

PRIVACY POLICY
(as at 16 May 2017)

INTRODUCTION

Institute for Human Resource Professionals (“IHRP” or as appropriate in the context, “we”; “us”; or “our”) operate a platform that offers accreditation for human resources professionals actively looking to become certified based on their work experience and competency in various areas. More information is available at [www.ihrp.sg] (subject to other additions) (the “Website”) (together with the Website, referred to as the “Services”).

IHRP respects the protection of the Personal Data of individuals and value the relationship we have with you. This Personal Data Policy (“Privacy Policy”) is applicable to any data processing implemented by IHRP and the Website

This Privacy Policy sets out IHRP's policy regarding the collection, use, and disclosure of any information you may provide when you access and use this Website or any of IHRP 's Services and/or products. It is intended to be read together with the Terms of Use.

BY SUBMITTING YOUR INFORMATION, SIGNING UP ON THE WEBSITE AND/OR OTHER CONFIRMATION, YOU ARE CONFIRMING THAT YOU ARE BOUND BY THIS PRIVACY POLICY. BY USING THE SERVICES OR BY OTHERWISE GIVING US YOUR INFORMATION, YOU WILL BE DEEMED TO HAVE READ, UNDERSTOOD AND AGREED TO THE PRACTICES AND POLICIES OUTLINED IN THIS PRIVACY POLICY AND YOU HEREBY CONSENT TO OUR COLLECTION, USE AND DISCLOSURE OF YOUR INFORMATION AS DESCRIBED IN THIS PRIVACY POLICY. WE RESERVE THE RIGHT TO CHANGE, MODIFY, ADD OR DELETE PORTIONS OF THE TERMS OF THIS PRIVACY POLICY, AT OUR SOLE DISCRETION, AT ANY TIME.

IF YOU DO NOT AGREE WITH THIS PRIVACY POLICY AT ANY TIME, DO NOT USE ANY OF THE SERVICES OR GIVE US ANY OF YOUR INFORMATION. IF YOU DO NOT PROVIDE US WITH SOME OR ALL OF THE INFORMATION REQUESTED BY IHRP OR WITHDRAW YOUR CONSENT TO IHRP COLLECTING AND USING YOUR PERSONAL DATA AND INFORMATION, IHRP WILL BE UNABLE TO PROVIDE OR CONTINUE TO PROVIDE YOU WITH OUR SERVICES.

IF YOU USE THE SERVICES ON BEHALF OF SOMEONE ELSE (SUCH AS YOUR CHILD) OR AN ENTITY (SUCH AS YOUR EMPLOYER), YOU REPRESENT THAT YOU ARE AUTHORISED BY SUCH INDIVIDUAL OR ENTITY TO (I) ACCEPT THIS PRIVACY POLICY ON SUCH INDIVIDUAL'S OR ENTITY'S BEHALF, AND (II) CONSENT ON BEHALF OF SUCH INDIVIDUAL OR ENTITY TO OUR COLLECTION, USE AND DISCLOSURE OF SUCH INDIVIDUAL'S OR ENTITY'S INFORMATION AS DESCRIBED IN THIS PRIVACY POLICY.

SECTION 1: WEBSITE

This Privacy Policy does not apply to third-party websites you may access through, or in the course of your use of, the Website. Your rights in relation to those third parties will be governed entirely by the privacy statements and/or terms and conditions of those third-party websites.

This Privacy Policy is governed by and shall be construed in accordance with the laws of the Republic of Singapore. Any dispute arising out of or in connection with this Privacy Policy shall be subject to the exclusive jurisdiction of the courts of the Republic of Singapore.

SECTION 2: WHY THIS PRIVACY POLICY?

This Privacy Policy is published in compliance with the Personal Data Protection Act (2012) of Singapore (the “PDPA”).

The objectives of this Policy are to:

- (a) Provide a set of privacy and personal data protection standards that govern our procedures and protect the privacy of your personal data.
- (b) Demonstrate our on-going commitment to protecting your privacy and addressing any privacy concerns that you might have.
- (c) Describe the ways in which we collect, use, disclose and retain your personal data.
- (d) Ensure that we comply with the PDPA.
- (e) Facilitate our compliance with any further developments in the protection of personal data.

