

# Data Protection Policy

EXTERNAL

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## CHANGE LOG

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Date	Author	Modification
07/01/2021	Andres Fernandez – Information Security Manager	Initial creation

# I. DATA PROTECTION NOTICE

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This Data Protection Notice ("Notice") serves as the basis for which PALO-IT ("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 organizations which we have engaged to collect, use, disclose or process personal data for our purposes.

In this context, "personal data" extends to all information that can be used to identify an individual OR any data that can be linked with such information to identify an individual directly or indirectly.

The Act considers the following concepts:

- **Consent** – Organizations may only collect, use, or disclose personal data only with the individual's knowledge and consent (with some exceptions).
- **Purpose** – Organizations may collect, use, or disclose personal data in an appropriate manner for the given circumstances, and only if they have informed the individual of the purposes for the collection, use or disclosure.
- **Reasonableness** – Organizations may collect, use or disclose personal data only for the purposes that would be considered appropriate to an individual in the given circumstances.

The Data Protection Officer is responsible for overseeing the implementation and review of this Policy (and the related policies and procedures) and can be contacted at: [sg-dpo@palo-it.com](mailto:sg-dpo@palo-it.com)

## 1. What personal data does PALO-IT collect about you?

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PALO-IT may collect and process the following information about you, directly from you, your authorized representatives, third parties, publicly available sources or in an automatic manner:

- Contact details.
- Full name.
- IDs.
- Background checks when needed.
- Mobile number.

## 2. Purpose for the Collection, Use & Disclosure of Personal Data

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Subject to applicable exceptions permitted in the Act, we shall notify you of the purposes for which your personal data may be collected, used and/or disclosed before we collect any personal data from you, as well as obtain consent for the collection, use and/or disclosure of your personal data for the intended purposes.

Depending on your relationship with us, the personal data which we collect from you may be used and/or disclosed for the following purposes:

### 2.1. For the Public and Other Third Parties

PALO-IT is committed to engaging and embracing its community, ecosystem, and society at large. As a result, we often organize activities where external stakeholders or the general public are invited to participate.

Naturally, in encouraging a vibrant interaction with the public, there shall be an opportunity, and often a need, to collect, use and/or disclose personal data from members of the public. Some of the reasons/ purposes are as follows:

- For security/ verification purposes for certain events
- For logistical/ administrative purposes for certain events (e.g., food catering)
- To keep you updated of future PALO-IT events/products which we feel may be of interest to you.
- For marketing/ publicity purposes (e.g., Photographs)

In the above situations, it is on your own accord to decide whether, and to what extent, you wish to provide us with your personal data. For events where such provision of personal data is a pre-requisite for attendance, you shall be informed in advance so that you may make an informed decision.

PALO-IT shall also always endeavour to inform you of the purposes for which your personal data shall be used.

Should you at any time feel that the way PALO-IT has acted, or seeks to act, in respect of the collection, use or disclosure of personal data for an event is inappropriate, please make your concerns known to the Data Protection Officer via email to [sg-dpo@palo-it.com](mailto:sg-dpo@palo-it.com).

### 2.2. For clients and/or vendors

Your relationship with PALO-IT shall be governed primarily by a Statement of Work (SoW) or similar, which is bound to our Policies (which may be revised from time to time). We shall inform you explicitly or implicitly of the manner in which your personal data shall be used, as well as its intended purposes.

### 2.3. For Employees/Staff

To comply with PALO-IT's contractual, statutory, and management obligations and responsibilities, we are required

to process personal data relating to our employees. All such data shall be processed in accordance with the provisions of the Act and the relevant PALO-IT's rules and policies, including those on data protection, which may be revised from time to time.

Our internal data privacy policy available to all employees/staff, has details about what data PALO-IT collects, use & disclose for employees/staff.

## 3. Disclosure of Personal Data to Third Parties

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We shall not disclose your personal data to any third parties without first obtaining your consent permitting us to do so, or unless any such disclosure is permitted under any of the statutory exemptions under the Act.

In this respect, please note that we may disclose your personal data to third parties without first seeking your consent, if such disclosure is either required or permitted under the Act, including without limitation, if the disclosure is required by law and/or regulations, or if there is an emergency.

