

# HAVENCE PORTAL LLP Personal Data Protection Policy

**Effective Date:** 1 January 2026

**Last Updated:** 1 March 2026

## 1. Introduction

This Personal Data Protection Policy (“Policy”) explains how **HAVENCE PORTAL LLP [insert full legal entity name]** and its related corporations and affiliates in Singapore, where applicable (collectively, “**HAVENCE PORTAL LLP**”, “**we**”, “**us**” or “**our**”), collect, use, disclose, retain and otherwise process personal data in accordance with the **Singapore Personal Data Protection Act 2012 (“PDPA”)**.

This Policy applies to personal data collected by HAVENCE PORTAL LLP through our websites, applications, products, services, events, business relationships, recruitment and employment processes, and other interactions with us.

By providing your personal data to us, interacting with us, using our services, submitting forms, applications or documents to us, or continuing to engage with us after being notified of this Policy, you acknowledge that you have read and understood this Policy and agree to the collection, use and disclosure of your personal data in accordance with this Policy, unless your consent is not required or another basis is available under applicable law. Under the PDPA, organisations generally have to notify individuals of the purposes for which personal data is collected, used or disclosed, obtain consent where required, and allow withdrawal of consent with reasonable notice.

If you have any questions about this Policy or our data protection practices, you may contact our Data Protection Officer using the details in Section 17 below. Under the PDPA, organisations must designate at least one individual to be responsible for compliance and make DPO contact information available.

## 2. What Personal Data We May Collect

“Personal data” generally means data, whether true or not, about an individual who can be identified from that data, or from that data together with other information to which we have or are likely to have access.

Depending on your relationship with HAVENCE PORTAL LLP, we may collect the following categories of personal data:

- identification and contact information, such as your name, title, company name, residential or mailing address, email address, telephone number and other contact details;
- personal identifiers and supporting documents, such as NRIC, passport, work pass, visa or other identification details where reasonably required and permitted by law;
- account, transaction and payment information, such as billing details, bank account details and payment records;
- employment and professional information, such as job title, employer, professional background, qualifications, certifications and work history;
- recruitment and assessment information, such as résumés/CVs, cover letters, interview notes, references, background screening information where permitted by law, and assessment results;
- employee administration information, such as payroll details, benefits information, next-of-kin details, leave records, training records, performance records and disciplinary records;
- health-related or accessibility information where reasonably required for employment, workplace safety, accommodation, insurance, event arrangements or other lawful purposes;
- communications and correspondence, including emails, forms, survey responses, support requests and other communications with us;
- audiovisual information, such as photographs, CCTV footage, security recordings, webinar recordings, meeting recordings and interview recordings;
- website, device and usage information, such as IP address, browser type, device information, access logs and website interaction data; and
- any other personal data you or your authorised representative provide to us.

If you provide us with personal data relating to another individual, you represent that you have the authority to do so and, where required, have obtained that individual's consent for us to collect, use and disclose that personal data for the relevant purpose.

### **3. How We Collect Personal Data**

We may collect personal data in one or more of the following ways:

- when you submit forms, applications, enquiries, contracts or other documents to us;
- when you use our website, systems, platforms or digital services;
- when you communicate with us by email, telephone, social media, video call, messaging platform or in person;
- when you purchase or enquire about our products or services;
- when you participate in events, seminars, webinars, surveys, promotions or marketing campaigns;
- when you apply for employment or internship opportunities with us;
- when you are employed or engaged by us;
- when you visit our premises and are recorded by visitor management or CCTV systems;
- from your referees, previous employers, educational institutions, business partners, service providers, recruiters, publicly available sources or other third parties, where permitted by law; and
- through cookies and similar technologies on our websites and applications.

Where appropriate, we may collect personal data from you directly, through your authorised representative, or from third parties. Where we do not collect your personal data directly from you, we will do so in accordance with applicable law and for purposes notified to you or otherwise permitted under the PDPA. Recruitment agencies and similar organisations are subject to the PDPA and generally must notify applicants of purposes and obtain consent unless an exception applies.

## **4. Purposes for Which We Collect, Use and Disclose Personal Data**

HAVENCE PORTAL LLP may collect, use and disclose personal data for one or more of the following purposes, depending on the nature of your relationship with us.

### **4.1 General business and relationship management purposes**

We may collect, use and disclose personal data to:

- respond to enquiries, requests, feedback and complaints;
- verify identity;
- manage our relationship with clients, customers, vendors, partners and other stakeholders;
- provide products and services and perform our contractual obligations;
- process transactions, invoices, reimbursements and payments;
- administer and operate our business, websites, platforms and systems;
- conduct due diligence, internal reporting, audits, investigations and compliance reviews;
- protect our legal rights and interests and prevent fraud, misuse or other unlawful activity;
- comply with legal, regulatory and internal policy requirements; and
- support mergers, acquisitions, restructurings, financing transactions, asset transfers or similar corporate transactions.

