

# DATA PROTECTION POLICY

**Last Revised: 11.12.2019**

## **Scope of application**

This data protection policy applies to Haring Timber Technology (SEA) (“HTT”). This policy governs the collection, use and disclosure of personal data submitted to HTT including through haring.ch or through the Singapore pages of haring.ch, and explains how HTT collects and handles personal data of individuals and comply with the requirements of the Personal Data Protection Act 2012 of Singapore and its regulation(s) (“PDPA”). In this policy, “personal data” shall have the meaning ascribed to it in the PDPA.

## **Summary**

HTT will collect, use or disclose personal data for reasonable business purposes only if there is consent or deemed consent from the individual and information on such purposes have been notified. HTT may also collect, use or disclose personal data if it is required or authorised under applicable laws.

## **Collection of Personal Data**

HTT collects personal data from clients, customers, business contacts, partners, personnel, contractors and other individuals. Such personal data may be provided to HTT in forms filled out by individuals, face to face meetings, email messages, telephone conversations, through HTT’s websites or provided by third parties. If any individuals contact HTT, HTT may keep a record of that contact.

HTT collects these personal data when it is necessary for business purposes or to meet the purposes for which the individuals have submitted the information.

HTT will only collect, hold, process, use, communicate and/or disclose such personal data, in accordance with this policy. If any party is acting as an intermediary or otherwise on behalf of a third party individual or supplying HTT with information regarding a third party individual (such as a friend, a colleague, an employee etc), such intermediary party undertakes that you are an authorised representative or agent of such third party individual and that you have obtained all necessary consents from such third party individual to the collection, processing, use and disclosure by us of their personal data. Because HTT is collecting the third party individual’s data from you, you undertake to make the third party individual aware of all matters listed in this policy preferably by distributing a copy of this policy to them or by referring them to HTT’s website.

## **Use of Personal Data**

HTT uses personal data for the following purposes:

- to provide HTTs services
- to respond to the individual’s request or for the purposes for which it was provided to HTT as stated at the time of the collection (or as is obvious from the context of collection)
- to maintain contact with clients and other contacts

- to keep clients and other contacts informed of the services HTT offers, industry developments, service offerings, seminars and other events HTT is holding, that may be of interest to them
- for general management and reporting purposes, such as invoicing and account management
- for recruitment purposes
- for purposes related to the employment of HTT's personnel and providing internal services to HTT's personnel
- all other purposes related to HTT's business.

Any individual may choose to unsubscribe from mailing lists, registrations, or elect not to receive further marketing information from HTT by contacting HTT's [Data Protection Officer](#), or if HTT has contacted such individual by email, such individual may use the unsubscribe function in that email to notify HTT. Such requests will be processed within 28 days.

### **Disclosure of Personal Data to Third Parties**

HTT does not disclose personal data to third parties except when required by law, when HTT has the individual's consent or deemed consent or in cases where HTT has engaged third parties such as data intermediaries or subcontractors specifically to assist with HTT's firm's activities. Any such third parties whom HTT engages will be bound contractually to keep all information confidential.

HTT may disclose personal data to other member firms in the Haring Group, where it is necessary (i) to meet the purpose for which such individual has submitted the information; or (ii) to enable such individual to be provided with information at a later date which may be of relevance and interest to such individual based on the nature and purpose of such individual's voluntary requests. HTT may also transfer all data in HTT's possession to a successor-in-interest to HTT's business or assets.

### **Access to and Correction of Personal Data**

Upon request, HTT will provide the individual with access to their personal data or other appropriate information on their personal data in accordance with the requirements of the PDPA.

Upon request, HTT will correct an error or omission in the individual's personal data that is in our possession or control in accordance with the requirements of the PDPA. HTT may charge for a request for access in accordance with the requirements of the PDPA.

### **Withdrawal of Consent**

Upon reasonable notice being given by an individual of his withdrawal of any consent given or deemed to have been given in respect of HTT's collection, use or disclosure of his personal data, HTT will inform the individual of the likely consequences of withdrawing his consent. HTT will cease (and cause any of HTT's data intermediaries and agents to cease) collecting, using or disclosing the personal data unless it is required or authorised under applicable laws.

### **Accuracy of Personal Data**

HTT will make a reasonable effort to ensure that personal data collected by HTT or on HTT's behalf is accurate and complete.

