



TITLE
PERSONAL DATA PROTECTION

DOCUMENT NO.
VCL-COR-POL-004

REVISION
2

PERSONAL DATA PROTECTION POLICY

- Website Data Protection
- Recruitment Data Protection

-	15/4/19	Approved for use	GFC	CEO	BOD
	07/01/21	To update company name and procedures based on current business segment	GFC	CEO	BOD
	06/03/22	To update for new website and contact details	GFC	CEO	BOD
Revision	Date	Remarks	Prepared	Reviewed	Approved

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VCL	COR	POL	004
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TITLE

DOCUMENT NO.

REVISION

PERSONAL DATA PROTECTION

VCL-COR-POL-004

2

Company Code	Process Code	Document code	Sequence No
Website Data Protection Policy			
Application	<ol style="list-style-type: none"> 1. V2Y Corporation Ltd. ("us", "we", "our") is the operator of www.v2y.si (the "Website"). We recognise the importance of the personal data you have entrusted to us and believe that it is our responsibility to properly manage, protect and process your personal data. 2. This policy (if you make a purchase or register on the Website) are designed to assist you in understanding how we collect, use, disclose and/or process your personal data. 3. We will collect, use or disclose personal data for reasonable business purposes only if there is consent or deemed consent from the individual and information on such purposes have been notified. Unless restricted by the Personal Data Protection Act of Singapore ("PDPA") or any other applicable law, you agree that we may process your personal data in the manner set out below. 4. In this policy, "personal data" shall have the meaning ascribed to it in the PDPA. 		
Collection, use and disclosure of personal data	<p>Why Personal Data is collected</p> <p>We may collect and use your personal data for any or all of the following purposes:</p> <ol style="list-style-type: none"> (a) when you register for an account on the Website; (b) when you make an order on the Website; (c) when you complete purchase orders or requests or applications for our products or services, request for refunds or cancellations (by telephone, in person, by mail or electronically); (d) when you liaise with us in relation to our products, services, promotions, competitions, complaints or special events (in person via our customer service centre or via our co-workers in our online stores, by email, telephone or any other means); (e) when you use services that are made available on the Website or at our online stores or our representative - 		



TITLE
PERSONAL DATA PROTECTION

DOCUMENT NO.
VCL-COR-POL-004

REVISION
2

	<p>What Personal Data is Collected</p> <p>We collect personal data through registration, placement of orders, email messages, telephone conversations, inquiries, requests, and other situations where you have chosen to provide personal data to us.</p> <p>The types of personal data which we may collect about you include:</p> <ul style="list-style-type: none"> (a) contact information such as names, addresses, telephone numbers, email addresses, contact preferences and phone details. (b) Services you have purchased or which you have acquired about, together with any additional data necessary to deliver those products and services and to respond to your enquiries (c) Any additional data relating to you that you provide to us directly through our websites or indirectly through use of our websites, through our representatives or otherwise (d) Data you provide to us through our service center, customer surveys or visits by our representatives from time to time. (e) housing information such as household size, type of home and living situation; (f) billing information such as billing address; (g) details of your visits to the Website, such as traffic data, location data; and - (h) your transaction history. - <p>We collect these personal data when it is necessary for business purposes or to meet the purposes for which the individuals have submitted the information. We hold your personal data in an electronic system in Singapore.</p> <p>Use of Personal Data</p> <p>We use personal data for the following purposes:</p> <ul style="list-style-type: none"> (a) performing obligations in connection with our provision of the goods or services requested by you; (b) verifying your identity; (c) responding to, handling and processing queries, requests, applications, complaints, responding to, handling, and processing queries, requests, applications, complaints, and feedback from you; (d) managing your relationship with us; (e) processing payment or credit transactions;
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TITLE	DOCUMENT NO.	REVISION
PERSONAL DATA PROTECTION	VCL-COR-POL-004	2

