

FORENSIGHTS PTE. LTD.

PRIVACY NOTICE

Version 1.1 | Effective Date: 7 July 2026 | Last Reviewed: 7 July 2026

Reference: Personal Data Protection Act 2012 (as amended 2021)

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

We aim to respond to all data protection enquiries within 30 days.

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, date of birth, and NRIC, passport, or other national identification number, collected only where required by law or where necessary to accurately establish or verify an individual's identity
- **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, and 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

What we mean by "behavioural and psychological assessment data": this may include questionnaire and psychometric responses; behavioural indicators derived from platform
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interactions; decision-making and risk-tolerance preferences; cognitive and personality tendencies relevant to risk assessment; cybersecurity-related behavioural patterns (e.g., scam susceptibility indicators); and organisational-level risk indicators derived from aggregated individual data. We apply heightened protection standards to this 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)

Our website uses essential, analytics, preference, and (where applicable) third-party cookies. You can manage cookie preferences through your browser settings. Full details are set out in our Cookie Policy at forensights.com/cookies.

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

Marketing versus service communications: if you opt out of marketing communications, you will continue to receive service-related communications — such as invoices, security notices, and contractual updates — that are necessary for the performance of our services and are not dependent on marketing consent.

3A. Research, Anonymisation, and Participant Rights

Where personal data is used for research, product improvement, or statistical analysis — including validation of our psychometric instruments such as the Individual Susceptibility Scale (ISS) and Organisation Susceptibility Scale (OSS) — we will, where reasonably practicable, anonymise or aggregate the data so that individuals cannot reasonably be re-identified. Where research involves identifiable participants, we additionally:

- seek voluntary, informed participation;
- permit withdrawal of data prior to anonymisation;
- obtain ethics review where applicable to the research context; and
- publish findings only in aggregated or de-identified form.

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. Automated Processing and AI-Assisted Decision-Making

ForenSights uses artificial intelligence, machine learning, and statistical models.

These models function as decision-support tools. Outputs are reviewed by qualified personnel before being relied upon in any assessment, report, or recommendation that carries material consequences for an individual or organisation. We do not make any solely automated decision that produces legal or similarly significant effects on an individual without appropriate human oversight.

Our psychometric instruments undergo structured validation (including reliability and validity testing) prior to operational use, and model performance is subject to periodic review.

6. Transfer of Personal Data Outside Singapore

Personal data may be processed using reputable cloud service providers located within or 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.

Details of our current processors and hosting arrangements 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.

7. 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
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.

8. Protection of Personal Data

We maintain administrative, technical, and physical safeguards appropriate to the sensitivity and volume of personal data we process. These safeguards include:

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

As ForenSights grows, these measures are reviewed and strengthened in line with our expanding data processing activities.

9. 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
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.

10. Accessibility

This Privacy Notice is available in an alternative format upon request. Please contact dpo@forensights.com.

11. Children and Minors

Our services are intended for adults. Where personal data relating to a minor is collected — for example, in the context of youth-focused presentations, research, or educational engagements — we will obtain consent from a parent, guardian, or authorised representative where required by applicable law.

12. Updates to This Notice

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

13. 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.