



**BACKBONE**

7 January 2024

## **PRIVACY POLICY**

### **Introduction**

Backbone Pte. Ltd. (UEN 202300023W) ("Backbone" or "we" or "our" or "us") takes our responsibilities under Singapore's Personal Data Protection Act 2012 (the "PDPA") seriously. We recognise the importance of the personal data you have entrusted to us. It is our responsibility to properly manage, protect, and process your personal data. We are committed to protecting your personal data.

**Please read this Privacy Policy to understand what personal data we collect or process, and for what purposes it is used and/or disclosed.**

By providing your personal data to us, you acknowledge and agree that you have fully read and understood this Privacy Policy, and are consenting to the collection, use, processing, and disclosure of your personal data as described in this Privacy Policy.

If you provide the personal data of any other third party to us, you warrant and agree that such third party has fully read and understood this Privacy Policy, and has consented to you disclosing his/her personal data to us for the collection, use, and disclosure by us as described in this Privacy Policy.

### **Personal Data**

Personal data refers to any data or information about you from which you can be identified either from the data or that data and other information to which we have access. Personal data can be factual (such as a name, address, or date of birth) or it can be an opinion (such as a performance appraisal). It can even include a simple e-mail address. Depending on your relationship with us (e.g., prospective or current client, employee, or business partner), the personal data about you that we may collect, use, store, and disclose include your name, email, address, telephone number, bank account details, payment information, queries, comments, etc. Other information we may collect includes professional interest, marketing preference, subscription preferences, training records, photographs, videos, and audio recordings taken by us at our events.

If you can't be identified (for example, when personal data has been aggregated and anonymised), then this Privacy Policy doesn't apply.

**BACKBONE PTE. LTD.**

UEN 202300023W

60 Cecil Street, Level 2 ISCA House, Singapore 049709

backbone.sg

**Accounting**  
**MadeEfficient**

## **How We Collect Your Data**

When you visit or use some parts of our websites and/or services, we might ask you to provide personal data to us. For example, we ask for your contact information when you sign up for a consultation, respond to a job application or an email offer, participate in discussions, join us on social media, take part in training and events, contact us with questions or request support. If you don't want to provide us with personal data, you don't have to, but it might mean you can't use some parts of our websites or services.

We collect some information about you automatically when you visit our websites or use our services, like your IP address and device type. We also collect information when you navigate through our websites and services, including what pages you looked at and what links you clicked on. This information is useful for us as it helps us get a better understanding of how you're using our websites and services so that we can continue to provide the best experience possible (for example, by personalising the content you see).

We use cookies on our websites. A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer or device. You can block or deactivate cookies in your browser settings. We use log-in cookies to remember you when you have logged in for a seamless experience. We use session cookies to track your movements from page to page and to store your selected inputs, so you are not constantly asked for the same information. We have no control over the cookies used by third parties. For further information on types of cookies and how they work, visit [www.allaboutcookies.org](http://www.allaboutcookies.org).

We may also receive information about you from third parties if you use any websites or social media platforms operated by third parties (for example, Facebook, Instagram, Twitter etc.) and, if such functionality is available, you have chosen to link your profile on our websites with your profile on those other websites or social media platforms.

## **Link to Other Websites**

Our websites and other digital and telecommunication channels may contain links to other sites that are operated by third-party companies with different privacy practices. You should remain alert and read the privacy statements of other sites. We have no control over personal data that you submit to or receive from these third parties.

## **Storage of Personal Data**

At each stage of data collection, use, and disclosure, we implement physical, electronic, administrative, and procedural safeguards to protect your personal data against loss, misuse, damage, and unauthorised access, modifications, or disclosures.

## **Purpose of Collecting Personal Data, Usage, and Disclosure**

We use your personal data to operate our websites and provide you with any services you've requested, and to manage our relationship with you. We also use your personal data for other purposes, which may include the following:

To communicate with you. This may include:

- providing you with information you've requested from us (like training or education materials) or information we are required to send to you
- operational communications, like changes to our websites and services, security updates, or assistance with using our websites and services
- marketing communications (about our or another product or service we think you might be interested in) in accordance with your marketing preferences
- asking you for feedback or to take part in any research we are conducting (which we may engage a third party to assist with).

