

A. Information for all users

I. General

We take the protection of your personal data very seriously. We protect your privacy and your private data. We collect, process and use personal data in accordance with the content of this privacy policy and the applicable data protection laws.

In principle, you can use the information we provide on this website without providing any personal data. In some cases, we require personal information from you, for example, when you send us an e-mail inquiry. This includes name, company, address, e-mail address and contact data. We only collect this information if you provide it yourself, for example by entering it in our online form for e-mail contact.

We would like to point out that data transmission over the Internet (e.g. communication by e-mail) can be subject to security gaps. A complete protection of the data against access by third parties is not possible.

II. Data Controller and data protection officer

1. Name and address of the data controller

The data controller of this website is:

Singapore Economic Development Board (EDB)
250 North Bridge Road, #28-00, Raffles City Tower, Singapore 179101

2. Name and address of the Data Protection Officer

If you have any questions regarding the collection, processing or use of your personal data, please contact our data protection officer, whom you can contact as follows:

250 North Bridge Road, #28-00, Raffles City Tower, Singapore 179101

Tel: 65 6832 6832

Email: client_services@edb.gov.sg

III. Data process on our website

1. Cookies

Our website uses cookies. Cookies are text files that are stored on the user's computer system in the Internet browser or by the Internet browser. When a user visits a website, a cookie can be stored on the user's operating system. This cookie contains a characteristic string of characters that enables the browser to be uniquely identified when the website is called up again.

Most of the cookies we use are so-called "session cookies". They are automatically deleted at the end of your visit. Other cookies remain stored on your terminal until you delete them. These cookies enable us to recognize your browser during your next visit.

The statistics cookies are used for the purpose of improving the quality of our website and its contents. The analysis cookies tell us how the website is used and enable us to constantly optimise our services.

2. Server log files

The provider of the pages automatically collects and stores information in so called server log files, which your browser automatically transmits to us. These are:

- browser type and browser version
- used operating system
- referrer URL
- hostname of the accessing computer
- time of the server request

- IP address

3. Finance & Accounting Self-Assessment Questionnaire

If you wish to receive a report card summarising the sophistication assessment and recommendations from the Finance & Accounting Self-Assessment Questionnaire, your responses (including your details in the profiling survey) will be stored by us. Your responses may be disclosed and distributed to other Singapore public sector agencies and EDB's network of clients and partners, provided that the reports will not attribute any specific response to you. EDB and other Singapore public sector agencies may contact you in relation to any related opportunities.

The processing of the data entered in the questionnaire takes place exclusively on the basis of your consent. You can revoke this consent at any time. For this purpose, an informal e-mail notification to client_services@edb.gov.sg is sufficient. The legality of the data processing operations carried out until the revocation remains unaffected by the revocation.

The data entered by you in the questionnaire will remain with us until you request deletion or revoke your consent to storage or until 2 years after the response is submitted (whichever is earlier).

4. Third Party modules

a. Adobe Analytics

This website also uses Adobe Analytics, a web analytics service provided by Adobe Systems Software Ireland Limited ("Adobe").

Adobe Analytics uses "cookies", which are text files placed on your computer, to help the website analyze how users use the site. If the information generated by the cookie about your use of the website is transmitted to an Adobe server, the settings ensure that the IP address is anonymised before geolocation and replaced by a generic IP address before storage. On behalf of the operator of this website, Adobe will use this information to evaluate user use of the website, to compile reports on

website activity and to provide other services relating to website activity and internet usage to the website operator.

The IP address transmitted by your browser as part of Adobe Analytics is not merged with other data from Adobe. You may refuse the use of cookies by selecting the appropriate settings on your browser, however please note that if you do this you may not be able to use the full functionality of this website. However, we would like to point out that in this case you may not be able to use all the functions of this website to their full extent.

You can also prevent Adobe from collecting the data generated by the cookie and related to your use of the website (including your IP address) and from processing this data by Adobe by downloading and installing the browser plug-in available under the following link: <http://www.adobe.com/sea/privacy/opt-out.html>.

b. WOGAA (Snowplow)

This website uses WOGAA (Snowplow), to help analyse overall traffic patterns.

By transmitting the information generated by the cookie about the use of the website to Snowplow, cookie settings ensure that IP address is anonymised before geo-localisation and will be replaced by a generic IP address before storage. On behalf of us, WOGAA will use this information for the evaluation of your use of the website, compiling reports on website activity for website operators, and in order to provide other services relating to website activity and use of the Internet to us. Snowplow will not associate your IP address with any other data held by Snowplow. You may refer to the WOGAA privacy policy [here](#).

