

## **Data Protection Policy:**

### **Policy Statement:**

Big Fund Private Limited (BF) collects and uses information about people with whom it communicates. As stipulated by the Personal Data Protection Act (2012) (hereinafter referred to as the Act or PDPA), the personal information we collect, record and use must be dealt with properly and in a secure manner whether it is collected either on paper, in a computer or any other material.

To this end BF fully endorses and adheres to the Principles of Personal Data Protection Act (2012).

### **1. The Purpose:**

The purpose of this Policy ("Data Protection Policy") is to inform you of how BF, manages Personal Data which is subject to the PDPA (2012). Please take a moment to read this Data Protection 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 Competitions, Offers and Products and Services offered by us, you agree and consent to BF, as well as our respective representatives, sponsors and/or agents (collectively referred to herein as "BF", "us", "we" or "our") collecting, using, disclosing and sharing amongst themselves your Personal Data, and disclosing such Personal Data to relevant third parties in the manner set forth in this Data Protection Policy.

This Data Protection Policy supplements but does not supersede nor replace any other consent you may have previously provided to BF in respect of your Personal Data, and your consents herein are additional to any rights which to BF may have at law to collect, use or disclose your Personal Data.

BF may from time to time update this Data Protection Policy to ensure that this Data Protection Policy is consistent with our future developments, industry trends and/or any changes in legal or regulatory regimes. Subject to your rights at law, you agree to be bound by the prevailing terms of the Data Protection Policy as updated from time to time on our website [fund.thebiggrp.com](http://fund.thebiggrp.com). Please check back regularly for updated information on the

handling of your Personal Data. This policy satisfies the obligations on the part of BF under the PDPA (2012) to notify individuals from whom data is collected, used or disclosed.

If you are a member of the European Union, please contact us at [pdpa@fund.thebiggrp.com](mailto:pdpa@fund.thebiggrp.com), so that we can forward you the relevant documents prior to taking your personal details via a positive opt-in option.

## **2. Principles:**

Principles that govern the Data Protection Policy of BF are derived from the PDPA (2012) of Singapore and the Guidelines on good practice that underline the aforesaid Act. Towards this end BF follows the under-mentioned principles outlined in the PDPA (2012).

## **3. Personal Data**

Personal Data for all purposes is defined herein as data whether true or not about an individual from such information contained in the data or in conjunction with other data in the possession of BF that could establish the identity of the aforesaid individual. It includes but is not limited to unique identifiers such as NRIC Numbers and Passport Numbers as well as a set of data such as names, age telephone number etc when taken together could identify the individual.

## **4. Collection of Personal Data:**

BF will generally collect Personal Data in the following ways but is not limited to the under-mentioned list:

- (a) when you submit your interest and or to register to be informed or participate in any one of our promotional activities and or activities conducted and or organized by us,
- (b) when you submit your business idea and or proposal either for any competition and or otherwise generally,
- (c) when you submit your interest and or register to be one of our mentors, speakers and or judges for any of our competitions and or otherwise generally,

- (d) when you agree to be one of our sponsors to any of our competitions and or in any activities conducted by us
- (e) when you request that we contact you, be included in an email or other mailing list;
- (d) when you respond to our promotions, initiatives or to any request for additional Personal Data;
- (e) when you are contacted by, and respond to, our marketing representatives.;
- (f) when we receive references from business directories and third parties, for example, where you have been referred by them;
- (g) when you submit your Personal Data to us for any other reasons.

When you browse our website, you generally do so anonymously but please see the section below on cookies. A cookie is a small piece of information that is placed on your computer when you visit certain websites.

We use third party re-marketing technology to market our site across the internet. Hence a cookie will be placed on your browser and then a 3<sup>rd</sup> party will read those cookies and may serve an ad on to a 3<sup>rd</sup> party site, after you have visited our website.

If you do not want the information collected through the use of cookies as referred to above, there is a simple procedure in most browsers that allow the customer to deny or accept the cookie feature. However, it must be noted that cookies may be necessary to provide customers with certain features on this website. In order to opt out of the aforesaid ad serving used by third parties on our website, please **Click [here](#)**. Thereafter, you may choose to opt out by clicking on the relevant button.

In addition, there may be advertisements placed on the BF website by third party advertisers and or their agencies. They may generate cookies to seek how many people have seen the particular advertisement and to track the flow of traffic on the website. BF does not control these third parties and their cookie policies. If you do have concerns about their cookie policies please do contact us and we will try our best to assist you. BF shall not be responsible for the personal data protection policies, content and or security of any third party websites linked to the BF website.

If you provide us with any Personal Data relating to a third party (e.g. information of your spouse, children, parents, and/or employees), by submitting such information to us, 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.

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 the Products and Services you have requested.

#### **5. Consent Obligations:**

BF will ensure at all times to collect the data referred to above in a manner consistent and in compliance with the statutory requirements. In this respect we will only collect, use or disclose personal data for purposes for which an individual has given his or her consent. We will also allow individuals to withdraw consent, with reasonable notice, and inform them of the likely consequences of withdrawal. In the event such withdrawal is effected, BF will cease the use of such data in any manner whatsoever.

