

# MOMENTUS ONE PLATFORM PERSONAL DATA PROTECTION POLICY

Latest Update: 4 Jan 2021

This Data Protection Notice ("**Notice**") sets out the basis which Momentus Research Pte Ltd ("**we**", "**us**", or "**our**") comply with the Singapore Personal Data Protection Act 2012 ("**PDPA**"), its associated regulations and subsidiary legislation, and guidelines issued by the Singapore Personal Data Protection Commission ("**PDPC**"). This Notice applies to personal data in our possession or under our control, including personal data in the possession of organisations which we have engaged to collect, use, disclose or process personal data for our purposes. Jurisdictions outside of Singapore may have different local data protection standards.

We also want you to understand the way in which we collect, use, disclose and/ or retain your Personal Data. This Personal Data Protection Policy sets out:

1. our policies on how we manage your Personal Data;
2. the types of Personal Data we collect, use, disclose and/ or retain;
3. how we collect, use, disclose and/ or retain your Personal Data; and
4. the purpose(s) for which we collect, use, disclose and/ or retain your Personal Data.

By giving us your particulars and other details, you are deemed to have given consent to us to collect and use your personal data for the purpose of processing and responding to your query and feedback.

This Personal Data Protection Policy supplements but does not supersede nor replace any other consent, which you may have previously provided to us, nor does it affect any right that we may have at law in connection with the collection, use, disclosure and/ or retention of your Personal Data.

From time to time, we may update this Personal Data Protection Policy to ensure that our Policy is consistent with developments and trends set by the authorities and/ or any regulatory changes. Should any revision(s) be made to this Personal Data Protection Policy, updates will be published on our site ([www.momentusresearch.com](http://www.momentusresearch.com)). Subject to your legal rights in Singapore, the prevailing terms of the Personal Data Protection Policy shall apply.

This Personal Data Protection Policy forms a part of the terms and conditions governing your relationship with us and should be read in conjunction with such terms and conditions ("**Terms and Conditions**").

In the event of any inconsistency between the provisions of the Personal Data Protection Policy and the Terms and Conditions, the provisions of the Terms and Conditions shall prevail.

## 1. **PERSONAL DATA**

1.1 As used in this Notice:

1.2 "**customer**" or "**you**" means a company and/or an employer's organisation or an individual, who (a) has contacted us through any means to find out more about any goods or services we provide, or (b) may, or has, entered into a contract with us for the supply of any goods or services by us; and

- 1.3 “**personal data**” means data, whether true or not, about a customer who can be identified:  
(a) from that data; or (b) from that data and other information to which we have or are likely to have legitimate access.
- 1.4 Depending on the nature of your interaction with us, some examples of personal data which we may collect from you include name, mailing address, email address, telephone number, gender, and other information relating to you which you have provided in any forms you may have submitted to use, or in other forms of interaction with you.
- 1.5 Information can be about your usage of and interaction with our website and/ or services including computer and connection information, device capability, bandwidth, statistics on page views and traffic to and from our website.
- 1.6 Other terms used in this Notice shall have the meanings given to them in the PDPA (where the context so permits).

## 2. **COLLECTION, USE AND DISCLOSURE OF PERSONAL DATA**

- 2.1 We generally do not collect your personal data unless (a) it is provided to us voluntarily by you directly or via a third party who has been duly authorised by you to disclose your personal data to us (your “**authorised representative**”) after (i) you (or your authorised representative) have been notified of the purposes for which the data is collected, and (ii) you (or your authorised representative) have provided written consent to the collection and usage of your personal data for those purposes, or (b) collection and use of personal data without consent is permitted or required by the PDPA or other laws. We shall seek your consent before collecting any additional personal data and before using your personal data for a purpose which has not been notified to you (except where permitted or authorised by law).
- 2.2 Generally, we may collect your Personal Data through the following ways:
  - 2.2.1 when your employer signs up for a service subscription with us;
  - 2.2.2 when you access our websites or perform an online transaction;
  - 2.2.3 when you install our mobile app and agree to the use of the app upon installation;
  - 2.2.4 when you interact with any of our employees or social media,
  - 2.2.5 when you submit an application to us for membership services and benefits;
  - 2.2.6 when you respond to our request for additional Personal Data;
  - 2.2.7 when you ask to be included in an email or other mailing list;
  - 2.2.8 when you request that we contact you;
  - 2.2.9 when you respond to our initiatives or promotions; and
  - 2.2.10 when you submit your Personal Data to us for any other reason
- 2.3 Generally, we may collect, use, disclose and/or retain your personal data for any or all of the following purposes:

