



# Data protection policy

**Last revised on 18 June 2018**

This data protection policy applies to Ginger International Trade & Investment Pte., Ltd., established in Singapore (“GITI” or “we”). This policy governs the collection, use and disclosure of personal data submitted to GITI Singapore pages of [giti.sg](http://giti.sg), and explains how we collect and handle personal data of individuals and comply with the requirements of the Personal Data Protection Act 2012 of Singapore and its regulation(s) (“PDPA”). In this policy, “personal data” shall have the meaning ascribed to it in the PDPA.

For more information about our recruitment data protection policy or our marketing data protection policy, please refer to the respective sections below.

## Main Data Protection Policy

### Summary

We will collect, use or disclose personal data for reasonable business purposes only if there is consent or deemed consent from the individual and information on such purposes have been notified. We may also collect, use or disclose personal data if it is required or authorized under applicable laws.

### Collection of Personal Data

We collect personal data from clients, customers, business contacts, partners, personnel, contractors and other individuals. Such personal data may be provided to us in forms filled out by individuals, face to face meetings, email messages, telephone conversations, through our websites or provided by third parties. If you contact us, we may keep a record of that contact.

We collect these personal data when it is necessary for business purposes or to meet the purposes for which you have submitted the information.

We will only collect, hold, process, use, communicate and/or disclose such personal data, in accordance with this policy. If you are acting as an intermediary or otherwise on behalf of a third party or supply us with information regarding a third party (such as a friend, a colleague, an employee etc.), you undertake that you are an authorized representative or agent of such third party and that you have obtained all necessary consents from such third party to the collection, processing, use and disclosure by us of their personal data. Because we are collecting the third party’s data from you, you undertake to make the third party aware of all matters listed in this policy preferably by distributing a copy of this policy to them or by referring them to our website.



## Use of Personal Data

We use personal data for the following purposes:

- to provide our services
- to respond to the individual's request or for the purposes for which it was provided to us as stated at the time of the collection (or as is obvious from the context of collection)
- to maintain contact with clients and other contacts
- to keep clients and other contacts informed of the services we offer, industry developments, service offerings, seminars and other events we are holding, that may be of interest to them
- for general management and reporting purposes, such as invoicing and account management
- for recruitment purposes
- for purposes related to the employment of our personnel and providing internal services to our personnel
- all other purposes related to our business.

You may choose to unsubscribe from mailing lists, registrations, or elect not to receive further marketing information from us by contacting our [Data Protection Officer](#), or if we have contacted you by email, you may use the unsubscribe function in that email to notify us. Please allow 20 days for your request to be processed.

## Disclosure of Personal Data to Third Parties

We do not disclose personal data to third parties except when required by law, when we have your consent or deemed consent or in cases where we have engaged the third party such as data intermediaries or subcontractors specifically to assist with our firm's activities. Any such third parties whom we engage will be bound contractually to keep all information confidential.

We may disclose personal data to other member firms in the Ginger International Trade & Investment Pte., Ltd. network of firms, where it is necessary (i) to meet the purpose for which you have submitted the information; or (ii) to enable you to be provided with information at a later date which may be of relevance and interest to you based on the nature and purpose of your voluntary requests. We may also transfer all data in our possession to a successor-in-interest to our business or assets.

## Access to and Correction of Personal Data

Upon request, we will provide the individual with access to their personal data or other appropriate information on their personal data in accordance with the requirements of the PDPA.

Upon request, we will correct an error or omission in the individual's personal data that is in our possession or control in accordance with the requirements of the PDPA.



## **Withdrawal of Consent**

Upon reasonable notice being given by an individual of his withdrawal of any consent given or deemed to have been given in respect of our collection, use or disclosure of his personal data, we will inform the individual of the likely consequences of withdrawing his consent. We will cease (and cause any of our data intermediaries and agents to cease) collecting, using or disclosing the personal data unless it is required or authorised under applicable laws.

## **Accuracy of Personal Data**

We will make a reasonable effort to ensure that personal data collected by us or on our behalf is accurate and complete.

## **Security and Protection of Personal Data**

We have implemented generally accepted standards of technology and operational security to protect the personal data in our possession or under our control and to prevent unauthorised access, collection, use, disclosure, copying, modification, disposal or similar risks. All GITI personnel follow a network-wide security policy. Only authorised GITI personnel are provided access to personally identifiable information and these personnel have agreed to ensure confidentiality of this information. GITI's policy is to use secure socket layer technology for the protection of credit card information submitted through web forms. This policy is also required for any fulfilment agents of GITI.

