

## **Scale Consulting Services - Privacy Policy**

This Privacy Policy governs the way Scale Consulting Services collects, uses, secures and discloses information collected from users (each, a "User") of the scale-cs.com.sg and vivobase.com.sg websites ("Site"), in compliance with the Personal Data Protection Act of Singapore. This privacy notice applies to the Site and all products and services offered by Scale Consulting Services.

### **How we collect your personal data**

We may collect personal identification information from Users in a variety of ways, including, but not limited to,

- Visit our site,
- Send inquiry using our site,
- Buy products on the site,
- Enter into an agreement or contract with us to provide you (as an individual with our consultancy, advisory and training services),
- Respond to marketing promotion activities like EDMs
- Communicate with us via email or WhatsApp
- and any other activities, services, features or resources we make available on our Site.

### **Obtaining & Withdrawal of Consent**

We will notify you of the purpose of collecting your personal data and will not collect more personal data than what is necessary for the stated purpose. If there is a change in the original purpose for the collection, use or disclosure, we will seek fresh consent from you.

You can withdraw your consent at any time by giving reasonable notice. It can be given in the form of an email or letter to us.

### **What personal data do we collect**

Users may be asked for, as appropriate, name, email address, mailing address, phone number, credit card information. Users may, however, visit our Site anonymously. We will collect personal identification information from Users only if they voluntarily submit such information to us. Users can always refuse to supply personal identification information, except that it may prevent them from engaging in certain Site related activities.

### **Non-personal identification information**

We may collect non-personal identification information about Users whenever they interact with our Site. Non-personal identification information may include the browser name, the type of computer and technical information about Users means of connection to our Site, such as the operating system and the Internet service providers utilized and other similar information.

### **Web browser cookies**

Our Site may use "cookies" to enhance User experience. User's web browser places cookies on their hard drive for record-keeping purposes and sometimes to track information about them. User may choose to set their web browser to refuse cookies, or to alert you when cookies are being sent. If they do so, note that some parts of the Site may not function properly.

### **How we use and disclose the collected personal data**

Scale Consulting Services may collect and use Users personal information for the following purposes:

- Respond to inquiries:

We may use the email address and / or telephone/mobile number to respond to their inquiries, questions, and/or other requests.

- Process the Purchase Order:

We may use the information Users provide about themselves when placing an order only to provide product, services like training, consulting or advisory, process invoicing, payment and credit related activities. We do not share this information with outside parties except to the extent necessary to provide the service. Outside parties may be professional service providers like book keepers, marketing campaign service providers and cloud service providers.

- Send periodic emails

We may use the email address to send User information and updates pertaining to their order and updates relating to new products and services.

We may disclose personal data about you to the relevant authorities or to law enforcement agencies, if the need arises.

### **How we protect your Personal Data**

We adopt appropriate data collection, storage and processing practices and security measures to protect against unauthorized access, alteration, disclosure or destruction of your personal information, username, password, transaction information and data stored on our Site.

Sensitive and private data exchange between the Site and its Users happens over an SSL secured communication channel and is encrypted and protected with digital signatures.

### **How We Retain Your Personal Data**

We will not retain any of your personal data when it is no longer needed for any business or legal purposes. We will dispose of or destroy such documents containing your personal data in a proper and secure manner when the retention limit is reached.

### **How You Can Access and Make Correction to Your Personal Data**

Once you find that the personal data, we hold about you is inaccurate, incomplete or not up to date you may ask us to correct the data. After we verify your identity (NRIC or other legal identification document) and are satisfied on the grounds that a correction should be made, we will correct the data as soon as possible, or within 30 days from the date we receive your request.

### **Sharing your personal information**

We do not sell, trade, or rent Users personal identification information to others. We may share generic aggregated demographic information not linked to any personal identification information regarding visitors and users with our business partners, trusted affiliates and advertisers for the purposes outlined above.

### **Transfer of Personal Data**

We do not see a need to transfer your personal data to another country outside Singapore. In the event we do so, we will ensure that the standard of data protection in the recipient country is comparable to that of Singapore's PDPA.

### **Mandatory Data Breach Notification**

In the unlikely event that we suffer a data breach, we will meet the PDPA's breach notification requirements based on the Significant Harm or Significant Scale definitions as set out by the PDPA.

### **Changes to this privacy policy**

Scale Consulting Services has the discretion to update this privacy policy at any time. When we do, we will post a notification on the main page of our Site. We encourage Users to frequently check this page for any changes to stay informed about how we are helping to protect the personal information we collect. You acknowledge and agree that it is your responsibility to review this privacy policy periodically and become aware of modifications.

### **Your acceptance of these terms**

By using this Site, you signify your acceptance of this policy. If you do not agree to this policy, please do not use our Site. Your continued use of the Site following the posting of changes to this policy will be deemed your acceptance of those changes.

### **Contacting us**

If you have any questions about this Privacy Policy, the practices of this site, or your dealings with this site, please send an email to [karthikl@scale-cs.com](mailto:karthikl@scale-cs.com)

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