- 2.3.1 to create your login profile, processing and termination of your membership when you are no longer working with our customer company;
  - 2.3.2 to provide you with membership benefits and services as an obligations in the course of or in connection with our provision of the goods and/or services requested by you;
  - 2.3.3 verifying your identity;
  - 2.3.4 responding to, handling, and processing queries, requests, applications, complaints, and feedback from you;
  - 2.3.5 managing your relationship with us;
  - 2.3.6 to process payment for purchase and subscriptions;
  - 2.3.7 to improve membership / customer services, such as resolving complains, providing support when handling requests and enquiries;
  - 2.3.8 to engage through conducting surveys, quizzes, polls, and interviews;
  - 2.3.9 to keep you updates on events, news, announcements; and
  - 2.3.10 complying with any applicable laws, regulations, codes of practice, guidelines, or rules, or to assist in law enforcement and investigations conducted by any governmental and/or regulatory authority;
  - 2.3.11 any other purposes for which you have provided the information;
  - 2.3.12 transmitting to any unaffiliated third parties including our third party service providers and agents, and relevant governmental and/or regulatory authorities, whether in Singapore or abroad, for the aforementioned purposes; and
  - 2.3.13 any other incidental business purposes related to or in connection with the above.
- 2.4 In the course of arranging and providing services for the event organised or managed by us, personal data will, by nature of the task and transaction, be provided by you to Momentus Research. In such instances, consent will necessary be implied from you that you are agreeable in providing your Personal Data through the submission of your details in order for us to provide the requested or necessary services to them.
- 2.5 We may disclose your personal data:
- 2.5.1 your employer who had paid for the use of the portal and app;
  - 2.5.2 our professional advisers such as auditors;
  - 2.5.3 relevant government regulators, statutory boards or authorities or law enforcement agencies to comply with any laws, rules, guidelines and regulations or schemes imposed by any government authorities;
  - 2.5.4 where such disclosure is required for performing obligations in the course of or in connection with our provision of the goods and services requested by you; or
  - 2.5.5 to third party service providers, agents and other organisations we have engaged to perform any of the functions with reference to the above-mentioned purposes.

### 3. **MARKETING / OPTIONAL PURPOSES**

- 3.1 From time to time, we may contact you via electronic mail, mobile spot notifications, or social media platforms, to inform you about our membership benefits, services and events that we think may be of interest to you.

3.2 You can let us know at any time if you no longer wish to receive marketing materials (by informing us through [support@momentusresearch.com](mailto:support@momentusresearch.com)) and we will remove your details from our direct marketing database. Please note that we may still send you non-marketing messages such as surveys, corporate notices from your organization and other service-related notices.

#### 4. **THIRD-PARTY SITES**

4.1 Our website may contain links to other websites operated by third parties independent of the Organization. We are not responsible for the privacy practices of such websites operated by third parties even though it is linked to our website(s).

4.2 We encourage you to learn about the privacy policies of such third party website(s) by checking the policy of each site you visit and contact its owner or operator if you have any concerns or questions.

#### 5. **WITHDRAWING YOUR CONSENT**

5.1 The consent that you provide for the collection, use and disclosure of your personal data will remain valid until such time it is being withdrawn by you in writing. You may withdraw consent and request us to stop collecting, using and/or disclosing your personal data for any or all of the purposes listed above by submitting your request in writing or via email to our Data Protection Officer at the contact details provided below.

5.2 Upon receipt of your written request to withdraw your consent, we may require reasonable time (depending on the complexity of the request and its impact on our relationship with you) for your request to be processed and for us to notify you of the consequences of us acceding to the same, including any legal consequences which may affect your rights and liabilities to us.

5.3 Whilst we respect your decision to withdraw your consent, please note that depending on the nature and scope of your request, we may not be in a position to continue providing our goods or services and/or membership benefits to you and we shall, in such circumstances, notify you before completing the processing of your request. Such a withdrawal may therefore result in the termination of any membership that you may have with us. Should you decide to cancel your withdrawal of consent, please inform us in writing in the manner described in clause 5.1 above.

5.4 Please note that withdrawing consent does not affect our right to continue to collect, use and disclose personal data where such collection, use and disclose without consent is permitted or required under applicable laws.

