



DATA PROTECTION NOTICE

This Data Protection Notice (“Notice”) sets out the basis which Spark Planners Pte Ltd (“Spark Planners”, “we”, “us”, or “our”) may collect, use, disclose or otherwise process personal data of persons in accordance with the applicable personal data protection laws and regulations. This Notice applies to personal data in our possession or under our control, including personal data in the possession of organisations which we have engaged to collect, use, disclose or otherwise process personal data for our purposes.

Personal Data

1. As used in this Notice:

“**person**” means an individual who (a) has contacted us through any means to find out more about any goods or services we provide, or (b) may enter or has entered into a contract with us for the supply of any products or services by us, or (c) has submitted a job or internship application with us; and

“**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.

2. Under the Singapore Personal Data Protection Act (PDPA), Business Contact Information (e.g., name, company address, company telephone number) is not considered as personal data so long as it is used strictly for business-to-business (B2B) transactions.
3. Depending on the nature of your interaction with us, some examples of personal data which we may collect from you include your name, contact information such as your address, email address or telephone number, nationality, gender, date of birth, marital status, photographs and other audio-visual information, employment information, education background, and information about your usage of and interaction with our website.
4. Other terms used in this Notice shall have the meanings given to them in the Singapore Personal Data Protection Act (where the context so permits).



Collection, Use and Disclosure of Personal Data

5. We may collect personal data from our customers, business partners, contractors, employees and other individuals such as job applicants. We would only collect, use and disclose data that (a) has been provided to us voluntarily by you directly or via a third party who has been duly authorised by you to disclose your personal data to us (your “authorised representative”) after (i) you (or your authorised representative) have been notified of the purposes for which the data is collected, and (ii) you (or your authorised representative) have provided written consent to the collection and usage of your personal data for those purposes, or (b) collection and use of personal data without consent is permitted or required by the PDPA or other laws. We shall seek your consent before collecting any additional personal data and before using your personal data for a purpose which has not been notified to you (except where permitted or authorised by law).
6. These personal data may be furnished to us in forms filled out by you, face to face meetings, email messages, or telephone conversations. We may also keep a record of any contact you have with us. These data would be collected only for business purposes or for the purpose(s) stated by us when we gather the personal data from you.
7. The personal data collected may be used for any or all of the following purposes:
 - 7.1 to provide our services and/or products to you;
 - 7.2 as part of our business operations;
 - 7.3 for job application and recruitment purposes;
 - 7.4 for billing and reporting, such as for invoicing and account management purposes;
 - 7.5 for follow-up action regarding any complaints, feedback, queries or requests received via our website or any other communication channels; and
 - 7.6 assisting in law enforcement and investigations conducted by any governmental and/or regulatory authority.
8. We may collect, disclose or use your personal data pursuant to an exception under the Personal Data Protection Act or other written law such as during the following situations:



- 8.1 To respond to an emergency that threatens your life, health and safety or of another individual; and
 - 8.2 Necessary in the national interest, for any investigation or proceedings.
9. We may disclose your personal data:
- 9.1 with your consent, where such disclosure is required for performing obligations in the course of or in connection with our provision of the goods or services requested by you;
 - 9.2 to comply with any applicable laws, regulations, codes of practice, guidelines or rules (e.g. in an emergency or when we receive a subpoena to disclose your personal data); or
 - 9.3 with your consent, to third party service providers, agents and other organisations we have engaged to perform any of the functions listed in paragraph 7 above for us. Any third parties engaged by us will be contractually bound to keep all personal data confidential.
10. You have the right of choice regarding the collection, usage and/or disclosure of your personal data. If you choose not to provide us with the personal data described in this notice, we may not be able to perform our obligations as stated in this notice. You have the right to object to the processing of your personal data and withdraw your consent in the manner described below.
11. If you choose not to provide us with your personal data for the purposes listed in paragraphs 7 and 8, you may submit a request in writing or via email to our Data Protection Officer at the contact details provided below or indicate in the personal data collection form submitted to us (if any). By choosing not to provide us with your personal data, depending on our relationship, we may not be able to provide services to you or process your job application. Depending on the complexity of the request and its impact to our relationship with you, we will not collect or, within 30 days of our receipt of your request, cease using and/or disclosing your personal data in accordance with your request.
12. The purposes listed in paragraph 7 may continue to apply even in situations where your relationship with us (for example, pursuant to a contract) has been terminated or altered in



any way, for a reasonable period thereafter (including, where applicable, a period to enable us to enforce our rights under any contract with you).

13. In the case where we receive unsolicited personal data via email or any other communication channels, the unsolicited personal data will not be retained and will be securely disposed of immediately.