## 4.2 Marketing and business development purposes

We may collect, use and disclose personal data to:

- send newsletters, event invitations, publications, updates and information about our products and services;
- maintain contact databases and relationship management systems;
- conduct market research, customer satisfaction surveys and service improvement exercises; and
- analyse preferences, interests and engagement to improve our communications, products and services.

If you have provided us with your **Singapore telephone number**, we may send you marketing or promotional messages by voice call, text message or fax only in accordance with the PDPA's **Do Not Call ("DNC")** provisions, including where you have given clear and unambiguous consent or where another applicable exemption applies. Marketing messages to Singapore telephone numbers must include opt-out information, and opt-out requests must be honoured within 21 days.

You may unsubscribe from email marketing by using the unsubscribe function in the relevant message or by contacting us. You may also ask us not to contact your Singapore telephone number for marketing purposes.

### **4.3 Recruitment purposes**

If you are a job applicant, we may collect, use and disclose your personal data to:

- assess and evaluate your suitability for current or future roles;
- process, verify and manage your application;
- arrange and conduct interviews and assessments;
- communicate with you about your application;
- verify your qualifications, employment history and references;
- conduct background screening where permitted by law and reasonably required for the role;
- prepare offers of employment and pre-employment documentation; and
- maintain recruitment records and consider you for future opportunities, subject to this Policy and applicable law.

Certain personal data, such as interview evaluations or opinion data kept solely for evaluative purposes, may be subject to exceptions under the PDPA. Job applicants nevertheless have statutory rights to request access to and correction of personal data held by organisations, subject to those exceptions.

### **4.4 Employment purposes**

If you are an employee, officer, intern or contractor, we may collect, use and disclose your personal data to:

- establish, manage and administer the employment or engagement relationship;
- process salary, CPF, tax, insurance, leave, claims, benefits and reimbursements;
- allocate systems, devices, accounts, access rights and workplace resources;

- administer training, development, appraisals, promotion, succession planning and workforce management;
- manage workplace health, safety, welfare and security;
- investigate grievances, misconduct, disciplinary issues and incidents;
- support business continuity, emergency response and contingency planning; and
- manage cessation, resignation or termination and post-employment matters.

## **5. Consent, Withdrawal of Consent and Other Lawful Bases Under the PDPA**

Where required by the PDPA, we will obtain your consent for the collection, use and disclosure of your personal data. In appropriate cases, your consent may be express or may be deemed under the PDPA based on your voluntary provision of personal data for a notified purpose or other circumstances recognised by law.

We may also collect, use or disclose personal data without consent where permitted or required by the PDPA or other applicable laws, including where necessary for evaluative purposes, investigations, legal proceedings, emergencies, managing employment relationships, or other statutory exceptions.

You may withdraw your consent at any time by giving us reasonable notice in writing using the contact details in Section 17. Upon receiving your request, we will inform you of the likely consequences of the withdrawal and, subject to applicable law, cease collecting, using or disclosing your personal data for the relevant purpose(s). Withdrawal of consent does not affect our right to continue to process personal data where such processing is permitted or required by law. Under the PDPA, individuals may withdraw consent with reasonable notice, and organisations should inform them of the likely consequences and cease collection, use or disclosure accordingly.

Please note that if you withdraw consent for certain purposes, we may not be able to continue providing certain products or services, process your job application, or continue parts of the employment or contractual relationship.

## **6. Access and Correction Requests**

Subject to the PDPA and any applicable exceptions, you may request:

- access to personal data about you that is in our possession or under our control; and
- information about the ways in which such personal data has been used or disclosed by us within one year before the date of your request; and
- correction of personal data about you that is inaccurate or incomplete.

We may need to verify your identity before processing your request. We will respond to your access or correction request as soon as reasonably possible. If we are unable to respond within 30 days, we will let you know in writing within 30 days when we will be able to respond. We may charge a reasonable fee for processing an access request, and if so, we will provide you with a written estimate in advance. We will not charge a fee for a correction request. Under the PDPA, individuals have rights of access and correction; organisations must respond as soon as reasonably possible, notify the requester if more than 30 days is needed, may charge a reasonable fee for access, and may not charge a fee for correction.

If we are unable to provide access or make a correction, we will generally inform you of the reasons, except where we are not required to do so under the PDPA.

## **7. Accuracy of Personal Data**

HAVENCE PORTAL LLP relies on the personal data provided to us to provide our services, process applications and administer our relationship with you. You should ensure that the personal data you provide is accurate, complete and up to date, and notify us promptly of any changes.

Where personal data is likely to be used to make a decision affecting you or is likely to be disclosed to another organisation, we will make a reasonable effort to ensure that such personal data is accurate and complete. The PDPA requires reasonable efforts to ensure accuracy and completeness in those situations.

## **8. Protection of Personal Data**

We take reasonable administrative, physical and technical measures to protect personal data in our possession or under our control against unauthorised access, collection, use, disclosure, copying, modification, disposal or similar risks. These measures may include access controls, authentication measures, encryption, network security controls, confidentiality obligations, staff training, secure disposal procedures and vendor management safeguards.

