

REAL ESTATE DOC PTE LTD

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28/02/22

DATE

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28/02/22

DATE

1 – Introduction

At Real Estate Doc Pte Ltd (“Real Estate Doc”) we respect the privacy and confidentiality of the personal data of our Clients, Associates and others whom we interact with in the course of providing our services. We are committed to implementing policies, practices and processes to safeguard the collection, use and disclosure of the personal data you provide us, in compliance with the [Singapore Personal Data Protection Act \(PDPA\) 2012](#).

We have developed this Data Privacy Notice to assist you in understanding how we collect, use, disclose, process, protect and retain your personal data that is in our possession.

2 – How We Collect Your Personal Data

Personal data refers to any information that can uniquely identify an individual person (a) on its own, or (b) when combined with other information. Under the PDPA, business contact information (e.g. full name, business address, business telephone number) is not considered as personal data so long as it is used strictly for business-to-business (B2B) transactions.

We collect your personal data when you:

- Respond to our electronic direct mails (EDMs) sent by us as part of our marketing or promotion campaigns through an authorised third party EDM service provider
- Are referred to us for our services by one of our clients
- Visit our website and leave behind your contact information through our contact form
- Communicate with us via emails or written correspondences

3 – Types of Personal Data We Collect About You

The types of personal data we collect about you include:

- Your contact information (Mobile Number, Email Address)
- Your personal details (Name, Gender, Date of Birth, Nationality)
- Your NRIC/Passport last four characters for verification

4 – How We Use Your Personal Data

We use the personal data you provide us for one or more of the following purposes:

- Analyze your visits to our website
- Provide our services
- Process account payables/receivables
- Process billing, payment and other credit-related activities
- Conduct direct marketing and lead generation activities through analyzing and tracking of our sales proposals, advertisements and EDMs on our events, conferences, seminars and workshops
- Conduct joint marketing with other companies and service providers
- Communicate with customers, members, and website visitors
- Respond to your inquiries and feedback to improve our quality of service
- Analyze the use of our products, services or websites

- Carry out our obligations arising from any contracts entered into between you and us
- Comply with or fulfil legal obligations and regulatory requirements

5 – Who We Disclose Your Personal Data To

We disclose some of the personal data you provide us to the following entities or organizations outside Real Estate Doc in order to fulfil our services to you:

- External professional service providers (Bookkeepers)
- EDM/Email Service Vendors (e.g. Mailchimp)
- Cloud Service Providers

Where required to do so by law, we may disclose personal data about you to the relevant authorities or to law enforcement agencies.

6 – How We Manage the Collection, Use and Disclosure of Your Personal Data

6.1 Obtaining Consent

Before we collect, use or disclose your personal data, we will notify you of the purpose why we are doing so. We will obtain written confirmation from you on your expressed consent. We will not collect more personal data than is necessary for the stated purpose. We will seek fresh consent from you if the original purpose for the collection, use or disclosure of your personal data has changed.

Under certain circumstances, we may assume deemed consent from you when you voluntarily provide your personal data for the stated purpose, e.g., when you apply for a job with us by sending in your resume/CV containing personal information.

We may rely on exceptions to the need for consent under the PDPA for the collection, use or disclosure of your personal data under the following circumstances (only those relevant to Real Estate Doc are included):

- The personal data is publicly available
- The personal data is disclosed by a public agency or disclosed to a public agency
- The personal data is necessary for any investigation or proceedings
- The personal data is necessary for evaluative purposes (e.g. determining the suitability of a job applicant for the job applied for)
- The personal data is necessary for the purpose of managing or terminating an employment relationship
- The personal data is necessary for a business asset transaction

6.2 Withdrawal of Consent

If you wish to withdraw consent, you should give us reasonable advance notice. We will advise you of the likely consequences of your withdrawal of consent, e.g., without your personal contact information we may not be able to inform you of future services offered by us.

Your request for withdrawal of consent can take the form of an email or letter to us, or through the “Unsubscribe” feature in an online service.

6.3 Use of Cookies

We use “cookies” to collect information about your online activity on our website. A cookie is a small text file created by the website that is stored in your computer to provide a way for the website to recognize you and keep track of your preferences. The cookie makes it convenient for you such that you do not have to retype the same information again when you revisit the website or in filling electronic forms.

Most cookies we use are “session cookies”, which will be deleted automatically from the hard disk of your computer at the end of the session.

You may choose not to accept cookies by turning off this feature in your web browser. Note that by doing so, you may not be able to use some of the features and functions in our web applications.

6.4 Third-Party Consent

We do not get consent on behalf of another individual. We only get consent from the individual who will be dealing directly with us.

7 – How We Ensure the Accuracy of Your Personal Data

We will take reasonable steps to ensure that the personal data we collect about you is accurate, complete, not misleading and are kept up to date.

From time to time, we may do a data verification exercise for you to update us on any changes to the personal data we hold about you. If we are in an ongoing relationship with you, it is important that you update us of any changes to your personal data (such as a change in your mailing address).

8 – How We Protect Your Personal Data

We have implemented appropriate information security and technical measures to protect the personal data we hold about you against loss; misuse; destruction; unauthorized alteration/modification, access, disclosure; or similar risks.

We have also put in place reasonable and appropriate organizational measures to maintain the confidentiality and integrity of your personal data and will only share your data with authorized persons on a ‘need to know’ basis.

When we engage third-party data processors to process personal data on our behalf, we will ensure that they provide sufficient guarantees to us to have implemented the necessary organizational and technical security measures and have taken reasonable steps to comply with these measures.

9 – How We Retain Your Personal Data

We have a document retention policy that keeps track of the retention schedules of the personal data you provide us, in paper or electronic forms. We will not retain any of your personal data when it is no longer needed for any business or legal purposes.

We will dispose of or destroy such documents containing your personal data in a proper and secure manner when the retention limit is reached.

10 – How You Can Access and Make Correction to Your Personal Data

You may write to us to find out how we have been using or disclosing your personal data over the past one year. Before we accede to your request, we may need to verify your identity by checking your NRIC or other legal identification document. We will respond to your request as soon as possible, or within 30 days from the date we receive your request. If we are unable to do so within the 30 days, we will let you know and give you an estimate of how much longer we require. We may also charge you a reasonable fee for the cost involved in processing your access request.

If you find that the personal data, we hold about you is inaccurate, incomplete, misleading or not up-to-date you may ask us to correct the data. Where we are satisfied on reasonable grounds that a correction should be made, we will correct the data as soon as possible, or within 30 days from the date we receive your request.

11 – Transfer of Personal Data

Where there is a need to transfer your personal data to another country outside Singapore, we will ensure that the standard of data protection in the recipient country is comparable to that of Singapore's PDPA. If this is not so, we will enter into a contractual agreement with the receiving party to accord similar levels of data protection as those in Singapore.

12 – Contacting Us

If you have any query or feedback regarding this Notice, or any complaint you have relating to how we manage your personal data, you may contact our Data Protection Officer (DPO) at: dpo@realestatedoc.co

Any query or complaint should include, at least, the following details:

- Your full name and contact information
- Brief description of your query or complaint

We treat such queries and feedback seriously and will deal with them confidentially and within reasonable time.

13 – Changes to this Data Privacy Notice

We may update this Data Privacy Notice from time to time. We will notify you of any changes by posting the latest Notice on our website. Please visit our website periodically to note any changes. Changes to this Notice take effect when they are posted on our website.