SECTION 3: TYPE OF PERSONAL DATA

Generally, some of the Services require us to know who you are so that we can best meet your needs. When you sign-up on the Website, access the Services, submit information, or through any interaction with us via application or registration forms, emails, telephone calls, short messaging services, texts or other correspondence, we may ask you to voluntarily provide us with certain information that personally identifies you or could be used to personally identify you.

Without prejudice to the generality of the above, information collected by us from you may include (but is not limited to) the following:

- (a) contact data (name, NRIC or FIN, passport or other identification number, photograph or image of yourself, telephone number(s), mailing address(es), email address(es), educational institutions attended, occupation, and any other information provided us in any forms you may have submitted to us, interaction with IHRP and its agents/employees, or through opening an account with IHRP);
- (b) other information that you voluntarily choose to provide to us (such as information shared by you with us through emails);
- (c) information received by body corporate under lawful contract or otherwise;
- (d) photographs and video footage;
- (e) your use of the Website and Services, including cookies, IP address, policy and usage history information; and
- (f) your usage of and interaction with our Website and/or services including computer and connection information, device capability, bandwidth, statistics on page views, and traffic to and from our Website.

The information collected from you by IHRP may constitute Personal Data under the PDPA.

“**Personal Data**” is defined under the PDPA to mean any data, whether true or not, about an individual who can be identified from that data or from that data and other information to which an organisation has or is likely to have access. This would include, without limitation, information such as name, address, telephone number, e-mail address, credit card details and any other personal information.

IHRP will be free to use, collect and disclose information that is freely available in the public domain without your consent.

Information that is business contact information such as your name, position name or title, business telephone number, business address, business electronic mail address or business fax number and any other similar information about you, which are not provided by you for personal purposes, will not be regarded as Personal Data under the PDPA. Your consent to us collecting, using and disclosing any business contact information will not be required.

SECTION 4: COLLECTION OF PERSONAL DATA

Personal Data may be collected by us through processes including, but not limited to the following:

- (a) when you subscribe or register on our Website with us for an account;
- (b) when you attend IHRP networking events;
- (c) when you participate in other organised events/seminars/conferences;
- (d) when you register for IHRP’s assessment (Levels 1 and 2) and through nomination for Level 3;
- (e) when you access our Website or submit information;
- (f) when you interact with any of our employees;
- (g) when you sign up to be included in an email or other mailing list;
- (h) when you request that we contact you;
- (i) when individual submits his/her Personal Data to IHRP for any other reason;
- (j) though any database purchased by IHRP;
- (k) by way of marketing through IHRP partners and/or affiliates;
- (l) when you serve as a committee member or board member;
- (m) when you are a stakeholder of IHRP; and
- (n) when you confirm attendance to IHRP.

Information that you submit via any of our Website shall be deemed to be collected by us with your permission. Such information may include but is not limited to your name, contact and fax numbers, home, work and email addresses, date of birth, and other information necessary to the provision of Services.

Data collected by automated means

Various technologies may be used on our Portal or our emailing system in order to make it more user-friendly, effective and secure. Such technologies may lead to data being collected automatically by us or by third parties on behalf of us. This data does not generally, but may, contain a user's personal data. These technologies include but are not limited to cookies, web beacons, tracing links, click stream data and web analytics. You may set up your web browser to block cookies. You may also remove cookies stored from your computer or mobile device. However if you do block cookies, you may not be able to use certain features and functions of our web sites. Please see Section 7: Additional Privacy Statements for Portal and Service Users.

