

## **DATA PROTECTION NOTICE**

This document ("**Data Protection Policy**") applies to all personal data collected by Providence Law Asia LLC ("**Providence Law**").

The purpose of this Data Protection Policy is to inform you of how Providence Law collects and manages Personal Data which is subject to the personal data protection principles under the Singapore Personal Data Protection Act 2012 ("**Act**"). 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.

### **1. Personal Data**

- 1.1. In this Data Protection Policy, "Personal Data" refers to any data, whether true or not, about an individual who can be identified from that data, or from that data and other information to which we have or are likely to have access, including data in our records as may be updated from time to time.
- 1.2. Examples of such Personal Data you may provide to us include your name, NRIC, passport or other identification numbers, telephone number(s), mailing address, email address, and any other information relating to any individuals which you have provided us.

### **2. Collection of Personal Data**

- 2.1. Generally, we collect Personal Data in the following ways:
  - 2.1.1. when you submit our client information questionnaire;
  - 2.1.2. when you enter into any agreement with us or provide other documentation to us, or when you use our services;
  - 2.1.3. when you interact with our lawyers and employees for example, via telephone calls, letters, face-to-face meetings, and emails;
  - 2.1.4. when you request that we contact you;
  - 2.1.5. when you respond to any request for additional Personal Data;
  - 2.1.6. when your images are captured by us in photographs or videos taken by us or our representatives when you attend events;
  - 2.1.7. when we receive references from business partners and third parties, for example, where you have been referred by them and they require us to carry out conflicts checks;
  - 2.1.8. when you apply for a job or internship with us; and/or
  - 2.1.9. when you submit your Personal Data to us for any other reason.
- 2.2. When you browse our websites, you generally do so anonymously. We do not, at our websites, automatically collect Personal Data unless you provide such information.
- 2.3. If you provide us with any Personal Data relating to a third party (e.g. information of your representatives, employees, agents, relatives and/or other contacts), by submitting such information to us, you represent and warrant to us that you have obtained the consent of the third party to provide us with their Personal Data for the relevant 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 the services you have requested.

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

- 3.1. Generally, Providence Law collects, uses and discloses your Personal Data for the following purposes:
  - 3.1.1. managing your relationship with us;
  - 3.1.2. responding to your queries, feedback, complaints and requests;
  - 3.1.3. completing our KYC and AML checks and verifying your identity;
  - 3.1.4. performing obligations in the course of or in connection with our provision of services to you;
  - 3.1.5. requesting feedback or participation in surveys for us to review, develop and improve the quality of our products and services;
  - 3.1.6. publicity, marketing and providing networking opportunities;
  - 3.1.7. in connection with any claims, actions or proceedings (including but not limited to drafting and reviewing documents, transaction documentation, obtaining legal advice, and facilitating dispute resolution), and/or protecting and enforcing our contractual and legal rights and obligations;
  - 3.1.8. conducting investigations relating to disputes, billing or fraud;
  - 3.1.9. complying with any applicable rules, laws, regulations, codes of practice or guidelines issued by any legal or regulatory bodies which are binding on us;
  - 3.1.10. creating and maintaining your profile in our system database for internal records and reference, and for future conflicts checks;
  - 3.1.11. providing customer service and support;
  - 3.1.12. any other purpose reasonably related to the aforesaid.

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

- 4.1. Providence Law will take reasonable steps to protect your Personal Data against unauthorised disclosure.
- 4.2. We may disclose your personal data 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.
- 4.3. We may also disclose your personal data, as reasonably necessary, to third party service providers, agents and other organisations we have engaged to perform any of the functions listed above. These include agents, contractors or third-party service providers who provide operational services to Providence Law, external banks, credit card companies and their respective service providers, or any other professional consultants or advisors we engage.

### **5. Retention of Personal Data**

- 5.1. We may retain your personal data for as long as it is necessary to fulfil the purpose for which it was collected, or as required or permitted by applicable laws.
- 5.2. We will cease to retain your personal data, or remove the means by which the data can be associated with you, as soon as it is reasonable to assume that such

retention no longer serves the purpose for which the personal data was collected, and is no longer necessary for legal or business purposes.

## **6. Data Security**

- 6.1. Providence Law will take reasonable efforts to protect Personal Data in our possession or our control by making reasonable security arrangements to prevent unauthorised access, collection, use, disclosure, copying, modification, disposal or similar risks. However, we cannot completely guarantee the security of any Personal Data we may have collected from or about you, or that no harmful code will enter our websites (for example viruses, bugs, trojan horses, spyware or adware). You should be aware of the risks associated with using websites.
- 6.2. While we strive to protect your Personal Data, we cannot ensure the security of the information you transmit to us via the Internet or when you use our online portals, and we urge you to take every precaution to protect your Personal Data when you are on the Internet. We recommend that you change your passwords often, use a combination of letters and numbers, and ensure that you use a secure browser.
- 6.3. In the event of a data breach in relation to your personal data, we will assess the breach and notify you and the relevant authorities, as may be required under the Act.

## **7. Transfers of Personal Data Outside of Singapore**

Personal data that you provide to us may be stored in and accessed via servers which are located outside of Singapore. Where such transfers are made, 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.

## **8. Feedback, Withdrawal of Consent, Access to and Correction of your Personal Data**

- 8.1. You can contact our Data Protection Officer, Ms Anne-Marie George, at [info@providencelawasia.com](mailto:info@providencelawasia.com), through our website or by calling our main line if you:
  - 8.1.1. have any questions or feedback relating to your Personal Data or our Data Protection Policy;
  - 8.1.2. would like to withdraw your consent to any use of your Personal Data as set out in this Data Protection Policy; or
  - 8.1.3. would like to obtain access and make corrections to your Personal Data records.
- 8.2. If you withdraw your consent to any or all use of your Personal Data, depending on the nature of your request, Providence Law may not be in a position to effectively provide services to you, which in turn may also result in the termination of any agreements with Providence Law and your being in breach of your contractual obligations or undertakings.

**9. Changes to Policy**

9.1. This Notice applies in conjunction with any other notices, contractual clauses and consent clauses that apply in relation to the collection, use and disclosure of your personal data by us.

9.2. We may revise this Policy from time to time without any prior notice. You may determine if any such revision has taken place by referring to the date on which this Notice was last updated. Your continued use of our services constitutes your acknowledgement and acceptance of such changes.

**10. Governing Law**

10.1. This Data Protection Notice shall be governed in all respects by the laws of Singapore.