We may contact you through a variety of channels, including but not limited to email, telephone, SMS, and in-product communications.

To support you: This may include assisting with the resolution of technical support issues or other issues relating to the websites or services, whether by email, in-app support, or otherwise.

To enhance our websites and services and develop new ones: For example, by tracking and monitoring your use of websites and services so we can keep improving, or by carrying out technical analysis of our websites and services so that we can optimise your user experience and provide you with more efficient tools.

To protect: So that we can detect and prevent any fraudulent or malicious activity, and make sure that everyone is using our websites and services fairly and in accordance with our terms of use.

To market to you: In addition to sending you marketing communications, we may also use your personal data to display targeted advertising to you online – through our own websites and services or through third-party websites and their platforms.

To analyse, aggregate, and report: We may use the personal data we collect about you and other users of our websites and services (whether obtained directly or from third parties) to produce aggregated and anonymised analytics and reports, which we may share publicly or with third parties.

There will be times when we need to share your personal data with third parties. We will only disclose your personal data to:

- other companies related to Backbone
- third-party service providers and partners who assist and enable us to use the personal data to, for example, support delivery of or provide functionality on the website or services, or to market or promote our goods and services to you.
- regulators, law enforcement bodies, government agencies, courts, or other third parties where we think it's necessary to comply with applicable laws or regulations, or to exercise, establish, or defend our legal rights. Where possible and appropriate, we will notify you of this type of disclosure.
- an actual or potential buyer (and its agents and advisers) in connection with an actual or proposed purchase, merger, or acquisition of any part of our business.
- other people where we have your consent.

## **Retention**

The length of time we keep your personal data depends on what it is and whether we have an ongoing business need to retain it (for example, to provide you with a service you've requested or to comply with applicable legal, tax, or accounting requirements).

We'll retain your personal data for as long as we have a relationship with you and for a period of time afterwards where we have an ongoing business need to retain it, in accordance with our data retention policies and practices. Following that period, we'll make sure it's deleted or anonymised.

## **Your Rights**

You have the right to ask us not to use your personal data for marketing purposes. If you no longer wish to receive marketing messages from us, you may request to withdraw your consent via email to [hello@backbone.sg](mailto:hello@backbone.sg).

You have the right to access and/or correct any personal data that we hold about you, subject to the requirements of the PDPA. If you would like to request a copy of your personal data being held by us (such right being subject to applicable exemptions), or to update and/or correct the personal data which you have previously provided to us, please write to [hello@backbone.sg](mailto:hello@backbone.sg).

We will need enough information from you in order to ascertain your identity as well as the nature of your request, so as to be able to deal with your request. We reserve the right, or may, charge a reasonable fee for the processing of any data access request.

For a request to access personal data, once we have sufficient information from you to deal with the request, we will seek to provide you with the relevant personal data within 30 days. Where we are unable to respond to you within the said 30 days, we will notify you of the soonest possible time within which we can provide you with the information requested.

For a request to correct personal data, once we have sufficient information from you to deal with the request, we will correct your personal data within 30 days. Where we are unable to do so within the said 30 days, we will notify you of the soonest practicable time within which we can make the correction. Note that the PDPA exempts certain types of personal data from being subject to your correction request as well as provides for situation(s) when correction need not be made by us despite your request. We will send the corrected personal data to every other organisation to which the personal data was disclosed by us within a year before the date the correction was made, unless that other organisation does not need the corrected personal data for any legal or business purpose.

### **General**

Your consent that is given pursuant to this Privacy Policy is additional to and does not supersede any other consents that you had provided to Backbone with regard to processing of your personal data. For the avoidance of doubt, in the event that Singapore personal data protection law permits an organisation such as us to collect, use, or disclose your personal data without your consent, such permission granted by the law shall continue to apply.

### **Contact Us**

We're always keen to hear from you. If you have a question or feedback for us on this Privacy Policy, our websites, or services, please get in touch via [hello@backbone.sg](mailto:hello@backbone.sg).