

## **INTRODUCTION**

We respect your privacy and commit to protecting your personal data. This privacy policy tells you how we look after your personal data when you visit our website and your rights over your personal data. It is provided in a layered format so that you can click the headings in the table of contents below to go straight to a specific item of interest to you. Alternatively, you can download a pdf version of the policy here: [ *insert link* ].

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## **IMPORTANT INFORMATION AND WHO WE ARE**

The website you are visiting is owned by Seasoned Singapore Expat Women. (“we”, “us” or “our” in this privacy policy). If you have any questions or concerns about this privacy policy and how we look after your personal data, please contact our privacy manager: Nici Schueler, 68 St Thomas Walk #34-01, Skyline 360° Singapore 238142 , Phone: +6583320315 Email: admin@ssew.co. If our privacy manager is unable to resolve your concerns you can always raise them with the Personal Data Protection Commission using this [link](#).

## ***PURPOSE OF THIS PRIVACY POLICY***

his privacy policy tells you how we collect and use the personal data you give us when you use and register on our website.

## ***CHANGES TO THIS PRIVACY POLICY AND YOUR PERSONAL DATA***

We keep this privacy policy under regular review, but it is also important that you tell us if the personal data you have given us (e.g., your email address) changes, so that we can keep it accurate and current.

## ***THIRD-PARTY LINKS***

This website includes links to other websites, plug-ins and applications. Clicking on those links or enabling those connections may allow others to collect or share data about you. We do not control how others collect or share data about you and are not responsible for them.

## ***THE DATA WE COLLECT ABOUT YOU***

Personal data is information about you from which you can be identified. We may collect, use, store and transfer the following kinds of personal data about you:

- **Identity Data** includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
- **Contact Data** includes addresses (including email address) and telephone numbers.
- **Financial Data** includes bank account and payment card details.
- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website.
- **Profile Data** includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
- **Usage Data** includes information about how you use our website, products and services.
- **Marketing and Communications Data** (we refer to this as “M&C” in this privacy policy) includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We do not collect details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data. Nor do we collect any information about criminal convictions and offences.

## ***CHOOSING NOT TO PROVIDE PERSONAL DATA***

We make it a condition of registration on this website that you provide personal data. By registering, you are deemed to have given your consent to the use of your personal data in the ways we describe in this privacy policy, including direct marketing communications. If a contract or service we provide needs your personal data and you do not provide it when requested, we can withdraw or cancel that product or service. You have the right to withdraw your consent to our use of your personal data at any time by de-registering from this website.

## HOW YOUR PERSONAL DATA IS COLLECTED

We use different methods to collect data from and about you including through:

- **Direct interactions.** When you give us your Identity, Contact and Financial Data by filling in forms on this website or by corresponding with us by any means, including through this website. This includes personal data you provide when you:
  - apply for our products or services;
  - create an account on our website;
  - subscribe to our service or publications;
  - request marketing to be sent to you;
  - enter a competition, promotion or survey; or
  - give us feedback or contact us.
- **Automated technologies or interactions.** When you interact with our website, we will collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. Please see our cookie policy [LINK] for further details.
- **Third parties or publicly available sources.** We may also receive personal data about you from various third parties, including for example Technical Data from analytics providers and social media sites such as Google or Facebook.

## PURPOSES FOR WHICH WE USE YOUR PERSONAL DATA

The table below describe the ways we may use your personal data and which legal or business purpose we rely upo to do so. We may use your personal data for more than one purpose.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you	(a) Identity (b) Contact	Performance of a contract with you
To process and deliver an order including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction (e) M&C	(a) Performance of a contract with you (b) Necessary to recover debts due to us
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey	(a) Identity (b) Contact (c) Profile (d) M&C	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary to keep our records updated and to study how customers use our products/services
To enable you to partake in a prize draw, competition or complete a survey	(a) Identity (b) Contact (c) Profile (d) Usage (e) M&C	(a) Performance of a contract with you (b) Necessary to study how customers use our products/services, to develop them and grow our business
To administer and protect our	(a) Identity	(a) Necessary for the smooth running of our

business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(b) Contact (c) Technical	business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise (b) Necessary to comply with a legal obligation
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) M&C (f) Technical	Necessary to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) M&C	Necessary to develop our products/services and grow our business

## **PROMOTIONAL OFFERS**

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. You will receive marketing communications from us because, by registering on this website, you are deemed to have given your consent to the use of your personal data for our marketing purposes. You may withdraw that consent at any time, but it will result in you being de-registered from this website.

## **THIRD-PARTY MARKETING**

We will get your express opt-in consent before we share your personal data with a third party for marketing purposes.

## **OPTING OUT**

You can ask us to stop contacting you at any time by clicking the opt-out links on our communications. Where you opt out in this way, the opt-out will not apply to personal data you have given us for a product/service you have purchased from us.

## **CHANGE OF PURPOSE**

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal data for an unrelated purpose, we will contact you and explain why and, if necessary, obtain your consent to the new purpose.



## ***DISCLOSURES OF YOUR PERSONAL DATA***

We may share your personal data for the purposes set out in the table above with:

- [ *list specific third parties, such as website/database administrators* ]
- Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. If control of our business changes, the new owners may use your personal data in the same way as set out in this privacy policy.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for the purposes set out in the table above and in accordance with our instructions.

## ***DATA SECURITY***

We have security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a legal or business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

## ***HOW LONG WE WILL USE YOUR PERSONAL DATA***

We will only keep your personal data for as long as reasonably necessary to fulfil the purposes for which we collected it, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint you make or we are in dispute with you.

To work out how long we keep your personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

## ***NO FEE USUALLY REQUIRED***

You will not have to pay a fee to access your personal data (or to exercise any other rights you may have over your personal data), but we may charge a reasonable fee if a request you make has no justification, is repetitive or excessive. We may also refuse to comply with your request in these circumstances.

## ***TIME LIMIT TO RESPOND***

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.