INFO-TECH CORPORATE SERVICES PTE. LTD.
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"Privacy Policy Under Construction" Notice

We are currently updating our Privacy Policy to ensure it fully reflects how we handle personal data in accordance with Singapore's Personal Data Protection Act 2012 (PDPA). While this update is in progress, any personal data you provide to us continues to be collected, used, disclosed, and stored responsibly and in line with our obligations under the PDPA. A summary of these obligations is set out below is.

If you have any questions about how your personal data is handled in the meantime, please contact our Data Protection Officer Sanjeev Gathani at **sanjeev.gathani@info-tech.com.sg**. We appreciate your patience and will publish the updated Privacy Policy shortly.

Last updated: 5th October 2026

Our Approach to the Collection, Use, Disclosure and Storage (CUDS) of Personal Data

Under the PDPA, organisations that collect, use, or disclose personal data in Singapore must comply with a defined set of data protection obligations administered by the Personal Data Protection Commission (PDPC). This section explains, in plain language, how Info-Tech Corporate Services Pte. Ltd. approaches each of the four pillars — Collection, Use, Disclosure, and Storage — while the full Privacy Policy is being finalised.

1. **Collection**
    - We collect personal data only for purposes that a reasonable person would consider appropriate in the circumstances (**Purpose Limitation Obligation**).
    - Before or at the point of collection, we notify individuals of the purposes for which their personal data is being collected (**Notification Obligation**).
    - Where consent is the basis for collection, we obtain it validly, and individuals may withdraw consent at any time on giving reasonable notice (**Consent Obligation**).
    - We take reasonable effort to ensure personal data collected is accurate and complete, particularly where it will be used to make a decision about the individual or disclosed to another organisation (**Accuracy Obligation**).
2. **Use**
    - Personal data is used strictly within the scope of the purposes notified to, or consented to by, the individual at the point of collection.

- We do not repurpose personal data for new uses without fresh consent, unless a specific exception under the PDPA applies (e.g. legal or business asset transactions, evaluative purposes).
- Access to personal data internally is limited to staff and service providers who genuinely need it to carry out the notified purposes.

3. Disclosure

- We disclose personal data to third parties — such as service providers, business partners, or regulators — only where necessary to fulfil a notified purpose, where required by law, or where the individual has given consent.
- Where personal data is transferred outside Singapore, we take steps to ensure the overseas recipient provides a standard of protection comparable to the PDPA (**Transfer Limitation Obligation**).
- Third-party processors we engage are bound by contract to data protection standards comparable to our own.

4. Storage (Protection & Retention)

- We put in place reasonable security arrangements — administrative, physical, and technical — to protect personal data against unauthorised access, collection, use, disclosure, copying, modification, or disposal (**Protection Obligation**).
- We retain personal data only for as long as it is necessary for legal or business purposes, after which it is securely disposed of or anonymised (**Retention Limitation Obligation**).
- Should a data breach occur that is likely to result in significant harm to affected individuals or is of a significant scale, we will notify the PDPC and affected individuals as required under the **Data Breach Notification Obligation**.