

Next Opus Ventures LLP

Privacy Policy

This Privacy Policy is provided to explain how Next Opus Ventures LLP (the “**Company**”), its subsidiaries and affiliates (collectively, the “**Group**”) collect, use and/or disclose your personal data in accordance with the Personal Data Protection Act 2012 (the “**PDPA**”).

By providing your personal data on the Company’s websites, you are deemed to have consented to the collection, use and disclosure of your personal data pursuant to this Privacy Policy.

Please note that this Privacy Policy complements, and does not limit or replace, the purposes for which you provide the Group with your personal data which may be expressly stated in any form for submission of personal data to the Group.

1. Personal Data

You hereby agree that the Company may collect, store, process, disclose, access, review and/or use personal data (including sensitive personal data) about you, whether obtained from you or from other sources, for the purposes set out below and/or any other administrative or operational purposes and/or the purpose of managing your relationship as a member of the community at the Company’s websites, including DaringAwards.org (the “**Community**”):-

- (i) providing services to you in relation to your membership in the Community, including services provided by the Group;
- (ii) enabling your use of the services which the Group provides, including, where necessary, contacting you (whether by SMS, email or otherwise);
- (iii) dealing with enquiries made by you;
- (iv) maintenance and updating of the personal data;
- (v) statistical analysis;
- (vi) administrative or operational purposes;
- (vii) tax filing preparation;
- (viii) processing credit notes and processing refunds;
- (ix) collection of fees, charges and expenses for services provided;
- (x) verification and identification purposes;
- (xi) facilitating the making and payment of claims, including payments by cheque, bank transfers or other means;
- (xii) carrying out billing, accounting, auditing and the maintenance of proper book-keeping to explain the Group’s operations and business; and/or
- (xiii) the disclosure of the relevant books, documents, records and information (in hard or soft copy) to the auditors for the preparation of financial reports.

2. Data Quality

The Company will take reasonable steps to make sure that the personal data it collects, uses or discloses is accurate, complete and up to date.

3. Data Security

The Company will take reasonable steps to protect the personal data it holds from misuse and loss and from unauthorized access, modification or disclosure.

4. Withdrawal of Consent

You may withdraw the consent that you provide for the collection, use and disclosure of your personal data by contacting the Designated Person at any time.

Upon receipt of your written request to withdraw your consent, the Company may require reasonable time (depending on the complexity of the request and its impact on our relationship with you as a member of the Community) for your request to be processed and for us to notify you of the consequences regarding the same. In general, we shall seek to process your request within fourteen (14) business days of receiving it.

5. Access and Correction

You are entitled to have access to the personal data about you that is in the possession or under the control of the Company and information about the ways in which the personal data has been or may have been used or disclosed within a year before the date of the request. This can be done by you making a written application to the Designated Person (as defined below) requesting for any such information. The Company reserves the right to charge a fee (representing its costs in administering your request) for supplying such information and to refuse requests which, in its opinion, occur with unreasonable frequency.

The Company will also, where you have requested that it correct an error or omission in the personal data about you that is kept with the Company, correct such data as soon as practicable and send the corrected personal data to every organisation to which the personal data was sent before it had been corrected, if applicable, unless that organisation does not need the corrected personal data for any legal or business purpose.

The Company may however choose not to provide you with access to or correct such information, in accordance with the exceptions under the PDPA. This would include cases where:

- (i) The Company is satisfied on reasonable grounds that the correction should not be made;
- (ii) The request for access is frivolous or vexatious or the information requested is trivial;
- (iii) The personal data is related to a prosecution and all the proceedings related to the prosecution have not been completed;
- (iv) The personal data, if disclosed, would reveal confidential commercial information that could, in the opinion of a reasonable person, harm the competitive position of the organisation; and
- (v) The personal data was collected, used or disclosed for the purposes of an investigation and associated proceedings and appeals have not been completed.

6. Retention of Personal Data

The Company will store your personal data only for as long as necessary to fulfil the purposes for which such personal data was collected, or as required or permitted by applicable laws. If the retention of your personal data is no longer necessary for those purposes, or retention is no longer necessary for any legal or business purpose, the Company will cease to retain your personal data or anonymise the personal data.

7. Transborder Data Flows

The Company will not transfer your personal data to a country or territory outside Singapore, except as specified in this Privacy Policy. In becoming a member of the Community, you understand, acknowledge and consent to the transfer of your personal data out of Singapore where it is necessary for the purposes set out at paragraph 1 above.

If your personal data is transferred out of Singapore, the Company will take appropriate steps to ensure that the recipients thereof are bound by legally enforceable obligations (such as laws, contracts, binding corporate rules or any other legally binding instrument), so that your personal data continues to receive a standard of protection that is at least comparable to that provided under the PDPA.

8. Updates to this Privacy Policy

The Company may change this Privacy Policy from time to time, so it is advisable to review it frequently. You are deemed to have consented to any and all changes to this Privacy Policy from the date such changes are published online.

9. No Rights or Obligations Created

The Company will make all reasonable efforts to store personal data collected by us in a secure server and/or secure files and keep such information accurate and up-to-date. However, please note that the internet is not a secure medium for the transmission of information. As such, we cannot accept responsibility for, warrant or guarantee the security of information you send to or receive from us over the internet. To the fullest extent allowed by law, we disclaim any responsibility or liability for any unauthorized access to the server or files or otherwise.

10. Enquiries and Complaints

The Company has designated the person whose details are set out below as the person ("**Designated Person**") who will be responsible for ensuring the Company's compliance with applicable data protection laws. If you have any queries or requests or wish to make any applications concerning your personal information or data, please contact the Designated Person :-

[Contact Details of Designated Person]