

PERSONAL DATA PROTECTION NOTICE

This Personal Data Protection Notice (“Notice”) sets out the basis which Avante Pte Ltd (“Avante”, “we”, “us”, or “our”) may collect, use, disclose or otherwise process personal data of our customers, contractors, subcontractors, suppliers, vendors, visitors and other individuals whom we may interact with in the course of our business dealings. This Notice applies to personal data collected in our possession or under our control, including personal data in the possession of organizations which we have engaged to collect, use, disclose or process personal data for our purposes and in accordance with the Personal Data Protection Act (“PDPA”).

PERSONAL DATA

1. As used in this “Notice”:
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. Depending on the nature of your interaction with us, some examples of personal data which we may collect from you include:
 - (a) your name and identification information such as your Passport and/or NRIC number,
 - (b) contact information such as your address, email address or telephone number,
 - (c) your nationality, gender, date of birth, marital status,
 - (d) photographs and other audio-visual information,
 - (e) employment information and
 - (f) financial information such as credit/debit card numbers or bank account information.
3. This Notice does not apply to personal data that is publicly available, including personal data which can be observed by reasonably expected means from the social media platforms, or at a location or event at which any individual may appear and that is open to the public, and whether or not subsequently restricted to limited access.
4. Other terms used in this Notice shall have the meanings given to them in the PDPA (where the context so permits).

COLLECTION, USE AND DISCLOSURE OF PERSONAL DATA

5. We generally do not collect your personal data unless
 - (a) it is provided to us voluntarily by you directly or via a third-party who has been duly authorized by you to disclose your personal data to us (your “authorized representative”) after you or your authorized representative have been notified of the purposes for which the data is collected, and you or your authorized 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 is permitted or authorized by law).
6. We may collect and use your personal data for any or all of the following purposes:
 - (a) performing obligations in the course of or in connection with our provision of the goods and/or services requested by you;
 - (b) verifying your identity;
 - (c) responding to, handling, and processing queries, requests, applications, complaints, and feedback from you; managing your relationship with us;
 - (d) processing payment or credit transactions;

- (e) sending your marketing information about our goods or services including notifying you of our marketing events, initiatives and promotions;
 - (f) complying with any applicable laws, regulations, codes of practice, guidelines, or rules, or to assist in law enforcement and investigations conducted by any governmental and/or regulatory authority;
 - (g) any other purposes for which you have provided the information;
 - (h) transmitting to any unaffiliated third parties including our third-party service providers and agents, and relevant governmental and/or regulatory authorities, whether in Singapore or abroad, for the aforementioned purposes; and
 - (i) any other incidental business purposes related to or in connection with the above.
7. We may disclose your personal data:
- (a) 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; or
 - (b) to third party service providers, agents and other organizations we have engaged to perform any of the functions listed in clause 6 above for us.
8. The purposes listed in the above clauses 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).

WITHDRAWING YOUR CONSENT

9. The consent that you provide for the collection, use and disclosure of your personal data will remain valid until such time it is being withdrawn by you in writing. You may withdraw 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 (see contact details below).
10. 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 it.
11. 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 clause 8 above.
12. Upon withdrawal of consent, we will cease (and cause all data intermediaries and agents to cease) collecting, using or disclosing the personal data, as the case may be.
13. 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.
14. For the avoidance of doubt, and notwithstanding the withdrawal of consent for the collection, use, or disclosure of his personal data, we are not obliged or required to delete or destroy the personal data upon request. We are permitted to retain and archive all personal data in our documents and records in accordance with the Data Protection Provisions.
15. In the event that, after you have withdrawn an earlier consent to the collection, use or disclosure of his personal data by us, but subsequently provides fresh consent, we may thereafter proceed to

collect, use or disclose all personal data within the scope of the fresh consent subsequently provided.

DEEMED CONSENT

16. We consider that you have given consent, implicitly or explicitly, for the purpose when you have been notified of the collection, use or disclosure of your personal data and how you may opt-out, but you chose not to opt-out within a specified period (referred to as “deemed consent by notification”).
17. As such, you are deemed to consent to the collection, use or disclosure of personal data if you voluntarily provide the personal data to us for the purpose when you have been notified of the collection; and it is reasonably deemed that you would do so.

ACCESS TO AND CORRECTION OF PERSONAL DATA

18. If you wish to make an access request to a copy of your personal data or a correction request to correct or update any of your personal data, you may submit your request in writing or via email to our Data Protection Officer (see contact details below).
19. 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.
20. We will respond to your request as soon as reasonably possible. Should we not be able to respond to your request within thirty (30) days after receiving your request, 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 accede to your access or connection request, 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).

PROTECTION OF PERSONAL DATA

21. To safeguard your personal data from unauthorized access, collection, use, disclosure, copying, modification, disposal or similar risks, we have introduced appropriate administrative, physical and technical measures to secure the storage and transmission of personal data by us, and disclosing personal data both internally and to our authorized third-party service providers and agents only on a need-to-know basis.
22. You should be aware, however, that 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 information and are constantly reviewing and enhancing our information security measures.

ACCURACY OF PERSONAL DATA

23. We generally rely on personal data provided by you (or your authorized 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 Officer (see contact details below).

RETENTION OF PERSONAL DATA

24. 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.
25. 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.

TRANSFERS OF PERSONAL DATA OUTSIDE OF SINGAPORE

26. We generally do not transfer your personal data to countries outside of Singapore. 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.

DATA PROTECTION OFFICER

27. You may contact our Data Protection Officer if you have any enquiries, request or feedback on our personal data protection policies and procedures:

Name of DPO: Suzanna Lim

Email Address: suzannalim@avante-co.com

Contact Number: 9277-5884

EFFECT OF NOTICE AND CHANGES TO NOTICE

28. 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.
29. We may revise this Notice 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.

END OF DOCUMENT