

DATA PROTECTION NOTICE

This Data Protection Notice ("**Notice**") sets out the basis which **BESONDER CONSULTING PTE LTD** ("**we**", "**us**", or "**our**") may collect, use, disclose or otherwise process personal data of our customers in accordance with the Personal Data Protection Act ("**PDPA**"). This Notice applies to personal data in our possession or under our control, including personal data in the possession of organisations which we have engaged to collect, use, disclose or process personal data for our purposes.

PERSONAL DATA

1. As used in this Notice:

"**individual**" means one who (a) has contacted us through any means to find out more about any goods or services we provide, or (b) may, or has, entered into a contract with us for the supply of any goods or services by us; or (c) has entered into a contract of service with us; and

"**Personal Data**" means data, whether true or not, about an individual who can be identified: (a) from that data; or (b) from that data and other information to which we have or are likely to have access, including data in our records as may be updated from time to time.

2. Depending on the nature of your interaction with us, some examples of personal data which we may collect from you include name, residential address, email address, telephone number, employment information and any other information relating to any individuals which you have provided to us in any forms which you may have submitted to us.
3. Other terms used in this Notice shall have the meanings given to them in the PDPA (where the context so permits).

COLLECTION, USE AND DISCLOSURE OF PERSONAL DATA

4. We generally collect Personal Data in the following ways:
 - (a) when you submit a registration/application form, or other forms relating to any of our events, courses, activities and services;
 - (b) when you enter into any service agreement in respect of your interactions with us;
 - (c) when you contact our admin staff via telephone calls, emails, face-to-face meetings, social media platforms, etc;
 - (d) when you interact with us via our activities or use services on our website;
 - (e) when you request that we contact you or request that you be included in an email, whatsapp or other mailing list, etc;
 - (f) when you respond to our promotions, activities or to any request for additional Personal Data;
 - (g) when your images are captured by us via photographs or videos taken by us or our representatives when you attend our events or programmes;
 - (h) when you fill up surveys after attending our events or programmes or any such survey administered by us;
 - (i) when you submit your Personal Data to us for any other reason.

We do not automatically collect Personal Data at our websites unless you voluntarily provide such information for your interest in any of our events or programmes. When you browse our websites, you generally do so anonymously. However, please refer to the **Clause 7** on “Use of Cookies”

You should ensure that all Personal Data submitted to us is complete, accurate, true and correct. Failure on your part to do so may result in our inability to provide you with the products and services you have requested.

5. We may collect and use your personal data for any or all of the following purposes:
 - (a) performing obligations in the course of or in connection with our provision of the goods and/or services requested by you;
 - (b) verifying your identity for our workshops, events and programmes;
 - (c) responding to, handling, and processing queries, requests, applications, complaints, and feedback from you;
 - (d) managing your relationship with us;
 - (e) managing our administrative and business operations and complying with internal control policies and procedures;
 - (f) complying with any applicable laws, regulations, codes of practice, guidelines, or rules, or to assist in law enforcement and investigations conducted by any governmental and/or regulatory authority;
 - (g) any other purposes for which you have provided the information;
 - (h) transmitting to any unaffiliated third parties including our third-party service providers and agents, and relevant governmental and/or regulatory authorities, whether in Singapore or abroad, for the aforementioned purposes;
 - (i) taking photographs and/or videos of you for our internal dissemination and for our publicity material on our events and programmes; and
 - (j) any other incidental business purposes related to or in connection with the above.
6. We will take reasonable steps to protect your Personal Data against unauthorized disclosure. Subject to the provisions of any applicable law, we may disclose your personal data:
 - (a) where such disclosure is required for performing obligations in the course of or in connection with our provision of services requested by you;
 - (b) to contractors, agents, third party service providers, and other organisations we have engaged to perform any of our operational services, such as telecommunications, information technology, billing, technical services, training, or any other services provided to us;
 - (c) to contractors, agents, third party service providers (including but not limited to external facilitators) who provide services in connection with our workshops, programmes and events;
 - (d) our partners or collaborators in our events and programmes (including but not limited to Academy of Executive Coaching Limited);
 - (e) external banks, credit card companies and their respective service providers;
 - (f) our professional advisers such as consultants, auditors and lawyers;
 - (g) relevant government ministries, regulators, statutory boards or authorities or law enforcement agencies to comply with any laws, rules, guidelines and regulations; and
 - (h) any other party whom you authorize us to disclose your Personal Data to.