	<p>(f) sending your marketing information about our goods or services including notifying you of our marketing events, initiatives and promotions, lucky draws, membership and rewards schemes and other promotions;</p> <p>(g) any other purposes for which you have provided the information;</p> <p>(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</p> <p>(i) all other purposes related to our business.</p> <p>Any individual may choose to unsubscribe from mailing lists, registrations, or elect not to receive further marketing information from us by contacting our Data Protection Officer at the contact details provided below, or if we have contacted such individual by email, such individual may use the unsubscribe function in that email to notify us. Such requests will be processed within 30 days.</p>
Disclosure of personal data to third parties	We may disclose your personal data to third party service providers, agents and other organisations we have engaged to perform any of the business functions. This 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).
Access to and correction of personal data	<ol style="list-style-type: none"> 1. Upon request, we will provide the individual with access to their personal data or other appropriate information on their personal data in accordance with the requirements of the PDPA. 2. Upon request, we will correct an error or omission in the individual's personal data that is in our possession or control in accordance with the requirements of the PDPA. 3. We may charge for a request for access in accordance with the requirements of the PDPA.



	TITLE	DOCUMENT NO.	REVISION
PERSONAL DATA PROTECTION		VCL-COR-POL-004	2

Withdrawal of consent	<ol style="list-style-type: none"> 1. You may withdraw your consent for the collection, use and/or disclosure of your personal data that is in our possession or under our control by writing our Data Protection officer at the contact details provided below. 2. We will process your request within a reasonable time from such a request for withdrawal of consent being made, and will thereafter not collect, use and/or disclose your personal data in the manner stated in your request. 3. 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. – 4. 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.
Accuracy of personal data	We will make a reasonable effort to ensure that personal data collected by us or on our behalf is accurate and complete.
Security and protection of personal data	<ol style="list-style-type: none"> 1. We will put in place reasonable security arrangements to ensure that your personal data is adequately protected and secured, to prevent unauthorised access, collection, use, disclosure, copying, modification, disposal or similar risks. 2. However, we cannot assume responsibility for any unauthorized use of your personal data by third parties which are wholly attributable to factors beyond our control. 3. We will also put in place measures to ensure that any of your personal data that is in our possession or under our control is destroyed and/or anonymized as soon as it is reasonable to assume that: <ol style="list-style-type: none"> (a) the purpose for which that personal data was collected is no longer being served by the retention of such personal data; and (b) retention is no longer necessary for any other legal or business purposes.



TITLE	DOCUMENT NO.	REVISION
PERSONAL DATA PROTECTION	VCL-COR-POL-004	2

Retention of personal data	We will cease to retain personal data, as soon as it is reasonable to assume that the purpose for collection of such personal data is no longer being served by such retention, and such retention is no longer necessary for legal or business purposes.
Transfer of personal data outside of Singapore	We will ensure that any transfers of personal data to a territory outside of Singapore will be in accordance with the PDPA so as to ensure a standard of protection to personal data so transferred that is comparable to the protection under the PDPA.
Data Protection Officer	<p>You may contact our Data Protection Officer if you have any enquiries or feedback on our personal data protection policies and procedures; or if you wish to make any request. please contact our Data Protection Officer Cai Jingren John and Adam Chong details set out below</p> <p>V2Y Insurtech Pte Ltd 38, Jalan Pemimpin, #05-03, M38 Singapore 577178 +65 6745 1668 administrator@v2y.si</p>
Effect of policy and changes to policies	<ol style="list-style-type: none"> 1. This Policy applies in conjunction with any other policies, notices, contractual clauses and consent clauses that apply in relation to the collection, use and disclosure of your personal data by us. 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. To keep you informed, we will notify changes to this Policy by prominently identifying the alteration for a period of not less than two weeks on our home page at www.v2y.si and www.devicecare.com.sg
Changes to our policy on personal data	We may change this policy from time to time and any changes will be posted on V2Y website at www.v2y.si and www.devicecare.com.sg . This policy on personal data was last updated on 12 Mar 2021.



TITLE

DOCUMENT NO.

