



Privacy Statement

2nd September 2014

PRIVACY STATEMENT

Clifford Capital Pte. Ltd. ("Clifford Capital") is committed to protecting and respecting your personal data.

This Privacy Statement (together with any other documents referred to on it) sets out the basis on which we will process any personal data we collect from you, or that you provide to us. This Privacy Statement is to be read together with the Terms and Conditions of Use available at Clifford Capital's website. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

COLLECTION AND PROCESSING OF PERSONAL DATA

You can use and browse our website without disclosing your personal data, except as may be necessary to allow us to respond to your requests or in cases where you contact us directly.

We collect personal data only when you provide it to us, through registration, completion of forms, emails, inquiries and requests, and similar situations in which you have chosen to provide the information to us.

We will retain control of, and responsibility for, the use of any personal data you disclose to us. Such data shall remain in our possession, or that of data intermediaries acting on our behalf.

PURPOSES OF USE

All personal data and other information collected may be used by Clifford Capital individually or collectively and may be combined with other information for the following purposes:

- Responding to your enquiries or requests pursuant to your emails, telephone calls, faxes and/or submission of form(s);
- Responding to your job/internship application or your recruitment queries;
- Responding to and taking follow-up action on complaints; and/or
- Performing Clifford Capital's operational or administrative matters.

IP ADDRESSES

When you use our website, we may collect and store information about your computer (including your IP address, operating system and browser type) for system administration. This is statistical data about our users' browsing actions and patterns. This data could possibly lead to your identification, but we, and our data intermediaries, do not use it to do so.

COOKIES

Our website may use cookies to distinguish you from other users of our website. This assists to increase efficiency when you browse our website and also allows us to improve our website.

THIRD PARTY WEBSITES

Our website may, from time to time, contain links to and from third party websites. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

DISCLOSURE OF YOUR PERSONAL DATA

To respond to or process your request to Clifford Capital, we may have to disclose your personal data to any member of our group or to third parties such as our service providers and professional advisors. Your personal data will not be disclosed on to any other parties, unless we have obtained your consent or are legally required to do so.

WHERE WE STORE YOUR PERSONAL DATA

The data that we collect from you may be transferred to, and stored at, a destination outside Singapore. It may also be processed by staff operating outside Singapore who work for us or for one of our service providers.

By submitting your personal data, you agree to this transfer, storing or processing. Clifford Capital will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Statement.

SECURITY

We use technical and organisational security precautions to protect your data from unauthorised access, collection, use, disclosure, copying, modification, disposal or similar risk. Our security procedures are continuously revised based on new technological developments.

DATA RETENTION

We retain personal data for as long as necessary for the fulfilment of the purposes for which it was collected or to which you have given your consent, except where otherwise provided by law.

RIGHT TO WITHDRAW CONSENT, REQUEST ACCESS TO, AND CORRECTION OF PERSONAL DATA

You have the right to withdraw consent, request access to, and correction of personal data that Clifford Capital holds about you in accordance with applicable laws.

All requests for the withdrawal of consent, access to, or correction of personal data held by Clifford Capital shall be made by completing Clifford Capital's standard request form (Please see Appendix 1), and sending a copy of the duly completed form to Clifford Capital via post or email at:

Clifford Capital Pte. Ltd.
12 Marina Boulevard,
#17-03 MBFC Tower 3,
Singapore 018982
Telephone: +65 3157 8911
Email: enquiry@cliffordcap.sg

Attention: Data Protection Officer

LODGING A COMPLAINT

Clifford Capital aims to deal promptly and efficiently with any concerns relating to the firm's processing of personal data. If you have any concerns or problems with the way in which your personal data has been processed, you should not hesitate to raise your concern with the Data Protection Officer at Clifford Capital (see contact details above). To help us to deal with your complaint, please provide a full written explanation of your concerns by completing Clifford Capital's standard complaint form (Please see Appendix 1) and sending a copy of the duly completed form to the Data Protection Officer at the abovementioned address.

Response times to your complaint are likely to vary depending on the nature of the complaint, although we endeavour to respond as promptly as possible. In any event, we will endeavour to provide a full response to your complaint within 30 days of receipt of your complaint.

The Data Protection Officer will liaise with the relevant departments to investigate your complaint and will confirm the outcome to you in writing. If you feel your complaint has not been resolved satisfactorily, you may appeal to the CEO who will review your complaint and reach a decision based on its findings within 90 days of receipt of your notification of appeal.

Our approach is to engage positively and resolve your complaint satisfactorily without you having to refer your complaint to an external regulator or court. If the complaints procedure does not resolve your complaint to your satisfaction, you may then seek further recourse by contacting the Personal Data Protection Commission.