For such third-party processors, PALO-IT shall undertake appropriate due diligence and enter an agreement that complies with the PDPA's requirements.

### 3.1. Transfers outside of Singapore

We generally do not transfer your personal data to countries outside of Singapore. However, if we do so, we shall obtain your consent for the transfer and 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.

A "transfer" of personal data includes transmitting, sending, viewing, or accessing personal data in or to a different country.

PALO-IT may only transfer personal data outside Singapore if one of the following conditions applies:

- The country of the proposed transfer ensures an adequate level of protection for the rights and freedoms of data subjects with appropriate safeguards in place, such as binding corporate rules or standard contractual clauses confirming that the data subject has given their explicit consent to the proposed transfer and has been fully informed of any potential risk.
- The transfer is necessary to perform a contract between PALO-IT and a data subject.
- The transfer is necessary, in limited circumstances, for PALO-IT's legitimate interests.
- PALO-IT shall ensure that employees do not transfer any personal data outside of Singapore except in the circumstances stated above and/or an advanced agreement is in place.

## 4. Request for Access, Correction and/or Withdrawal of Personal Data

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Subject to certain exceptions in the Act, you may request to access and/or correct the personal data currently in our possession or withdraw your consent for the collection, use and disclosure of your personal data in our possession at any time.

### 4.1. Access

Upon receiving your request to access your personal data or any information regarding the retention period and destruction method, we shall provide you with the relevant personal data after a reasonable period of time.

This request can be made by via email to our Data Protection Officer at [sg-dpo@palo-it.com](mailto:sg-dpo@palo-it.com).

### 4.2. Correction

Upon receiving your request to correct relevant personal data, we shall process your request and undertake necessary verification activities in a feasible and timely manner.

Organizations privy to the personal data that was previously disclosed by PALO-IT a year before the date of correction shall receive the corrected personal data, unless that organization does not need the corrected personal data for any legal or business purposes, or if you so consent, only to specific organizations privy to the personal data that was previously disclosed by PALO-IT a year before the date of correction.

This request can be made by via email to our Data Protection Officer at [sg-dpo@palo-it.com](mailto:sg-dpo@palo-it.com).

### 4.3. Withdraw Consent

You may withdraw consent and request us to stop using and/or disclosing your personal data for any or all the purposes listed above by submitting your request in writing or via email to our Data Protection Officer at [sg-dpo@palo-it.com](mailto:sg-dpo@palo-it.com).

Upon receiving 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) to process your request and notify you of the consequences of us acceding to your request, 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) days.

While we respect your decision to withdraw your consent, please note that depending on the nature and scope of your request, we may not be able to continue providing our services to you and we shall, in such circumstances, notify you before completing the processing of your request. Should you decide to cancel or withdraw your consent,

please inform us in writing in the manner described above.

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 applicable laws.

## 5. Administration and Management of Personal Data

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We shall take appropriate measures to keep your personal data accurate, complete, and updated.

This includes taking appropriate precautions and preventive measures to ensure that your personal data is adequately protected and secured. Appropriate security arrangements shall be taken to prevent any unauthorized access, collection, use, disclosure, copying, modification, leakage, loss, damage and/or alteration of your personal data.

We shall also take reasonable efforts to ensure that the personal data in our possession or under our control is destroyed as soon as it is reasonable to assume that:

- The purpose for which that personal data was collected is no longer being served by the retention of such personal data.
- Retention is no longer necessary for any other legal or business purposes.

Our websites may contain links to other websites not maintained by PALO-IT. Such third-party websites are subject to their own data protection and privacy practices, and you are encouraged to examine the data protection policies of those websites.

## 6. Direct marketing

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PALO-IT shall ensure that it has appropriate consent from individuals to send them direct marketing communications. When a data subject exercises their right to object to direct marketing, such requests must be honoured promptly.

## 7. Data Protection Officer

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You may contact our Data Protection Officer if you have any enquiries or feedback on our personal data protection policies and procedures, or if you wish to make a request, via email: [sg-dpo@palo-it.com](mailto:sg-dpo@palo-it.com)