

## PRIVACY POLICY

### 1 Introduction

- 1.1 Global Financial Consultants Pte Ltd (the “**Company**” or “**we**” or “**our**” or “**us**”) is in the business of providing financial advisory services. The Company is committed to respecting your privacy and complying with applicable data protection and privacy laws.
- 1.2 This Privacy Policy applies to all persons and entities that access this website located at: www.gfcadvice.com (“**Site**”), and to all products and services provided by the Company in accordance with the Terms and Conditions of Use. The Company cannot distinguish the age of persons who access and use its Site. If a minor (according to applicable laws) has provided the Company with Personal Data without parental or guardian consent, the parent or guardian should contact the Company to remove the relevant Personal Data.
- 1.3 All capitalised terms in this Privacy Policy shall have the same meaning as set forth in the Terms and Conditions of Use, unless otherwise specified.
- 1.4 By accessing and / or using the services available on or through the Site, you hereby acknowledge that you have read and agree to accept and be bound by the terms of this Privacy Policy (together with our Terms and Conditions of Use and any other documents referred to on it), and you consent to the collection, use, disclosure, and processing of Personal Data in accordance with the terms of this Privacy Policy, as may be revised from time to time.

### 2 Changes to Privacy Policy

- 2.1 We reserve the right to amend the terms of this Privacy Policy at our sole and absolute discretion. Any amended Privacy Policy will be posted on our Site.
- 2.2 By continuing to use our Site and/or services after any changes to this Privacy Policy, you are deemed to agree to the revised Privacy Policy.

### 3 The Information We Collect and Why We Collect It

- 3.1 We may collect, use, disclose and/or process personal data or personal information in relation to this Site for the purposes of providing you with our services and dealing with your enquiries and requests, in your dealings or interactions with us, and/or when you use our Site .
- 3.2 “**Personal Data**” means data, whether true or not, about an individual who can be identified (i) from that data; or (ii) from that data and other information to which the organization has or is likely to have access. Personal Data we collect about you may include without limitation the following:
- (a) Any information or data that you make available to us when you create an account through the Site or use our services, such as your name, email address and other contact information;
  - (b) Any information and data about you generated and/or provided to us in the course of maintaining the relationship between us and you, including records of correspondence with you through this Site over the phone or via email; and/or
  - (c) Any information and data about you collected in relation to each of your visit to our Site, including your login information and IP address, and information and data from cookies or other technologies deployed on our Site.

- 3.3 The Company may collect, use, disclose and/or process your Personal Data for one or more of the following purposes (collectively, "**Purposes**"):
- (a) administering, facilitating, processing and/or dealing in any matters relating to your use of the Site or our services, which include without limitation sourcing and engaging financial advisers, providing financial advisory services to clients, and organising events related to the business;
  - (b) providing our services to you, including carrying out your instructions or responding to any enquiry given by you or on your behalf;
  - (c) complying with any applicable law, governmental or regulatory requirements of any jurisdiction which we determine are applicable to us (whether Singapore or another country), including carrying out due diligence or other screening activities (including background checks), and/or our risk management procedures that may be required by law (whether Singapore or another country) or that may have been put in place by us;
  - (d) complying with or as required by any request or direction of any governmental authority (whether Singapore or of another country) which we are expected to comply with; or responding to requests for information from public agencies, ministries, statutory boards or other similar authorities (whether Singapore or of another country);
  - (e) storing, hosting, backing up (whether for disaster recovery or otherwise) of your personal data, whether within or outside Singapore (or whether within or outside your country of residence); and/or
  - (f) if you have separately consented to it, sending you marketing, advertising and promotional information relating to the products or services that the Company or such third party organisations may be selling, marketing, offering or promoting
- 3.4 As the purposes for which we may collect, use, disclose or process your Personal Data depend on the circumstances at hand, such purpose(s) may not appear above. However, we will notify you of such other purpose at the time of obtaining your consent for the collection of such Personal Data, unless processing of your Personal Data without your consent is permitted by law.

#### **4 Disclosure and Transfer of Personal Data**

- 4.1 You agree that we may disclose and transfer (whether in Singapore or to a location outside of Singapore) your personal data to third party service providers engaged by us at our sole discretion to assist with providing you with our services (the "**Third Party Service Providers**").
- 4.2 Where we permit any third parties to collect and use your Personal Data, we will use reasonable efforts to ensure that such third parties only use your Personal Data: (i) in compliance with this Privacy Policy; or (ii) subject to any other instructions we give them, including any appropriate confidentiality and security measures that we implement.

#### **5 Management of Personal Data**

- 5.1 We will take reasonable efforts to ensure that your Personal Data is accurate and complete, if your Personal Data is likely to be used by the Company to make a decision that affects you, or disclosed to another organisation. However, this means that you must also update us of any changes in your Personal Data that you had initially provided us

with. We will not be responsible for relying on inaccurate or incomplete Personal Data arising from your failure to update us of any changes in your Personal Data that you had initially provided us with.

- 5.2 You have the right to request from us access to or correction of the Personal Data about you held by the Company. If you wish to access, update or otherwise change or remove any information that you provide to us, please contact our Data Protection Officer at [enquiries@gfcadvice.com](mailto:enquiries@gfcadvice.com) or +65 6532 2711. Any access request may be subject to a fee to meet our costs in providing you with details of the information we hold about you.
- 5.3 In exceptional circumstances, the Company may deny you access to your Personal Data but we will provide you with an explanation of the reason(s) which prevent us from doing so under the applicable laws. Such exceptional circumstances include, for example, where the Personal Data is collected in connection with an investigation of a breach of contract or contravention of law.

## **6 Protection of Personal Data**

- 6.1 We will put in place reasonable security arrangements to ensure that your Personal Data is adequately protected and secured from any unauthorised access, collection, use, disclosure, copying, modification, leakage, loss, damage and/or alteration of your Personal Data. However, we cannot assume responsibility for any unauthorised use of your Personal Data by third parties which are wholly attributable to factors beyond our control.
- 6.2 We will also put in place measures such that your Personal Data in our possession or under our control is destroyed and/or anonymized as soon as it is reasonable to assume that (i) the purpose for which that Personal Data was collected is no longer being served by the retention of such Personal Data; and (ii) retention is no longer necessary for any other legal or business purposes.

## **7 Withdrawal of Your Consent**

- 7.1 You may withdraw your consent for the collection, use and/or disclosure of your Personal Data in our possession or under our control by emailing us at [enquiries@gfcadvice.com](mailto:enquiries@gfcadvice.com). We will process your request within a reasonable time from such a request for withdrawal of consent being made, and will thereafter not collect, use and/or disclose your Personal Data in the manner stated in your request, unless an exception under the law or a provision in the law permits us to. However, your withdrawal of consent could result in certain consequences arising from such withdrawal, including us being unable to perform the services requested by you or your use of our Site, as the case may be.

## **8 Use of Cookies**

- 8.1 Cookies are pieces of information which are issued to your computer or mobile device when you visit a website, and which store and track information about your use of the website. We use cookies to store and track certain anonymous statistical information when you browse our website. We use this information to improve our website and to learn which parts of our website are most popular with users.

## **9 Contacting Us**

- 9.1 If you have any queries on this Privacy Policy or any other queries in relation to how we may manage, protect and/or process your Personal Data, please do not hesitate to contact our Data Protection Officer via email at [enquiries@gfcadvice.com](mailto:enquiries@gfcadvice.com) or via postal mail at:

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