

## **Trio-Tech International Pte Ltd**

### **Privacy Notice**

*Last modified: September-2021*

Trio-Tech International Pte Ltd and its affiliates/subsidiaries (“**TTI**” or as appropriate in the context, “**us**”, “**we**” or “**our**”) are committed to safeguarding the privacy of your Personal Data (defined below). This Data Protection Notice (“**Notice**”) sets out the purposes and the basis of how we may collect, use, disclose or otherwise process your Personal Data in accordance with the Singapore Personal Data Protection Act 2012 (“**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. By interacting with or transacting with us (whether through a form, an interview, our website, or otherwise), you signify that you have read, understood and you consented to our collection, use, disclosure, retention, transfer, and processing of your Personal Data in the manner outlined in this Notice.

#### **1. Personal Data that We Collect**

“Personal Data” refers to any data and/or information about you, whether true or not, from which you can be identified, whether (a) from that data; or (b) from that data and other information to which we may have legitimate access to. Depending on the nature of your interaction with us, the Personal Data that we may collect includes but are not limited to:

- Personal identification information, including name, gender, date of birth, marital status, nationality, photographs, videos, voice recordings, closed-circuit television footages;
- Contact information, including postal address, email address, mobile numbers, fixed desk line numbers;
- Financial information, including credit card numbers, debit card numbers, bank account information.
- Other terms used in this Notice shall have the meanings given to them in the PDPA (where the context so permits).

#### **2. CONSENT**

2.1 As a general rule, we will seek your consent before collecting, using, or disclosing your Personal Data. That being said, this is subject to applicable exemptions under the PDPA or other applicable law.

2.2 By voluntarily providing any Personal Data to us, you are also deemed (to the fullest extent permitted by law) to have consented to the collection, use, and/or disclosure of such Personal Data by us for any reasonable purpose or for which you have been notified (which includes any purposes set for in paragraph 3 below), until and unless you notify us otherwise.

2.3 You may have provided your Personal Data to us personally, or authorised other individuals to provide your Personal Data to us (“**authorised representative**”) and consent (on your behalf) to our collection of your Personal Data from these individuals. Where you have given Personal Data about other individuals, you confirm that you are authorised to disclose and consent, on their behalf, to the processing of such Personal Data for the purposes described in paragraph 3 below, or other purposes for which your consent has been sought and obtained.

### **3. PURPOSES FOR COLLECTION, USE, DISCLOSURE AND PROCESSING OF PERSONAL DATA**

3.1 Generally, we do not collect your Personal Data unless:

- (a) it is provided to us voluntarily by you directly or your authorised representative after (i) you (or your authorised representative) have been notified of the purposes for which the data is collected, and (ii) you (or your authorized representative) have provided consent to the collection and usage of your personal for those purposes, or
- (b) collection and use of personal data without consent is permitted or required by the PDPA or other laws. We shall seek your consent before collecting any additional personal data and before using your Personal Data for a purpose that has not been notified to you (except where permitted or authorised by the PDPA or applicable law).

3.2 We may collect and use your Personal Data as may be reasonable or appropriate for any or all 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 and to communicate with you as part of providing such goods and/or services;
- (b) To evaluate and to improve the goods and/or services of TTI;
- (c) Verifying your identity for security clearance/entry access into the premises of TTI;
- (d) Responding to, handling, and processing queries, requests, applications, complaints, and feedback from you;
- (e) Managing your relationship with us;
- (f) Processing payment or credit transactions;
- (g) Sending your marketing information about our goods or services including notifying you of our marketing events, initiatives and promotions, lucky draws, membership and rewards schemes, and other promotions;
- (h) To evaluate applications for employment within TTI and/or employment relationship;
- (i) 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;

- (j) Any other purposes for which you have provided the information;
- (k) 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; and
- (l) Any other incidental business purposes related to or in connection with the above.

#### **4. DISCLOSURE AND TRANSFER OF PERSONAL DATA**

4.1 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 the goods or services requested by you; or
- (b) To third-party service providers, agents, and other organizations (whether located within or outside of Singapore) we engaged to perform any of the purposes listed in paragraph 3 above.

In this regard, you hereby acknowledge, agree, and consent that we are permitted to disclose your Personal Data to such third-parties (whether located within or outside of Singapore) for one or more of the purposes listed in paragraph 3, and for the said third parties to subsequently collect, use, disclose and/or process your Personal Data for one or more purposes listed in paragraph 3.

