



## **WEBSITE PRIVACY POLICY**

*Effective 25 May 2018*

This Privacy Policy explains how we use the personal information that RCMA Group Pte Ltd and its subsidiaries (the "**Group**") collects or generates both in relation to this website and our products and services.

The list below sets out what is covered in this Privacy Policy.

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## 1. BACKGROUND

- 1.1 RCMA Group Pte Ltd, with its registered office at 1 Temasek Avenue, #16-01 Millenia Tower, Singapore 039192, and its subsidiaries (the "**RCMA Group**" or the "**Group**"), collect and use certain Personal Data. Each Group entity is responsible for ensuring that it uses that Personal Data in compliance with data protection laws.
- 1.2 At RCMA Group we respect the privacy of our clients and we are committed to keeping all your Personal Data secure. This Privacy Policy governs the handling of Personal Data by RCMA Group in the course of carrying on commercial activities.
- 1.3 We use the following definitions in this Privacy Policy:

**"RCMA Group", "the Group", "we", or "us"** means RCMA Group Pte Ltd and its subsidiaries.

**"Personal Data"** means any data which relates to a living individual who can be identified from that data or from that data and other information which is in the possession of, or is likely to come into the possession of, RCMA Group (or its representatives or service providers). In addition to factual information, it includes any expression of opinion about an individual and any indication of the intentions of RCMA Group or any other person in respect of an individual.

## 2. THE PRODUCTS AND SERVICES WE PROVIDE

- 2.1 This Privacy Policy concerns the following categories of information that we collect about you when providing the following products and services:
  - (a) Information we receive through our websites ("**RCMA Websites**"); and
  - (b) Information we receive through our products ("**RCMA Products**").

## 3. THE TYPES OF PERSONAL DATA WE COLLECT

- 3.1 Many of the products and services offered by RCMA Group require us to obtain Personal Data about you in order to provide or perform the products and services we have been engaged to provide or perform. In relation to each of the products and services described at paragraph 2.1 above, we will collect and process the following Personal Data about you:
  - (a) **Information that you provide to RCMA Group.** This includes information about you that you provide to us. The nature of the services or products you are requesting will determine the kind of Personal Data we might ask for, though such information may include (by way of a non-exhaustive list) basic Personal Data (such as first name; family name; bank account information; position in the company; company name; company email address; business phone number; business address; city; postcode; and country of residence).



- (b) **Information that we collect or generate about you.** This includes (by way of non-exhaustive list):
  - i. a file with your contact history to be used for enquiry purposes so that we may ensure that you are satisfied with the services or products which we have provided to you;
  - ii. through our cloud security services, traffic and security reports that include information on the internet usage of the organisation's computer users (e.g. what websites were visited by each user, any documents downloaded, security incidents, prevention measures taken by the gateway, etc.); and
  - iii. activity data relating to the use of protected documents, such as altering a document's permissions and information regarding the individual that performed the activity.
- (c) **Information we obtain from other sources.** This includes (by way of non-exhaustive list) other websites, publicly available sources, and other agencies.
- (d) **Cookies.**

When you visit RCMA Websites, cookies are used to collect technical information about the services that you use, and how you use them.
- (e) **Anonymized data**

In addition to the categories of Personal Data described above, RCMA Group will also process further anonymized information and data that is not processed by reference to a specific individual.

#### 4. HOW WE USE YOUR INFORMATION

- 4.1 Your Personal Data may be stored and processed by us in the following ways and for the following purposes:
  - (a) for ongoing review and improvement of the information provided on RCMA Websites to ensure they are user friendly and to prevent any potential disruptions or cyber attacks;
  - (b) to allow you to use and access the functionality provided by RCMA Websites;
  - (c) to assess your request for RCMA Products, where applicable;
  - (d) to set up customers to purchase and receive RCMA Products;
  - (e) to conduct analysis required to detect malicious data and understand how this may affect your IT system;
  - (f) for statistical monitoring and analysis of current attacks on devices and systems and for the on-going adaptation of the solutions provided to secure devices and systems against current attacks;
  - (g) to understand feedback on RCMA Products and to help provide more information on the use of those products and services quickly and easily;
  - (h) to communicate with you in order to provide you with services or information about RCMA Group and RCMA Products;
  - (i) for in-depth threat analysis;
  - (j) to understand your needs and interests;
  - (k) for the management and administration of our business;



- (l) in order to comply with and in order to assess compliance with applicable laws, rules and regulations, and internal policies and procedures; or
- (m) for the administration and maintenance of databases storing Personal Data.

