



## **PRIVACY POLICY STATEMENT**

Last Updated/Effective Date: March 2017

### **1. Overview**

- 1.1. Simply Giving Pte. Ltd. is a private limited company registered in Singapore and its parents, subsidiaries, affiliates, related companies, officers, directors, employees, agents, representatives, partners, and/or licensors (“**SimplyGiving**” or the “**Company**” or “**We/Our/Us**”) are committed to the highest standard of protecting and respecting privacy and personal data in compliance with applicable laws and rules.
- 1.2. This Privacy Policy Statement (the “**Statement**”) (read together with our Terms of Service and any other documents referred to in it) which serves also as a notice to inform you as well as set out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us when you appoint or engage us to provide the Services, when you access or use our Services or interact with us.
- 1.3. By appointing or engaging us to provide the Services, when you access or use our Services or interact with us, you consent to us using, collecting and processing your personal data in the manner as stipulated in prescribed in this Statement.
- 1.4. Notwithstanding the above, you have control over your personal data including how it is shared with others. This includes contact and personal information and details of your Campaigns, Fundraising Page and/or others. You control the sharing of that personal data when disclosing it to register or use the Services and/or through any “Social Networks” including Facebook, LinkedIn, Twitter, Pinterest or Google+ privacy settings. We will not use or share your personal data with anyone, except as described in this Privacy Policy.
- 1.5. If you are under 18, please do not share or send any personal data about yourself to us without prior consent from your parent(s) and/or legal guardian.
- 1.6. If you have questions about the Statement or would like to suggest improvements, please contact us at [hello@simplygiving.com](mailto:hello@simplygiving.com).

### **2. Definitions**

- 2.1. In this Statement, the following expressions shall have the same meanings as set out in Clause 4 of our Terms of Service, unless specified otherwise.

### **3. Variation and Changes**

This Statement may be amended or updated from time to time. We would advise you to check this Statement on our Services from time to time for amendments or updates. By continuing to

use or engage our services, to use our website or to communicate with us subsequent to any amendments or updates to this Statement, it would confirm and indicate your acceptance to the amendments or updates to this Statement.

#### **4. Personal Data collection**

4.1. Personal Data in general means any information/data about individual or person who can be identified from that information/data. Your personal data is collected and processed by us at the start of our services or interaction and, from time to time, in the course of our engagement or interaction and/or you using our Services. The type of personal data collected and processed by us includes but not limited to:

- a) government issue identification document, name, date of birth, nationality, gender, national identification card number, passport or passport number, voters ID, driver license, student registration card, residency status, correspondence address, contact details including mobile, office and residential telephone number and facsimile number, e-mail address, banking details, bank statements, photos, videos and/or other information or documents that you provide by filling in the registration forms on our Services. This includes information or documents provided at the time of registering to use our Services, subscribing to our Services, posting material or requesting further Services. We may also ask you for information at other times, for example in connection with further verification, a promotion or when you report a problem with our Services;
- b) details of transactions you carry out through our Services and/or for the fulfilment of your request or completing the said transactions;
- c) such other information relevant or required for:
  - i. compliance with legal and regulatory requirement;
  - ii. for conducting any transaction on our Services; and/or
  - iii. engagement of our Services.
- d) details of your visits to our Services and the resources that you access; and/or
- e) Any additional information provided by you or third parties about you.

4.2. We only retain personal data for so long as it is necessary. Personal data may be archived as long as the purposes for which the personal data is used still exists

#### **5. Source of Personal Data**

Personal data collected will mainly be from you. However, we may also collect some personal data from other available sources including but not limited to Payment Provider or government agencies, public registries, websites, social media, publications, and/or events.