SECTION 5: PURPOSES FOR WHICH WE COLLECT AND USE PERSONAL DATA

IHRP may collect, use or disclose your personal data only for the following purposes:

- (a) direct email contacts for reminders of assessment/certification/re-certification related matters;
- (b) to inform you of CPD and other learning and development opportunities;
- (c) to invite you to IHRP events and/or events jointly organised with IHRP partners and affiliates;
- (d) to invite you to speak at IHRP events and/or events jointly organised with IHRP partners and affiliates;
- (e) that a reasonable person would consider appropriate in the circumstances;
- (f) to process and, where necessary, respond to your application(s), enquiry(s), or request(s);
- (g) to enable IHRP to comply with all of its legal and regulatory obligations;
- (h) to inform or update you about products, or services that you request from IHRP or that may interest you, where you have consented to be contacted for such purposes;
- (i) to update you about changes to the Website or IHRP's operations;
- (j) taking of photographs and/or videos (whether by IHRP staff or third party photographers and/or videographers) during courses, seminars, events or programmes organised by IHRP for its affiliates for publicity purposes, including but not limited to, as collaterals, to be placed on IHRP's website and in newsletters;
- (k) if consented to in the application/ registration form and/or other methods of consent notification, providing marketing, advertising and promotional information via postal mail, electronic mail, SMS, and/or voice calls;

- (l) to monitor, improve, and administer the Website and the services provided through it, and conduct statistical or other forms of analysis for purposes of maintaining or improving the Website and IHRP's services in general; or
- (m) to comply with all proceedings or inquiries from any state, regulatory, or enforcement agency.
- (n) where you have been informed in accordance with this Privacy Policy, to the extent applicable.

Marketing Purposes

Where you have specifically provided IHRP with additional consents for marketing, IHRP may also collect, use and/or disclose your Personal Data for the following purposes:

- (a) providing you benefit, including without limitation sending you details of our services generally, or which may be of interest to you; and
- (b) matching your Personal Data with other data collected for other purposes and from other sources (including third parties) in connection with the provision services, whether by IHRP, or other affiliated third parties.

If you have provided your Singapore telephone number(s) and have indicated that your consent to receiving marketing or promotional information via your Singapore telephone number(s), then from time to time, IHRP may contact you using such Singapore telephone number(s) (including via voice calls, SMS, fax or other means) with information about IHRP's products and services.

SECTION 6: CONSENT TO COLLECTION OF PERSONAL DATA

IHRP shall not collect, use or disclose your personal data unless:

- (a) you give, or are deemed to give, consent to the collection, use or disclosure of your personal data; or
- (b) the collection, use or disclosure of your personal data without your consent is required or authorised under the PDPA or other written law.

IHRP shall not, as a condition of providing a product or service to you, require you to consent to the collection, use or disclosure of your personal data beyond what is reasonable to provide the product or Service to you.

IHRP shall not obtain or attempt to obtain your consent for collecting, using or disclosing personal data by providing false or misleading information with respect to the collection, use or disclosure of your personal data, or use deceptive or misleading practices.

As part of our continuous effort to keep you informed on our services, we may mail, email, telephone and contact you by any other means. Information sent to you may also include upcoming special events, seminars or other relevant information that may be of interest to you.

You will always have the option to decline any or all of these communications by following the directions included in our emails or other communications, or by contacting IHRP directly at dpo@ihrp.sg.

IHRP may collect and use personally identifiable information that you volunteer, or other behavioural data and big data generated. In addition to that, permission will be deemed given for communication from us that are necessary to fulfil transactions and services requested by you.

Photographs, videos and CCTV footage may constitute personal data if an identifiable individual is captured. IHRP will either seek your written consent for the collection, use and disclosure of photographs, videos and/or CCTV footage of you, or state in the invitation to you of an event/launch, that photographs/videos/CCTV footage will be taken at the event/launch for publicity on IHRP's print and electronic media. Appropriate and obvious notices shall also be put up at the reception or entrance of our event/launch to inform attendees on the event/launch day.

SECTION 7: DISCLOSURE OF INFORMATION

IHRP will not sell or rent your personal information to any third party. Information you provide to IHRP will be disclosed to third parties where:

- (a) you have expressly or implicitly consented to such disclosure, or may be deemed to have consented to such disclosure;
- (b) necessary to provide you with services you have requested for, or to respond to your queries;
- (c) necessary for the operation of the Website or IHRP's internal processes;
- (d) required by any government, statutory, or regulatory authority, or to comply with any applicable law, court order, directive, or proceeding of such authority; and
- (e) IHRP believes, in good faith, that doing so will be appropriate or necessary for it to investigate and defend against any third party claims or allegations, or prevent or stop any illegal activity, security breaches, or harm to the Website, IHRP's interests, or any IHRP employee.

