

## PreceptsGroup's Personal Data Protection Policy

### ABOUT THIS POLICY

**Please take a moment to read this Personal Data Protection Policy as they may have important consequences for you.**

This is the PreceptsGroup's Personal Data Protection Policy for all our clients and users of our website.

This purpose of this Personal Data Protection Policy ("**Policy**") is to provide an understanding on the processes involved in protecting your Personal Data in accordance with the Personal Data Protection Act 2012 ("**PDPA**") by the Personal Data Protection Commission Singapore ("**PDPC**") as well as the EU's General Data Protection Regulation ("**GDPR**"). Please read this Policy so that you understand the purposes for which we collect, use, disclose or process your Personal Data.

In this Policy, ("**we**", "**us**", "**our**" or "**PreceptsGroup**") means the PreceptsGroup International group of Companies, including:-

- 1) **PreceptsGroup International Pte Ltd;**
- 2) **Precepts Legacy Pte Ltd;**
- 3) **Precepts Trustee Ltd;**
- 4) **Precepts Academy Pte Ltd;**
- 5) **Precepts Incorporations Pte Ltd;**
- 6) **Precepts Corporate Services Pte Ltd;**
- 7) **Estate Planning Practitioners Ltd; and**
- 8) **its related corporations and affiliates.**

("**ESP**") means our licensed Estate and Succession Practitioners representing Precepts Legacy Pte Ltd, and our Trust Introducers of Precepts Trustee Ltd.

By submitting information to us or signing up for any promotions, engaging our services or products offered by us, you agree and consent to PreceptsGroup, as well as our ESP to the collecting, using, disclosing and processing of your Personal Data amongst themselves, and disclosing such Personal Data to PreceptsGroup's authorized service providers and relevant third parties in the manner set forth in this Policy.

This Policy applies to Personal Data in our possession or under our control, including Personal Data in the possession of PreceptsGroup which we have engaged to collect, use, disclose and/or process for our purposes.

PreceptsGroup is deeply concerned and wishes to ensure proper data privacy is maintained in accordance with the 9 Data Protection Obligations implemented by the PDPC for your benefit. Under this policy, please be assured that your Personal Data shall only be used for PreceptsGroup's businesses and services. Where necessary, we will require any person to whom we provide your Personal Data to agree to comply with our Personal Data Protection Policy.



We may also amend this policy from time to time to ensure that this policy remains consistent with any developments to the manner PreceptsGroup uses your Personal Data or any changes to the laws and regulations applicable. We will make available the updated policy on our website<sup>1</sup> and will only notify you of the changes where required by law to do so.

All communications, transactions and dealings with us shall be subject to the latest version of this notice in force at the time.

## **1. Personal Data**

- 1.1. In this Policy, ("**Personal Data**") means any data or information about you, whether true or not, from which you can be identified; or from that data and other information to which PreceptsGroup has or is likely to have access.
- 1.2. Personal Data which we collect shall be used for PreceptsGroup's businesses and services only.
- 1.3. The type of Personal Data which we collect and for what purpose it is collected for will depend on the type of services provided to you and may include but are not limited to the following:
  - 1.3.1. full name, including aliases;
  - 1.3.2. National Registration Identification Card number ("**NRIC**") for Singaporeans;
  - 1.3.3. passport number and country of issue for non-Singaporeans;
  - 1.3.4. nationality;
  - 1.3.5. family / beneficiary personal details;
  - 1.3.6. tax residency & Tax Identification Number (TIN);
  - 1.3.7. occupation information including the name of employer, position held, address of business and nature of employment;
  - 1.3.8. contact details including house phone number, mobile phone number, email address and mailing address; and
  - 1.3.9. any other Personal Data derived from any legal documentation including but not limited to, Insurance Policies, Letter of Administration, Grant of Probate, Power of Attorney, Birth Certificate and Death Certificate.

## **2. Collection of Personal Data**

- 2.1. We generally collect Personal Data from you directly but we may also collect Personal Data from third parties such as:
  - 2.1.1. your ESP;
  - 2.1.2. your agents and representatives;
  - 2.1.3. other professional service providers that provide services to you; or
  - 2.1.4. other third parties.

