

## **Data Protection Policy**

We at SolarPVExchange Pte Ltd take our responsibilities under the Personal Data Protection Act 2012 (the “**PDPA**”) seriously. We also recognize the importance of the personal data you have entrusted to us and believe that it is our responsibility to properly manage, protect and process your personal data.

This Data Protection Policy is designed to assist you in understanding how and why we collect, use and/or disclose the personal data you have provided to us, as well as to assist you in making an informed decision before providing us with any of your personal data.

If you, at any time, have any queries on this 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 (the “**DPO**”) at:

Mr Rob Khoo

[privacy@solarpvex.com](mailto:privacy@solarpvex.com)

tel: (65)6795-4465

### **1 WHAT IS PERSONAL DATA**

- 1.1 “Personal Data” is defined under the PDPA to mean data, whether true or not, about an individual who can be identified from that data, or from that data and other information to which an organization has or is likely to have access. Common examples of personal data could include names, identification numbers, contact information, home addresses, photographs and video images.
- 1.2 We will collect your personal data in accordance with the PDPA. In general, before we collect any personal data from you, we will notify you of the purposes for which your personal data may be collected, used and/or disclosed, as well as obtain your consent for the collection, use and/or disclosure of your personal data for the intended purposes.

### **2 THE INFORMATION WE COLLECT**

- 2.1 We use fair and proper means to collect your Personal Information (which means information about a living individual which can identify the specific individual by name, date of birth or other description contained in such information (including such information as will allow easy reference to other information and will thereby enable the identification of the specific individual) such as your name, date of birth, e-mail address, credit card information, shipping and billing address, etc.) to the extent necessary to achieve the purpose for use prescribed in this Privacy Policy.
- 2.2 We will automatically collect your IP address and referring website address, browser type, domain name and website access frequency. This information is intended to help facilitate your online experience on the Sites. We also use cookies to track usage patterns on the Sites as well as to offer other functionalities (such as screening for age and “recognizing” you to speed up your log-in when you visit the Sites). You can turn off cookies, but that will affect your online experience.

### 3 PURPOSES FOR COLLECTION, USE & DISCLOSURE OF PERSONAL DATA

3.1 The personal data which we collect from you may be collected, used and/or disclosed for the following purposes:

- (a) Registering and managing your SolarPVExchange account with us;
- (b) Providing you with a Sun Quote at your request;
- (c) Providing you with the SolarPVExchange solar marketplace service;
- (d) Responding to enquiries initiated and made by you;
- (e) Connecting you with an Initiator, Installer or Investor at your request;
- (f) Sending regular (updated) information on your solar PV project that you (as an initiator) have put up for installers to quote or for investors to “SunVest” (invest) in your solar PV project.
- (g) Sending regular (updated) information on solar PV project that you (as an installer) have quoted for.
- (h) Sending regular (updated) information on solar PV project that you (as an investor) have “SunVested” (invested) in.
- (i) Sending regular updates/news and events about SolarPVExchange. (Collectively, the “**Purposes**”)

3.2 As the purposes for which we may/will collect, use, disclose or process your personal data depend on the circumstances at hand, such purpose may not appear above. However, we will notify you of such other purpose at the time of obtaining your consent, unless processing of your personal data without your consent is permitted by the PDPA or by law.

3.3 In order to conduct our business operations more smoothly, we may also be disclosing the personal data you have provided to us to our third party service providers, agents and/or our affiliates or related corporations, which may be sited outside of Singapore, for one or more of the above-stated Purposes. This is because such third party service providers, agents and/or affiliates or related corporations would be processing your personal data on our behalf for one or more of the above-stated Purposes.

### 4 SPECIFIC ISSUES FOR THE DISCLOSURE OF PERSONAL DATA TO THIRD PARTIES

4.1 We respect the confidentiality of the personal data you have provided to us.

4.2 In that regard, we will not disclose any of your personal data to any third parties without first obtaining your expressed consent permitting us to do so. However, please note that in certain specific circumstances, we may disclose your personal data to third parties without first obtaining your consent. These specific circumstances set out in the PDPA. For more information on the exceptions, you are encouraged to peruse the Second, Third and Fourth Schedules of the PDPA which is publicly available at <http://statutes.agc.gov.sg>.

4.3 Where we disclose your personal data to third parties with your consent, we will endeavor to ensure that such third parties protect your personal data.

## 5 ADMINISTRATION AND MANAGEMENT OF PERSONAL DATA

- 5.1 We will take appropriate measures to keep your personal data accurate, complete and updated. 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 you not updating us of any changes in your personal data that you had initially provided us with.
- 5.2 We will also take commercially reasonable efforts to take appropriate precautions and preventive measures to ensure that your personal data is adequately protected and secured. Appropriate security arrangements will be taken to prevent any unauthorized access, collection, use, disclosure, copying, modification, leakage, loss, damage and/or alteration of your personal data. However, we cannot assume responsibility for any unauthorized use of your personal data by third parties, which are wholly attributable to factors beyond our control.
- 5.3 We will also take commercially reasonable efforts to ensure that the 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.
- 5.4 Where your personal data is to be transferred out of Singapore, we will comply with the PDPA in doing so. In this regard, this includes us obtaining your consent unless an exception under the PDPA or law applies, and taking appropriate steps to ascertain that the foreign recipient organisation of the personal data is bound by legally enforceable obligations to provide to the transferred personal data a standard of protection that is at least comparable to the protection under the Act. This may include us entering into an appropriate contract with the foreign recipient organisation dealing with the personal data transfer or permitting the personal data transfer without such a contract if the PDPA or law permits us to.

## 6 COMPLAINT PROCESS

- 6.1 If you have any complaint or grievance regarding about how we are handling your personal data or about how we are complying with the PDPA, we welcome you to contact us with your complaint or grievance.
- 6.2 Please contact us through one of the following methods with your complaint or grievance:  
Ms Jasmine Choong
- (a) Telephone number: 3150 8306.
- (b) E-mail: [privacy@solarpvex.com](mailto:privacy@solarpvex.com) Attention it to the 'Data Protection Officer'.
- (c) Office address: 18 Boon Lay Way,

Tradehub 21 #06-143,  
Singapore 609966  
Attention it to the 'Data Protection Officer'  
SolarPVExchange Pte Ltd: Office: 18 Boon Lay Way, Tradehub 21 #06-143, Singapore 609966  
[www.solarpvexchange.com](http://www.solarpvexchange.com) | Email: [enquiries@solarpvex.com](mailto:enquiries@solarpvex.com)

- 6.3 Where it is an email or a letter through which you are submitting a complaint, your indication at the subject header that it is a PDPA complaint would assist us in attending to your complaint speedily by passing it on to the relevant staff in our Company to handle. For example, you could insert the subject header as “**PDPA Complaint**”.
- 6.4 We will certainly strive to deal with any complaint or grievance that you may have speedily and fairly.

## **7 UPDATES ON DATA PROTECTION POLICY**

- 7.1 As part of our efforts to ensure that we properly manage, protect and process your personal data, we will be reviewing our policies, procedures and processes from time to time.
- 7.2 We reserve the right to amend the terms of this Data Protection Policy at our absolute discretion. Any amended Data Protection Policy will be posted on our website and can be viewed at [www.solarpvexchange.com](http://www.solarpvexchange.com).
- 7.3 You are encouraged to visit the above website from time to time to ensure that you are well informed of our latest policies in relation to personal data protection.

*Last Updated on 20 May 2016*