PRIVACY POLICY

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1. Introduction

Mintellect Global Pte Ltd (Company Registration No. 202642103D) ("**Mintellect**", "**we**", "**our**", "**us**") is a company incorporated in Singapore and handles Personal Data in accordance with the Personal Data Protection Act 2012 of Singapore ("**PDPA**") and applicable regulations.

This Privacy Policy describes how we collect, use, disclose and protect Personal Data (as defined below) in connection with our brand and marketing agency business and our website.

Where the EU General Data Protection Regulation ("**GDPR**") or another data protection law applies to a particular activity (for example, where we offer our services to, or monitor the behaviour of, individuals in the European Union), we will also comply with its applicable requirements.

In this Privacy Policy:

Personal Data means data, whether true or not, about an individual who can be identified (a) from that data; or (b) from that data and other information to which the organisation has or is likely to have access.

Data Protection Officer means the person designated by Mintellect under section 11 of the PDPA, who is the contact person for questions and complaints about Mintellect's handling of Personal Data.

The latest Privacy Policy is published on our website at https://www.mintellectglobal.com and is available free of charge.

2. Personal Data we collect

We may collect Personal Data relevant to enquiries, our services and our business relationships, including:

- identification, professional and contact information, such as your name, job title, company name, address, email address and telephone number;
- information relating to your enquiries, business needs, projects and our communications with you;
- information required to establish, administer or fulfil a client, supplier or other business relationship, including billing and payment information where applicable;
- information provided in connection with a job application or engagement with us;
- technical and usage information collected through our website, where applicable; and
- any other Personal Data that you provide to us or that is reasonably necessary for the purposes described in this Privacy Policy.

We collect Personal Data about clients and prospective clients and their representatives; service providers and suppliers; job applicants, employees and contractors; individuals whose Personal Data is provided to us by clients or processed in connection with client projects,

including campaign audiences, leads and participants; and other people who contact or interact with us.

3. How we collect Personal Data, and our lawful basis

We generally collect Personal Data directly from you through our Website contact form, other forms, correspondence and interactions in the course of providing our services.

We may also collect Personal Data from third parties, such as your employer or colleagues, clients, electronic verification services, referrers, marketing agencies, business partners and other service providers, as well as from publicly available sources. Where we process Personal Data on behalf of a client, we generally receive it from the client or collect it in connection with the client's project, and process it in accordance with the client's instructions and applicable law.

If the Personal Data we request is not provided, we may be unable to respond to your enquiry or provide the relevant services.

In accordance with section 13 of the PDPA, we collect, use or disclose Personal Data with your consent (express or deemed) or where an exception under the PDPA applies. Depending on the circumstances, we may rely on an exception where the collection, use or disclosure is required or authorised by law, necessary for an investigation or proceedings, necessary to respond to an emergency, or permitted under the Legitimate Interests Exception following the assessment required by the PDPA.

Where the GDPR applies, we process Personal Data on one or more of the following legal bases: your consent; the performance of a contract with you, or steps taken at your request before entering into a contract; compliance with a legal obligation; or our legitimate interests (such as responding to enquiries, managing our business relationships, and operating and improving our services and Website), where those interests are not overridden by your interests or fundamental rights and freedoms. Where we rely on consent, you may withdraw it at any time, without affecting the lawfulness of processing carried out before its withdrawal.

In accordance with section 20 of the PDPA, we will notify you of the purposes for which we intend to collect, use or disclose your Personal Data on or before the relevant collection, use or disclosure, unless an exception under the PDPA applies.

4. Why we collect Personal Data

We use and disclose Personal Data for the following purposes:

- to provide our services and manage our relationships with clients, prospective clients, suppliers and other business contacts;
- to plan, deliver, manage and measure campaigns and other projects for clients, including processing Personal Data on their behalf where applicable;
- to respond to enquiries and communicate with you about our services, proposals, industry developments and matters relevant to our relationship with you;
- to consider concerns or complaints;
- to comply with applicable laws and regulatory obligations;

- where relevant, to conduct identity verification, due diligence, sanctions screening, fraud prevention, conflicts checks and other compliance and risk management activities;

- to manage recruitment and our relationships with employees and contractors;

- subject to your consent (express or deemed under the PDPA), or where otherwise permitted by law, to send you communications about our services, special offers or invitations to events;

- to maintain and improve our services and Website; and

- for any other purpose to which you have consented, or that is otherwise permitted or required by law.

We will use and disclose your Personal Data for the purposes for which it was collected, except where you have given consent to another purpose or the use or disclosure is otherwise permitted or required by law.

5. Who we share Personal Data with

We may disclose Personal Data, where relevant, to:

- a related entity of Mintellect;

- an agent, contractor or service provider we engage to carry out our functions and activities, including website hosting, cloud storage, IT, marketing platform, design and development providers, and our lawyers, accountants or other advisers;

- clients and project collaborators, where relevant to providing our services or carrying out an agreed project;

- organisations involved in a transfer or sale of all or part of our assets or business;

- organisations involved in managing payments, including payment service providers and financial institutions such as banks;

- identity verification, sanctions screening and similar electronic verification service providers, where relevant;

- regulatory bodies, government agencies, law enforcement bodies and courts; and

- anyone else to whom you authorise us to disclose it or where disclosure is required or permitted by law.