IV. Recipients

Other Singapore public sector agencies

Personal Data may be transferred to other Singapore public sector agencies for processing, if an application is submitted as described in sections 1 to 4.

Other Third Parties

Personal Data may be transferred, on a case by case basis, to designated service providers or EDB's network of clients and partners for processing, if an application is submitted as described in sections 1 to 4.

V. Your rights

1. Revocation of your consent to data processing

Many data processing operations are only possible with your express consent. You can revoke a previously given consent at any time. For this purpose, a notification by e-mail to client_services@edb.gov.sg is sufficient.

2. Information, blocking, deletion

Within the framework of the applicable legal provisions, you have the right to obtain information free of charge at any time about your stored personal data, its origin and recipients and the purpose of the data processing and, if applicable, a right to correct, block or delete this data. You can contact us at any time at the address given in the imprint for this purpose and for further questions about personal data.

3. Right to data transferability

You have the right to have data, which we process automatically, on the basis of your consent or in fulfilment of a contract, handed over to you or to another responsible person in a common, machine-readable format. If you request the direct transfer of the data to another responsible person, this will only be done as far as it is technically feasible.

4. Right to object

If we have a legitimate interest in processing data, you have the right at any time to object to the processing of personal data concerning you for reasons arising from your particular situation; this also applies to profiling.

VI. Changes to the privacy policy

We reserve the right to adapt this privacy policy at any time with effect for the future so that it always corresponds to the current legal requirements or in order to implement changes to our services in the privacy policy, e.g., with the introduction of new services. Please therefore look at the privacy policy again the next time you visit us.

B. Information explicitly for users from the European Union

I. Data we process when visiting the website

1. Description and scope of data processing

Each time the website is accessed, we collect data and information through an automated system. These are stored in the log files of the server.

The following data can be collected:

1. Information about the browser type and the version used
2. The user's operating system
3. The IP address of the user
4. Date and time of access
5. The last website from which the user's system reaches our website is
6. Websites accessed by the User's system through our Website

The data is stored in the log files of our system at short notice. These data are not stored together with other personal data of the user.

2. Legal basis for data processing

The legal basis for the temporary storage of data and log files is Art. 6 (1) lit. f GDPR.

3. Purpose of the data processing

The temporary storage of the IP address by the system is necessary to enable delivery of the website to the user's computer. For this purpose, the IP address of the user must remain stored for the duration of the session. Logfiles are stored to ensure the functionality of the website. The data is also used to optimise the website and to ensure the security of our information technology systems. Our legitimate interest in data processing pursuant to Art. 6 (1) lit. f GDPR lies in these purposes.

4. Duration of storage

The data will remain with us until 2 years after the response is submitted.

5. Possibility of objection and removal

The collection of data for the provision of the website and the storage of data in logfiles is mandatory for the operation of the website. Consequently, there is no possibility of objection on the part of the user.

II. Use of cookies

1. Description and scope of data processing

We may use cookies to make our website more user-friendly. Some elements of our website require that the calling browser can be identified even after a page change.

In addition, we may use cookies on our website, which enable us to analyse the surfing behaviour of our users.

In this way, the following data can be transmitted as examples:

1. Entered search terms
2. Frequency of page views

3. Use of website functions

2. Legal basis for data processing

The legal basis for the processing of personal data using cookies is Art. 6 (1) lit. f GDPR or Art. 6 (1) lit. a GDPR if you have giving you consent.

3. Purpose of data processing

The purpose of using technically necessary cookies is to simplify the use of websites for users. Some functions of our website cannot be offered without the use of cookies. For these it is necessary that the browser is recognized also after a page change.

The analysis cookies are used for the purpose of improving the quality of our website and its contents. The analysis cookies tell us how the website is used and enable us to constantly optimise our services. Please refer to the web analysis section for the exact purpose of use.

Our legitimate interest in the processing of personal data in accordance with Art. 6 (1) lit. f DSGVO also lies in these purposes.

4. Duration of storage, possibility of objection and removal

Cookies are stored on the user's computer and transmitted to our site by the user. Therefore, as a user, you have full control over the use of cookies. By changing the settings in your Internet browser, you can deactivate or restrict the transmission of cookies. Cookies that have already been saved can be deleted at any time. This can also be done automatically. If cookies are deactivated for our website, it is possible that not all functions of the website can be used to their full extent.