## **Security and Protection of Personal Data**

HTT has implemented generally accepted standards of technology and operational security to protect the personal data in HTT's possession or under HTT's control and to prevent unauthorised access, collection, use, disclosure, copying, modification, disposal or similar risks. All HTT personnel follow a network-wide security policy. Only authorised HTT personnel are provided access to personally identifiable information and these personnel have agreed to ensure confidentiality of this information.

## **Retention of Personal Data**

HTT will cease to retain personal data, as soon as it is reasonable to assume that the purpose for collection of such personal data is no longer being served by such retention, and such retention is no longer necessary for legal or business purposes.

## **Transfer of Personal Data outside of Singapore**

HTT will ensure that any transfers of personal data to a territory outside of Singapore will be in accordance with the PDPA so as to ensure a standard of protection to personal data so transferred that is comparable to the protection under the PDPA.

## **Privacy on Our Websites**

The website operator takes your privacy seriously and treats your personal data confidentially and in accordance with the relevant legislation.

Please bear in mind that data transmission via the Internet is fundamentally prone to security breaches. Despite protective measures, third-party access cannot be entirely excluded.

### Access data

The operator/provider of this website gathers data about access to the site and saves this in the form of server log files. The following data is recorded in this way:

- Website visited
- Time accessed
- Volume of transmitted data in bytes
- Source/link used to reach the page
- Browser used
- Operating system used
- IP address used

The data gathered is used solely for statistical analyses and improving the website. However, the operator of the website reserves the right to inspect the server log files later on if any substantial evidence points to illegal usage.

### Cookies

This website uses cookies. Cookies are small text files that are stored on your end device. Your browser accesses these files. Using cookies makes this website more user-friendly and secure.

Common browsers offer the option of rejecting cookies in the settings. Note: If you have set your browser options to reject cookies, you might not be able to use all the functions on this website to their full extent.

### Treatment of personal data

The operator of this website will only gather, use and pass on your personal data as permitted by law or subject to your agreement.

The term personal data refers to any information that identifies you personally and can be traced back to you – e.g. your name, email address and telephone number.

### Treatment of contact details

If you contact the operator of the website using the options provided, your details will be stored for processing and responding to your enquiry. This data will not be passed on to third parties without your consent.

### Google Analytics

This website uses “Google Analytics”, a service provided by Google Inc. (1600 Amphitheatre Parkway, Mountain View, CA 94043, United States) to analyse the use of this website. This service uses text files known as cookies, which are stored on your end device. The information gathered by these cookies is normally transmitted to and stored by Google on one of its servers in the United States.

An IP shield is used on this website, which abbreviates users’ IP addresses within the member states of the European Union and the European Economic Area, making it impossible to link your IP address to you personally. Under the agreement on data processing that website operators have agreed with Google Inc., the latter uses the information gathered to evaluate website usage and activity and to provide services related to using the Internet.

You can choose to prevent cookies from being stored on your device by selecting the appropriate settings in your browser. If your browser rejects cookies, you might not be able to use all the functions on this website to their full extent.

In addition, you can use a browser plugin to prevent the information collected by cookies (including your IP address) from being transmitted to and used by Google Inc. Use the following link to access this plugin:

<https://tools.google.com/dlpage/gaoptout?hl=en>

You can find further information on how Google Inc. uses data here:

<https://support.google.com/analytics/answer/6004245?hl=en>

### Google reCaptcha

We use Google’s reCaptcha service to determine whether it is a human or computer completing our contact or newsletter form. Google uses the following data to check this: IP address of the end device used, the website of ours you are visiting containing the captcha, the date and duration of the visit, the identification data of the browser and the kind of operating system used, the Google account if you are logged in to Google, mouse movements on the reCaptcha interfaces, and tasks that require you to identify images. The legal basis for the data processing described is Art. 6 para. 1 f of the General Data Protection Regulation. We have a justified interest in processing data this way so as to ensure the security of our website and protect us against automated entries (attacks).

### User’s rights: Access, rectification and erasure

As the user, you can request to be informed free of charge about which personal data of yours we have stored. As long as your request does not conflict with a legal obligation to preserve data (e.g. telecommunications data retention), you have a right

to the rectification of any incorrect data and to your personal details being blocked or erased.

### **Data Protection Officer**

If an individual believes that information HTT holds about him is incorrect or out of date, or if an individual has concerns or further queries about how HTT is handling his personal data, or any problem or complaint about such matters, please contact our Data Protection Officer.

### **Modifications**

HTT reserves the right to modify or amend this Policy at any time. The effective date will be displayed at the beginning of this Policy.