#### **6. Use of the Personal Data**

- 6.1. The purposes for which your personal data & information is collected by us may be used or processed by us in and/or outside Singapore, Hong Kong or Malaysia:
- a) to verify/ascertain User including Donor, Lender, Fundraiser, and Beneficiaries identity;
  - b) to communicate with you including responding to your enquiries;
  - c) all purposes related to or in connection with engagement of our Services;
  - d) for the purposes of enforcing or defending our legal rights and/or obtaining legal advice;
  - e) to allow Beneficiary through a secure charity admin area, and to access report in a commonly used data format. This is to enable Beneficiaries to issue relevant documents including but not limited to receipts and thank you note to Donor;
  - f) to allow Beneficiary to issue relevant documents such as thank you note to Fundraisers;
  - g) to comply with legal and/or regulatory requirements in and outside of Singapore, Malaysia and/or Hong Kong including, audits, reporting, investigation and/or etc.;
  - h) ensuring that content from our site is presented in the most effective manner for you and for your computer;
  - i) to send you materials and publication including providing you with alerts, newsletter, education materials, updates and/or information that you requested or signed up to or information about event(s) that may be of interest to you;
  - j) to promote, offer or market our current and/or future services to you, subject to your right to opt-out (please see further details in clause 6.2 below);
  - k) carrying out our obligations arising from any contracts entered into between you and us;
  - l) to assist in the prevention, detection or investigation of crime or possible criminal activities or for the administration of justice;
  - m) for security and internal audit purposes;
  - n) allowing you to participate in interactive features of our Service, when you choose to do so;
  - o) designing and conducting surveys/questionnaires for client profiling/segmentation, statistical analysis, improving and furthering the provision our products and services;
  - p) researching, designing and launching services or products including seminars/events/forums;
  - q) for such other purposes as may be directed or consented to by you; and/or
  - r) purposes directly related or incidental to the above.

6.2. We also intend to use your personal data in direct marketing and we require your consent (which includes an indication of no objection) for that purpose. In this connection, please note that:

- a) your name, contact details (including address, contact number, email address), products and services information, transaction pattern and behaviour, background and demographic data held by us from time to time may be used by us in direct marketing;
- b) the following classes of services, products and subjects may be marketed in direct marketing:
  - (i) services and products related to our Services (including marketing affiliates programs we are a part of);
  - (ii) reward, loyalty or privileges programmes, promotional offers and related services; and
  - (iii) invitations to events such as seminars/webinars/tele-seminars, conferences, live programs or events.
- c) We may conduct direct marketing via fax, email, direct mail, telephone and other means of communication or send e-newsletters to you. You may choose not to receive promotional materials, by simply telling us (see below for contact details), and we will cease to do so, without charge.

## **7. Disclosure of Personal Data & Information**

7.1. Under certain circumstances, we may be required to disclose your personal data to third parties. Third parties to whom your personal data may be disclosed by us are as follows:

- a) any persons directed by or consented to by you;
- b) any persons required for the purposes of the legal engagements and/or legal transactions including but not limited to counter parties, other advisors, financial institutions, Payment Providers, regulatory bodies etc.;
- c) any person for the purposes of compliance with legal and regulatory requirements;
- d) our overseas offices, affiliates, business partners and counterparts (if any);
- e) persons under a duty of confidentiality to us;
- f) our data processors i.e. third party who we engage to process personal data on our behalf including but not limited to archival storage, data entry service providers, computer backup services, disaster recovery services, Payment Provider, banks and financial institutions etc.;

- g) actual or proposed transferees or participants of our Services in or outside our current operation and/or
  - h) our professional advisors including but not limited to legal advisors, tax advisors, financial advisors, auditors, insurance brokers etc.
- 7.2. Further, we may also be required to transfer your personal data outside of Singapore, Malaysia, or Hong Kong for the purposes and to such third parties stated in this Statement. The transfer of your personal data outside Singapore, Malaysia or Hong Kong would also be required if you are travelling, residing or based outside of the said territory.

## 8. Internet Protocol & Cookies

- 8.1. We collect Internet Protocol (IP) addresses of all visitors to our site. An IP address is a number assigned to your computer automatically when you use the Internet. This information is only collected in aggregate (in other words, we are not able to monitor your individual usage of the site) and helps us monitor site traffic patterns and refine content based on Country of Origin in order to improve our service. Our site additionally uses cookies for some interactive features.
- 8.2. Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site. By continuing to browse the site, you are agreeing to our use of cookies.
- 8.3. A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer if you agree. Cookies contain information that is transferred to your computer's hard drive.
- 8.4. We use the following cookies:
- a) **Strictly necessary cookies.** These are cookies that are required for the operation of our website. They include, for example, cookies that enable you to log into secure areas of our website, use a shopping cart or make use of e-billing services.
  - b) **Analytical/performance cookies.** They allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily.
  - c) **Functionality cookies.** These are used to recognise you when you return to our website. This enables us to personalise our content for you, greet you by name and remember your preferences (for example, your choice of language or region).
- 8.5. Please note that third parties (including, for example, advertising networks and providers of external services like web traffic analysis services) may also use cookies, over which we have no control. These cookies are likely to be analytical/performance cookies or targeting cookies.