4.2 However we use Personal Data, we make sure that the usage complies with law and the law allows us and requires us to use Personal Data for a variety of reasons. These include:

- (a) we need to do so in order to perform its contractual obligations with its customers;
- (b) we have obtained your consent;
- (c) we have legal and regulatory obligations that we have to discharge;
- (d) we may need to do so in order to establish, exercise or defend our legal rights or for the purpose of legal proceedings;
- (e) the use of your Personal Data as described is necessary for our legitimate business interests, such as:
  - i. allowing us to effectively and efficiently manage and administer the operation of our business;
  - ii. maintaining compliance with internal policies and procedures;
  - iii. monitoring the use of our copyrighted materials;
  - iv. enabling quick and easy access to information on RCMA Products;
  - v. offering optimal, up-to-date security solutions for mobile devices and IT systems; and
  - vi. obtaining further knowledge of current threats to network security in order to update our security solutions and provide these to the market.

4.3 We will take steps to ensure that the Personal Data is accessed only by employees of RCMA Group that have a need to do so for the purposes described in this Privacy Policy.

## 5. **DISCLOSURE OF YOUR INFORMATION TO THIRD PARTIES**

5.1 We may share your Personal Data within the RCMA Group for the purposes described above:

5.2 We may also share your Personal Data outside of the RCMA Group for the following purposes:

- (a) with our business partners. For example, this could include our partners from whom you or your company or your organisation purchased the RCMA Products. Personal Data will only be transferred to a business partner who is contractually obliged to comply with appropriate data protection obligations and the relevant privacy and confidentiality legislation;
- (b) with suppliers, third party agents, and contractors for the purposes of providing goods and services to us (for example, RCMA Group's accountants, professional advisors, IT and communications providers and debt collectors). These third parties will be subject to appropriate data protection obligations and they will only use your Personal Data as described in this Privacy Policy;
- (c) to the extent required by law, for example if we are under a duty to disclose your Personal Data in order to comply with any legal obligation (including, without limitation, in order to comply with tax reporting requirements and disclosures to regulators), or to establish, exercise or defend its legal rights;



- (d) if we sell our business or assets, in which case we may need to disclose your Personal Data to the prospective buyer for due diligence purposes; and
- (e) if we are acquired by a third party, in which case the Personal Data held by us about you will be disclosed to the third party buyer.

## 6. **INTERNATIONAL TRANSFERS OF PERSONAL DATA**

6.1 RCMA Group is a global business. Our customers and our operations are spread around the world. As a result we collect and transfer Personal Data on a global basis. That means that we may transfer your Personal Data to locations outside of your country.

6.2 Where we transfer your Personal Data to another country outside the European Economic Area (“**EEA**”), we will ensure that it is protected and transferred in a manner consistent with legal requirements. In relation to data being transferred outside of the EEA, for example, this may be done in one of the following ways:

- (a) the country that we send the data to might be approved by the European Commission as offering an adequate level of protection for Personal Data;
- (b) the recipient might have signed up to a contract based on “model contractual clauses” approved by the European Commission, obliging them to protect your Personal Data;
- (c) where the recipient is located in the US, it might be a certified member of the EU-US Privacy Shield scheme; or
- (d) in other circumstances the law may permit us to otherwise transfer your Personal Data outside the EEA.

6.3 You can obtain more details of the protection given to your Personal Data when it is transferred outside the EEA (including a copy of the standard data protection clauses which we have entered into with recipients of your Personal Data) by contacting us as described in paragraph 11 below.