## **Retention of Personal Data**

We will cease to retain personal data, as soon as it is reasonable to assume that the purpose for collection of such personal data is no longer being served by such retention, and such retention is no longer necessary for legal or business purposes.

## **Transfer of Personal Data outside of Singapore**

We will ensure that any transfers of personal data to a territory outside of Singapore will be in accordance with the PDPA so as to ensure a standard of protection to personal data so transferred that is comparable to the protection under the PDPA.

## **Privacy on Our Web Sites**

This Policy also applies to any personal data we collect via our websites. Cookies may be used on some pages of our websites. "Cookies" are small text files placed on your hard drive that assist us in providing a more customised website experience. Cookies are now used as a standard by many websites to improve users' navigational experience. If you are concerned about cookies, most browsers permit individuals to decline cookies. In most cases, a visitor may refuse a cookie and still fully navigate our websites, however other functionality in the



site may be impaired. After termination of the visit to our site, you can always delete the cookie from your system if you wish.

Because we want your website experience to be as informative and resourceful as possible, we may provide a number of links to third party websites. We assume no responsibility for the information practices of these third party websites that you are able to access through ours. When a visitor to our website links to these third party websites, our privacy practices no longer apply. We encourage you to review each website's privacy policy before disclosing any data.

### **Data Protection Officer**

If you believe that information we hold about you is incorrect or out of date, or if you have concerns or further queries about how we are handling your personal data, or any problem or complaint about such matters, please contact our Data Protection Officer at [dpo@giti.sg](mailto:dpo@giti.sg)

### **Modifications**

We reserve the right to modify or amend this Policy at any time. The effective date will be displayed at the beginning of this Policy. To keep you informed, we will notify changes to this Policy by prominently identifying the alteration for a period of not less than two weeks on our home page at <http://www.giti.sg/>

## **Marketing Data Protection Policy**

The privacy of information you provide in this form is important to us. The following privacy statement governs the collection and, use and disclosure of personal data submitted to Ginger International Trade & Investment Pte., Ltd. firms which are established in Singapore (the "Firm" or "GITI"). GITI's information handling practices are in accordance with current privacy and data protection legislation in Singapore.

### **Why do we collect personal data and how do we use it?**

The personal data submitted in this form will be used by GITI for the purposes of any relevant promotional activities organised by GITI such as, but not limited to, seminars, firm events and alerts on publications. We may also send you communications from time to time, for example, to advise you of technical updates or ask you to participate in surveys which may be of interest to you. By submitting the information in this form, you acknowledge that you have consented to our processing data in accordance with the privacy statement for the purposes described.



## **Retention of Personal Data**

Personal data that is kept by us will be destroyed after a reasonable period from the time when it becomes outdated or is no longer required for the purpose for which it was collected or when we receive your request to delete it.

## **How is this personal data secured?**

The personal data submitted to us is stored in our contacts database or similar system and is available to only authorised partners and staff, and contractors. Access to Your Personal Data If you wish to access, delete or correct your personal data provided to us or if you have any concerns about how we handle information about you, please send your request to our Data Protection Officer at [dpo@giti.sg](mailto:dpo@giti.sg)

## **Disclosure of Data to Third Parties**

Personal data collected may be transferred and shared internationally between the member firms of the Ginger International Trade & Investment Pte., Ltd. global network, in order to meet the purpose for which you have submitted the information and activities directly related to it. By submitting personal data in this form, you are providing explicit consent to trans-border transmission of such data as described above.

The personal data submitted will not be disclosed to third parties except when required by law, when we have your explicit consent or in cases where the third party is a contractor or supplier whom we have engaged specifically to assist with GITI's activities. All such contractors will be bound contractually to keep all information confidential.

## **Recruitment Data Protection Policy**

Ginger International Trade & Investment Pte., Ltd. firms which are established in Singapore ("GITI" or "we") believe that privacy is an important individual right and this policy provides information regarding our use and disclosure of personal data collected from individuals including via our websites for recruitment purposes. GITI's information handling practices are in accordance with current privacy and data protection legislation in Singapore.

For more general information about the privacy practices of GITI, please refer to our main Data Protection Policy.