Where we disclose Personal Data to service providers acting on our behalf, we require them by contract to use the Personal Data only for authorised purposes, maintain a standard of protection comparable to that under the PDPA, and notify us promptly of any actual or suspected data breach.

6. Transfers outside Singapore

We may transfer Personal Data to recipients located outside Singapore. Where we do so, we comply with section 26 of the PDPA and the Transfer Limitation Obligation under the Personal Data Protection Regulations 2021, including by entering into written contracts containing data

protection terms, relying on intra-group binding corporate rules, or relying on another transfer mechanism recognised under applicable Singapore law.

Where the GDPR applies, we transfer Personal Data outside the European Economic Area only where the recipient country is the subject of an adequacy decision of the European Commission or appropriate safeguards are in place, such as the European Commission's standard contractual clauses. You may contact our Data Protection Officer for further information on these safeguards.

7. Security of Personal Data

In accordance with section 24 of the PDPA, we make reasonable security arrangements to protect Personal Data in our possession or under our control from unauthorised access, collection, use, disclosure, copying, modification or disposal, and against loss of storage media.

8. Cookies

Our website may use cookies, which are small text files transferred to your device when you visit a website. These may include cookies necessary for the website to function and, where used, non-essential cookies such as analytics, performance or marketing cookies. We will request your consent before placing non-essential cookies on your device where required by applicable law.

Where cookies collect or process Personal Data, we will handle that Personal Data in accordance with the PDPA and this Privacy Policy. We retain Personal Data collected through cookies only for as long as necessary for the purposes for which it was collected. You can use your browser settings to accept, refuse or delete cookies; if you do so, some features of our website may not be available.

9. Data breach notification

We have implemented procedures to detect, contain and respond to data breaches involving Personal Data. Where a data breach occurs that is likely to result in significant harm to affected individuals, or that is or is likely to be of a significant scale, we will notify the Personal Data Protection Commission, and, where the data breach is likely to result in significant harm to affected individuals, we will also notify those individuals, as required under Part 6A of the PDPA. Where the GDPR applies, we will also comply with its data breach notification requirements.

10. Direct marketing and Do Not Call

We use Personal Data for direct marketing with your consent (express or deemed under the PDPA) or where otherwise permitted by law. You may opt out at any time using the unsubscribe facility provided in a marketing message or by contacting our Data Protection Officer; we will give effect to your request within a reasonable period.

Before sending specified marketing messages to Singapore telephone numbers, we will comply with the applicable Do Not Call provisions of the PDPA, including relevant exemptions. Where we send unsolicited commercial electronic messages in bulk, we will comply with the Spam Control Act 2007 of Singapore.

11. Retention of Personal Data

In accordance with section 25 of the PDPA, we retain Personal Data only for as long as it is necessary for the purposes for which it was collected or for legal or business purposes, including maintaining project, contractual, financial and correspondence records. When Personal Data is no longer required, we securely destroy, anonymise or otherwise dispose of it.

12. National identifiers

We collect, use or disclose government-issued identifiers (such as NRIC, FIN, work pass numbers, passport numbers and driver's licence numbers) only where required by law or necessary to accurately establish or verify your identity to a high degree of fidelity, in accordance with the PDPA and the PDPC's guidelines on the use of national identification numbers.

13. Your rights — access, correction, withdrawal of consent

You may contact our Data Protection Officer to:

- **request access** to the Personal Data we hold about you and information about how it has been used or disclosed during the preceding year, subject to the PDPA's requirements and exceptions. We may verify your identity and charge a reasonable fee where permitted;

- **request correction** of inaccurate or incomplete Personal Data, subject to the PDPA's requirements and exceptions; and

- **withdraw consent**, with reasonable notice, to collection, use or disclosure of your Personal Data. We will inform you of the likely consequences and cease the relevant processing unless it is required or authorised by law.

Where the GDPR applies, you may also have the right to request erasure of your Personal Data, restriction of its processing or data portability, and to object to its processing (including processing for direct marketing purposes), in each case subject to the conditions and exceptions in the GDPR. Where another applicable data protection law gives you additional rights, you may contact us to exercise them.

Where we process your Personal Data on behalf of a client, we may refer your request to that client and will assist the client in responding to it where required.

14. Complaints and contact

If you have any questions about this Privacy Policy or wish to make a request or complaint about how we have handled your Personal Data, please contact:

Data Protection Officer

Mintellect Global Pte Ltd

138 Cecil Street, #13-02, Cecil Court, Singapore 069538

Email: info@mintellectglobal.com (please use the subject line “Data Protection”)

If you are not satisfied with our response, you may raise a concern with the Personal Data Protection Commission of Singapore at https://www.pdpc.gov.sg. Where the GDPR applies, you also have the right to lodge a complaint with a data protection supervisory authority, in particular in the EU Member State of your habitual residence, place of work or place of the alleged infringement.

15. Updates to this Privacy Policy

We will review this Privacy Policy from time to time to reflect changes in laws, technology and our operations. The current version will be published on our website. Where required by law, we will provide further notice or obtain consent for material changes to our handling of Personal Data.