

**Your privacy is important to us. The purpose of this Privacy Policy is to inform you of how Absolute PR manages personal data in accordance with the Personal Data Protection Act 2012 (“the Act”). Please take a moment to read this Privacy Policy so that you know and understand the purposes for which we collect, use and disclose your Personal Data.**

**By interacting with us, submitting information to us or signing up for any promotions or services offered by us, you agree and consent to Absolute PR, its related corporations and affiliates, (collectively referred to herein as "Absolute PR", "us", "we" or "our"), as well as our respective representatives collecting, using, disclosing and sharing amongst themselves your Personal Data, and disclosing such Personal Data to Absolute PR’s authorised service providers and relevant third parties in the manner set forth in this Privacy Policy.**

This Privacy Policy supplements but does not supersede nor replace any other consents you may have previously provided to Absolute PR nor does it affect any rights which Absolute PR may have at law in connection with the collection, use or disclosure of your Personal Data. Absolute PR may from time to time update this Privacy Policy to ensure that this Privacy Policy is consistent with our future developments, industry trends and/or any changes in legal or regulatory requirements. Subject to your rights at law, you agree to be bound by the prevailing terms of the Privacy Policy as updated from time to time on our websites. Please check regularly for updated information on the handling of your Personal Data.

## **1. Your Personal Data**

In this Privacy Policy, “Personal Data” refers to any data or information about you from which you can be identified either (a) from that data; or (b) from that data and other information to which we have or are likely to have access. Examples of such Personal Data which you may provide to us include (depending on the nature of your interaction with us):

(a) your name, Company details, telephone number(s), mailing address, email address and any other information relating to you which you have provided us in any forms you may have submitted to us, or in other forms of interaction with you;

(b) information about your use of Absolute PR’s website and services, including cookies, IP address, subscription details, but only to the extent that Absolute PR may identify you from such information;

(c) information about 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.

## 2. Collection of Personal Data

2.1 Generally, **Absolute PR** collects your Personal Data in the following ways:

- when you submit forms relating to any of our products or services;
- when you register for or use any of our services on websites owned or operated by us or when you register as a member of websites owned and/or operated by us, or use services on such websites;
- when you interact with our customer service officers;
- when you establish any online accounts with us;
- when you request that we contact you;
- when you are contacted by, and respond to, our marketing representatives and agents;
- when you respond to our request for additional Personal Data
- when you ask to be included in an email or other mailing list;
- when you respond to our promotions and other initiatives;
- when we receive references from business partners and third parties, for example, where you have been referred by them;
- when you submit your Personal Data to us for any other reason.

2.2 When you browse our website, you generally do so anonymously but please see the section below on cookies.

2.3 If you provide us with any Personal Data relating to a third party (e.g. information of colleague and/or authorised representatives), by submitting such information to us, you represent to us that you have obtained the consent of the third party to you providing us with their Personal Data for the respective purposes.

**2.4** You should ensure that all Personal Data submitted to us is complete, accurate, true and correct. Failure on your part to do so may result in our inability to provide you with products and services you have requested.

### **3. Purposes for the Collection, Use and Disclosure of Your Personal Data**

**3.1** Generally, Absolute PR collects, uses and discloses your Personal Data for the following purposes:

- responding to your queries and requests and responding to complaints;
- managing the infrastructure and business operations of Absolute PR and complying with internal policies and procedures;
- matching any Personal Data held which relates to you for any of the purposes listed herein;
- verifying your identity;
- protecting and enforcing our contractual and legal rights and obligations;
- conducting audits, reviews and analysis of our internal processes, action planning and managing commercial risks;
- any other purpose relating to any of the above.

**3.2** In addition, where permitted under the Act, Absolute PR may also collect, use and disclose your Personal Data for the following purposes (which we may describe in our documents and agreements as "Additional Purposes" for the handling of Personal Data):

- providing services, products and benefits to you, including promotions, loyalty and reward programmes;
- matching Personal Data with other data collected for other purposes and from other sources (including third parties) in connection with the provision or offering of products and services, whether by Absolute PR or other third parties;
- administering contests, competitions and conducting lucky draws, including, where necessary, in order to announce the results of these contests, competitions and lucky draws and identify and contact the winners, and in order to publicise and conduct marketing strictly related to these contests, competitions and lucky draws;
- sending you details of products, services, special offers and rewards, either to our customers generally, or of particular products and services which may be of interest to you; and

- conducting market research, understanding and determining customer location, preferences and demographics for us to review, develop and improve our products, services and also develop special offers and marketing programmes.