- 8.6. Our website uses Google Analytics, a web traffic analysis service provided by Google Inc. ("Google"). Please refer to <http://www.google.com/policies/privacy/partners> to find out more about how Google uses data when you use our website and how to control the information sent to Google.
- 8.7. You block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our site.
- 8.8. Furthermore, you can prevent Google's collection and processing of data by using the Google Ads Settings page or downloading and installing their browser plug-in (<https://tools.google.com/dlpage/gaoptout>).

## 9. Security

- 9.1. All information you provide to us is stored on our secure servers. Where we have given you (or where you have chosen) a password, which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone. Please be sure to sign off when you finished using our Services on a shared computer.
- 9.2. Unfortunately, the transmission of information via the Internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk and you agree not to hold us responsible for any breach of security while accessing the Internet that is out of our control. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

## 10. Third party websites

Our website may contain links to other sites ("**Linked Sites**"). We are not responsible for the privacy policies or practices of such other Linked Sites. We encourage our Users to be aware when leaving our website to read the privacy policies or statements of each Linked Site that collects your personal data. You agree to waive any claim against us with respect to the Linked Sites.

## 11. Changes to our Privacy Policy

Any changes we may make to our Privacy Policy in the future will be posted on this page and, where appropriate, we will update you on the changes of our Privacy Policy by email. Your continued use of our Services constitutes your agreement to this Privacy Policy and any updates.

## 12. Data transfers

We may hold your data on servers in Singapore, Hong Kong, Malaysia and any other territories as we see fit from time to time. We may also transfer your data to our overseas offices or to any people listed at clause 6.1 above, who may be located in or outside of Singapore.

### **13. Facebook Connect:**

If you create a user account with SimplyGiving using Facebook Connect, you give permission for SimplyGiving to post your personal fundraising and donation activity to your wall. However, you may adjust these settings via Facebook.com. You also authorise SimplyGiving to download information including email address, name, address, and date of birth to assist in the creation of your SimplyGiving account.

### **14. Obligation to Provide Personal Data**

14.1. We acknowledge that you have the right in deciding the information you wish to provide to us. The provision of the information listed above is voluntary in nature. However, please note that if you do not provide the information above or limit the way such information is to be processed, it may result in us not being able to:

- a) communicate or correspond with you;
- b) undertake the engagement or complete transaction and/or provide our Services to you; and/or
- c) grant you access to our Services.

### **15. Your consent and rights**

15.1. By using our service, making an application or visiting our website, you consent to the collection, use and processing of your personal data and other activities as outlined in this Statement.

15.2. If you so wish to do so, you have the right:

- a) to check whether we hold personal data about you and to access such data;
- b) to require us to correct or update as soon as reasonably practicable any data relating to you which is inaccurate or omitted;
- c) to ascertain our policies and practices in relation to personal data and the kind of personal data held by us; and/or
- d) to withdraw your consent or limit the use of your personal data;
- e) to object to the use of your personal data for marketing purposes and we shall not use your personal data for marketing purposes after you communicate your objection to us.

15.3. You may exercise your opt-out right by notifying us if you wish to object to the use of your personal data for direct marketing purposes. Please send requests for such objections, access to data, correction of data, information regarding policies and practices and kinds of data held, questions or complaints to:

**Attention:** Chief Executive Officer  
**Mailing:** 120 Robinson Road #07-01, Singapore 068913  
**Phone:** +65 3158 4691  
**Email:** [hello@simplygiving.com](mailto:hello@simplygiving.com)

15.4. In accordance with the applicable local laws and/or policies, we reserve the right to and may charge a minimum fee for processing any data access request.

## **16. Disclaimer**

16.1. The accuracy and completeness of your personal data depends on the information you provide. We assume that the information you have provided is accurate, up to date and complete unless you inform us otherwise

16.2. Where you provide any third party information to us, it is our assumption that such information is accurate, up to date and complete and that you have obtained the necessary consent to disclose the same.

16.3. Where you have consented or allowed us to disclosed personal data to third party and/or other User when using our Services, you understand that SimplyGiving no longer has any control or authority as to how the said third part and/or other User will use or process the personal data. Therefore, you agree that SimplyGiving will not be responsible for the subsequent use of your personal data by the third party or other User. If you wish to stop them from further using your personal data, please contact them directly.

## **17. Governing law and jurisdiction**

Nothing in this Statement shall limit your right under applicable local privacy law. This Privacy Policy Statement shall be governed by the laws of Singapore. You agree to submit to the exclusive jurisdiction of the Singapore courts.

## **18. Languages**

This agreement is drafted in the English language. If this agreement is translated into any other language, the English language version shall prevail.