#### **6. Purposes for the Collection and use of Your Personal Data**

Generally, BF collect, use and disclose your Personal Data inter-alia for the following purposes. But take note that list below is not exhaustive:

- (a) responding to your queries and requests;
- (b) Recording your interest in our promotions, activities, competitions;
- (c) Registering you for any of our promotional activities and or events and entering you for our competitions;
- (d) Registering you as a mentor, sponsor, speaker and or judge for any of our promotional events, activities and competitions;
- (b) managing the administrative and business operations of BF and complying with internal policies and procedures;
- (c) facilitating business asset transactions;

(d) matching any Personal Data held which relates to you for any of the purposes listed herein;

(e) resolving complaints and handling requests and enquiries;

(f) organising promotional events and competitions;

(g) legal purposes (including but not limited to obtaining legal advice and dispute resolution);

(h) conducting investigations relating to disputes, billing or fraud;

(i) meeting or complying with any applicable rules, laws, regulations, codes of practice or guidelines issued by any legal or regulatory bodies which are binding on BF (including but not limited to responding to regulatory complaints, disclosing to regulatory bodies and conducting audit checks, due diligence and investigations); and

(j) purposes which are reasonably related to the aforesaid.

Furthermore, where permitted under the Act:

(a) BF may also collect, use and disclose your Personal Data for the following “Additional Purposes”:

(i) analytics and tracking, including facilitating the sale of analytical data

(ii) conducting market research and surveys to enable us to understand and determine customer location, preferences and demographics to develop special offers and marketing programmes in relation to BF's Products and Services, and to improve our service delivery and your customer experience at our touch points;

(iii) providing additional Products and Services and benefits to you, including promotions, loyalty and reward programmes from BF;

(iv) matching Personal Data with other data collected for other purposes and from other sources (including third parties) in connection with the provision, marketing or offering of Products and Services by BF;

- (v) leads generation and management for marketing BF's Products and Services;
- (vi) administering contests, competitions and marketing campaigns, and personalising your experience at BF's touch points;
- (vii) communicating to you advertisements involving details of our Products and Services, special offers and rewards, either to our customers generally, or which we have identified may be of interest to you (including but not limited to up selling, cross selling and telemarketing);
- (viii) organising promotional events and corporate social responsibility projects;  
and
- (ix) purposes which are reasonably related to the aforesaid.

In addition, where permitted under the Act and subject to the provisions of any applicable law, your Personal Data may be disclosed, for Additional Purposes, to the vendors or other third party service providers in connection with promotions and services offered by BF.

## **7. Disclosure of Personal Data**

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

- (a) BF's related corporations and employees to provide content, and Services to you, address your questions and requests in relation to your enquiries and subscription and billing arrangements with us.
- (c) agents, contractors or third party service providers who provide operational services to BF, such as courier services, information technology, payment, printing, billing, processing, technical services, training, or other services to BF;
- (d) vendors or third party service providers in connection with marketing promotions and services offered by BF;

(e) any business partner, investor, assignee or transferee (actual or prospective) to facilitate business asset transactions (which may extend to any merger, acquisition or asset sale);

(f) our professional advisers such as auditors and lawyers;

(g) relevant government regulators, statutory boards or authorities or law enforcement agencies to comply with any laws, rules, guidelines and regulations or schemes imposed by any governmental authority; and

(h) any other party to whom you authorise us to disclose your Personal Data to.

## **8. Access and Correction Obligation**

a) Any individual's whose data has been used or disclosed has the right to require full details of the usage and disclosure up to a period of one year before the date of such request has been made by the individual. However, such right is subject to the following limitations:

- cause immediate or grave harm to the individual's safety or physical or mental health;
- threaten the safety or physical or mental health of another individual;
- reveal personal data about another individual;
- reveal the identity of another individual who has provided the personal data, and the individual has not consented to the disclosure of his or her identity; or
- be contrary to national interest.

BF will exercise due diligence in exercising this limitation option and the individual confirms that he or she will be liable for legal costs in challenging the decision made by BF as set out above.

b) BF will also take steps to correct any error or omission in an individual's personal data upon his or her request unless there are justifiable grounds to refuse such request

made by the individual. It is also the duty of BF to ensure that such corrected data is rightfully notified to any relevant parties.

- c) The purpose behind the correction of data is to ensure BF's accuracy obligations under the PDPA (2012).

## **9. Protection Obligation**

BF confirms that reasonable security arrangements have been adapted to protect the personal data held by us to prevent such data being used by authorised third parties.

## **10. Retention Limitation Obligation**

BF will cease retention of personal data or remove the means by which the personal data can be associated with particular individuals, when there is no longer a business or legal reason to associate the Organisation with the individual concerned.

## **11. Transfer Limitation Obligation**

BF recognises the need to transfer personal data to another country only according to the requirements prescribed under the regulations, to ensure that the standard of protection provided to the personal data so transferred will be comparable to the protection under the PDPA, unless exempted by the PDPC.

## **12. Openness Obligation**

In fulfilment of the openness obligations under the PDPA (2012), BF make available information about our data protection policies, practices and complaints process on request.

There is further a designated Data Protection Officer appointed and his/her role will be to ensure that our obligations under the PDPA are complied with.

## **13. Don Not Call Register:**

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, BF may contact you using such Singapore telephone number(s) (including via voice calls, text, fax or other means) with information about our

Programs or those events offered by our preferred partners (including discounts and special offers).

You have a choice to withdraw your consent for receiving marketing or promotional materials/communication. You may contact us using the contact details found below.

Please be aware that once we receive confirmation that you wish to withdraw your consent for marketing or promotional materials/communication, it may take up to 30 working days for your withdrawal to be reflected in our systems. Therefore, you may still receive marketing or promotional materials/communication during this period of time. Please note that even if you withdraw your consent for the receipt of marketing or promotional materials, we may still contact you for other purposes in relation to the Program that you hold or have subscribed to with BF which is deemed necessary in reasonable circumstances.

#### **14. Governing Law**

This Data Protection Policy and your use of our website shall be governed in all respects by the laws of Singapore and is not limited to the provisions of the PDPA (2012).