



Vantage Commerce Personal Data Protection Policy

Vantage Commerce Pte. Ltd. (Singapore)

Our Vantage Commerce Personal Data Protection Policy refers to our commitment to treat personal data of our employees, customers, stakeholders, and other interested party with care and utmost respect towards individual right to privacy.

We will collect, use or disclose personal data for reasonable business purposes only if there is consent or deemed consent from the individual and information on such purposes have been notified. We may also collect, use or disclose personal data if it is required or authorised under applicable laws.

1. Contents of the website

Any information published via this website is given to the best of our knowledge. However, Vantage Commerce Pte. Ltd. does not, as far as legally permissible, accept any liability for the relevance, accuracy, or completeness of the information offered in its website

2. Copyrights and other proprietary rights

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3. Liability

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4. Personal Data

Personal Data refers to any data about an individual who can be identified from that data; or from that data and other information to which we have or is likely to have access. Personal data in Singapore is protected under the Personal Data Protection Act 2012 (PDPA).

5. Collection of Personal Data

As part of the operations, from time to time, we are required to obtain and process personal data. We collect this information when it is necessary for business purposes and only with the full cooperation and knowledge of interested parties.

If you provide us with any personal data relating to a third party, you represent and warrant to us that you are an authorized representative or agent of such third party and that you have obtained the necessary consent from the third party to the collection, processing, use, and disclosure by us of their personal data.

6. Use of Personal Data

6.1 We may use, process, and disclose your personal data for the following purposes in general:

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- evaluating and providing advice and/or recommendations to you regarding the type of products and services suited to your needs;
 - assessing and processing any applications or requests made by you for products and services offered by Vantage Commerce Pte. Ltd;
 - communicating with you to inform you of changes and updates to our policies, terms and conditions and other administrative information, including without limitation for the purposes of servicing you in relation to products and services offered to you;
 - administering, maintaining, managing and operating the products and services offered to you, including government-driven schemes;
 - processing and administering benefits or entitlements in connection with our services which you have applied for;
 - verification of your identity for the purpose of providing you with our services;
 - responding to your queries and requests and handling complaints;
 - conducting market research for statistical profiling and other purposes to understand and determine customer preferences and demographics in order for us to review, develop and improve the products and services which we are providing to you (including without limitation to ensure that the products and services offered are relevant to you);
 - managing our infrastructure and business operations and complying with internal policies and procedures;
 - archival of documents and records in both electronic and physical form for record keeping purposes;
 - maintaining records of customer instructions, whether through phone recordings, hard copy documents, soft copy documents or instructions given via electronic or other means;
 - facilitating the verification and checks of your personal data in order to provide you with our products and services which you have requested;
 - preventing, detecting and investigating crime, including fraud and any form of financial crime, and analyzing and managing other commercial risks;
 - compliance with any applicable local or foreign statute, rule, law, regulation, judgment, decree, directive, code of practice, guideline, administrative requirement, sanctions regime, court order, agreement in relations to any affiliate or subsidiary of Vantage Commerce Pte. Ltd;
 - subject to applicable law, any other purpose set out in the Terms and Conditions;
 - purposes which are reasonable related to the aforementioned
- 6.2 If you are an employee, we may collect, use, and disclose your personal data for the following additional purposes:
- providing remuneration and staff benefits, reviewing salaries and bonuses, conducting salary benchmarking reviews, staff appraisals and evaluation, as well as recognising individuals for their services and conferring awards;
 - administering the employment relationship, its management and termination, including manpower, logistics management, work permit, employment pass or visa applications, providing employee relocation support, processing expense claims, tax clearance and payment to provident funds, facilitating overseas travel arrangements, and reservist management;
 - training, learning and talent development;



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- providing you with tools and/or facilities to enable or facilitate the performance of your duties;
- business continuity, including compiling and publishing internal directories and emergency contact lists;
- conducting analytics, surveys and research for human resource planning and management, and for us to review, develop, optimise and improve work-related practices, environment and productivity;
- ensuring that the administrative and business operations of Vantage Commerce Pte. Ltd. and its affiliates and subsidiaries;
- other purposes related to the employment and providing internal service to the employees.