#### 6. **ACCESS TO AND CORRECTION OF PERSONAL DATA**

6.1 If you wish to make (a) an access request for access to a copy of the personal data which we hold about you or information about the ways in which we use or disclose your personal data, or (b) a correction request to correct or update any of your personal data

which we hold about you, you may submit your request in writing or via email to our Data Protection Officer at the contact details provided below.

- 6.2 Please note that a reasonable fee may be charged for an access request. If so, we will inform you of the fee before processing your request.
- 6.3 If we are unable to provide you with any personal data or to make a correction requested by you, we shall generally inform you of the reasons why we are unable to do so (except where we are not required to do so under the PDPA).

## 7. **PROTECTION OF PERSONAL DATA**

- 7.1 To safeguard your personal data from unauthorised access, collection, use, disclosure, copying, modification, disposal or similar risks, we have introduced appropriate administrative, physical and technical measures such as up-to-date physical firewalls, antivirus protection, use of privacy filters, and disclosing personal data both internally and to our authorised third party service providers and agents only on a need-to-know basis.
- 7.2 You should be aware, however, that no method of transmission over the Internet or method of electronic storage is completely secure. While security cannot be guaranteed, we strive to protect the security of your information and are constantly reviewing and enhancing our information security measures.

## 8. **ACCURACY OF PERSONAL DATA**

- 8.1 We generally rely on personal data provided by you (or your authorised representative). In order to ensure that your personal data is current, complete and accurate, please update us if there are changes to your personal data by informing our Data Protection Officer in writing or via email at the contact details provided below.

## 9. **RETENTION OF PERSONAL DATA**

- 9.1 We may retain your personal data for as long as it is necessary to fulfil the purpose for which it was collected, or as required or permitted by applicable laws.
- 9.2 Data will be destroyed after 30 days from end of activity and/or event when fulfilment of the purpose is confirmed by customer, or only based on customer's request which ever earlier.
- 9.3 We will cease to retain your personal data, or remove the means by which the data can be associated with you, as soon as it is reasonable to assume that such retention no longer serves the purpose for which the personal data was collected, and is no longer necessary for legal or business purposes.

## 10. TRANSFERS OF PERSONAL DATA OUTSIDE OF SINGAPORE

- 10.1 We generally do not transfer your personal data to countries outside of Singapore. However, if we do so, we will obtain your consent for the transfer to be made and we will take steps to ensure that your personal data continues to receive a standard of protection that is at least comparable to that provided under the PDPA.

## 11. SOCIAL MEDIA CODE OF CONDUCT

- 11.1 By “social media” here, we refer to a variety of online communities like blogs, social networks, chat rooms and forums – not just platforms like Facebook, Instagram or Twitter. This applies to any social media engagement that is relation to the events managed or hosted by Momentus Research. When you’re sitting behind a corporate social media account, you are expected to act carefully and responsibly to protect the image and reputation of us and the company that you are employed under.
- 11.2 Your personal account or statements does not represent us. You should not state or imply that your personal opinions and content are authorized or endorsed by us. We advise using a disclaimer such as “opinions are my own” to avoid misunderstandings.
- 11.3 Be respectful, polite and patient in your communications. Should you encounter a situation while using social media that threatens to become antagonistic, you should disengage from the dialogue in a polite manner and seek the advice of your supervisor.
- 11.4 You should get appropriate permission before you refer to or post images of current or former employees, members, vendors or suppliers. Additionally, you should get appropriate permission to use a third party's copyrights, copyrighted material, trademarks, service marks or other intellectual property. Follow our confidentiality policy and data protection policy and observe laws on copyright, trademarks, plagiarism, protection from online falsehoods and manipulation act and fair use.
- 11.5 Never post discriminatory, offensive or libellous content and commentary. Although not an exclusive list, some specific examples of prohibited social media conduct include posting commentary, content, or images that are defamatory, pornographic, proprietary, harassing, libellous, or that can create a hostile work environment.
- 11.6 You are not to publish, post or release any information that is considered confidential or not public by your company and/or employer. If there are questions about what is considered confidential, check back with your company and/or Momentus Research.

## 12. CONTACTING US

- 12.1 If you have any questions or complaints relating to the use or disclosure of your Personal Data, or if you wish to know more about our data protection policies and practices, please contact us at [support@momentusresearch.com](mailto:support@momentusresearch.com)