

# Privacy Policy

*Last updated: [5 June 2020]*

This Personal Data Protection and Privacy Policy (PDPPP) is adopted by Voices of Asia Pte Ltd, a Singapore private limited company (No 201314231R, individually or collectively “**VOA**”, “**we**”, “**us**”, “**our**”) to define the way it shall manage personal data in accordance with (and as defined by) the Personal Data Protection Act 2012 (the “**Act**”) of Singapore and regulations as amended from time to time.

VOA respects the privacy of individuals and recognises the need to treat personal data in an appropriate and lawful manner. VOA commits itself to comply with its obligations in this regard as set forth herein with respect to all personal data it handles.

Our proprietary internal web application (“**WeConnect**”) allows you to fill out personal information for the purpose of learning more about the use of our services or functionalities (collectively the “**Services**”), applying for accounts or making general inquiries.

If you believe that this policy has not been followed in respect of personal data about you or others, please contact VOA’s Appointed Officer using the details in the Contact Us section below as soon as possible.

## Personal Data

The personal data collected by VOA may include some or all of the following information. Such information may be collected and/or retained in either digital and/or hardcopy:

- 1) personal contact data including name, mobile number, email address, residential address and correspondence address;
- 2) occupational details like designation, work experience, company information, educational history;
- 3) basic personal demographic information including date of birth, nationality, ethnicity, gender, marital status;
- 4) personal interest, skills, traits;
- 5) banking and payment information like bank account, credit/debit cards, purchase information;
- 6) images and voice recordings of conversations with you; and
- 7) coaching related information including mentoring goals, coaching notes, your objectives of use and certification information.

## Non-Personal Data:

WeConnect logs internet protocol (“**IP**”) addresses and browser types for the purposes of system administration and user functionality. These logs will be analysed to improve the value of the materials available on WeConnect. User sessions and user browsing behaviours may be tracked. We use non-identifying and aggregate information to better design our WeConnect. We also may collect

browser type, device type (such as desktop, laptop, table, phone, etc.), cookie\* information, operating system and local time zone.

\*A cookie is a small piece of information that may be placed on a computer when a user visits certain website.

## **Purpose**

Generally, VOA collects, uses and discloses personal data for the following purposes:

- 1) contact and communicate with you;
- 2) facilitate your use of our Services;
- 3) enable VOA administration to carry out their duties, including maintaining the users' account;
- 4) manage requests and queries and resolving complaints;
- 5) provide service for meeting our contractual terms to users;
- 6) enhance WeConnect user experience for all and future users of the Services;
- 7) protect, investigate, and deter against fraudulent, unauthorized, or illegal activity;
- 8) internal and external communication and publications.

## **Disclosure of Personal Data**

VOA will take reasonable steps to protect personal data against unauthorised disclosure. Subject to the provisions of any applicable law, personal data may be disclosed, for the purposes listed above (where applicable), to the following:

- VOA's staff and volunteers; and
- Agents, contractors or third-party service providers who provide services to the VOA, such as website and application providers.

VOA may disclose personal information, without notice, to entities outside of VOA if required to do so by privacy law and/or applicable law to:

- comply with the law or respond to any legal processes served on VOA;
- protect and defend the rights or property of VOA, our agents, customers, and others. This includes enforcing our agreements, policies, and the Terms and Conditions; and
- act under exigent circumstances to protect the personal safety of users of WeConnect, our employees and agents or the public.

VOA will use its reasonable endeavours to ensure that the third parties, whom personal data is disclosed to, provide a comparable standard of protection to personal data. However, the VOA does not warrant or take any responsibility of any misuse undertaken by those third parties.

## **Consent**

By using WeConnect, you agree and consent to the collection, use and disclosure of your personal data by VOA for some or all of the purposes mentioned herein. If you provide us with personal information relating to a third party (e.g. your spouse, child, parent, relative, or friend), you represent

to us that you have obtained the consent of the third party to provide us with their personal data for the respective purposes.