## 7. **HOW WE SAFEGUARD YOUR INFORMATION**

7.1 We have extensive controls in place to maintain the security of our information and information systems. Client files are protected with safeguards according to the sensitivity of the relevant information. Appropriate controls (such as restricted access) are placed on our computer systems. Physical access to areas where Personal Data is gathered, processed or stored is limited to authorised employees.

7.2 As a condition of employment, RCMA Group employees are required to follow all applicable laws and regulations, including in relation to data protection law. Access to sensitive Personal Data is limited to those employees who need to it to perform their roles. Unauthorised use or disclosure of confidential client information by a RCMA Group employee is prohibited and may result in disciplinary measures.

7.3 When you contact a RCMA Group employee about your file, you may be asked for some Personal Data. This type of safeguard is designed to ensure that only you, or someone authorised by you, has access to your file.



## 8. HOW LONG WE KEEP YOUR PERSONAL DATA

8.1 How long we will hold your Personal Data for will vary and will be determined by the following criteria:

- (a) the purpose for which we are using it – RCMA Group will need to keep the data for as long as is necessary for that purpose; and
- (b) legal obligations – laws or regulation may set a minimum period for which we have to keep your Personal Data.

## 9. YOUR RIGHTS

9.1 In all the above cases in which we collect, use or store your Personal Data, you may have the following rights and, in most cases, you can exercise them free of charge. These rights include:

- (a) the right to obtain information regarding the processing of your Personal Data and access to the Personal Data which we hold about you;
- (b) the right to withdraw your consent to the processing of your Personal Data at any time. Please note, however, that we may still be entitled to process your Personal Data if we have another legitimate reason for doing so. For example, we may need to retain Personal Data to comply with a legal obligation;
- (c) in some circumstances, the right to receive some Personal Data in a structured, commonly used and machine-readable format and/or request that we transmit those data to a third party where this is technically feasible. Please note that this right only applies to Personal Data which you have provided directly to RCMA Group;
- (d) the right to request that we rectify your Personal Data if it is inaccurate or incomplete;
- (e) the right to request that we erase your Personal Data in certain circumstances. Please note that there may be circumstances where you ask us to erase your Personal Data but we are legally entitled to retain it;
- (f) the right to object to, or request that we restrict, our processing of your Personal Data in certain circumstances. Again, there may be circumstances where you object to, or ask us to restrict, our processing of your Personal Data but we are legally entitled to refuse that request; and
- (g) the right to lodge a complaint with the relevant data protection regulator if you think that any of your rights have been infringed by us.

9.2 You can exercise your rights by contacting us using the details listed in paragraph 11 below.

## 10. DESIGNATED REPRESENTATIVE

10.1 RCMA Group Pte Ltd's registered office may be contacted using the following contact information:

*Address:* 1 Temasek Avenue, #16-01 Millenia Tower, Singapore 039192

*Email Address:* [dpo@rcma.com](mailto:dpo@rcma.com) / [catherine.yap@rcma.com](mailto:catherine.yap@rcma.com) (Attn: Catherine Yap)



10.2 RCMA Group's designated representative in the EU may be contacted using the following contact information:

*Address:* Suite 4.1, Exchange Court, 1 Dale Street, Liverpool L2 2PP, UK

*Email Address:* [dpo@rcma.com](mailto:dpo@rcma.com) / [andy.holden@rcma.com](mailto:andy.holden@rcma.com) (Attn: Andy Holden)

## 11. **QUESTIONS AND CONCERNS**

11.1 If you have any questions or concerns about RCMA Group's handling of your Personal Data, or about this Policy, please contact our Data Protection Officer using the following contact information:

*Address:* 1 Temasek Avenue, #16-01 Millenia Tower, Singapore 039192

*Email Address:* [dpo@rcma.com](mailto:dpo@rcma.com)

We are usually able to resolve privacy questions or concerns promptly and effectively. If you are not satisfied with the response you receive from our Data Protection Officer, you may escalate concerns to the applicable privacy regulator in your jurisdiction. Upon request, RCMA Group's Data Protection Officer will provide you with the contact information for that regulator.