Withdrawal of Consent

14. The consent that you provide for the collection, use and disclosure of your personal data will remain valid until such time it is withdrawn by you in writing. You may withdraw your consent and request us to stop using and/or disclosing your personal data for any or all of the purposes listed above by submitting your request in writing or via email to our Data Protection Officer.
15. Upon receipt of your written 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 ten (10) business days of receiving. Should we require more time to give effect to a withdrawal notice, we will inform you of the time frame by which the withdrawal of consent will take effect.
16. 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 goods or services to you and we shall, in such circumstances, notify you before completing the processing of your request. Should you decide to cancel your withdrawal of consent, please inform us in writing in the manner described in paragraph 14 above.
17. Please note that withdrawing consent does not affect our right to continue to collect, use and disclose personal data where such collection, use and disclose without consent is permitted or required under applicable laws.

Access to and Correction of Personal Data

18. If you wish to make (a) an access request for access to a copy of the personal data which we hold about you or information about the ways in which we use or disclose your personal data, or (b) a correction request to correct or update any of your personal data which we hold about



you, you may submit your request in writing or via email to our Data Protection Officer at the contact details provided below.

19. We will respond to your request as soon as reasonably possible. 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. Should we not be able to respond to your request within thirty (30) days after receiving your request in writing (including both electronic and non-electronic methods), we will inform you in writing within thirty (30) days of the time by which we will be able to respond to your request. If we are unable to provide you with any personal data or to make a correction requested by you, we shall generally inform you of the reasons why we are unable to do so (except where we are not required to do so under the PDPA).
20. If your request relates to personal data which we are processing on behalf of another organisation, we will instead forward your request to the relevant organisation for their necessary action.
21. 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.

Protection of Personal Data

22. To safeguard your personal data from unauthorised access, collection, use, disclosure, copying, modification, disposal or similar risks, we have introduced appropriate administrative, physical and technical measures such as up-to-date antivirus protection, encryption and the use of privacy filters to secure all storage and transmission of personal data by us, and disclosing personal data both internally and to authorised third parties and agents only on a need-to-know basis.
23. If there is a need to disclose your Personal Data to third parties in line with the purposes mentioned in paragraph 9, we will ensure that they provide sufficient guarantees to us to have implemented the necessary security measures to protect your Personal Data.
24. However, no method of transmission over the Internet or method of electronic storage is completely secure. While security cannot be guaranteed, we strive to protect the security of your personal data and are constantly reviewing and enhancing our information security



measures. In the event of a personal data breach, we will endeavour to notify the affected parties no later than within 3 calendar days from when we become aware of the breach.

Accuracy of Personal Data

25. We will make every reasonable effort to ensure that personal data collected by us or on our behalf is accurate and complete.
26. We generally rely on personal data provided by you (or your authorised representative). In order to ensure that your personal data is current, complete, and accurate, please update us if there are changes to your personal data by informing our Data Protection Officers at the contact details provided in paragraph 32 below.

Retention of Personal Data

27. We may retain your personal data for as long as it is necessary to fulfil the purpose(s) for which it was collected, or as required or permitted by applicable laws.
28. We dispose of or destroy such documents containing your personal data in a secure manner when the retention limit is reached and it is reasonable to assume that the permitted purpose is no longer being served by their retention.

Cross-border Transfers of Personal Data

29. Unless for business-related needs, we generally do not transfer your personal data to other jurisdictions. However, if we do so, we will obtain your consent for the transfer to be made and we will take steps to ensure that your personal data continues to receive a standard of protection that is at least comparable to that provided under the PDPA, including entering into an agreement with the receiving party to accord similar levels of data protection as those in Singapore.

Data Breach Notification

30. In the event a breach of security leading to accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, personal data, we shall promptly assess the impact and if appropriate, report this breach within 3 calendar days to the Personal Data Protection Commission (PDPC). We will notify you when the data breach is likely to result in significant harm to you after our notification to PDPC. We may also notify other relevant regulatory



agencies, where required. If we are a Data Intermediary, we shall inform the Data Controller immediately of any data breach so they can promptly assess the impact and comply with their data breach notification obligation.

Data Protection Officer

31. You may contact our Data Protection Officer if you have any enquiry, feedback or complaint regarding our personal data protection policies and procedures, if you wish to make any request, or if you believe that information we hold about you is incorrect or out-dated.
32. You may contact our Data Protection Officer via email at dpo@sparkplanners.com.sg or enquiry@sparkplanners.com.sg or phone at +65 6338 2321.

Modifications

33. We may revise this Notice at any time without any prior notice. Your continued use of our services and/or products constitutes your acknowledgement and acceptance of such changes.

Effective: 1 November 2022

Last Updated: 31 October 2022