III. Finance & Accounting Self-Assessment Questionnaire

1. Description and scope of data processing

If you wish to receive a report card summarising the sophistication assessment and recommendations from the Finance & Accounting Self-Assessment Questionnaire, your responses (including your details in the profiling survey) will be transmitted to us and stored.

The following data will also be stored at the time the message is sent:

1. the IP address of the user
2. Date and time of registration.

Your consent will be obtained for the processing of the data as part of the sending process and reference will be made to this privacy policy.

2. Legal basis for data processing

The legal basis for the processing of the data is Art. 6 (1) lit. a GDPR if the user has given his consent.

3. Purpose of data processing

The processing of the personal data from the profiling survey input mask serves us for providing the report card to the user and for establishment of contact if necessary. The other personal data processed during the sending process serve to prevent misuse of the form and to ensure the security of our information technology systems.

4. Duration of storage

The data will continue to remain with us until 2 years after the response is submitted.

5. Possibility of objection and removal

The user has the possibility to revoke his/her consent to the processing of personal data at any time. If the user contacts us by e-mail, he/she can object to the storage of his/her personal data at any time. In such a case, the conversation cannot be continued. Please inform us of your revocation in text form at the following e-mail address: client_services@edb.gov.sg

In this case, all personal data stored in the course of establishing contact will be deleted.

IV. Recipients

Other Singapore public sector agencies

Personal Data may be transferred to other Singapore public sector agencies for processing, if an application is submitted as described in section IV.

Other Third Parties

Personal Data may be transferred, on a case-by-case basis, to designated service providers or EDB's network of clients and partners for due diligence screening, if an application is submitted as described in section IV.

V. Your Rights

If personal data is processed, you are the data subject within the meaning of the GDPR and you are entitled to the following rights against the controller:

1. Right of information

You can ask the controller to confirm whether personal data concerning you will be processed by us.

In the event of such processing, you may ask the data controller to provide you with the following information:

- a. the purposes for which the personal data will be processed;
- b. the categories of personal data processed;
- c. the recipients or categories of recipients to whom the personal data concerning you has been or will be disclosed;

- d. the planned duration of the storage of the personal data concerning you or, if this is not possible, criteria for determining the duration of the storage;
- e. the existence of a right to rectify or delete personal data concerning you, a right to limit the processing by the person responsible or a right to object to such processing;
- f. the existence of a right of appeal to a supervisory authority;
- g. all available information on the origin of the data, if the personal data are not collected from the data subject;
- h. the existence of automated decision-making including profiling in accordance with Article 22(1) and (4) GDPR and - at least in these cases - meaningful information on the logic involved and the scope and intended effects of such processing for the data subject.

You have the right to request information as to whether the personal data concerning you will be transferred to a third country or to an international organisation. In this context, you may request to be informed of the appropriate guarantees pursuant to Art. 46 GDPR in connection with the transfer.

2. Right to rectification

You have the right to have your personal data corrected and/or completed by the controller if the personal data processed concerning you is inaccurate or incomplete. The data controller must rectify the data without delay.

3. The right to limit the processing

Under the following conditions, you may request that the processing of your personal data be restricted:

- a. if you dispute the accuracy of the personal data concerning you for a period of time which enables the person responsible to verify the accuracy of the personal data;

- b. the processing is unlawful and you refuse to delete the personal data and instead request the restriction of the use of the personal data;
- c. the controller no longer needs the personal data for the purposes of processing, but you need them to assert, exercise or defend legal claims; or
- d. if you have lodged an objection against the processing pursuant to Art. 21 () GDPR and it has not yet been determined whether the justified reasons of the data controller outweigh your reasons.

If the processing of personal data concerning you has been restricted, such data - apart from their storage - may only be processed with your consent or for the assertion, exercise or defence of legal claims or for the protection of the rights of another natural or legal person or for reasons of an important public interest of the Union or a Member State.

If the processing restriction has been limited in accordance with the above conditions, you will be informed by the controller before the restriction is lifted.

4. Right to cancellation

4.1 You may request the data controller to delete the personal data relating to you immediately and the data controller is obliged to delete such data immediately if one of the following reasons applies:

- a. The personal data concerning you are no longer necessary for the purposes for which they were collected or otherwise processed.
- b. You revoke your consent on which the processing was based pursuant to Art. 6 (1) lit. a or Art. 6 (2) lit. a GDPR and there is no other legal basis for the processing.
- c. You object to the processing pursuant to Art. 21 (1) GDPR and there are no overriding legitimate reasons for the processing, or you object to the processing pursuant to Art. 21 (2) GDPR.
- d. The personal data concerning you has been processed unlawfully.

e. The deleting of the personal data concerning you is necessary for the fulfilment of a legal obligation.

f. The personal data relating to you has been collected in relation to information society services offered pursuant to Art. 8 (1) GDPR.