## **Why do we collect personal data?**

As part of our recruitment process, we collect necessary personal data about you to consider you for employment with our firm. During the course of the recruitment and selection process, we may request further information about you to assess your suitability for positions with our firm. In doing so, we only collect personal data that is necessary for recruitment decisions. The procedures used by GITI to gather further information about you might include:



- selection interviews;
- assessment centres;
- written skills tests;
- referee reports;
- security vetting; and,
- necessary pre-employment activities.

References from your current or former employer(s) or other sources will only be obtained with your written consent. In some cases, pre-employment checking may be necessary. Any checking is "tailor-made" and the extent and nature of information sought is no more than is justified by the particular position being filled. Failure to provide requested information may influence the processing and outcome of your application.

### **How do we use personal data?**

We use the personal data for the primary purpose of considering your suitability for positions with us. Only that information which is relevant to the purpose of assessing your suitability is collected and use. We will not collect or use personal data in ways other than as described in this policy unless we have obtained your consent. In some cases we may specifically request a consent form to be signed. In other cases consent may be implied (for instance, you give us information after being fully advised of how it will be used).

### **Cookies and log files**

This policy also applies to any personal data we collect via our websites. Cookies may be used on some areas of our website. "Cookies" are small text files placed on your hard drive that assist us in providing a more customised website experience. Cookies are now used as a standard by many websites to improve users' navigational experience. If you are concerned about cookies, most browsers permit individuals to decline cookies. In most cases, a visitor may refuse a cookie and still fully navigate our websites, however other functionality in the site may be impaired. After termination of the visit to our site, you can always delete the cookie from your system if you wish.

In order to properly manage our website and related email services, we may anonymously log information on our operating systems about the number and duration of visits to our website and identify categories of visitors by items such as domains and browser types, and to track document identification number by way of email acknowledgement or return receipt. These statistics are reported in the aggregate to our webmaster and system administrators. In addition, site statistics are compiled by third parties, and therefore your IP address will be passed to third parties for statistical reporting only. This is to ensure that our website presents the best web experience for visitors and is an effective information resource.

Whenever a registered member visits our website, they may be required to identify themselves in order to gain entry. This data is logged by GITI primarily to measure website performance and in assisting to resolve any website technical difficulties.



## **Disclosure of personal data**

Your personal data will be used only by partners and staff directly involved in the recruitment process. Information will not be disclosed to third parties except when required by law, when we have your explicit consent or in cases where the third party is a contractor or supplier whom we have engaged specifically to assist with our firm's activities. All such contractors will be bound contractually to keep all information confidential.

## **Transfer of Data to Other Countries**

Personal data collected by GITI may be transferred internationally to other Ginger International Trade & Investment Pte., Ltd.' entities world-wide, where it is necessary to meet the recruitment purposes. By submitting your personal data to GITI whether through our websites or otherwise, you are providing explicit consent to transmission of such data collected by GITI whether through our websites or otherwise for the fulfilment of recruitment applications.

## **How is this information secured?**

We keep your personal data secure and make it accessible to partners and staff on a need to know basis. The information you provide in your online application is stored into our recruitment database. GITI has implemented generally accepted standards of technology and operational security in order to protect personal data from loss, misuse, alteration or destruction. All GITI staff follow a firm wide security measures. Only authorised GITI personnel are provided access to personal data and these employees have agreed to ensure confidentiality of this information.

## **How long is information kept?**

Generally, in Singapore, we hold recruitment information for specific vacancies for up to two years. To request us to delete your personal data submitted to GITI whether through our websites or otherwise, please send your request to [dpo@giti.sg](mailto:dpo@giti.sg)

## **Access to your information**

Access to your personal data can be made by request to us unless granting access would infringe another person's privacy. If you wish to gain access to your personal data, please send your request to [dpo@giti.sg](mailto:dpo@giti.sg)

## **Correction and Concerns**

If you believe that information we hold about you is incorrect, if you have concerns about how we are handling your personal data, or if you changed your mind about our usage of your data, please email us at [dpo@giti.sg](mailto:dpo@giti.sg) and we will try to resolve those concerns.



## **Changes to the Ginger International Trade & Investment Pte., Ltd. Recruitment Data Protection Policy**

GITI reserves the right to modify or amend this policy at any time and for any reason. However, GITI commits to ensure that the privacy rights of individuals are maintained.

### **Contact our Privacy Office**

We welcome your enquiries or comments about our Recruitment Data Protection Policy and any queries or concerns that you may have about this website.