



NCI Brokers (Asia) Pte Ltd

Privacy Policy

Effective: 21st July 2021

This policy sets out how NCI Brokers (Asia) Pte Ltd (**NCI**) will manage personal information that we deal with in providing services to our clients. NCI are bound by the Personal Data Protection Act 2012 (PDPA) and are committed to protecting the personal data we receive. The collection use and disclosure of personal data is dealt with by NCI in accordance with the PDPA.

This Policy applies to all our employees.

What is personal data?

Personal data refers to data, whether true or not, about an individual who can be identified from that data, or from the data and other information to which the organisation has or is likely to have access to.

How and why do we collect and use personal data?

We collect and use personal data in a number of ways, including:

- Anti-money laundering and countering terrorism financing assessments we must undertake prior to engaging in business relationships and periodically for review purposes.
- Processing applications for credit limits on behalf of our clients to obtain trade credit insurance on their debtors.
- Processing and analysing applications for credit limits to provide recommendations and opinions.
- To assist in debt collection action.
- Reviewing personal guarantees.
- Business development purposes and direct marketing.
- Managing and responding to your requests and queries.
- Internal and external audit being conducted.
- From a third party or publicly available source where:
 1. You have consented for this collection (usually via our privacy policy and/or credit application form); or
 2. You would reasonably expect us to collect your personal information in this way and it is necessary for us to collect this information for a specific purpose (such as investigation of a complaint).

We also automatically collect certain information when you visit our website, some of which may be capable of personally identifying you. Please see the "Cookies" section below for more details.

What personal data do we collect?

The type of personal data we may collect from you includes:

- Name.
- Mobile phone number.
- Residential phone number.
- Office phone number.
- Residential address.
- Postal Address.
- Email Address.
- Age / Date of birth.
- Gender.
- Occupation.
- Passport.
- NRIC or FIN number.

We will make reasonable effort to ensure the personal data collected is accurate and complete.

Do we use personal data for direct marketing?

Some of the personal data we collect we may use to send marketing material to prospective and existing clients, but only in accordance with the direct marketing rules contained in the PDPA.

You may opt out of direct marketing at any time by emailing us at:

info@ncib.sg

Or you may click 'unsubscribe' at the bottom of any electronic marketing materials you receive from us.

Who do we disclose personal data to?

We may disclose your personal data for:

- The purpose to which it was provided to us.
- Purposes which are directly related to the purpose it was provided for; and
- Any other purposes to which you may have consented, including to
 - our related companies or third parties who help manage our business and provide our services, including our third-party service providers, such as payment system operators, IT suppliers, lawyers, accountants, other advisers and financial institutions.
 - courts, law enforcement, regulators and other government agencies to comply with all applicable laws, regulations and rules; or
 - requests of courts, law enforcement, regulators and other governmental agencies

Data Transfers

We may transfer personal data held about you outside Singapore if permitted by law to countries including Australia, New Zealand and United Kingdom.

We may be disclosing your personal data to the following parties: third party service providers, insurers and/or our related companies as they may be processing your personal information either on our behalf or otherwise for one or more of the above-stated purposes.

Some of the third party service providers to whom we disclose personal information are located in countries outside of your country of residence, for example, Australia (or, in relation to New Zealand, outside New Zealand, or in relation to Singapore, outside Singapore) such as Malaysia, the Philippines, Vietnam and the United States of America. In this regard, unless exempted by applicable Privacy Laws, we would have sought your express consent to do so prior to the transfer of your personal information overseas. Transfer of your personal information will only be made for one or more of the purposes specified in this Privacy Policy. We will take reasonable steps to ensure that the overseas recipient does not breach the Privacy Laws applicable in relation to your personal information.

How is personal data secured?

Your information may be held in an electronic or non-electronic form. We will take steps to ensure the data is secured and protected from unauthorised access by:

- Password protection.
- Restricting access.
- Destructing and de-identifying the personal data once it is no longer required.
- Staff training in relation to handling personal data.
- Destruction of personal data that is unsolicited and we were not permitted to collect as soon as practicable.

Accuracy, accessing and correcting your personal data

Chief Executive Officer - Asia

The Central, 8 EU Ton Sen St, #23-84
Singapore 059818
Stuart.Anderson@ncib.sg

Your consent and rights

By visiting our website, applying for or purchasing our products and services, you consent to the collection and use of your information and other activities as specified in this privacy policy.

Links to third party sites

Our website may contain links to other third-party websites. We do not endorse or otherwise accept responsibility for the content or privacy practices of those websites, or any products or services offered on them. We recommend that you check the privacy policies of these third-party websites to find out how these third parties may collect and deal with your personal information.

Cookies

Like many website operators, we use standard technology called cookies on our website. Cookies are small data files that are downloaded onto your computer when you visit a particular website. Cookies help provide additional functionality to the site or to help us analyse site usage more accurately. For instance, our server may set a cookie that keeps you from having to enter a password more than once during a visit to one of our sites. In all cases in which cookies are used, the cookie will not collect personal information except with your consent. You can disable cookies by turning them off in your browser; however, our website may not function properly if you do so.

If you follow a link from our website to another website, please be aware that the owner of the other website will have their own privacy and cookie policies for their site. We recommend you read their policies, as we are not responsible or liable for what happens at their website.

You can adjust the settings in your web browser to determine whether sites can set cookies on your device. If you've visited this site before, there may be previously set cookies on your computer. To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, visit www.aboutcookies.org or www.allaboutcookies.org.

Complaints and queries

If you have a complaint or require further information about how NCI manage your personal data, please contact NCI's Privacy Officer by contacting:

Chief Executive Officer – Asia

Stuart Anderson
The Central, 8 EU Ton Sen St, #23-84
Singapore 059818
Email: Stuart.Anderson@ncib.sg
Telephone: +65 6221 1512

Complaints will be dealt with as soon as practicable.

Data Protection Officer

Stuart Anderson
Email: Stuart.Anderson@ncib.sg
Telephone: +65 6221 1512

Changes to privacy policy and notice

We may amend this Privacy Policy at any time. A current version will be available by following the 'privacy policy' link located at the bottom of our website homepage at <http://www.ncib.sg>.

For further information on personal data, please visit the Personal Data Protection Commission at www.pdpc.gov.sg