SECTION 8: ADDITIONAL PRIVACY STATEMENTS FOR WEBSITE USERS

Persons who have subscribed for our updates on the Website ("Subscribers") Note:

This section applies to all Subscribers.

- (a) As part of the signing-up process that is available to Subscribers on the Website, certain information, including Personal Data or sensitive personal information is collected from the Subscribers.
- (b) All the statements in this Privacy Policy apply to all Subscribers, and all Subscribers are therefore required to read and understand the privacy statements set out herein prior to submitting any Personal Data or sensitive personal information to IHRP, failing which they are required to leave the Website immediately.
- (c) If you have inadvertently submitted any such information to IHRP prior to reading the privacy statements set out herein, and you do not agree with the manner in which such information is collected, processed, stored, used or disclosed, then you may access, modify and delete such

information by using options provided on the Website. In addition, you can, by sending an email to dpo@ihrp.sg, inquire whether IHRP is in possession of your Personal Data, and you may also require IHRP to delete and destroy all such information.

- (d) IHRP will communicate with the Subscribers through email. The Subscribers can change their e-mail address by resubscribing and sending an email to dpo@ihrp.sg for the deletion of previous email.
- (e) All IHRP employees and data processors, who have access to, and are associated with the processing of sensitive personal data or information, are obliged to respect the confidentiality of every Subscribers' Personal Data or sensitive personal information.
- (f) To the extent necessary to provide Subscribers with the Services, IHRP may provide their Personal Data to third party contractors who work on behalf of or with IHRP to provide Subscribers with such Services, to help IHRP communicate with Subscribers or to maintain the Website. Generally, these contractors do not have any independent right to share this information, however certain contractors who provide services on the Website, including the providers of online communications services, may use and disclose the personal information collected in connection with the provision of these Services in accordance with their own privacy policies. In such circumstances, you consent to us disclosing your personal information to contractors, solely for the intended purposes only.
- (g) Subscribers may choose to unsubscribe from marketing communications that they receive from IHRP or manage their preferences via the links provided at the end of every such email and/or promotional communication.

Persons who register and have accounts to use the Website ("Members") Note:

This section applies to all Members.

- (a) Accordingly, a condition of each Member's use of and access to the Website and the Services is their acceptance of the terms of this Privacy Policy. Any Member that does not agree with any provisions of the same has the option to discontinue the Services provided by IHRP immediately.
- (b) All the information provided to IHRP by a Member, including Personal Data or any sensitive personal information, is voluntary. You understand that IHRP may use certain information of yours, which has been designated as Personal Data under the PDPA, (a) for the purpose of providing you the Services, (b) for commercial purposes and in an aggregated or non-personally identifiable form for research, statistical analysis and business intelligence purposes, (c) for sale or transfer of such research, statistical or intelligence data in an aggregated or non-personally identifiable form to third parties and affiliates. IHRP also reserves the right to use information provided by or about the Member for the following purposes:
 - i. Publishing such information on the Website;
 - ii. Contacting Members for offering new services;
 - iii. Contacting Members for taking Service feedback;
 - iv. Analysing anonymised practice information for our commercial use.

If you have voluntarily provided your Personal Data to IHRP for any of the purposes stated above, you hereby consent to such collection and use of such information by IHRP.