4.2 If the controller has made the personal data concerning you public and is obliged to delete them in accordance with Art. 17 (1) GDPR, he shall take reasonable measures, including technical measures, taking into account the available technology and the implementation costs, to inform the controller for data processing who process the personal data that you, as the person concerned, have requested them to delete all links to this personal data or from codes or replications of this personal data.

4.3 The right to deleting does not exist if the processing is necessary.

a. the exercise of freedom of expression and information;

b. to fulfil a legal obligation which processing is subject to under the law of the Union or of the Member States to which the controller is subject or to perform a task carried out in the public interest or in the exercise of public authority vested in the controller;

c. for reasons of public interest in the field of public health pursuant to Art. 6 (2) lit. h and i and Art. 6 (3) GDPR;

d. for archive purposes in the public interest, scientific or historical research purposes or for statistical purposes pursuant to Art. 86 (1) GDPR, insofar as the law referred to in (1) presumably makes the realisation of the objectives of such processing impossible or seriously impairs them, or

e. to assert, exercise or defend legal claims.

5. Right of information of recipients

If you have exercised your right to rectify, cancel or limit the processing with respect to the data controller, the data controller is obliged to notify all recipients to whom the personal data concerning you have been disclosed of this rectification or cancellation

or limitation of processing, unless this proves impossible or involves a disproportionate effort.

You have the right to be informed of these recipients by the data controller.

6. Right to transfer data

You have the right to receive the personal data concerning you that you have provided to the responsible party in a structured, common and machine-readable format. In addition, you have the right to transfer these data to another person in charge without being hindered by the person in charge to whom the personal data was provided, provided that

- a. the processing is based on a consent pursuant to Art. 6 (1) lit. a GDPR or Art. 6 (2) lit. a GDPR or on a contract pursuant to Art. 6 (1) lit. b GDPR and
- b. processing is carried out using automated procedures.

In exercising this right, you also have the right to request that the personal data concerning you be transferred directly by a person responsible to another person responsible, insofar as this is technically feasible. Freedoms and rights of other persons must not be affected by this.

The right to data transfer does not apply to the processing of personal data necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the person responsible.

7. Right of objection

You have the right, for reasons arising from your particular situation, to object at any time to the processing of your personal data on the basis of Art. 6 (1) lit. e or f GDPR; this also applies to profiling based on these provisions.

The person responsible will no longer process the personal data relating to you unless he can prove compelling grounds for processing worthy of protection which outweigh your interests, rights and freedoms, or the processing serves the assertion, exercise or defence of legal claims.

You may exercise your right to object to the use of information society services, notwithstanding Directive 2002/58/EC, by means of automated procedures using technical specifications.

8. Right to revoke the declaration of consent under data protection law

You have the right to revoke your declaration of consent under data protection law at any time. The revocation of your consent does not affect the legality of the processing carried out on the basis of your consent until you revoke it.

9. Automated decision in individual cases

You have the right not to be subject to a decision based solely on automated processing which has legal effect in relation to you or which significantly affects you in a similar manner. This shall not apply if the decision is made

- a. is necessary for the conclusion or performance of an agreement between you and the controller,
- b. is lawful under Union or Member State legislation to which the controller is subject and contains adequate measures to safeguard your rights and freedoms and your legitimate interests; or
- c. with your express consent.

However, these decisions may not be based on special categories of personal data pursuant to Art. 6 (1) GDPR, unless Art. 6 (2) lit. a or g applies and appropriate measures have been taken to protect the rights and freedoms as well as your legitimate interests.

With regard to the cases referred to in a. and c., the controller shall take appropriate measures to protect the rights and freedoms as well as your legitimate interests, including at least the right to obtain the intervention of a person on the part of the person responsible, to state his own position and to challenge the decision.

10. Right to appeal to a supervisory authority

Without prejudice to any other administrative or judicial remedy, you have the right to appeal to a supervisory authority, in particular in the Member State of your residence, place of work or alleged infringement, if you consider that the processing of your personal data is in breach of the GDPR.

The supervisory authority to which the complaint was submitted informs the complainant of the status and results of the complaint, including the possibility of a judicial remedy pursuant to Art. 78 GDPR.