

SUBRA TT LAW LLC

Privacy & Confidentiality Policy

We, SUBRA TT LAW LLC have prepared this Policy Notice (“policy”), in relation to the Personal Data Protection Act (No. 26 of 2012) (“the Act”). Basically, we will inform you how your personal data and confidential information (“data”) will be securely managed. We have put in place safeguards to protect your data that are stored with us. This Notice describes how we may collect, use, disclose, process and manage your data.

By using or continuing to use our services, you shall be deemed to accept and agree to be bound by the provisions of this policy.

SUBRA TT LAW LLC’s Privacy and Confidentiality proposition are as follows:

Personal particulars (e.g., name, contact details, residential address, date of birth, identity card or passport details, education details etc.);

Specimen signature or signatures;

Financial details (e.g., CPF, credit history);

Images of our conversations with you (e.g., text messages)

Employment details (e.g., occupation, directorships and other positions held, employment history, salary details);

Tax information;

Information about your investments, business interests, assets;

Banking information (e.g., account numbers); and/or

Personal opinions made known to us (e.g., feedback)

TYPES OF PERSONAL DATA THAT MAY BE COLLECTED

Under the Act, “Personal data” refers to any data that can be utilised to identify a natural person.

In the course of serving you, based on need, we may have to collect the following from you:

Personal particulars such as name, contact details, residential address, date of birth, identity card or passport details, education details etc.;

Specimen signature or signatures;

Financial details such as CPF statements and balances, credit history etc.,

Communications via text messages images etc.,;

Employment details such as occupation, directorships, positions held, employment history, salary and benefits etc;

Tax information;

Information about your investments, business interests, assets;

Bank information such as account numbers; and/or

Your feedback etc., and opinions to us

HOW DATA IS COLLECTED

Generally, data can be collected in the following ways:

Via submission of any form, such as application and declaration forms;

As you deal with us or when you engage our services, via any agreement entered into between us or provision of any documents or information;

Via communicating with us such as telephone calls, text messages, letters, fax, email and meetings in person;

When we contact you at your request, or upon your request to be included in an email or other mailing list;

When you respond to our request for additional data;

when you submit an employment application or when you provide documents or information including your resume and/or curriculum vitae in connection with any appointment or position;

when you use our services, or interact with us via website;

when we seek information about you and receive your personal data in view of your relationship with us, from relevant business partners, public agencies, your ex-employer/s and relevant authorities;

through references received from business partners and third parties such as when they have referred you;

when you submit your personal data to us for any other reason.

HOW PERSONAL DATA IS USED

Generally, we may collect, use and/or disclose your personal data for the following purposes:

when providing you with our services at your request;

when we verify your identity for the purpose of providing our services to you;

when we respond to your queries and requests and when handling complaints, feedback and suggestions etc.;;

when providing you with personalised service, such as our customer service touchpoints;

when we network to maintain client relationship, via client outreach and relationship management, or when we send you newsletters and our promotional and other materials that may be of interest to you;

when performing sanctions screening and due diligence checks that may be required to be carried out under any applicable law, regulation or directive;

For the purposes of preventing, detecting and investigating crime, including fraud and money laundering or terrorist financing and to analyse and manage commercial risks;

legal purposes (including but not limited to obtaining regulations, codes of practice or guidelines or to assist in law enforcement and investigations by relevant authorities; and/or

any other purpose relating to any of the above.

PARTIES TO WHOM DATA MAY BE DISCLOSED

All reasonable steps will be taken to protect your data against unauthorised disclosure. Subject to the provisions of any applicable law, your personal data may be provided, for the purposes listed above, on a strictly need to know basis, to the following entities or parties, whether located overseas or in Singapore:

- any person in connection with the services you have requested us to provide for you;
- our professional advisers such as our auditors and lawyers;
- surveyors, valuers or other third parties in relation to loans, CPF applications or other transactions;
- any liquidator, receiver, official assignee/trustee, judicial manager or any other person appointed under pursuant to any applicable law or court order in connection with the bankruptcy, liquidation, winding up, judicial management or any other analogous process in respect of any individual, company or business;
- the Commissioner of Stamp duties and any other government department, agency, ministry, body or statutory board or any relevant authority;
- any person to whom disclosure is allowed or required by law, regulation or any other applicable instrument;
- any court, tribunal regulator (including national and/or international regulator), enforcement agency, exchange body, tax or other authority (including HDB, CPF or and authority investigating an offence) where we are required to do so by applicable law and/or regulator, or any agreement with regulator or an authority; and/or
- any third party to whom we have outsourced a part of our work to, to the extent it is necessary for them to carry out the assigned tasks; and/or

- any other party to whom you authorise us to disclose your data.