- (c) Collection, use and disclosure of information which has been designated as Personal Data under the PDPA requires your express consent. By affirming your assent to this Privacy Policy, you provide your consent to such use, collection and disclosure as required under applicable law. Our Services may be unavailable to you in the event such consent through an email is not given.
- (d) You are responsible for maintaining the accuracy of the information you submit to us, such as your contact information provided as part of account registration. If your personal information changes, you may correct, delete inaccuracies, or amend information by making the change on your account page or by contacting us through dpo@ihrp.sg. We will make good faith efforts to make requested changes in our then active databases as soon as reasonably practicable. If you provide any information that is untrue, inaccurate, out of date or incomplete (or becomes untrue, inaccurate, out of date or incomplete), or IHRP has reasonable grounds to suspect that the information provided by you is untrue, inaccurate, out of date or incomplete, IHRP may, at its sole discretion, discontinue the provision of the Services to you. There may be circumstances where IHRP will not correct, delete or update your Personal Data, including (a) where the Personal Data is opinion data that is kept solely for evaluative purpose; and (b) the Personal Data is in documents related to a prosecution if all proceedings relating to the prosecution have not been completed.
- (e) If you wish to cancel your account or request that we no longer use your information to provide you Services, contact us through dpo@ihrp.sg. We will retain your information for as long as your account with the Services is active and as needed to provide you the Services. We shall not retain such information for longer than is required for the purposes for which the information may lawfully be used or is otherwise required under any other law for the time being in force. After a period of time, your data may be anonymised and aggregated, and then may be held by us as long as necessary for us to provide our Services effectively, but our use of the anonymised data will be solely for analytic purposes. Please note that your withdrawal of consent, or cancellation of account may result in IHRP being unable to provide you with its Services or to terminate any existing relationship IHRP may have with you.
- (f) If you wish to opt-out of receiving non-essential communications such as promotional and marketing-related information regarding the Services, you may do so via your email and/or account.
- (g) This Privacy Policy applies to Services that are owned and operated by IHRP. IHRP does not exercise control over the Websites displayed as search results or links from within its Services. These other Websites may place their own cookies or other files on the Member's computer, collect data or solicit personal information from the Member, for which IHRP is not responsible or liable. Accordingly, IHRP does not make any representations concerning the privacy practices or policies of such third parties or terms of use of such Websites, nor does IHRP guarantee the accuracy, integrity, or quality of the information, data, text, software, sound, photographs, graphics, videos, messages or other materials available on such Websites. The inclusion or exclusion does not imply any endorsement by IHRP of the Website, the Website's provider, or the information on the Website. If you decide to visit a third party Website linked to the Website, you do this entirely at your own risk. IHRP encourages the Member to read the privacy policies of that Website.
- (h) IHRP does not collect information about the visitors of the Website from other sources, such as public records or bodies, or private organisations, save and except for the purposes of registration of the

Members (the collection, use, storage and disclosure of which each User must agree to in order for IHRP to effectively render the Services).

- (i) IHRP maintains a strict "No-Spam" policy, which means that IHRP does not intend to sell, rent or otherwise give your e-mail address to a third party without your consent.
- (j) IHRP has implemented best international market practices and security policies, rules and technical measures to protect the Personal Data that it has under its control from unauthorised access, improper use or disclosure, unauthorised modification and unlawful destruction or accidental loss. However, for any data loss or theft due to unauthorised access to the Member's electronic devices through which the Member avails the Services, IHRP shall not be held liable for any loss whatsoever incurred by the Member.
- (k) IHRP implements reasonable security practices and procedures and has a comprehensive documented information security programme and information security policies that contain managerial, technical, operational and physical security control measures that are commensurate with respect to the information being collected and the nature of IHRP's business. The reasonable security practices and procedures implemented by IHRP include, but not limited to: ensuring that any Personal Data is protected by password.
- (l) IHRP takes your right to privacy very seriously and other than as specifically stated in this Privacy Policy, will only disclose your Personal Data in the event it is required to do so by law, rule, regulation, law enforcement agency, governmental official, legal authority or similar requirements or when IHRP, in its sole discretion, deems it necessary in order to protect its rights or the rights of others, to prevent harm to persons or property, to fight fraud and credit risk, or to enforce or apply the terms under this Privacy Policy.
- (m) IHRP takes all reasonable steps to ensure that all unsolicited information is destroyed immediately.

