

# TrickleStar Limited

Policies  
and  
Standard Operating Procedures

**PERSONAL DATA PROTECTION ACT  
POLICY**

Policy Number 16

Approved by the Board of Directors on 28 March 2019

## **PERSONAL DATA PROTECTION ACT (“PDPA”) POLICY**

### **1. Introduction**

The Personal Data Protection Act (“PDPA”) Policy sets out the basis which TRICKLESTAR (“the Company”) may collect, use, disclose or otherwise process personal data provided to the Company from customers, business contacts, employees or other individuals in forms filled out by individuals, face to face meetings, email messages or through the company’s websites.

### **2. Scopes**

The information the Company collects is information that is required in order to perform business operations and trading. The personal data that the Company may collect and maintain includes but not limited to name, address, e-mail address, telephone number, income, assets and liabilities. The Company may only process sensitive personal data after an express consent is obtained.

### **3. Collection, Use and Disclosure of Personal Data**

3.1 The Company shall notify the associated party of the purposes for which the data is collected and obtain written consent for the collection and use of the information; unless otherwise as permitted or authorised by the Personal Data Protection Act (“PDPA”) 2012, may use and/or disclose the personal data without consent provided.

3.2 The personal data are collected, used and disclosed for the following purposes:

- (a) To verify the identity of the associated party;
- (b) To process, respond and handle queries, requests, applications, complaints and feedback;
- (c) To perform obligations in the course of or in connection with the provisions of business trading requested by the party;
- (d) To process payment or credit transactions;
- (e) To transmit to any unaffiliated third parties including outsourced service providers, agents, relevant governmental and/or regulatory authorities whether in Singapore or abroad, for the aforementioned purposes; and/ or
- (f) Any other purposes for which the party have provided the information.

3.3 The party may withdraw the consent and request the Company to stop using and/ or disclosing their personal data for any or all the purposes listed in the above clause by submitting the request in writing or via email to the liaison.

3.4 The Policy continues to apply even in situations where the relationship pursuant to a contract engaged with the associated party has been terminated or altered in any way, for a reasonable period thereafter.

3.5 Despite Clause 3.3, withdrawing consent does not affect the Company’s right under this section where such collection, use and disclosure without consent is permitted or required under PDPA or other applicable laws.

### **4. Access and amendment of Personal Data**

The party may request to access to or make amendment to their personal data records by submitting their request to the designated PDPA officer.

## **5. Protection of Personal Data**

5.1 The Company in order to fulfil the requirements of applicable laws, may retain the personal data for as long as it is necessary. As such, the Company is in the position to safeguard the data from unauthorised access, replicating, modification or disposal.

5.2 Administration Department shall ensure method of transmission over Internet or electronic storage is completely secured by constantly reviewing the Company's information security measures.

## **6. Retention of personal data**

Personal data is retained as long as the purpose for which it was collected remains and until it is no longer necessary for any other legal or business purposes.

## **7. Transfer of Personal Data Outside of Singapore**

The Company shall take necessary steps to ensure the information continues to receive a standard of protection that is at least comparable to that provided under the PDPA.

## **8. Contacting us**

If you have any questions about our collection, use, and/or disclosure of your personal data; feedback regarding this Policy, or any complaint you have relating to how we manage your personal data, you may contact our Data Protection Officer Mr Ling Hee Keat

Contact Number: 03-6205 3120

Email Address: [keat.ling@tricklestar.com](mailto:keat.ling@tricklestar.com)

Any query or complaint should include, at least, the following details:

- Full name and contact information of the data subject;
- Brief description of the complaint or query

We treat such queries and complaints seriously and will deal with them confidentially and within reasonable timeframe.