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<sup>1</sup> <http://www.preceptsgroup.com/data-privacy/>



- 2.2. Personal Data is collected:
- 2.2.1. when you sign up to purchase our products and services from us or our ESP;
  - 2.2.2. when you register your interest with us or our ESP to purchase the products and services;
  - 2.2.3. when you attend our public talk and seminars;
  - 2.2.4. when you visit our websites or social networking sites;
  - 2.2.5. from any company within PreceptsGroup;
  - 2.2.6. pursuant to any transaction or enquiry or communication made with or to us or our ESP; or
  - 2.2.7. from third-party sources such as credit reference agencies, fraud prevention agencies and publicly available sources of information.

### **3. Usage of Personal Data**

- 3.1. As our estate planning services cover the preparation of estate planning instruments such as Wills, Trusts and Lasting Power of Attorney, we will process the Personal Data collected for, but not limited to, the following purposes;
- 3.1.1. to facilitate the drafting of wills and other legacy planning instruments as instructed by you;
  - 3.1.2. to facilitate the drafting of trusts as instructed by you;
  - 3.1.3. for billing and financial purposes, including payments for PreceptsGroup services (and all transactions related thereto), accounting and tax;
  - 3.1.4. for administrative purposes;
  - 3.1.5. to comply with legal and statutory requirements;
  - 3.1.6. for contact purposes;
  - 3.1.7. for responding to your enquires;
  - 3.1.8. to conduct research and statistical analysis;
  - 3.1.9. to help us monitor and improve our product and service offerings;
  - 3.1.10. for providing you with regular communications relating to services provided by PreceptsGroup, its related companies and partners from time to time;
  - 3.1.11. for direct marketing purposes; or
  - 3.1.12. for providing you with information and updates on the products and services.
- 3.2. Please also note that depending on the product and services required, we are compelled by law to collect and retain your Personal Data, including NRIC for:
- 3.2.1. identification and verification purposes; and
  - 3.2.2. fulfilling our Anti Money Laundering and Combating the Financing of Terrorism obligations.



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- 3.3. Use of Personal Data for marketing purposes; we may use your Personal Data for marketing purposes, including:
  - 3.3.1. monitoring and improving our product and service offerings;
  - 3.3.2. providing you with regular communications relating to services provided by PreceptsGroup from time to time;
  - 3.3.3. for direct marketing purposes; and/or
  - 3.3.4. providing you with information and updates on products and services.
  
- 3.4. Such marketing messages may be sent to you in various modes including:
  - 3.4.1. electronic mail;
  - 3.4.2. direct mailers;
  - 3.4.3. short message service;
  - 3.4.4. telephone calls; or
  - 3.4.5. facsimile.
  
- 3.5. The information required by us are necessary and mandatory which you must provide in order to accurately identify the relevant parties and in compliance with the relevant regulations such as Anti Money Laundering and Combating the Financing of Terrorism, failing which, we may not be able to provide you with the estate planning products and services and relevant updates or information.

## **4. Disclosure and sharing of Personal Data**

- 4.1. To facilitate the purpose above and the provision of products and services to you, we may process, use and disclose your Personal Data to the following classes of third parties:
  - 4.1.1. companies within the PreceptsGroup;
  - 4.1.2. our ESP and service providers (including those located overseas) providing services relating to the purposes for which the Personal Data is collected;
  - 4.1.3. our service providers, consultants, auditors and advisors on a need to know basis;
  - 4.1.4. your other professional advisers, subject to your approval;
  - 4.1.5. regulatory authorities and enforcement agencies;
  - 4.1.6. any court of law or any relevant party in connection with any claim or legal proceedings; and
  - 4.1.7. any person who is under a duty of confidentiality who has undertaken to keep such Personal Data confidential.



- 4.2. As PreceptsGroup adopts cloud-based solutions for our client administration, your Personal Data might be moved and stored in the cloud-based solutions with their servers located outside of Singapore. On this note, PreceptsGroup wishes to ensure you that your Personal Data are protected to a standard comparable to that under the PDPA, in the jurisdictions that they are transferred to and maintained at.