Casual Visitors Note:

- (a) No sensitive personal data or information is automatically collected by IHRP from any casual visitors of this Website, who are merely perusing the Website.
- (b) Nevertheless, certain provisions of this Privacy Policy are applicable to even such casual visitors, and such casual visitors are also required to read and understand the privacy statements set out herein, failing which they are required to leave this Website immediately.
- (c) If you, as a casual visitor, have inadvertently browsed any other page of this Website prior to reading the privacy statements set out herein, and you do not agree with the manner in which such information is collected, processed, stored, used, disclosed or retained, merely quitting this browser application should ordinarily clear all temporary cookies installed by IHRP. All visitors, however, are encouraged to use the "clear cookies" functionality of their browsers to ensure such clearing / deletion, as IHRP cannot guarantee, predict or provide for the behaviour of the equipment of all the visitors of the Website.
- (d) You are not a casual visitor if you have willingly submitted any Personal Data or personal information to IHRP through any means, including email or through the registration process on the Website. All such visitors will be deemed to be, and will be treated as, Users for the purposes of this Privacy Policy, and in which case, all the statements in this Privacy Policy apply to such persons.

SECTION 9: CONFIDENTIALITY AND SECURITY

Your Personal Data is maintained by IHRP in electronic form on its equipment, and on the equipment of its employees. Such information may also be converted to physical form from time to time. IHRP has implemented and will continue to maintain security measures adequate to prevent the unauthorised collection, use, disclosure, copying, modification, and disposal of your information. Nevertheless, you acknowledge and agree that communications through the Internet are not entirely secure and that any information transferred to IHRP is done so at your own risk. IHRP does not warrant or guarantee that the information you provide will not be accessed, copied, used, or disposed of in breach of IHRP's security measures, and you agree not to hold IHRP liable or responsible for any loss or damage resulting therefrom. In the event of such a breach, IHRP will, as far as reasonably possible, promptly notify all affected persons.

No administrator at IHRP will have knowledge of your password. You accept that you are responsible for keeping confidential your username and password to your account with IHRP. Be sure to log off from the Website when finished. IHRP does not undertake any liability for any unauthorised use of your account and password. If you suspect any unauthorised use of your account, you must immediately notify IHRP by sending an email to dpo@ihrp.sg. You shall be liable to indemnify IHRP due to any loss suffered by it due to such unauthorised use of your account and password.

SECTION 10: AGE OF CONSENT

By using the Website, you represent that you are at least the age of 18 years old, or you have given us your consent to allow any of your minor dependents to use this Website as the case may be.

IHRP strongly encourages parents and guardians to supervise the online activities of their minor children and consider using parental control tools available from online services and software manufacturers to help provide a child-friendly online environment. These tools also can prevent minors from disclosing their name, address, and other personally identifiable information online without parental permission. Although the Website and Services are not intended for use by minors, IHRP respects the privacy of minors who may inadvertently use the internet or the mobile application.

SECTION 11: WEB-RELATED INFORMATION

IHRP may collect certain information from you without you actively providing the information when you navigate the Website via cookies. Cookies are small data text files stored in your local browser cache that send information about your previous visits to and activities on the Website. These cookies will not give IHRP any personal information about you. IHRP reserves the right to use the cookies to recognise your browser and thereby customise and optimise the Website to your preferences.

You can accept or delete cookies. For security reasons, you may wish to deactivate the storing of cookies or adjust your browser to inform you before the cookies are stored on your computer. However, please note that if you do erase or block the cookies, you may not be able to utilise some features on the Website. In such situations, IHRP shall not be held liable for any loss or damage resulting from your inability to use those features.

IHRP may also collect your Internet Protocol (IP) address. Your Internet Service Provider allocates an IP address to your computer in order for it to access the Internet. The IP address is considered to be non-

personal information and it may be dynamic (changing every time you connect to the Internet) or it may be static (unique to your computer). IHRP collects your IP address in order to facilitate its administration and improvement of the Website. The information derived from your IP address can help IHRP diagnose server problems, report aggregate information, and determine the fastest route from your computer to the Website.