REVISION

PERSONAL DATA PROTECTION

VCL-COR-POL-004

2

Recruitment Data Protection

Application	This Policy applies to all persons engaged in a contract of service with us (whether on a part-timer, temporary or full-time basis) and interns and trainees working at or attached to us (collectively referred to as “employees”) as well as persons who have applied for any such position with us (“job applicants”), and all references to “employment” shall apply equally to internships and traineeships (as may be applicable).
Personal Data	<ol style="list-style-type: none"> 1. Personal data” means data, whether true or not, about an employee or a job applicant 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. If you are a job applicant, personal data which we may collect includes, without limitation, your: <ol style="list-style-type: none"> (a) name or alias, gender, NRIC/FIN or passport number, date (b) of birth, nationality, and country and city of birth; (c) mailing address, telephone numbers, email address and other contact details; (d) resume, educational qualifications, professional qualifications and certifications and employment references; (e) employment and training history; (f) work-related health issues and disabilities; and (g) photographs. 3. If you are an employee, personal data which we may collect in the context of your employment with us includes, without limitation, your: <ol style="list-style-type: none"> (a) name or alias, gender, NRIC/FIN or passport number, date (b) of birth, nationality, and country and city of birth; (c) mailing address, telephone numbers, email address and (d) other contact details; (e) employment and training history; (f) salary information and bank account details; (g) details of your next-of-kin, spouse and other family members; work- related health and disabilities;



TITLE	DOCUMENT NO.	REVISION
PERSONAL DATA PROTECTION	VCL-COR-POL-004	2

	<ul style="list-style-type: none"> (h) records on leave of absence from work; (i) photographs and other audio-visual information; (j) performance assessments and disciplinary records; and (k) any additional information provided to us by you as a job applicant (that is, prior to being engaged as an employee).
Collection, use and disclosure of personal data	<ol style="list-style-type: none"> 1. We generally collect personal data that <ol style="list-style-type: none"> (a) you knowingly and voluntarily provide in the course of or in connection with your employment or job application with us, or via a third party who has been duly authorised by you to disclose your personal data to us (your “authorised representative”, which may include your job placement agent), after <ol style="list-style-type: none"> (i) you (or your authorised representative) have been notified of the purposes for which the data is collected, and (ii) you (or your authorised 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 permitted or authorised by law). 2. If you are a job applicant, your personal data will be collected and used by us for the following purposes and we may disclose your personal data to third parties where necessary for the following purposes: <ol style="list-style-type: none"> (a) assessing and evaluating your suitability for employment in any current or prospective position within the organisation; and (b) verifying your identity and the accuracy of your personal details and other information provided. 3. If you are an employee, your personal data will be collected and used by us for the following purposes and we may disclose your personal data to third parties where necessary for the following purposes:



TITLE	DOCUMENT NO.	REVISION
PERSONAL DATA PROTECTION	VCL-COR-POL-004	2

	<p>(a) performing obligations under or in connection with your contract of employment with us, including payment of remuneration and tax;</p> <p>(b) all administrative and human resources related matters within our organisation, including administering payroll, granting access to our premises and computer systems, processing leave applications, administering your insurance and other benefits, processing your claims and expenses, investigating any acts or defaults (or suspected acts or defaults) and developing human resource policies;</p> <p>(c) managing and terminating our employment relationship with you, including monitoring your internet access and your use of our intranet email to investigate potential contraventions of our internal or external compliance regulations, and resolving any employment related grievances;</p> <p>(d) assessing and evaluating your suitability for employment / appointment or continued employment / appointment in any position within our organisation;</p> <p>(e) ensuring business continuity for our organisation in the event that your employment with us is or will be terminated;</p> <p>(f) performing obligations under or in connection with the provision of our goods or services to our clients;</p> <p>(g) facilitating any proposed or confirmed merger, acquisition or business asset transaction involving any part of our organisation, or corporate restructuring process; and</p> <p>(h) facilitating our compliance with any laws, customs and regulations which may be applicable to us.</p> <p>4. 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).</p>
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TITLE	DOCUMENT NO.	REVISION
PERSONAL DATA PROTECTION	VCL-COR-POL-004	2