## **5. How does PreceptsGroup protect your Personal Data**

- 5.1. The security and protection of Personal Data are of utmost importance. In PreceptsGroup, we have internal policies and controls in place to ensure that Personal Data is securely maintained and is prevented from unauthorised disclosure, use, alteration or destruction.
- 5.2. Your Personal Data is not accessible except by our trained staffs and managers only, who will at all times act honestly and proper in the performance of their duties.
- 5.3. Whenever applicable, we will also use encryption and other adopted technologies currently available and are within our knowledge that can assist in securing the Personal Data provided to us.
- 5.4. It is of utmost importance that your Personal Data is protected whenever they are transferred to a jurisdiction outside of Singapore. PreceptsGroup will ensure that the software we use is hosted on reputable cloud solutions providers such as Amazon Web Services and Microsoft Azure. In addition, we also ensure that the software has high-security features such as:
  - 5.4.1. 256 bit SSL implemented for all web browser-based conversations;
  - 5.4.2. 4 digit PIN required to access any mobile app;
  - 5.4.3. dual encryption of all documents stored on the platform for enhanced security; and
  - 5.4.4. passwords are not stored on the system but managed through a token-based system.

## **6. How long will your Personal Data be kept for?**

- 6.1. Your Personal Data will be retained for as long as necessary to fulfil the business or legal purposes we collected it for.
- 6.2. Once your business relationship with us has ended, or when retention is no longer necessary, we will securely delete or destroy your Personal Data in accordance with our data retention policy and applicable laws and regulations unless retention is required to satisfy legal or regulatory requirements.
- 6.3. Depending on the business product, we might be obligated to retain your Personal Data for up to 7 years.



- 6.4. For the avoidance of doubt, due to the business nature of PreceptsGroup, we generally have a legal purpose to retain your Personal Data indefinitely for certain services even after cessation of business. For example:
- 6.4.1. for Will Writing Services, even after the permanent retrieval of the Will, your Personal Data will be retained for any unforeseen situations in the future such as providing testamentary scripts to be attached in affidavits in cases of dispute.
  - 6.4.2. for Lasting Power of Attorney (LPA), even if PreceptsGroup Trustee Ltd is not appointed as one of the Properties and Affairs donees of the LPA, your Personal Data will be retained for any unforeseen situations in the future such as providing scripts to be attached in affidavits in cases of dispute.

## **7. What rights do you have in respect to your Personal Data?**

- 7.1. The following individual rights are provided in the GDPR and may not be applicable if you are not an EU person. However, PreceptsGroup will provide the same rights to you on the basis that they do not prevent or hinder us from:
- 7.1.1. complying with the legal obligations we have; and
  - 7.1.2. providing you with the requested products and services.
- 7.2. As a data subject, you have the following rights in respect to the Personal Data we collected about you:
- 7.2.1. Right to be informed – PreceptsGroup will inform you about the collection and use of your Personal Data through various forms and letters of engagement. Other information regarding how your Personal Data will be used can be found in this notice;
  - 7.2.2. Right of access – You can request us to give you a copy of your Personal Data that you have provided to us;
  - 7.2.3. Right of rectification – You can request us to update or rectify your Personal Data if they are outdated, incomplete or incorrect;
  - 7.2.4. Right of erasure – You can request us to delete or remove your Personal Data if our business relationship has ended, or when retention is no longer necessary. However, please note that depending on the business product, we might have a legal obligation to retain your Personal Data for up to 7 years;
  - 7.2.5. Right to restrict processing – You can request the restriction or suppression of your Personal Data in certain circumstances. For example, you can request for us to stop processing your Personal Data during the retention period (due to legal obligations) before we can erase your Personal Data;
  - 7.2.6. Right to data portability – You can request for your Personal Data to be obtained and reused across different services. For example, you can request



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for your Personal Data stored with PreceptsGroup to be shared with a third party providing professional services to you;

7.2.7. Right to object – You have the right to object to the processing of your Personal Data in certain circumstances. For example, you have an absolute right to opt-out from our use of your Personal Data for direct marketing purposes; and

7.2.8. Rights related to automated decision-making including profiling – This right is not applicable as PreceptsGroup’s products do not relate to any of this provision.

## **8. Access and correction of Personal Data**

8.1. If you would like to make any enquiries or wish to exercise any of the above rights, you may contact our Data Protection Officer by writing to the following address:

Data Protection Officer  
PreceptsGroup International Pte Ltd  
10 Anson Road,  
#06-17 International Plaza,  
Singapore 079903

Alternatively, you can contact our Data Protection Officer at [dpo@preceptsgroup.com](mailto:dpo@preceptsgroup.com).

## **9. Governing Law**

9.1. This Policy shall be governed in all respects by the Laws of Singapore.