6.3 If you are a board member or shareholder of Vantage Commerce Pte. Ltd. or its affiliate and subsidiaries:

- onboarding or facilitating your appointment;
- maintaining statutory registers and to manage the publication of shareholder and director statistics on annual reports and circulars;
- facilitating the execution of duties and administrative matters (including but not limited to issuing new share certificates, organising meetings, passing resolutions, and approving, executing and signing contracts);
- administering remuneration, compensation and benefits;
- purposes which are reasonably related to the aforesaid.

7. Disclosure of Personal Data

We will take reasonable precautions to protect your personal data against unauthorized disclosure but we may disclose personal data to the affiliates and subsidiaries of Vantage Commerce Pte. Ltd, where it is necessary to meet the purpose for which you have submitted the information; or to enable you to be provided with information at a later date which may be of relevance and interest to you based on the nature and purpose of your voluntary requests.

Subject to the provisions of any applicable law, your personal data may be disclosed for the purposes listed above (where applicable) to the following parties

- affiliates and subsidiaries of Vantage Commerce Pte. Ltd;
- companies providing services relating to insurance and/or reinsurance to Vantage
- agents, contractors or third party service providers who provide services, such as telecommunications, call centre, mailing, information technology, payment, payroll, data processing, training, market research, storage and archival, to Vantage Commerce Pte. Ltd. and its affiliates and subsidiaries;
- vendors or third party service providers in connection with marketing promotions, products and services offered by the Group;
- any business partner, investor, assignee or transferee (actual or prospective) to facilitate business asset transactions (which may extend to any merger, acquisition or asset sale) involving any of the Companies;
- external banks, credit card companies and their respective service providers;
- our professional advisers such as consultants, auditors and lawyers;
- companies providing hospitality services to guests and customers of our hotels and



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- serviced suites (including but not limited to taxi / limousine companies and tour operators);
- foreign embassies, travel agencies and hotels in relation to facilitating overseas travel arrangements;
- relevant government ministries, regulators, statutory boards or authorities or law enforcement agencies to comply with any laws, rules, guidelines and regulations or schemes imposed by any governmental authority; and
- any other party to whom you authorise us to disclose your personal data to.

8. Use of cookies

- 8.1 We may collect and analyse information such as the number of users and their frequency of use from the use of “cookies”. This information will be used to analyse the usage of our websites and to improve our website.
- 8.2 Should you wish to disable the cookies, please note that all web-browsers offer the option to refuse any cookies and you may do so by changing the setting on your browser.

9. Third-Party Sites

Our website may contain links to other websites operated by third parties. We are not responsible for the privacy practices of websites operated by third parties that are linked to our website.

10. Correction and Concerns

Should you believe that information we hold about you is incorrect or should you require further information, suggestions or complaints regarding the processing of your personal data, please directly contact our data protection officer.

11. Withdrawal of Consent

should you wish to withdraw your consent to any use or disclosure of your personal data, you may directly contact our data protection officer.

Please note that if you withdraw your consent to any or all use or disclosure of your personal data, depending on the nature of your request, we may not be in a position to continue to provide our products or services to you or administer any contractual relationship in place. Such withdrawal may also result in the termination of any agreement you may have with us.

12. Modifications

We reserve the right to modify or amend this Policy at any time. The effective date will be displayed at the beginning of this Policy. To keep you informed, you can find the latest version of this policy on our home page at <http://www.vantage-commerce.com>

13. Disclaimer

- 13.1 While we strive to protect your personal data, we cannot ensure the security of the information you transmit to us via the Internet or through the use of our electronic services, and we urge you to take every precaution to protect your personal data when you use such platforms. We are not liable for any damages resulting from any security breaches, on unauthorised and/or fraudulent use of your username and password.



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13.2 This Vantage Commerce Personal Data Protection Policy supplements but does not supersede nor replace any other consents you may have previously provided to us.

14. Contact Us

For further information, suggestions or complaints regarding any legal inquiry or your personal data, please contact our data protection officer:

Address: 71-2A Tras Street, Singapore 079717

Email: info@vantage-commerce.com