USE OF COOKIES

7. Cookies are small pieces of information that is placed on your computer when you visit certain websites. Cookies will only start to perform their functions after such permission is granted. We use cookies and similar tracking technologies to track the activity on our website. Cookies do not grant us access to your computer or any information about you outside of your browsing activity on our website nor does it capture any data which allows us to identify you individually. Overall, the data collected by the cookies is used for the purpose of improving your browsing experience on our website.

All web-browsers offer the option to reject any cookie, and if you reject our cookie then we do not gather any information on that visit.

Permission for cookies is granted by default in most web browsers. You can however choose to disable this function by changing the setting on your web browser. This may prevent you from entering certain part(s) of our websites.

THIRD PARTY LINKS

8. Our website may contain links to other third-party websites. These third-party websites have separate and independent Privacy Policy or Data Protection Notice. We are not responsible for the privacy policies of such other websites and we have no responsibility or liability for the content and activities of these linked websites. This Data Protection Notice solely applies to Personal Data collected by our website.

This Data Protection Notice does not address, and we are not responsible for, the privacy policy, information or other practices of any third parties. Any inclusion of any third-party links on our website does not give rise to any implied endorsement of the linked websites or services by us.

Please take note that we are not responsible for the collection, usage and disclosure policies and practices (including the information security practices) of other organizations that have a link on our website.

RELIANCE ON THE LEGITIMATE INTERESTS EXCEPTION

9. In compliance with the PDPA, we may collect, use or disclose your personal data without your consent for the legitimate interests of *BESONDER CONSULTING PTE LTD* or another person. In relying on the legitimate interest exception of the PDPA, *BESONDER CONSULTING PTE LTD* will assess the likely adverse effects on the individual and determine that the legitimate interests outweigh any adverse effect.
10. In line with the legitimate interests' exception, we will collect, use or disclose your personal data for the following purposes:
 - a. Fraud detection and prevention;
 - b. Detection and prevention of misuse of services;
 - c. Network analysis to prevent fraud and financial crime, and perform credit analysis; and
 - d. Collection and use of personal data on company-issued devices to prevent data loss.

The purposes listed in the above clause may continue to apply even in situations where your relationship with us (for example, pursuant to a contract) has been terminated or altered in any way, for a reasonable period thereafter.

WITHDRAWING YOUR CONSENT

11. 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 collecting, 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.
12. 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.
13. 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 the 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 11**.
14. 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.

ACCESS TO AND CORRECTION OF PERSONAL DATA

15. 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.
16. 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.
17. We will respond to your request as soon as reasonably possible. In general, our response will be within ten (10) business days. 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).

PROTECTION OF PERSONAL DATA

18. We will take reasonable efforts to protect your personal data in our possession with appropriate technical, physical, legal and organizational measures. While the transference of electronic data over the internet has inherent risks, we will use reasonable precautions to ensure your personal data is not subject to unnecessary risks. You should be aware of the risks associated with using websites, applications, and digital services.

19. You should be aware, however, that no method of transmission over the Internet or method of electronic storage is completely secure. While security cannot be guaranteed, we strive to protect the security of your information and are constantly reviewing and enhancing our information security measures.

ACCURACY OF PERSONAL DATA

20. We generally rely on personal data provided by you (or your authorised representative). 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.

RETENTION OF PERSONAL DATA

21. We may retain your personal data for as long as it is necessary to fulfil the purpose for which it was collected, or as required or permitted by applicable laws.
22. We will cease to retain your personal data, or remove the means by which the data can be associated with you, as soon as it is reasonable to assume that such retention no longer serves the purpose for which the personal data was collected, and is no longer necessary for legal or business purposes.

TRANSFERS OF PERSONAL DATA OUTSIDE OF SINGAPORE

23. We generally do not transfer your personal data to countries outside of Singapore. However, if we do so, we will obtain your consent for the transfer to be made and we will take steps to ensure that your personal data continues to receive a standard of protection that is at least comparable to that provided under the PDPA.

CONTACT US

24. If you have any enquiries or feedback on our personal data protection policies and procedures, or if you wish to make any request, please contact our Data Protection Officer at finance@besonder.com.

EFFECT OF NOTICE AND CHANGES TO NOTICE

25. This Notice applies in conjunction with any other notices, contractual clauses and consent clauses that apply in relation to the collection, use and disclosure of your personal data by us.
26. We may revise this Notice from time to time without any prior notice. You may determine if any such revision has taken place by referring to the date on which this Notice was last updated. Your continued use of our services constitutes your acknowledgement and acceptance of such changes.

Last updated : 8 December 2024