which may be sensitive in nature. We apply heightened protection standards to such data and collect it only with explicit, informed consent or under a lawful contractual basis with appropriate safeguards.

2. How We Collect Personal Data

We collect personal data through the following channels:

- Direct submission via our website, assessment platforms, or intake forms
- Service agreements and contractual engagements
- Communications with us by email, telephone, or in person
- Automated technical means (e.g., cookies, platform analytics)
- Third parties where authorised by clients or by law (e.g., client organisations submitting data under a DPA)

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3. Purposes for Which We Use Your Personal Data

We process personal data only for purposes that have been notified to you or for which you have provided consent.

Purpose	Legal Basis
Delivering contracted services and assessments	Contract performance
Communicating with clients and prospects	Legitimate interest / Consent
Conducting behavioural and cyber risk assessments	Consent / Contract performance
Research and product development (anonymised or consented)	Consent
Invoicing and financial administration	Legal obligation / Contract
Complying with legal and regulatory obligations	Legal obligation

Purpose	Legal Basis
Improving our services and platform	Legitimate interest
Marketing and service updates (opt-in only)	Consent

4. Disclosure of Personal Data

We do not sell your personal data. We may disclose personal data to:

- Service providers and subprocessors engaged to support our operations, bound by contractual data protection obligations
- Professional advisors (legal, financial, insurance) under confidentiality obligations
- Regulatory bodies and law enforcement where required by law or court order
- Client organisations where data is processed on their behalf under a Data Processing Agreement
- Successor entities in the event of a merger, acquisition, or business transfer, subject to equivalent protections

5. Transfer of Personal Data Outside Singapore

Where we transfer personal data to recipients outside Singapore, we ensure that adequate protections are in place, including:

- Contractual clauses equivalent to Singapore's PDPA transfer obligation standards
- Verification that the receiving jurisdiction provides comparable protection, or
- Your explicit consent to the transfer

Our primary cloud infrastructure is hosted on GoDaddy servers (<https://forensights.com/>). Where data is processed outside Singapore, details are available upon request.

Where your data is processed exclusively within Singapore, no overseas transfer occurs and this section does not apply to your engagement.

6. Retention of Personal Data

We retain personal data only for as long as necessary to fulfil the purposes for which it was collected, or as required by law or contract.

Data Category	Retention Period
Assessment and psychological data	3 years from completion of assessment engagement, unless a longer period is required by contract or applicable law

Data Category	Retention Period
Client contact and contractual data	7 years from contract end (tax and legal compliance)
Marketing and communications data	Until withdrawal of consent, or 2 years from date of last meaningful contact. Data removed within 10 business days of consent withdrawal
Website analytics logs	12 months rolling
Security and access logs	24 months rolling
Research data (anonymised)	Indefinitely, subject to periodic anonymisation standard review
Job applicant data (unsuccessful candidates)	12 months from date of application, then securely destroyed
Job applicant data (successful candidates)	Transfers to employee records; governed by employment contract

Following the retention period, data is securely destroyed or irreversibly anonymised.

7. Protection of Personal Data

We implement technical and organisational measures proportionate to the sensitivity and volume of data we process, including:

- Encryption of data in transit and at rest
- Multi-factor authentication on all systems
- Access controls on a need-to-know basis
- Periodic security assessments commensurate with our operational scale
- Data protection awareness among all personnel handling personal data

8. Your Rights Under the PDPA

Right	Description
Access	Request a copy of personal data we hold about you
Correction	Request correction of inaccurate or incomplete data
Withdrawal of Consent	Withdraw consent at any time, subject to legal or contractual consequences

Right	Description
Data Portability	For data portability requests, we will provide your data in a commonly used, machine-readable format (e.g., CSV or PDF) within 30 days

To exercise any of these rights, submit a written request to dpo@forensights.com. We will respond within 30 days. Where a request is complex, we may extend this period by a further 30 days with prior notice.

9. Updates to This Notice

We may update this Privacy Notice periodically. Material changes will be communicated via email or prominent notice on our website.

10. Complaints

If you are dissatisfied with how we have handled your personal data, you may lodge a complaint with the Personal Data Protection Commission (PDPC):

Website: www.pdpc.gov.sg

Email: pdpc_complaints@pdpc.gov.sg

We encourage you to contact us first at dpo@forensights.com so we may resolve your concern directly.