### **Accuracy, Access, Updating and Withdrawal of Personal Data**

You should ensure that all personal data submitted to us is complete and accurate. Failure to do so may result in our inability to provide you with information or services you have requested. VOA shall make a reasonable effort to ensure that personal data collected by or on behalf of VOA is accurate.

Providers of personal data can access, verify, update, or withdraw their personal data in accordance with applicable law by making such requests to VOA's Appointed Officer using the details in the Contact Us section below. For security reasons, VOA reserves the right to take steps to authenticate the identity of persons making such requests.

You may at any time withdraw any consent given in respect of the collection, use or disclosure of your personal data by making a written request to the Appointed Officer using the details in the Contact Us section below. In the event you withdraw your consent to VOA for the processing of your personal data, VOA shall cease to process your personal data within 30 working days upon receiving your withdrawal request. Please note that once consent is withdrawn, we may not be able to fulfil our services to you.

### **Use of Cookies and Links**

The VOA may use cookies on WeConnect to enable certain features and functions, build a profile of the way WeConnect is used, to provide administrative services or establish usage statistics, etc. WeConnect may also reference other websites. VOA is not responsible for the privacy of third-party websites. You should check the privacy policies on these websites before providing any personal data.

### **Security, Transfer and Retention**

While security cannot be guaranteed, VOA will take reasonable technical and organisational security measures to protect personal data from unauthorised access, improper use or disclosure, unauthorised modification, unlawful destruction or accidental loss.

You should be aware, however, that no method of transmission over the internet or method of electronic storage is 100% secure. VOA, therefore, does not, and cannot accept responsibility for, warrant or guarantee the security of information you send to or receive from WeConnect over the internet. When submitting your information, the provider agrees that VOA does not and will not have (to the fullest extent allowed by law) any responsibility or liability for any claim, damage or loss connected to the loss of, or unauthorised use of, any personal data, whether by unauthorised access to the server or files or otherwise.

VOA will endeavour to advise foreign recipients (mainly third-party IT provider) of personal data of its practices regarding security and will encourage them to provide secure systems in keeping with the security requirements required under the Act.

VOA will store personal data only for the time necessary for fulfilment of the purposes for which such personal data is collected, or upon formal request to us to withdraw our processing of personal data, or as permitted by applicable law.

## **Miscellaneous**

In addition to personal data protection, the Act also prohibits organisations from calling (by phone, fax or text message) persons for marketing purposes. While VOA does not engage in telemarketing, VOA may call users in accordance to the purposes we collect personal data. VOA makes the reasonable assumption that persons who have provided us with their contact details have therefore agreed to be contacted by VOA staff and volunteers.

If you do not wish to be called by VOA, you should withdraw your telephone contact information by making a written request to the Appointed Officer using the details in the Contact Us section below.

Our marketing emails tell you how to “opt-out.” If you opt out, we may still send you non-marketing emails. Non-marketing emails include emails about your accounts and our business dealings with you.

## **Variation**

We will be reviewing this policy from time to time and will post on WeConnect and website any changes to this policy with the effective date of the changed policy. If at any point in time, any significant changes to our policy are made, we will notify you via an announcement about the change and provide you an opportunity to withdraw, should you so desire, your consent for your personal data to be processed by us.

## **Governing Law**

This policy shall be governed in all respects by the laws of the Republic of Singapore. You hereby submit to the exclusive jurisdiction of the courts of the Republic of Singapore for purposes of any disputes arising under or in connection with this policy.

## **Contact Us**

VOA’s Appointed Officer will be instructed and tasked with providing compliance with this policy and answering questions about data privacy or security issues. If you have questions, comments or concerns about data privacy, VOA’s policy or the security of personal data that we process, you may send an e-mail to [cs@voicesofasia.org](mailto:cs@voicesofasia.org).