

Privacy Policy

This Privacy Policy (the “**Policy**”) applies to the collection, use and disclosure of your Personal Data (hereinafter defined) arising from the services offered by us, 6 Degrees Pte Ltd (hereinafter referred to as “us” or “we” or “our”).

1. General

- 1.1 This Policy statement provides information on the obligations and policies of 6 Degrees Pte Ltd in respect of an individual customer’s Personal Data. We undertake to use reasonable efforts in applying, where practicable, those principles and the processes set out herein to its operations.
- 1.2 Our officers, management, and members of staff shall use reasonable endeavours to respect the confidentiality of and keep safe any and all Personal Data collected and/or stored and/or disclosed and/or used for, or on behalf of, us. We shall use reasonable endeavours to ensure that all collection and/or storage and/or disclosure and/or usage of Personal Data by us shall be done in an appropriate manner and in accordance with the Act and this Policy.
- 1.3 By interacting with us, submitting information to us, or signing up for any products or services offered by us, you agree and consent to 6 Degrees Pte Ltd as well as to its respective representatives and/or agents (“Representatives”) (collectively referred to herein as “The Group”, “us”, “we” or “our”) collecting, using, disclosing and sharing amongst themselves your Personal Data, and disclosing such Personal Data to our authorised service providers and relevant third parties in the manner set forth in this Privacy Statement.
- 1.4 This Policy supplements but does not supersede nor replace any other consents you may have previously provided to us in respect of your Personal Data, and your consents herein are additional to any rights which we may have at law to collect, use or disclose your Personal Data.
- 1.5 For the purposes of this Policy, in line with the provisions under the *Singapore Personal Data Protection Act 2012 (No. 26 of 2012)* (the “**Act**”), “**Personal Data**” shall mean data, whether true or not, about an individual customer who can be identified — from that data; or from that data and other information which an organisation has or is likely to have access. Such Personal Data shall also refer to that which is already in our possession or that which shall be collected by us in future.

2. Contacting the Data Protection Officer

- 2.1 Where you legitimately request access to and/or correction of Personal Data relating to you, such Personal Data which is in our possession and control, we shall provide and/or correct

that data in a reasonable time and manner in accordance with its standard procedures as stated hereinafter.

- 2.2 In accordance with the Act, we have established a process for receiving and responding to any query or complaint that may arise with respect to the application of this Act. To ensure that we receive your complaints and enquiries, please send the same *via* email to our Data Protection Officer, Mr. Bryan Lee (the “DPO”) at the following email address: dpo@sixdegrees.asia
- 2.3 Please note that if your personal data has been provided to us by a third party (e.g. a member via a referral process), you should contact that individual to make such queries, complaints, and access and correction requests to the DPO on your behalf.
- 2.4 Should you not want us to use your Personal Data for any of the purposes listed in Clauses 3.2 to 3.4, or not to receive promotional materials from us, you may opt out by sending a clearly worded email to the DPO via the email address provided in Clause 2.2. Your request shall be processed within a reasonable time.

3. Statement of Practices

Types of Personal Data Collected:

- 3.1 As part of its day-to-day activity, we may collect from you, through various means, including *via* our website or any form used by us from time to time, some or all of the following Personal Data:
- Name (first and surname);
 - NRIC Number;
 - Postal Address;
 - Phone number (including mobile);
 - Office number;
 - Email address;
 - Gender;
 - IP addresses; and
 - Photographs and images.

Cookies

- 3.2 We may use cookies on our websites to track website visitor-ship and experience. Most web browsers are designed to accept cookies. If you do not wish to receive any cookies, you may set your browser to refuse it.

Purpose of Collection of Personal Data

- 3.3 The above Personal Data mentioned in Clause 3.1 is collected for the purposes of processing your application and registration of your membership and to evaluate your eligibility for the Media Development Authority (MDA)'s Talent Assistance (Training) Scheme and Training Allowance, other related purposes; through voice calls; text messages; email; direct mail and facsimile messages; for payment and/or credit control purposes; to notify you of any changes to our policies or services which may affect you; to respond to queries and feedback; maintaining and updating your membership details; gathering feedback; and informing you of new developments, services of 6 Degrees Pte Ltd and other third parties which we are associated with.

Disclosure of Personal Data

- 3.4 In order to carry out the functions described above, we may, from time to time, disclose your Personal Data to MDA, or between the 6 Degrees Pte Ltd's associated companies (if any).

- 3.5 Without derogating from any of the above, we may also disclose your Personal Data to the following third parties:

- Regulators and law enforcement officials;
- Lawyers;
- Auditors;
- Third party service providers and consultants;
- Credit, debit and charge card companies, banks and other entities processing payment;
- Potential buyers or investors; and
- Any agent or subcontractor acting on our behalf for the provision of our services.