While we make reasonable efforts to protect personal data, no method of transmission over the Internet or method of electronic storage is completely secure. The PDPA requires organisations to make reasonable security arrangements to protect personal data in their possession or under their control.

## 9. Retention of Personal Data

We will retain personal data only for as long as it is reasonably necessary to fulfil the purpose for which it was collected, or as required or permitted by law, including for legal, regulatory, tax, accounting, audit, dispute resolution, business or operational purposes.

When personal data is no longer necessary for legal or business purposes, we will cease to retain it, or remove the means by which it can be associated with particular individuals, as required by the PDPA. The PDPA's retention limitation obligation requires organisations to keep personal data only as long as necessary for business or legal purposes.

## 10. Disclosure of Personal Data

We may disclose personal data to the following categories of recipients, where reasonably necessary for the purposes set out in this Policy:

- our related corporations and affiliates;
- our employees, officers, agents and authorised representatives on a need-to-know basis;
- service providers and professional advisers, including IT vendors, cloud providers, payment processors, insurers, payroll administrators, background screening providers, recruiters, auditors, lawyers, consultants and other business support providers;
- business partners, clients, counterparties and vendors where relevant to the products or services requested or to our business relationship;
- regulators, government agencies, statutory boards, law enforcement authorities, courts or tribunals where required or permitted by law; and
- counterparties involved in mergers, acquisitions, restructurings, financings, asset sales or other corporate transactions.

Where third parties process personal data on our behalf as data intermediaries, they are contractually required to implement appropriate security and confidentiality measures and to process personal data only in accordance with our instructions and the PDPA.

## 11. Overseas Transfer of Personal Data

HAVENCE PORTAL LLP may transfer personal data outside Singapore, including to our related corporations, service providers or business partners located overseas. Where we do so, we will take appropriate steps to ensure that the recipient is bound by legally enforceable obligations to provide a standard of protection to the transferred personal data that is **comparable to the protection under the PDPA**, or that another basis for transfer under the PDPA applies.

If we rely on your consent for an overseas transfer, we will provide the information required by law before doing so. Under the PDPA, organisations must not transfer personal data outside Singapore unless they comply with requirements designed to ensure a comparable standard of protection for the transferred data.

## 12. Cookies and Similar Technologies

Our websites and applications may use cookies, pixels, analytics tools and similar technologies to:

- enable site functionality;
- remember preferences;
- improve performance and user experience;
- understand site usage and trends;
- enhance security; and
- support marketing and communications.

You may manage cookies through your browser or device settings. However, disabling cookies may affect the functionality of parts of our website or services.

## 13. AI-Enabled Tools, Recordings and Transcripts

HAVENCE PORTAL LLP may use AI-enabled or automated tools to support communications, productivity, search, analytics, meeting administration, translation, drafting assistance and customer service. We may also use such tools in recruitment and internal administration.

Where calls, meetings, interviews, webinars or events are recorded or transcribed, we will notify you in advance and obtain consent where required by law. Unless otherwise notified, we do not use your personal data to train third-party AI models for general public use. Any use of personal

data in AI-assisted workflows will remain subject to this Policy, our internal controls, and applicable law.

## 14. Data Breach Management

If a data breach affecting personal data in our possession or under our control occurs, we will assess the breach in a reasonable and expeditious manner and take appropriate steps to contain, investigate and remediate it.

Where the breach is a **notifiable data breach** under the PDPA, HAVENCE PORTAL LLP will notify the Personal Data Protection Commission (“PDPC”) **as soon as practicable and no later than 3 calendar days** after determining that the breach is notifiable, and will notify affected individuals as soon as practicable where required by law. Under the current PDPA framework, notification is generally required where a breach is likely to result in significant harm or is of significant scale, including where 500 or more individuals are affected.

## 15. Third-Party Websites and Services

Our website or communications may contain links to websites, applications or services operated by third parties. We do not control and are not responsible for the privacy practices of those third parties. You should review their privacy notices separately.

## 16. Complaints and Concerns

If you have any complaint or concern about how HAVENCE PORTAL LLP has handled your personal data, please contact our Data Protection Officer first. We will review your concern and respond within a reasonable time.

The PDPC encourages individuals to first approach the organisation to seek clarification and resolution before lodging a complaint with the Commission.

## 17. Contact Details of Data Protection Officer

HAVENCE PORTAL LLP’s Data Protection Officer may be contacted at:

**Data Protection Officer**

Email: [DPO@havence.com.sg](mailto:DPO@havence.com.sg)

Under the PDPA, all organisations must designate at least one individual to be responsible for compliance and make DPO contact information available.

## **18. Updates to this Policy**

We may update this Policy from time to time to reflect changes in our business practices, technologies, operational requirements, or applicable laws and regulations. The updated version will be posted on our website or otherwise made available to you, and the revised version will take effect from the date stated in the updated Policy.