



CLIENT
BUSINESS DATA PROTECTION NOTICE

Effective date on 1st June 2020

Last updated on 1st June 2020



BUSINESS DATA PROTECTION NOTICE

BUSINESS PROTECTION NOTICE FOR CLIENT

This Data Protection Notice (“Notice”) sets out the basis which WE Development (“we”, “us”, or “our”) may collect, use, disclose or otherwise process data of our client. This Notice applies to data in our possession or under our control, including data in the possession of organisations which we have engaged to collect, use, disclose or process business data for our purposes.

DATA

1. As used in this Notice:

“Client” (“you” or “your”) means an individual or an entity who (a) works with WE Development to provide content, products and services, (b) uses WE Development’s Website as a platform to market, advertise or showcase themselves with monetary transactions, or (c) uses WE Development’s Website as a platform to market, advertise or showcase themselves without monetary transactions or known as “Contributor” if this term is useful in application of other Notice and Policy, or (d) representative of client who conducts activities described in (a), (b) and (c) in this paragraph.

“Business Data” means data, whether true or not, about information relating to (a) agreements set by both Client and WE Development (includes strategies, tactics, harvested data), or (b) identity of the person representing Client (includes name, personal contacts, network relating to the agenda of business), or (c) personal data of User permitted by Personal Data Protection Act (“PDPA”) to conduct business related activities.

“User” means an individual who (a) has visited our Website or contacted us through any means to find out more about any of our goods (digital content, digital product, print product, merchandise) or services (our forum, comment section) we provide, or (b) may, or has, entered into a contract with us for the supply of any products, memberships or services by us.



2. Depending on the nature of your interaction with us, some examples of Business Data which we may collect from you include the name, identification numbers such as nric, fin, work permit and birth certificate, residential address, email address, telephone number, nationality, gender, date of birth, marital status, photograph (personal or group), video (personal or group), employment information and financial information but not limited to business strategies, business tactics, your customers, your suppliers, your intellectual properties, your proprietary properties, certain level of trade secrets and industry insights.

COLLECTION, USE AND DISCLOSURE OF BUSINESS DATA

3. We generally do not collect your Business 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 Business 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 Business Data for those purposes, or (b) collection and use of business data without consent is permitted or required by law. We shall seek your consent before collecting any additional Business Data and before using your Business Data for a purpose which has not been notified to you (except where permitted or authorised by law).

4. We may collect and use your Business Data for any or all of the following purposes:

- (a) performing obligations in the course of or in connection with our provision of any products 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) any other purposes for which you have provided the information;



- (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;
 - (i) any other incidental business purposes related to or in connection with the above; and
 - (j) to inform news by WE Development for the purpose of notice, update, sharing and marketing
5. We may disclose your Business Data:
- (a) where such disclosure is required for performing obligations in the course of or in connection with our provision of the products and services requested by you (includes your representative, unless otherwise specified); or
 - (b) to third party service providers, agents and other organisations we have engaged to perform any of the functions with reference to the above mentioned purposes.
 - (c) where law enforcer of Singapore request of such due to infringe and outrage of law. WE Development should check and verify the actual identity of the law enforcer before disclosure.
6. The purposes listed in the above clauses may continue to apply even in situations where your relationship with us 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 an agreement with you).

WITHDRAWING YOUR CONSENT

7. The consent that you provide for the collection, use and disclosure of your business data will remain valid until such time it is being withdrawn by you in writing. You may withdraw consent and request us to stop collecting, using and/or disclosing your business 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.



8. 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. In general, we shall seek to process your request within thirty (30) business days of receiving it.
9. 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 products, services and collaboration with you and we shall, in such circumstances, notify you before completing the processing of your request. Should you decide to cancel your withdrawal of consent, please inform us in writing in the manner described in clause 6 above.
10. Please note that withdrawing consent does not affect our right to continue to collect, use and disclose business data where such collection, use and disclose without consent is permitted or required under applicable laws.

PROTECTION OF BUSINESS DATA

11. To safeguard your business 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 encryption, and disclosing such data both internally and to our authorised third party service providers and agents only on a need-to-know basis.
12. 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.



RETENTION OF BUSINESS DATA

13. We may retain your business data for as long as it is necessary to fulfil the purpose for which it was collected, or as required or permitted by applicable laws.
14. We will cease to retain your business 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 purpose for which the business data was collected, and is no longer necessary for legal or business purposes.

DATA PROTECTION OFFICER

15. 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, in the following manner:

Email Address: welisten@wedevdevelopment.sg

EFFECT OF NOTICE AND CHANGES TO NOTICE

16. This Notice applies in conjunction with any other notices, contractual clauses and consent clauses that apply in relation to the collection, use and disclosure of your personal data by us.
17. We may revise this Notice 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 use of our services constitutes your acknowledgement and acceptance of such changes.