We use the following cookies:

- (a) **Strictly necessary cookies.** These are cookies that are required for the operation of the Website. They include, for example, cookies that enable you to log into secure areas of the Website, using IHRP's online payment services.
- (b) **Analytical/performance cookies.** They allow IHRP to recognise and count the number of visitors and to see how visitors move around the Website when they are using it. This helps IHRP to improve the way the Website works, for example, by ensuring that users are able to use custom features.
- (c) **Functionality cookies.** These are used to recognise you when you return to our Website. This enables IHRP to personalise its content for you, greet you by name and remember your preferences (for example, your choice of language or region).
- (d) **Targeting cookies.** These cookies record your visit to the Website, the pages you have visited and the links you have followed. IHRP will use this information to make the Website and the advertisements targeted more relevant to your interests. IHRP may also share this information with third parties for this purpose.

Our Website includes certain social media features, such as the Facebook, Twitter, LinkedIn buttons and widgets. These features may collect your IP address, which page you are visiting on our Website, and may set a cookie to enable the feature to function properly. Social media features and widgets are either hosted by a third party or hosted directly on our Website. Your interactions with these features are governed by the privacy policy of the third party website providing such features.

SECTION 12: NOTIFICATIONS & COMMUNICATIONS

IHRP will send you email notifications from time to time. You may not opt out of receiving certain service-related notifications that are:

- (a) necessary elements of your transactions on the Website and any product or service of IHRP's, such as confirmations of particular actions you have taken and matters related to your assessment/certification/accreditation as well as on-going CPD;
- (b) are required for legal or security purposes; or
- (c) meant to inform you of changes to Website policies or IHRP's operations or services.

SECTION 13: ACCURACY

IHRP will take reasonable efforts to ensure that any Personal Data collected is accurate and up to date by updating its records whenever changes to information come to its attention. IHRP will disregard information which seems, on a reasonable basis, to be inaccurate or out of date by reason of the time which has elapsed since it was collected or by reason of any other information in its possession.

SECTION 14: TRANSFER, STORAGE, & RETENTION OF INFORMATION

IHRP will retain all information collected for as long as you continue to use the Website or IHRP's services. If you are a Member and terminate your IHRP account, IHRP will retain the information, including personal data, collected during your membership for as long as reasonably necessary for any business or legal purpose. Generally, we do not retain Personal Data for a period of longer than six (6) years after the original purposes for which the Personal Data was collected have ceased to be applicable, unless otherwise required by law or other mandatory directions by court or government authorities or for purposes of legal proceedings or other similar proceedings or investigations. Any personal data stored in hardcopy will be shredded and any personal data stored electronically will be erased.

SECTION 15: COMMUNICATIONS

IHRP may record, and/or monitor any communication(s) (including telephone calls or other electronic communications) between you and IHRP. IHRP may do so in order to resolve queries in the future and/or for the purpose of ensuring security, staff training and complying with its legal and/or regulatory responsibilities.

SECTION 16: ACCESS AND WITHDRAWAL OF PERSONAL DATA

You may withdraw your consent to our continued use and disclosure of your Personal Data or seek access to your Personal Data (to a reasonable extent and as permitted by the Act) at any time by writing to dpo@ihrp.sg. You may also withdraw your consent for specific forms of communication and on specific communications via the unsubscribe options as stated on our email or other marketing messages.

In withdrawing your consent, you acknowledge that we may not be able to provide or continue providing certain goods and/or services to you and that we may cease such provision accordingly without any liability. Please note that it may take up to 30 working days for any request for consent withdrawal to be reflected in our systems.

We will, at your request, endeavour to provide you with an account of your Personal Data in our possession or control within a reasonable time. Such account shall be in respect of how your Personal Data has been or may have been generally used or disclosed within the year before the date of your request. We reserve the right to charge a reasonable administrative fee for carrying out your request.

There may be circumstances where IHRP will not correct, delete or update your Personal Data, including: (a) where the Personal Data is opinion data that is kept solely for evaluative purpose; and (b) the Personal Data is in documents related to a prosecution if all proceedings relating to the prosecution have not been completed.