- 3.5 We may disclose your Personal Data to the abovementioned parties also in the occurrence of any of the following events:

- To the extent that the we are required to do so by the law;
- In connection with any legal proceedings or prospective legal proceedings;
- To establish, exercise or defend our legal rights;
- To the purchaser (or prospective purchaser) of any business or asset which we are (or are contemplating) selling;
- To any person and/or entity for the purpose of processing such information on our behalf;
- To third parties who provide services to us or on its behalf;
- To any third party that purchases our business or any part of our business;
- With your consent; and
- For the purposes of disaster recovery.

Optional Provision of Personal Data

3.6 In some instances, you may also be requested to provide certain Personal Data that may be used to further improve our services and/or better tailor the type of information presented to you. In most cases, this type of data is optional although, where the requested service is a personalised service, or provision of a product or dependent on your providing all requested data, failure to provide the requested data may prevent us from providing the service to you. This type of data includes, but is not limited to:

- Your age;
- Gender;
- Salary range and employment details;
- Education and Profession;
- Hobbies and leisure activities;
- Other related products and services subscribed to; and
- Family and household demographics.

3.7 Under certain circumstances, telephone calls made to us and/or service hotlines and/or inquiry telephone numbers may be recorded for the purposes of delivery of our services to you, quality control, appraisal, as well as staff management and development. In such an event, by agreeing to this Policy, you hereby give your clear and unambiguous consent for the collection, use and disclosure of such Personal Data in accordance to this Policy.

4. Transfer of Personal Data Overseas

Your Personal Data may be processed by us, our affiliates, agents and third parties providing services to us, in jurisdictions outside of Singapore. In this event we will comply with the terms of the Act.

5. Accuracy of Personal Data

Where possible, we will validate data provided using generally accepted practices and guidelines. This includes the use of check sum verification on some numeric fields such as account numbers or credit card numbers. In some instances, we are able to validate the data provided against pre-existing data held by us. In some cases, we are required to see original documentation before we may use the Personal Data such as with Personal Identifiers and/or proof of address. To assist in ensuring the accuracy of your Personal Data in our possession, please inform us of any updates of any parts of your Personal Data by sending a clearly worded email to the DPO at the email address provided at Section 2.2.

6. Protection of Personal Data

We use commercially reasonable physical, managerial, and technical safeguards to preserve the integrity and security of your Personal Data and will not knowingly allow access to this data to anyone outside our company, other than to you or as described in this Policy. However, we cannot ensure or warrant the security of any information you transmit to us and you do so entirely at your own risk. In particular, we do not warrant that such information may not be accessed, altered, collected, copied, destroyed, disposed of, disclosed or modified by breach of any of our physical, technical, or managerial safeguards.

7. Access and Correction of Personal Data

7.1 In accordance with Clause 2.1 of this Policy, you have the right to:

- a) check whether we hold any Personal Data relating to you and, if so, obtain copies of such data; and
- b) require us to correct any Personal Data relating to you which is inaccurate for the purpose for which it is being used.

7.2 We reserve the right to charge a reasonable administrative fee in order to meet your requests under Clause 7.1. Upon payment of the requisite fee, your request shall be processed within a reasonable time.

7.3 If you wish to verify the details you have submitted to us or if you wish to check on the manner in which we use and process your personal data, our security procedures mean that we may request proof of identity before we reveal information. This proof of identity will take the form of full details of name, membership number and NRIC or Passport or Fin number. You must therefore keep this information safe as you will be responsible for any action which we take in response to a request from someone using your membership details. We would strongly recommend when you login to your online account in our websites, that you do not use the browser's password memory function as that would permit other people using your terminal to access your personal information.

8. Storage and Retention of Personal Data

We will delete, as reasonably possible, or otherwise anonymise any Personal Data in the event that the Personal Data is not required for any reasonable business or legal purposes of our company and where the Personal Data is deleted from our electronic, manual, and other filing systems in accordance with the our internal procedures and/or other agreements.

9. Change Policy

We reserve the right to alter any of the clauses contained herein in compliance with local legislation and/or to meet its global policy requirements, and for any other purpose deemed reasonably necessary by us. You should look at these terms regularly. If you do not agree to the modified terms, you should inform us as soon as possible of the terms to which you do

not consent. Pending such notice, if there is any inconsistency between these terms and the additional terms, the additional terms will prevail to the extent of the inconsistency.

10. Governing Law

This Policy is governed by and shall be construed in accordance with the laws of Singapore. You hereby submit to the non-exclusive jurisdiction of the Singapore courts.

11. Miscellaneous

- 11.1 This Policy only applies to the collection and use of Personal Data by us. It does not cover third party sites to which we provide links, even if such sites are co-branded with our logo. We do not share your Personal Data with third party websites. We are not responsible for the privacy and conduct practices of these third party websites, so you should read their own privacy policies before disclosure of any Personal Data to these websites.
- 11.2 We will not sell your personal information to any third party without your permission, but we cannot be responsible or held liable for the actions of third party sites which you may have linked or been directed to our website.
- 11.3 Our websites do not target and are not intended to attract children under the age of 18 years old. We do not knowingly solicit personal information from children under the age of 18 years old or send them requests for personal data.