

## Privacy Policy

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New Silkroutes Group Limited and its Group of Companies ("**we**", "**our**", "**us**") value the information you have provided us or permitted us to collect. We strive to protect your privacy while providing you with the best service and experience we can provide. All such personal information in our possession is valued and is collected, used, disclosed and protected in accordance with the Singapore Personal Data Protection Act 2012 ("**PDPA**"). This Privacy Policy applies to all websites on which this Privacy Policy or a link to this Privacy Policy appears, as well as all our activities to the extent that you have been notified that such activities are subject to this Privacy Policy.

By visiting or using any of the websites on which this Privacy Policy or a link to this Privacy Policy appears, you are deemed to agree to the terms of this Privacy Policy. Please review this Privacy Policy carefully prior to visiting or using any such websites or otherwise providing any personal data.

If you wish to opt-out of this Privacy Policy, amend or remove any of your personal data in our possession, please read paragraph 6 below for the required procedure.

### 1. **PERSONAL INFORMATION AND OTHER DATA WE COLLECT**

Personal data as defined in the PDPA refers to data about an individual who can be identified from either that particular data, or from that data and other information which we have or are likely have access to. Personal data is collected where reasonably necessary for our functions and activities. Personal data that we may hold include the following:

- (A) name, address and contact details;
- (B) date of birth;
- (C) NRIC number, FIN number, driver's licence, passport number, or work permit number;
- (D) employment and income details;
- (E) bank account details;
- (F) details of services provided to an individual by us;
- (G) details of an individual's dealings with us, including telephone records, email and online interactions;
- (H) credit-related personal information;
- (I) photos and CCTV recordings; and
- (J) other personal data as may be provided by an individual from time to time.

#### **Collection of personal data**

Wherever possible, we will collect personal data directly from you. We will only collect, use and disclose personal data with your consent, your deemed consent or as may be otherwise permitted under the PDPA or other applicable laws.

In addition to the personal data you provide to us, certain information related to you that is not considered personal data under the PDPA may also be collected. We collect this information to improve our website. Such non-personal data may include information such as your IP address, the internet browser you use, details of your interaction with our website and other types of non-personal data.

#### **Use of cookies**

Cookies are small files which require user permission in order to be installed on a computer's hard drive. Cookies will only start to perform their functions after such permission is granted. By collecting and analysing data on the user's browsing patterns, cookies allow web applications to respond to the user as an individual by tailoring a web application's operations to the user's specific needs and preferences.

Permission for cookies is granted by default in most web browsers. You can however choose to disable this function in your browser's settings. This may prevent you from taking full advantage of our website.

We may use traffic log cookies to identify which pages are being used. This use is designed to assist us in gathering data on web page traffic. The gathered data is used only for statistical purposes and is removed from our database shortly after.

Overall, the data collected by the cookies is used for the purpose of improving your browsing experience 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.

## **2. USE OF YOUR PERSONAL DATA**

We collect personal data from our existing and prospective customers, business associates and employees for various reasons. Without limitation, these purposes include:-

- (A) providing customer support;
- (B) supplying you with information that is relevant to your existing relationship with us;
- (C) processing your employment applications;
- (D) for fraud prevention and detection; or
- (E) in our sole discretion, in exceptional circumstances such as national emergency, security concerns, or other situations in which we deem that such disclosure is prudent.

We may, for the above purposes, contact you via mail, electronic mail, telephone, SMS, facsimile or other forms of communication through mobile applications. Should you wish to opt-out of our contact list for any reason, please refer to the below paragraph 6 for the relevant procedure.

## **3. SHARING YOUR PERSONAL DATA**

In the course of providing our services and products to you, we may need to disclose your personal data with external organisations. The reasons for which we may disclose your personal data are set out under the paragraph 2 above. The possible parties we may share your personal data with include our group companies, our affiliates, partners, principals, third party service providers (for the purpose of providing us administrative or marketing support), and governmental or regulatory authorities. If any of our businesses are sold or transferred to another entity, your personal data may be transferred along with the business.

In the event that any of the above parties receiving your personal data are located or are operating outside of Singapore, we will take reasonable steps to ensure that the overseas recipient provides a standard of protection to your personal data so transferred that is comparable to the protection under the PDPA.

## **4. SECURITY**

We will protect your personal data using industry standard precautions. While the transference of electronic data over the internet has inherent risks, we use reasonable precautions to ensure your personal data is not subject to unnecessary risks.

## **5. RETENTION**

We will retain your Personal Data for as long as necessary in order to fulfil the purpose for which it was collected, or as required by the relevant laws.

## **6. ACCESS, UPDATE, WITHDRAWAL OF CONSENT**

You must obtain, fill out, and submit to us a written request if you subsequently decide to request access of, update or withdraw your consent for us to collect, use and/or disclose your personal data. Please note that it may take up to 14 business days to attend to your request and an additional 30 business days for us to process your request.

## **7. RIGHTS TO AMEND THIS PRIVACY POLICY**

We reserve the right to amend this Privacy Policy at any time. If material changes are made to this Privacy Policy, they will be posted on this page and date stamped. We encourage you to review this page periodically in order for you to stay notified of any changes.

Your continued use of this website and acceptance of our services after any changes to this Privacy Policy constitutes your consent to any such changes, to the extent such consent is not otherwise provided.

## **8. CONTACT US**

If you have comments or questions about this Privacy Policy statement, or wish to obtain a form mentioned in paragraph 6, please contact our us at: **[dpo@newsilkroutes.org](mailto:dpo@newsilkroutes.org)**