Access to and correction of personal data	<ol style="list-style-type: none"> 1. If you wish to make (a) an access request for access to a copy of the personal data which we hold about you or information about the ways in which we use or disclose your personal data, or (b) a correction request to correct or update any of your personal data which we hold, you may submit your request in writing or via email to our Data Protection Officer at the contact details provided below. 2. A reasonable time frame should be set, and there should not be any unjustified delay in effecting the withdrawal request. Generally, as a rough gauge, the time frame to be indicated should stay within 30 days of the withdrawal request. 3. 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. 4. We will respond to your access request as soon as reasonably possible. Should we not be able to respond to your access request within 30 days after receiving your access request, we will inform you in writing within 30 days of the time by which we will be able to respond to your request. If we are unable to provide you with any personal data or to make a correction requested by you, 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). 5. Please note that depending on the request that is being made, we will only need to provide you with access to the personal data contained in the documents requested, and not to the entire documents themselves. In those cases, it may be appropriate for us to simply provide you with confirmation of the personal data that our organisation has on record, if the record of your personal data forms a negligible part of the document.
Withdrawal of consent	<ol style="list-style-type: none"> 1. 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. If you are a job applicant, 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 at the contact details provided below. 2. 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



	TITLE	DOCUMENT NO.	REVISION
PERSONAL DATA PROTECTION		VCL-COR-POL-004	2

	<p>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 and effect your request within 7 days upon receiving it.</p> <p>3. Whilst we respect your decision to withdraw your consent, please note that depending on the nature and extent of your request, we may not be in a position to process your job application (as the case may be). We shall, in such circumstances, notify you before completing the processing of your request (as outlined above). Should you decide to cancel your withdrawal of consent, please inform us in writing in the manner.</p> <p>4. 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.</p>
Accuracy of personal data	<p>We generally rely on personal data provided by you (or your authorised 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 in writing or via email at the contact details provided below</p>
Security and protection of personal data	<p>1. To safeguard your personal data from unauthorised access, collection, use, disclosure, copying, modification, disposal or similar risks, we have introduced appropriate administrative, physical and technical measures such as up-to-date antivirus protection, encryption and the use of privacy filters to secure all storage and transmission of personal data by us, and disclosing personal data both internally and to our authorised third party service providers and agents only on a need-to-know basis.</p> <p>2. 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.</p>
Retention of personal data	<p>1. We may retain your personal data for as long as it is necessary to fulfil the purposes for which they were collected, or as required or permitted by applicable laws.</p> <p>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</p>



TITLE	DOCUMENT NO.	REVISION
PERSONAL DATA PROTECTION	VCL-COR-POL-004	2

	<p>purposes for which the personal data were collected, and are no longer necessary for legal or business purposes.</p> <p>3. The organisation may not be obliged to provide the employee with access to the disciplinary records, investigations reports, or decisions to terminate, that the organisation has created for evaluative purposes of the employee.</p>
Transfer of personal data outside of Singapore	We generally do not transfer your personal data to countries outside of Singapore (this excludes data stored securely on data servers on cloud platform which may be stored in countries outside Singapore which we have no control over the storage location). In the event that we do so, we will obtain your consent for the transfer to be made and 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	<p>You may contact our Data Protection Officer if you have any enquiries or feedback on our personal data protection policies and procedures; or if you wish to make any request, please contact our Data Protection Officer via details set out below</p> <p>V2Y Insurtech Pte Ltd 38, Jalan Pemimpin, #05-03, M38 Singapore 577178 +65 6745 1668 administrator@v2y.si</p>
Effect of policy and changes to policy	<p>1. This Policy applies in conjunction with any other policies, notices, contractual clauses and consent clauses that apply in relation to the collection, use and disclosure of your personal data by us.</p> <p>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 employment and participation in our recruitment process constitute your acknowledgement and acceptance of such changes.</p>



TITLE	DOCUMENT NO.	REVISION
PERSONAL DATA PROTECTION	VCL-COR-POL-004	2

This document shall be reviewed; As and when there is update in PDPA.

Revision History

Date	Revision	Description of Revision	Prepared	Reviewed	Approved
4 Jan 2021	1	To update company name and procedures based on current business segment	GFC	CEO	BOD
06 Mar 22	2	To update for new website and contact details	GFC	CEO	BOD