

# Privacy Policy

## Introduction

Texture Media Pte Ltd does not collect personal data other than those that individuals voluntarily provide. We are committed to protecting the privacy and confidentiality of any personal information you share with us in accordance with the Singapore Personal Data Protection Act 2012 and all associated regulations and guidelines which may from time to time be issued by the Personal Data Protection Commission of Singapore.

## Definitions

As used in this Privacy Policy:

**“Personal Data”** means data, whether true or not, about an individual who can be identified: (a) from that data; or (b) from that data and other information to which we have or are likely to have access.

**“Business Contact Information (BCI)”** is defined as an individual’s name, position name or title, business telephone number, business address, business email address and any other similar information about the individual, not provided by the individual solely for his personal purposes.

## 1. Application of This Privacy Policy

1.1. This Privacy Policy concerns our customers and users of our website.

1.2. This Privacy Policy applies to all data in any form about an individual who can be identified from that data which are in our possession or under our control for the purposes of and in connection with our contractual duties and provisions of our services.

1.3. Under the Singapore Personal Data Protection Act, business contact information (e.g. name, business address, business telephone number) is not considered as Personal Data so long as it is used strictly for business-to-business (B2B) transactions.

## 2. Collection of Personal Data

2.1. We collect Personal Data when:

- You voluntarily provide to us, for example when you communicate with us via email, telephone or other channels. The data we collect includes contact information (your name, phone no., email address), company name, relevant department and position/job title and will be used strictly for B2B transactions.
- You contact us through our website. You will be required to provide your name and email address. The information you provide will be handled according to this Privacy Policy.

2.2. You have choices regarding our collection, use or disclosure of your personal data. You have the right to object to the processing of your personal data and withdraw your consent in a manner described in section 3 below. If you choose not to provide us with the personal data as described in this Policy, we may not be able to fulfil our contractual duties towards you or facilitate your request or provide the service to you.

2.3. We may collect, disclose or use your personal data pursuant to an exception under the Personal Data Protection Act or other written law.

### **3. Withdrawing Your Consent and its Consequences**

3.1. Providing us with your Personal Data is voluntary. However, if you choose not to provide us with the Personal Data described in this Policy, we may not be able to fulfil our contractual duties towards you or facilitate your request or provide the service to you, or the company you may be representing.

3.2. You may withdraw consent and request us to stop using and/or disclosing your personal data for any or all of the purposes listed in section 4 by submitting your request to our Data Protection Officer at the contact details provided in section 11.

3.3. Upon receipt of your request to withdraw your consent, we may require reasonable time (depending on the complexity of the request and its impact on our relationship with you) for your request to be processed and for us to notify you of the consequences of us acceding to the same, including any legal consequences which may affect your rights and liabilities to us. In general, we shall seek to process your request within 30 business days of receiving it.

3.4. Whilst we respect your decision to withdraw your consent, please note that depending on the nature and scope of your request, we may not be in a position to continue providing our services to you and we shall, in such circumstances, notify you before completing the processing of your request.

3.5. Please note that withdrawing your consent does not affect our right to continue to collect, use and disclose personal data where such collection, use and disclosure without consent is permitted or required under applicable laws.

### **4. Use of Personal Data**

4.1. We use the Personal Data you provide us for one or more of the following purposes:

- Provide you with information that you request from us or which we think may interest you;
- Respond to your enquires and feedback;
- Carry out obligations arising from any contracts entered into between you and us;
- Enter into a contract with you or manage our existing business relationship; and
- Comply with or fulfil legal obligations and regulatory requirements.

We do not sell, distribute or otherwise make your Personal Data available to any third party other than described in this Privacy Policy.

### **5. Disclosure of Personal Data**

5.1. We may disclose your Personal Data to third party providers, agents and other organizations we have engaged to perform any of the functions listed in section 4 above for us; and

5.2. Where required to do so by law, we may disclose Personal Data about you to the relevant authorities or to law enforcement agencies.

### **6. Accuracy of Personal Data**

6.1. We will take reasonable steps to ensure that the Personal Data we collect about you is accurate, complete, not misleading and kept up-to-date. If we are in an ongoing business relationship with you, please update us of any changes to your Personal Data for the purposes listed in section 4 of this Privacy Policy.

### **7. Protection of Personal Data**

7.1. We employ appropriate administrative, physical, technical and organizational security measures to help protect your Personal Data against loss and to guard against access by unauthorized persons.

7.2. If there is a need to disclose your Personal Data to third parties in the manner described in section 5, we will ensure that they provide sufficient guarantees to us to have implemented the necessary security measures to protect your Personal Data.

## **8. Retention of Personal Data**

8.1. We will not retain any of your Personal Data when it is no longer needed for any business or legal purposes.

8.2. We will dispose of or destroy such documents containing your Personal Data in a secure manner as soon as it is reasonable to assume that the permitted purpose is no longer being served by their retention.

8.3. Any unsolicited personal data received by us will be returned to the sender immediately. If received by email or through our website, these unsolicited personal data will be deleted right away. If received by telephone, these will not be recorded.

## **9. Access and Correction to Your Personal Data**

9.1. You have the right to know what Personal Data we have and process about you. You may write in to us at the contact details provided in section 11 to find out how we have been using or disclosing your Personal Data over the past one year.

9.2. You are also entitled to have incorrect Personal Data about you corrected and you may in some cases ask us to delete your Personal Data. You can also object to certain Personal Data about you being processed and request that processing of your Personal Data be limited.

9.3. Before we accede to your access or correction request, we may need to verify your identity by checking identification document, and the legitimacy of your request.

9.4. We will respond to your access or correction request as soon as reasonably possible, or within 30 days from the date we receive your request. If we are unable to do so within 30 days, we will let you know and give you an estimate of how much longer we require.

9.5. Please note that a reasonable fee may be charged for an access request. If so, we will inform you of the fee before processing your request.

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

10.1. We do not transfer personal data outside of Singapore.

10.2. In case transfer is necessary in line with the purposes listed in section 4, we will ensure that the standard of data protection in the recipient country is comparable to that of the Singapore Personal Data Protection Act 2012. If this is not so, we will enter into an agreement with the receiving party to accord similar levels of data protection as those in Singapore.

## **11. Contacting Us**

11.1. If you have any questions about this Privacy Policy, or have any complaint relating to how we manage your Personal Data, or would like to exercise any of your data protection rights, you may contact our Data Protection Officer (DPO) via this email address: [dpo@texture.sg](mailto:dpo@texture.sg)

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

- Your Name and Contact Information

We treat such queries and feedback seriously and will deal with them confidentially and within reasonable time.

## **12. Effect of Policy and Changes to Policy**

12.1. This Policy applies in conjunction with any other sources, contractual clauses and consent clauses that apply in relation to the collection, use and disclosure of your Personal Data by us.

12.2. We may revise this Policy from time to time. Please visit our website periodically to note any changes. Changes to this Policy take effect when they are posted on our website.

12.3. Your continued use of our services constitutes your acknowledgment and acceptance of this Policy and any such changes.

12.4 This Privacy Policy was last updated on 2<sup>nd</sup> March 2020.