We may also share data with third parties only if and for the purposes of the third party providing relevant services in connection with the services you have requested us to provide for you.

None of your data will be sold or made known to any third parties.

CONFIDENTIAL INFORMATION

Subject to all relevant laws, applicable rules and regulations and any legal professional restrictions the following are applicable:

- we owe duty of confidentiality to all our clients and accordingly, subject to any overriding legal obligation on you or us and point 2 herein, we will keep all documents and information which we receive as a result of acting for you confidential.
- All confidential information received by us in the course of acting for you under an agreement for engagement may be disclosed, on a need to know basis to .
- Any party to whom we are permitted or are required by law, by an order of court, or by a tribunal to make the disclosure;
- Any party in confidence, for the sole purpose of obtaining advice in connection with our legal ethical obligations;
- A provider or broker of our professional indemnity insurance in confidence, in connection with any claim or potential claim, any complaint or potential complaint, by any person against us;
- Any party for responding to or defending any charge or complaint, relating to our conduct or professional behaviour, brought against the legal practitioner in court, before a Review Committee, in Inquiry Committee or a Disciplinary Tribunal, before a complaints committee appointed under section 36(5) of the Legal Profession Act, or before any relevant professional disciplinary body where we are duly authorised or registered to practice law;
- Any third party to whom we have outsourced a part of our work to or service provider, in confidence, to the extent that it is necessary for them to carry out the assigned tasks; and/or
- Any other party to whom you authorise us to disclose the information.

WITHDRAWAL OF CONSENT

In the event you wish to withdraw your consent to any use or disclosure of your personal data or confidential information as set out above, you may contact us.

Please note that if you withdraw your consent to any or all disclosure of your data or confidential information, depending on the nature of your request and extent of withdrawal, we may be unable to continue provision of our services to you. Such withdrawal may also result in termination of any agreement you may have with us, in which event, we cannot be held responsible or liable. As such, our rights and remedies are expressly reserved in such event.

USE OF COOKIES

Our website may adopt the use of cookies. A cookie is small text file placed on your computer or mobile device when you visit a website. Cookies collect information about users of the website and their visit, such as their internet protocol (IP) address, how they arrived at the website (for example, through a search engine or a link from another website) and how they navigate with the website. We use cookies and other technologies to facilitate your internet sessions, offer you services according to your preferred settings, track visitor's use of our websites and compile statistics about website activities.

A pixel tag, also known as a web beacon, is an invisible tag placed on certain pages of our website but not on your computer. Pixel tags are usually used in conjunction with cookies and are used to monitor the behaviour of users visiting the website.

You may set your browser to block cookies which will, in turn, disable the pixel tags from monitoring your website visit. You may also remove cookies stored from your computer or mobile device. However, if you do block cookies and pixel tags, you may not be able to use certain features and functions of our website.

THIRD PARTY SITES

Our website may contain links to other websites operated by third parties that are linked to our website. It will be useful for you to learn about the privacy policies of such third party websites. Upon leaving our website, you are advised to check the applicable privacy policy of the third party website to appreciate and determine how your data collected by them will be handled by them.

CONTACT US

If you:

- Have any query or feedback in relation to your personal data or confidential information or our policy;
- Wish to withdraw your consent to any use of your personal data or confidential information as stated in this privacy and confidentiality protection notice; or
- Wish to obtain access and make corrections to your personal data or confidential information records

Kindly reach us by:

01. Emailing us at thanuja@mstt.com.sg;
02. Call our Data Protection officer, Thanuja at 63568391; or
03. Send a letter to:

Thanuja (Data Protection Officer)

SUBRA TT LAW LLC

480 LORONG 6 TOA PAYOH

#07-01 HDB HUB EAST WING

SINGAPORE 310480

GOVERNING LAW

This Notice and our privacy and confidentiality policy shall be governed in totality by the laws of Singapore.

For the benefit of doubt, nothing in this Notice can limit or seek to limit all our rights, which are reserved, under the Act.

UPDATE OF OUR PRIVACY & CONFIDENTIALITY POLICY

Kindly note that we may update our privacy and confidentiality policy from time to time to ensure that our privacy and confidentiality policy is in keeping with our future developments, both industry or otherwise and/or change in legal or regulatory or professional body requirements. We will notify you if there are material changes to our privacy and confidentiality policy, by posting a notice of such changes on our website or by sending you a notification directly.

In conclusion, you agree to be bound by the prevailing terms of our policy and confidentiality policy.

This Notice was last updated on 14 February 2023.