

USER PRIVACY POLICY – WEBSITE AND SERVICES

This Privacy Notice contains important information about the information we collect through this site and through the use of our services. It states who we are, and how and why we collect, store, use, and share personal data. It also sets forth your rights in relation to your personal data and how to contact us and applicable supervisory authorities if you have a complaint. Please read this carefully.

This Privacy Notice supplements other notices and privacy policies and is not intended to override them.

The information that forms part of the ADAMftd corporate data set (i.e., the database of information about companies, including their trading, economic, legal, ownership and other activities, that ADAMftd makes available) is governed by our Public Records Privacy Policy.

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Important Information and Who We Are

ADAMftd Ltd is a registered company providing a comprehensive platform for accessing some trade, economic, and company data. This Privacy Notice explains how we handle your personal data collected through our website and services.

How to File a Complaint

If you have any complaints about how we process your personal data, please contact us. If you are not satisfied with our response, you have the right to lodge a complaint with the relevant supervisory authority in the relevant jurisdiction.

The Data We May Collect About You

We may collect, use, store, and transfer different kinds of personal data about you which we have grouped as follows:

- **Identity Data:** includes first name, last name, username, or similar identifier.
- **Contact Data:** includes billing address, delivery address, email address, and telephone numbers.
- **Financial Data:** includes bank account and payment card details.
- **Transaction Data:** includes details about payments to and from you and other details of services you have purchased from us.
- **Technical Data:** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website.
- **Profile Data:** includes your username and password, purchases or orders made by you, your interests, preferences, feedback, and survey responses.
- **Usage Data:** includes information about how you use our website, products, and services.
- **Marketing and Communications Data:** includes your preferences in receiving marketing from us and your communication preferences.
- **Company Data:** includes your company's name, job title, employee information, company logo, descriptions, and other related details.

How Your Personal Data is Collected

We use different methods to collect data from and about you, including:

- **Direct Interactions:** You may give us your Identity, Contact, Financial, and Company Data by filling in forms or by corresponding with us by post, phone, email, or otherwise. This includes personal data you provide when you:
 - Apply for our services.
 - Create an account on our website.
 - Subscribe to our service or publications.
 - Request marketing to be sent to you.
 - Enter a survey or provide feedback.
 - Contribute data to the ADAMftd platform.
- **Automated Technologies or Interactions:** As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions, and patterns. We collect this personal data by using cookies, server logs, and other similar technologies.
- **Third Parties or Publicly Available Sources:** We may receive personal data about you from various third parties and public sources as set out below:
 - Technical Data from analytics providers.
 - Contact, Financial, and Transaction Data from providers of technical, payment, and delivery services.
 - Identity and Contact Data from publicly available sources such as company registers.

How We Use Your Personal Data

We will use your personal data when and only to the extent the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- **Performance of Contract:** Where we need to perform the contract we are about to enter into or have entered into with you.
- **Legitimate Interests:** Where it is necessary for our legitimate interests as described below (or those of a third party) and your interests and fundamental rights do not override those interests.
- **Compliance with Legal Obligations:** Where we need to comply with a legal or regulatory obligation or requirement.

Purposes for Which We Will Use Your Personal Data

We have set out below, in a table format, a summary description of the ways we plan to use your personal data, and the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Purpose/Activity	Type of Data	Lawful Basis for Processing Including Basis of Legitimate Interest
To register you as a new user	(a) Identity (b) Contact	Performance of a contract with you
To process and deliver paid for services including: (a) Manage payments, fees and charges, and (b) Collect and recover money owed to us	(a) Identity; (b) Contact; (c) Financial; (d) Transaction; (e) Usage; and (f) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate contractual or legal rights and interests (including to recover debts due to us)
To manage our relationship with you which includes: (a) Notifying you about changes to our terms or privacy notice; (b) Asking you to provide feedback or take a survey; (c) Notifying you if your use of our services is in breach of the terms of use	(a) Identity; (b) Contact; (c) Profile; (d) Usage; and (e) Marketing and Communications	(a) Performance of a contract with you; (b) Necessary to comply with a legal obligation or requirement; (c) Necessary for our legitimate interests (e.g. to keep our records updated, ensure usage is compliant with our terms and conditions, and to study how customers use our services)
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting, hosting of data, and monitoring and reporting any non-compliance with the terms of use)	(a) Identity; (b) Contact; (c) Technical; and (d) Usage	(a) Necessary for our legitimate interests (including for operating our business, ensuring users comply with the terms of use, provision of administration and IT services, network security, to prevent fraud, and in the context of a business reorganization or group restructuring exercise); and (b) Necessary to comply with a legal obligations and requirements
To deliver relevant website content to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity; (b) Contact; (c) Profile; (d) Usage (e) Marketing and Communications; and (f) Technical	Necessary for our legitimate interests (including to study how customers use our products/services, to develop them, to develop and expand our business, and to inform our marketing strategy)
To use data analytics to improve our website, services, marketing, customer relationships, and experiences	(a) Technical; and (b) Usage	Necessary for our legitimate interests (including to define types of customers for our services, to keep our website updated and relevant, to develop and expand our business, and to inform our marketing strategy)
To make suggestions and recommendations to you about our services, events (including those of selected third parties), developments in our services that may be of interest to you	(a) Identity; (b) Contact; (c) Technical; (d) Usage; (e) Profile; and (f) Marketing and Communications	Necessary for our legitimate interests (including the development of our products/services and to develop and expand our business)

Contribution and Use of Company Data

Users may contribute data to the ADAMftd platform, including company data, logos, descriptions, and other details, the accuracy, correctness and completeness of which shall be and remain the sole responsibility of the contributing user and upon which we can fully rely. Once contributed, this data may not be removed unless explicitly requested in writing. Termination of an account does not remove the contributions made by the user, and by contributing, users grant us the right to use this information in perpetuity, world-wide and without compensation.