4.2 The purposes listed in the above clauses 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 (including, where applicable, a period to enable us to enforce our rights under any contract with you).

4.3 Before transferring your Personal Data outside of Singapore, we will take appropriate steps to ascertain whether, and to ensure that, the recipient is bound by legally enforceable obligations to provide to the Personal Data a standard of protection that is at least comparable to the protection under the PDPA.

#### **5. WITHDRAWING YOUR CONSENT**

5.1 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 reasonable notice of the withdrawal to us in writing via email to our Data Protection Officer at the contact details provided below (“**Withdrawal Notice**”).

- 5.2 Upon receipt of your Withdrawal Notice, 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, as far as possible, of the likely consequences of us acceding to the same. In general, we shall seek to process your request within ten (10) business days of receiving it.
- 5.3 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 wish to persist with the withdrawal of your consent after having been notified of the likely consequences thereof, please inform us in writing in the manner described in paragraph 5.1 above.
- 5.4 Please note that withdrawing consent does not affect our right to continue to collect, use and disclose personal data where such collection, use, and disclosure without consent is permitted or required under the PDPA or other applicable laws.

## **6. ACCESS TO AND CORRECTION OF PERSONAL DATA**

- 6.1 If you wish to make an access request for access to a copy of the Personal Data which we store about you or information about the ways in which we use or disclose your Personal Data, or 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.
- 6.2 We will endeavour to respond to your request as soon as reasonably possible from the time when the request is made. 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 PDPA).
- 6.3 Please note that TTI may charge a reasonable fee for the handling and processing of your requests to access and/or correct your Personal Data, and you will be notified in advance of such costs.
- 6.4 For the avoidance of doubt, TTI reserves the right not to provide you with access to any Personal Data or information in respect of matters specified in the Fifth Schedule to the PDPA.

## **7. PROTECTION OF PERSONAL DATA**

- 7.1 To safeguard your Personal Data from unauthorized access, collection, use, disclosure, copying, modification, disposal, or similar risks, we will maintain appropriate administrative, physical, and technical measures such as up-to-date antivirus protection, encryption, and the use of privacy filters to secure all storage and transmission of Personal Data to us, and when disclosing Personal Data both internally and to authorised third-party service providers and agents only on a need-to-know basis.

7.2 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.

## **8. ACCURACY OF PERSONAL DATA**

We rely on Personal Data provided by you (or your authorized 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 via a request in writing or via email at the contact details provided below.

## **9. RETENTION OF PERSONAL DATA**

9.1 We may retain your Personal Data as long as it is necessary to fulfil the purpose for which it was collected, or as required or permitted by applicable laws.

9.2 We will put in place measures to ensure that any of your Personal Data that is in our possession or under our control is destroyed and/or anonymised as soon as it is reasonable to assume that such retention no longer serves the purpose for which that Personal Data was collected is no longer being served by the retention of such Personal Data, and retention is no longer necessary for other legal or business purpose.

## **10. DATA BREACH NOTIFICATION OF PERSONAL DATA**

Under the Personal Data Protection (Amendment) Act 2020, it is mandatory for organisations to notify the PDPC upon confirmation that a data breach has occurred and such data breach meets the criteria for notification. In this regard, once we have discovered and accessed that a data breach is likely to result in significant harm to individuals whose personal data is affected by the said data breach, or the data breach is of a significant scale of more than 500 individuals, we will notify the PDPC of the data breach within 3 calendar days. In the event that we have accessed the data breach is one which is likely to result in significant harm to affected individuals, we will also notify the affected individuals.

## **11. CONTACT US**

You may contact our Data Protection Officer if you:

- have any enquiries or feedback on our personal data protection policies and procedures;
- would like to withdraw your consent to any use of your Personal Data;
- would like to obtain access and make corrections to your Personal Data.

Email : [dpo@triotech.com.sg](mailto:dpo@triotech.com.sg)

Address: 1008 Toa Payoh North, #03-09, Singapore 318996

## **12. EFFECT OF NOTICE AND CHANGES TO NOTICE**

- 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.
- As part of our efforts to ensure that TTI properly manages, protects, and processes your Personal Data, we will be reviewing our policies, procedures, and processes from time to time. In that regard, 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.