**3.3** If you have provided your Singapore telephone number(s) and have indicated that you consent to receiving marketing or promotional information via your Singapore telephone number(s), then from time to time, Absolute PR may contact you using such Singapore telephone number(s) (including via voice calls, sms, fax or other means) with information about our products and services (including discounts and special offers).

**3.4** In relation to particular products or services or in your interactions with us, we may also have specifically notified you of other purposes for which we collect, use or disclose your Personal Data. If so, then we will collect, use and disclose your Personal Data for these additional purposes as well, unless we have specifically notified you otherwise.

#### **4. Disclosure of Personal Data**

Absolute PR will take reasonable steps to protect your Personal Data against unauthorised disclosure. Subject to the provisions of any applicable law, this Personal Data may be disclosed, for the purposes listed above (where applicable), to the following third parties, whether they are located overseas or in Singapore:

##### **4.1** Absolute PR affiliates;

- vendors or any third party business partners who offer goods and services or sponsor contests or other promotional programs on Absolute PR's sites, whether in conjunction with us or not;
- external business and charity partners in relation to corporate promotional events;
- the Credit Bureau, or in the event of default or disputes, any debt collection agencies or dispute resolution centres;
- anyone to whom we transfer or may transfer our rights and duties;
- banks, credit card companies and their respective service providers;
- our professional advisors such as our auditors and lawyers;
- relevant government regulators or authority or law enforcement agency to comply with any laws or rules and regulations imposed by any governmental authority; and

- any other party to whom you authorise us to disclose your personal data

## **5. Use of cookies**

When you interact with us on our websites, we may collect or analyse anonymised information from which individuals cannot be identified (“**Aggregate Information**”), such as number of users and their frequency of use, the number of page views (or page impressions) that occur on the website and common entry and exit points into website.

**5.1** Absolute PR uses "cookies", where a small data file is sent to your browser to store and track Aggregate Information about you when you enter our websites. The cookie is used to track information such as the number of users and their frequency of use, profiles of users and their preferred sites.

**5.2** Absolute PR may use an independent company to measure and analyse the Internet usage across Absolute PR web sites. Absolute PR uses the third party Company’s services to collect the following core information on the usage of our web sites, including:

- The number of page views (or page impressions) that occur on Absolute PR web sites;
- The number of unique visitors to Absolute PR web sites;
- How long these unique visitors (on average) spend on Absolute PR web sites when they do visit; and
- Common entry and exit points into Absolute PR web sites.

**5.3** This information is aggregated by the third party Company and provided to Absolute PR to assist in analysing the usage of Absolute PR web sites.

**5.4** Pages on Absolute PR web sites may be coded with software which enables the third party Company to track visitors to our web sites.

**5.5** Should you wish to disable the cookies associated with these technologies; you may do so by changing the setting on your browser. However, you may not be able to enter certain part(s) of our website..

## **6. Third-Party Sites**

**6.1** Our website may contain links to other websites operated by third parties, such as our business partners. We are not responsible for the privacy practices of websites operated by third parties that are linked to our website. We encourage you to learn about the privacy policies of such third party websites. Some of these third party websites may be co-branded with our logo or trademark, even though they are not operated or maintained by us. Once you have left our website, you should check the applicable terms, conditions and policies of the third party website to determine how they will handle any information they collect from you.

## **7. Withdrawal, Access and Correction of your Personal Data**

**7.1** Should you wish to withdraw consent to use of your Personal Data or obtain access to or make corrections to your Personal Data records, please log in to the relevant account through which the Personal Data was provided, if any, failing which please contact us through our Absolute PR website.

**7.2** Please note that if your Personal Data has been provided to us by a third party, you should contact such party directly to make any queries, feedback, and access and correction requests to Absolute PR on your behalf.

**7.3** Please note that if you withdraw your consent to any or all use of your Personal Data, depending on the nature of your request, Absolute PR may not be in a position to continue to provide its products or services to you or administer any contractual relationship in place, and this may also result in the termination of any agreements with Absolute PR and your being in breach of your contractual obligations or undertakings, and Absolute PR's legal rights and remedies in such event are expressly reserved.

## **8. Governing Law**

**8.1** This Privacy Policy shall be governed in all respects by the laws of Singapore.

### **CHANGE TO THIS POLICY**

We may update our Privacy Policy from time to time. Regularly reviewing this page ensures you are updated on the information which is collected, how it is used and under what circumstances, if any, it is shared with other parties.

### **Contact Us**

If you have any questions or suggestions about our Privacy Policy, do not hesitate to contact us.