International Transfers

We can share your personal data within ADAMftd Ltd, which may involve transferring your data outside the jurisdiction. Whenever we transfer your personal data outside the jurisdiction, we will seek to ensure that a similar degree of protection is afforded to it by providing, to the extent reasonably and legally possible and practicable that appropriate safeguards are implemented. These safeguards may include:

- **Standard Contractual Clauses (SCCs):** We intend to use specific contracts, which are approved for use in the jurisdiction, to give personal data similar (as above described) protection it has in Singapore.
- **Corporate Rules (CRs):** Where applicable, these rules provide a framework for our group's international data transfers.

Data Security

We have put in place security measures to prevent, as reasonably possible and practicable, your personal data from being accidentally lost, used, or accessed in an unauthorized way, altered, or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors, and other third parties who have a business need to know. They will only process your personal data in accordance with our instructions and they will be subject to a duty and obligation of confidentiality in accordance with applicable law.

We have put in place reasonable and practicable procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

Data Retention

Retention Period

We retain personal data as long as needed, useful or appropriate to fulfill the purposes for which it was collected, such as providing our services, maintaining our business relationships, and complying with legal and regulatory obligations. Additionally, we will take into account the need to answer queries or resolve possible problems, comply with legal obligations and requirements under applicable laws, consider our own legitimate business needs, and protect our interests.

Criteria for Retention

The criteria used to determine our retention periods, each of which is subject to the other criteria which we use, include:

- **Duration of Your Use of Our Services:** We keep your personal data as long as you are using our services, and for a reasonable duration thereafter in case of any follow-up questions or potential legal claims.
- **Legal Obligations:** If there are legal or regulatory requirements that require us to keep records for a specific period, we retain these records for the period stipulated by the law or the regulations. This includes information needed for tax and financial auditing purposes.

- **Contractual Obligations:** For individuals or parties with whom we have a direct contractual relationship, we retain personal data during the term of the contract and for a period thereafter as we deem necessary or appropriate, to handle any post-contractual claims or inquiries.
- **Consent:** Where we rely on your consent to process personal data, we keep the data for as long as necessary to fulfill the purposes for which it was collected, or until you withdraw your consent in writing. If you withdraw consent, we may still be legally required to retain some or all of the data.
- **Legitimate Interests:** To the extent that we rely on legitimate interests for processing your data, we will assess whether our interest in retaining the data overrides any rights you may have and will only retain it for as long as reasonably necessary or appropriate to fulfill those interests, but in all cases subject to our legal obligations under any applicable laws or regulations.

Post-Retention Actions

Once the retention period expires, personal data will be deleted as best as reasonably possible and practicable or anonymized, depending on the nature of the data and the needs of our business. For instance, we may retain anonymized or aggregate data for statistical analysis and business planning.

Special Circumstances

In certain cases, we may keep your data for longer periods for specific purposes, such as ongoing legal proceedings, regulatory investigations, or where archival is necessary for historical or research purposes. In such cases, access to data will be restricted and the data will be only used for the designated purposes.

Review and Update of Retention Policies

Our data retention policies and procedures are regularly reviewed to ensure compliance with applicable laws and regulations and to reflect changes in our business operations. We commit to handling your personal data responsibly throughout its lifecycle within our organization.

Your Legal Rights

As a data subject, you may have certain rights under the data protection laws in the jurisdiction. These rights are intended to provide you with certain control over how your personal data is handled by us. They are in general:

- **Right to Access:** You have the right to request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Right to Correction:** You have the right to request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **Right to Erasure:** You have the right to request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no legitimate reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local applicable law. Note, however, that we may not always be able to comply with your request of erasure for legal reasons, including conflicting legal requirements, which will be notified to you, if applicable, at the time of your request.
- **Right to Object to Processing:** You have the right to object to the processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing as you feel it impacts on your fundamental legal rights. You also have the right to object where we are processing your personal data for direct marketing purposes.
- **Right to Restrict Processing:** You have the right to request the restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to reasonably establish the data's accuracy; (b) where our use

of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

- **Right to Data Portability:** You have the right to request the transfer of your personal data to you or to a third party. This right applies to personal data you have provided to us and is being processed with your consent or for the performance of a contract, and when processing is carried out by automated means. This enables you to receive your data in a structured, commonly used, and machine-readable format, and to have us transfer that data to another data controller where technically feasible.

Glossary

- **Data Controller:** The natural or legal person, public authority, agency, or other authorized body which, alone or jointly with others, has the legal right to determine the purposes and means of the processing of personal data.
- **Data Processor:** A natural or legal person, public authority, agency, or other authorized body which processes personal data on behalf of the controller.
- **Data Subject:** Any living individual who is the subject of personal data.
- **Personal Data:** Any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.
- **Processing:** Any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.
- **Legitimate Interest:** Processing necessary for the purposes of the legitimate interests pursued by the data controller or a third party, except where such interests are overridden by the fundamental legal rights of the data subject which require protection of personal data.
- **Consent:** Freely given informed, indication of the data subject's wishes by which he or she, by a statement or by an affirmative action, signifies agreement to the processing of personal data relating to him or her.

These terms and the rights outlined above ensure that you are informed of how your personal data is used and provide mechanisms for you to protect your privacy under the data protection laws of the jurisdiction. If you have any questions or require clarification on any of these terms, please contact us for further information.

This policy was last updated on July 22, 2024.