

## **Garden Impact Investments (GII) Privacy Policy**

Your privacy is important to us. The purpose of this Privacy Policy is to inform you of how Garden Impact Investments (“GII”) manages personal data in accordance with the Personal Data Protection Act 2012 (“the PDPA”) of Singapore. Please take a moment to read this Privacy Policy so that you know and understand the purposes for which we collect, use and disclose your Personal Data.

By interacting with us, submitting information to us or signing up for any promotions or services offered by us, you agree and consent to GII, its related corporations and affiliates, (collectively referred to herein as "GII", "us", "we" or "our"), as well as our respective representatives collecting, using, disclosing and sharing amongst themselves your Personal Data, and disclosing such Personal Data to GII’s authorised service providers and relevant third parties in the manner set forth in this Privacy Policy.

### **1. YOUR PERSONAL DATA**

1.1. In this Privacy Policy, “Personal Data” refers to any data and/or information about you from which you can be identified by, either (a) from that data; or (b) from that data and other information to which we may have legitimate access to. Examples of such Personal Data include but are not limited to:

- a. your name, NRIC, passport or other identification number, telephone number(s), mailing address, email address and any other information relating to you which you have provided in any forms you may have submitted to use, or in other forms of interaction with you;
- b. your photos;
- c. your employment history, education background, and income levels;
- d. Personal Data of your family members, such as next of kin, spouses, and children;
- e. information relating to payments, such as your bank account number or credit card information;
- f. information about your usage of and interaction with our website and/or services including computer and connection information, device capability, bandwidth, statistics on page views and traffic to and from our website

### **2. COLLECTION OF YOUR PERSONAL DATA**

2.1. 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 authorised by you to disclose your personal data to us (your “authorised representative”) after
  - 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).
- 2.2. Generally, we may collect your Personal Data through the following ways:
- a. when you access our websites or perform an online transaction;
  - b. when you interact with any of our employees and volunteers;
  - c. when you respond to our request for additional Personal Data;
  - d. when you ask to be included in an email or other mailing list;
  - e. when you request that we contact you; and
  - f. when you submit your Personal Data to us for any other reason.

### **3. PURPOSES FOR THE COLLECTION, USE AND DISCLOSURE OF YOUR PERSONAL DATA**

- 3.1. Generally, we may collect, use, disclose and/or retain your Personal Data for 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;
  - d. managing your relationship with us;
  - e. processing payment or credit transactions;
  - 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. 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
  - h. any other incidental business purposes related to or in connection with the above.
- 3.2. 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 organisations we have engaged to perform any of the functions listed in clause 3.1 above for us.
- 3.3. 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).

### **4. USE OF COOKIES**

- 4.1. We may collect or analyse anonymised information from which individuals cannot be identified (“Aggregate Information”), such as number of users and their frequency of use, the number of page views (or page impressions) that occur on our websites and common entry and exit points into our websites.

- 4.2. We make use of “cookies” to store and track Aggregate Information about you when you enter our website(s). Such cookies are used to track information such as the number of users and their frequency of use, profiles of users and their online preferences.
- 4.3. Such aggregate Information collected may be used to assist us in analysing the usage of our website(s) so as to improve your online experience with us.
- 4.4. Should you wish to disable the cookies associated with these technologies you may do so by changing the setting on your browser. However, please note that this may affect the functionality of the website(s).

## **5. THIRD-PARTY SITES**

- 5.1. Our website may contain links to other websites operated by third parties independent of the Organisation. We are not responsible for the privacy practices of such websites operated by third parties even though it is linked to our website(s).
- 5.2. We encourage you to learn about the privacy policies of such third-party website(s) by checking the policy of each site you visit and contact its owner or operator if you have any concerns or questions.

## **6. PROTECTION OF YOUR PERSONAL DATA**

- 6.1. We maintain appropriate security safeguards and practices to protect your Personal Data from unauthorised access, collection, use, disclosure, copying, modification disposal or similar risks, in accordance with applicable laws.
- 6.2. 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.

## **7. ACCURACY OF YOUR PERSONAL DATA**

- 7.1. We take all reasonable measures to ensure that your Personal Data remains accurate, complete and up-to-date.
- 7.2. You may also keep us informed when there are any updates to your Personal Data by contacting us directly.

## **8. TRANSFERS OF PERSONAL DATA OUTSIDE OF SINGAPORE**

- 8.1. Where we are subject to the PDPA in respect of our processing of your personal data and if we transfer your personal data outside Singapore, we will take all reasonable steps to ensure that:
  - a. the recipient agrees to protect personal data at a standard that is at least comparable to the PDPA; or
  - b. any other transfer will otherwise be in accordance with the PDPA.

## **9. WITHDRAWAL OF CONSENT**

- 9.1. 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.

- 9.2. If you wish to withdraw your consent to any use or disclosure of your Personal Data as set out in this Privacy Policy, you may submit your request in writing or via email to our Data Protection Officer at the contact details provided in clause 10 below.
- 9.3. 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.
- 9.4. 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.

## **10. DATA PROTECTION OFFICER**

- 10.1. 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 by emailing [impact@gardenimpact.com](mailto:impact@gardenimpact.com).