

## PRIVACY POLICY

### 1. General

This privacy policy sets out the policies and practices of AMPD Analytics Pte. Ltd. ("AMPD") in the collection, use, sharing and protection of your personal information. AMPD may update or change this policy and these changes will be posted on AMPD's website.

### 2. Collection of Your Personal Information

a) For the purpose of carrying on AMPD's business including sale, provision, registration and advertisements of AMPD business and related products, events and services, AMPD will collect your personal information when you:

- (i) purchase a product with AMPD;
- (ii) subscribe or register to a service of AMPD;
- (iii) enquire information about a product, event or service from AMPD;
- (iv) contact AMPD via phone, e-mail or in person;
- (v) use AMPD's products or services;
- (vi) attend AMPD's events;
- (vii) take part in market research;
- (viii) participate in surveys;
- (ix) use AMPD online portals.

### 3. Types of Personal Data Collected

a) For the purpose of carrying on AMPD's business including sale, provision, registration and administration of AMPD's related products, events and services (including relevant on-line services), the information that AMPD collects includes but is not limited to the following:

- (i) your name;
- (ii) email address(es);
- (iii) contact number(s);
- (iv) company, industry, telephone number(s) and address(es);
- (v) an email or letter you send to AMPD; and other records of any contact you have with AMPD;

b) In support of our services and other services provided by AMPD's affiliates, business partners, clients, industry associations and organizations, information may be automatically collected by AMPD including but not limited to:

(i) the telephone numbers and/or email addresses of calls, emails and other communications made and received by you and the date, duration, time and cost of such communications;

#### **4. Use of Your Personal Information**

AMPD may use and analyse your information for the following purposes including but not limited to:

- (i) for the daily operation of AMPD's services provided to customers;
- (ii) processing your order and providing information on the products, events and services that you have purchased from AMPD;
- (iii) keeping you informed of AMPD's latest products, events and services;
- (iv) marketing the following products, events and services:

All products, events or services by AMPD; products, events and services offered by AMPD's affiliates, business partners, clients, industry associations and organizations.

- (v) assisting you with any products, events or services enquiries;
- (vi) billing you for AMPD's products, events or services;
- (vii) contacting you if necessary.

#### **5. Withdrawing Your Consent**

- (a) 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 your request in writing or via email to our Data Protection Officer at the contact details provided below.
- (b) 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.
- (c) 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 decide to cancel your withdrawal of consent, please inform us in writing in the manner described in clause 5(a) above.
- (d) 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.

## 6. Access to and Correction of Personal Data

- (a) 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.
- (b) 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.
- (c) We will respond to your access request as soon as reasonably possible. Should we not be able to respond to your access 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 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).
- (d) We will respond to your correction request as soon as reasonably possible. Should we not be able to correct the correction request within ten (10) days after receiving your request, we will inform you in writing on the time by which we will be able to correct your correction request. If we are unable 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).
- (e) We will not provide information under the access requirement for:
- i. opinion data kept solely for an evaluative purpose;
  - ii. any examination, examination scripts and, prior to the release of examination results, examination results;
  - iii. the personal data of the beneficiaries of a private trust kept solely for the purpose of administering the trust;
  - iv. personal data kept by an arbitral institution or a mediation centre solely for the purposes of arbitration or mediation proceedings administered by the arbitral institution or mediation centre;
  - v. documents related to a prosecution if all proceedings related to the prosecution have not been completed;
  - vi. personal Data subject to legal privilege;
  - vii. personal Data which, if disclosed, would reveal confidential commercial information that could, in the opinion of a reasonable person, harm the competitive position of the organisation;
  - viii. personal Data collected, used or disclosed without consent pursuant to the exemptions in the PDPA, for the purposes of an investigation if the investigation and associated proceedings and appeals have not been completed;
  - ix. the personal data was collected or created by a mediator or arbitrator in the conduct of a mediation or arbitration for which he was appointed to act —
    - under a collective agreement under the Industrial Relations Act (Cap. 136) or by agreement between the parties to the mediation or arbitration;
    - under any written law; or
    - by a court, arbitral institution or mediation centre.
  - x. any request:
    - That would unreasonably interfere with the operations of the organisation because of the repetitious or systematic nature of the requests;
    - If the burden or expense of providing access would be unreasonable to the organisation or disproportionate to the individual's interests;
    - For information that does not exist or cannot be found;
    - For information that is trivial; and

- That is otherwise frivolous or vexatious.
- xi. personal Data or other information shall not be provided to an individual if the provision of that Personal Data or information could reasonably be expected to:
  - Threaten the safety or physical or mental health of an individual other than the individual who made the request;
  - Cause immediate or grave harm to the safety or to the physical or mental health of the individual who made the request;
  - Reveal Personal Data about another individual;
  - Reveal the identity of an individual who has provided Personal Data about another individual and the individual providing the Personal Data does not consent to the disclosure of his/her identity; or be contrary to national interest.
- xii. If Personal Data has been disclosed to a prescribed law enforcement agency without the consent of the individual or pursuant to the exemptions in the PDPA, we shall not be required to inform the individual of such disclosure.

(f) Correction request will not be approved in respect of:

- i. opinion data kept solely for an evaluative purpose;
- ii. any examination conducted by an education institution, examination scripts and, prior to the release of examination results, examination results;
- iii. the personal data of the beneficiaries of a private trust kept solely for the purpose of administering the trust;
- iv. personal data kept by an arbitral institution or a mediation centre solely for the purposes of arbitration or mediation proceedings administered by the arbitral institution or mediation centre; or
- v. a document related to a prosecution if all proceedings related to the prosecution have not been completed.

## **7. Retention of Personal Data**

AMPD will destroy any personal data it may hold in accordance with its internal policy. Personal data will only be retained for as long as AMPD needs it unless the personal data is also retained to satisfy any applicable statutory or contractual obligations or for the purpose of investigation, detection, and prosecution of crime.

## **8. Disclosure and Sharing of Personal Data**

All personal data held by AMPD will be kept confidential but AMPD may disclose information about you to the following parties:

- (i) AMPD's subsidiary websites;
- (ii) contractors, agents or suppliers who are involved in delivering the products and services you have ordered or used;
- (iii) any agent, contractor or third party service provider who provides administrative, telecommunications, computer, payment or other services to AMPD in connection with the operation of its business;
- (iv) law-enforcement or government bodies, regulatory bodies, courts or as required by law;
- (v) any person to whom AMPD is under an obligation to make disclosure under the requirements of any law binding on AMPD or under and for the purposes of any guidelines issued by regulatory or other authorities with which AMPD is expected to comply.

## **9. Security of Personal Data**

AMPD has adequate measures to protect your personal information from unauthorized access, accidental loss or destruction.

## **10. Privacy Policy Published <https://media-partners-asia.com/ampd/>**

This Privacy Policy is subject to change from time to time and any changes will be posted on AMPD website <https://media-partners-asia.com/ampd/>

If there is any inconsistency or conflict between the version posted on the website and the previous versions, this version shall prevail.

## **11. Data Protection Officer Contact**

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 any request, in the following manner:

- Attention to Vinita Tang / Data Protection Officer
- Email to [dpo@ampd-research.com](mailto:dpo@ampd-research.com)
- Content of your queries, feedback, or request