CONTACT

Questions, comments and requests regarding this Privacy Statement are welcomed and should be addressed to our Data Protection Officer at the contact details provided above or emailed to enquiry@cliffordcap.sg

**PERSONAL DATA
REQUEST FORM / COMPLAINTS FORM**

Things to Note

1. Please complete this form in English.
2. Please note that Clifford Capital Pte. Ltd. ("**Clifford Capital**") may refuse to disclose or amend any information for the reasons set out in the Personal Data Protection Act 2012 ("**PDPA**").
3. Clifford Capital will respond to your request no later than 30 days from when we receive your request, subject to the requirements and exemptions of the PDPA. If we are unable to respond within such time, we will inform you of when we are able to respond.
4. You are not entitled to access personal data that does not belong to you. Clifford Capital may require you to verify your identity.
5. It is important that you specify in this form clearly and in detail the personal data for which you request information, correction, or withdrawal of consent. Clifford Capital may be unable to comply with your request if you have not provided the information that Clifford Capital reasonably requires. You consent to Clifford Capital contacting you for verification of information for your request.
6. The information that you have provided herein shall be used for processing your requests /complaints as the case may be. The provision of the personal data herein is voluntary.
7. Please send a copy of the duly completed form to Clifford Capital by hand, via post or email to us at:

Clifford Capital Pte. Ltd.
12 Marina Boulevard,
#17-03 MBFC Tower 3,
Singapore 018982
Email: enquiry@cliffordcap.com.sg

Attention: Data Protection Officer
8. You shall bear all postage fees.
9. A charge of S\$20 (including GST) will be imposed on each submission of a PERSONAL DATA REQUEST FORM for **access to, correction of or cessation from use of personal data** to meet our costs in providing you with details of the information we hold about you.
10. The above charge may be subject to revision by Clifford Capital from time to time.
11. The applicable charge shall be paid by way of cheque made out to **Clifford Capital Pte. Ltd.** at the time of submission of the request for access.
12. Please attach separate sheets if necessary.

SECTION A: DETAILS OF REQUESTOR / COMPLAINANT

Type of Request / Complaint

Please tick where applicable:

Access to personal data *(Please complete Sections A and B).*

<input type="checkbox"/> Please indicate the information you are requesting access to:

<input type="checkbox"/> Please tick this box if you require information on the use of the above information.

Correction of personal data
(Please complete Sections A, B and C)

Withdrawal of consent to use and disclosure of personal data
(Please complete Sections A, B and D)

Lodge a Complaint
(Please complete Sections A, B and E)

Requestor's / Complainant's Particulars

Name:	If you were previously known by another name, please also state your previous name(s). Please also indicate the time period that you have used such name(s). Official Name: Other Names:
Gender:	Male / Female *
Identification No:	NRIC (for Singaporean and SPR): Passport No.* (for foreigners):
Address:	
Previous Address:	Complete this section if you have lived at your current address for less than one year. Please also indicate the time period that you have lived at each address.
Telephone No:	If you have previously used other telephone number(s), please also state your previous number(s) and the time period that you have used each number.
Email:	State all your email addresses. If you have previously used other email addresses, please also state your previous email addresses and the time period that you have used each email address

*(*Please delete where applicable)*

Proof of Identity

Please enclose **certified true copies** of one of the following documents. Please tick where applicable.

- A valid passport, including photograph
- A valid Singapore driving license
- Singapore national resident identity card (NRIC)

Declaration of Requestor /Complainant

I confirm that I am the requestor / complainant* named in Section A, and I am submitting this form in relation to my own personal data. I confirm that the information provided herein (including information in Sections B, C, D and E, as applicable) is true and accurate. I understand that the information that I have supplied will be used to confirm my identity and help locate the information I have requested and/or referred to. I also understand that it may be used for statistical and monitoring purposes.

Signature : _____

Date : _____

* *Delete as appropriate*

SECTION B: DESCRIBE HOW YOU PROVIDED YOUR PERSONAL DATA TO CLIFFORD CAPITAL

Please indicate the date on which you have provided your personal data to Clifford Capital, and the reason for doing so. Please provide as much information possible.

Please tick where applicable

<input type="checkbox"/>	Job Application Date: Other Information:	<input type="checkbox"/>	Other Commercial Relationship (please specify): Date: Other Information:
<input type="checkbox"/>	Visit to Clifford Capital's office Date: Other Information:	<input type="checkbox"/>	Enquiries via Website Date: Other Information:
<input type="checkbox"/>	Employment/Secondment/Internship Date: Other Information:	<input type="checkbox"/>	Enquiries via email, tel. fax (please specify): Date: Other Information:
		<input type="checkbox"/>	Others (please specify): Date:

Please indicate to whom was your personal data provided to:

Person-in-charge : _____

Office/Department : _____

SECTION C: REQUEST FOR CORRECTION

Please complete this section if you are requesting a correction of your personal data by Clifford Capital.

Type of Personal Data	Before Correction	After Correction

SECTION D: CESSATION OF USE AND DISCLOSURE OF PERSONAL DATA

Specify the particulars of the personal data that you wish for Clifford Capital to cease using and disclosing.

Please note that there may be legal consequences resulting from the withdrawal of consent and we would advise you to contact our Data Protection Officer for a discussion before proceeding with such cessation.

SECTION E: LODGING A COMPLAINT

Please complete this section if you are lodging a complaint.

The grounds of your complaint are (*please tick the relevant box below*):

Unfair or Unlawful Processing of Personal Data

Misuse of Your Personal Data

Unauthorised Access to Your Personal Data

Loss of Your Personal Data

Others (*Please specify*) _____

Please provide below the full fact details of your complaint including particulars of personal data forming the subject matter of your complaint.

All complaints about the firm's processing of personal data will be handled in line with the procedures set out in the Privacy Statement.