SECTION 17: ACCURACY AND CORRECTION

You may request for information from IHRP on what Personal Data of yours we have and how we have used and shared your Personal Data during the last one (1) year before the date of your request. We will endeavour to ensure that your Personal Data we use is sufficiently accurate and complete in making any decision that impacts you.

To help us maintain the accuracy of your Personal Data, we encourage you to inform us when there are any changes to your Personal Data which you have provided us by writing to our Data Protection Officer. We will correct or complete your Personal Data as soon as reasonably practicable. If you have any concerns, feedback or complaints about the use and/or sharing of your Personal Data, you may contact us at dpo@ihrp.sg.

SECTION 18: DO NOT CALL PROVISIONS

IHRP shall not, and shall ensure that its agents shall not, send a specified message to a Singapore telephone number without first checking with the Do Not Call Registry established by the Personal Data Protection Commission ("PDPC") and receiving confirmation from the PDPC that such Singapore telephone number is not listed on the Do Not Call Register.

IHRP shall not, and shall ensure that its agents shall not, send a specified message to a Singapore telephone number, unless the specified message includes clear and accurate information identifying the person sending the specified message, and such person's contact information.

The prescribed duration within which IHRP must check with the Do Not Call Registry before sending a specified message to a Singapore telephone number will be 30 days. You may continue to receive marketing messages and other product information from IHRP within the prescribed validity period.

IHRP shall not make, cause or authorise a voice call addressed to a Singapore telephone number that conceals or withholds, or that has the effect of concealing or withholding, the calling line identity from the recipient.

IHRP will not require an Account Holder or users of a Singapore telephone number to consent to the sending of a specified message beyond what is reasonable for IHRP to provide its services. IHRP will not obtain or attempt to obtain such consent by:

- (a) providing false or misleading information; or
- (b) using deceptive or misleading practices.

If an Account Holder or user of a Singapore telephone number gives notice withdrawing consent for the sending of a specified message to that number, then IHRP shall cease (and cause its agents to cease) sending specified messages to that number. Such withdrawal of consent shall be without prejudice to and does not limit or derogate from IHRP's rights to collect, use and/or disclose the Account Holder's or user's personal data, in this case, pursuant to the applicable terms and conditions governing his/her relationship with IHRP and under the law.

SECTION 19: YOUR RIGHTS

You have the right to ask IHRP not to process your personal data for marketing purposes. IHRP will usually inform you (before collecting your data) if it intends to use your data for such purposes or if it intends to disclose your information to any third party for such purposes. You can exercise your right to prevent such processing by checking certain boxes on the forms IHRP uses to collect your data. You can also exercise the right at any time by contacting IHRP at dpo@ihrp.sg. The Website may, from time to time, contain links to and from the Websites of its partner networks, advertisers and affiliates. If you follow a link to any of these Websites, please note that these Websites have their own privacy policies and that IHRP does not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these Websites.

You may choose to stop receiving or change the frequency of email, direct mail, phone and mobile marketing communications. You can update and correct your personal information anytime using My Account or by contacting IHRP at dpo@ihrp.sg.

SECTION 20: CHANGES TO THIS PRIVACY POLICY

IHRP may update this Privacy Policy at any time, with or without advance notice. As always, if you object to any of the changes to our terms, and you no longer wish to use the Services, you may contact IHRP at dpo@ihrp.sg. Unless stated otherwise, IHRP's current Privacy Policy applies to all information that IHRP has about you and/or your account.

If a Subscriber or Member uses the Services; or accesses the Website after a notice of changes has been sent to such Prospect or Member, or published on the Website, such Prospect or Member hereby provides his/her/its consent to the changed terms.

SECTION 21: HOW TO CONTACT US

Should you have questions about this Privacy Policy or IHRP's information collection, use and disclosure practices, or if you would like to access, correct, amend or delete any personal information we have about you, register a complaint, or simply want more information, please contact our Data Protection Officer (the "DPO") at: dpo@ihrp.sg. We will use reasonable efforts to respond promptly to any requests, questions or concerns, which you may have regarding our use of your personal information.