

# PIERIAN SINGAPORE PTE LLPPRIVACY POLICY







#### Introduction

This Privacy Policy applies to all our customers as well as Website visitors. This Privacy Policy describes how Pierian Singapore Pte. Ltd. ("Pierian", "us", "we") collects, receives, uses, and discloses information and what choices you have with respect to the information.

#### Services

It is Pierian Singapore Pte. Ltd.'s policy to respect your privacy regarding any information we may receive or collect while using our websites, processing and digital transformation services and analytics platforms, collectively called 'Services'.

It applies to:

individuals with whom we may have had contact for business purposes, either on our own account or on behalf of third parties or organizations

- individuals who are employed by or otherwise associated with us suppliers, vendors, or professional advisors
- individuals with whom we have contact during a recruitment process; and
- individuals who have opted to receive communications from Pierian Singapore Pte. Ltd.

This Privacy Policy applies when you use our Services.

#### Data Controller and Data Processor

We process following types of personal data:

**Customer Data –** Personal data that forms part of data that is provided by our customers and their end-users for obtaining our services.

**Other Data -** Personal data about our customers, visitors, and other individuals that is collected and processed directly by us.

Our Customers are the controller of 'Customer Data'. Pierian Singapore Pte. Ltd. is the processor of 'Customer Data' and the controller of 'Other Data'.

#### Information We Collect

**Customer Data -** As customers, you provide data to us for processing as part of the usage of our services.

Data received for business process management or digital enablement.

PIERIAN SERVICE's customer organizations share personal data for managing their or their customer organization's business processes such as payroll, accounting, academy admission process etc.



**Customer Support data -** As customers, you may contact us for support through our 'Helpdesk' facility.

Your data (Name, Business Email Id, your organization's name) is required to log support requests in our helpdesk.

Other Data - We also collect data when you use our applications and websites.

**Log Data –** We use the following data collected as part of the logs

- Google Analytics services to analyse our Website traffic.
- Google's crash reporting service through which we get details of the crash, device and user id associated with the crash
- Logs for usage of the custom-built platforms

**Get in touch Form Data -** Data captured through 'Get in touch' form on the Website When you enquire about our products and services, we collect and store this data to communicate with you and respond to your enquiry. This includes your name, organization, and email.

#### How We Use Your Data

How we use your personal data will depend on which Services you use and how you use those Services.

**Customer Data -** It is used in accordance with the Customer's instructions, including any applicable terms in the Customer Agreement and as required by applicable law. We are a processor or sub-processor of 'Customer Data' and the Customer organization is the controller or processor.

- We only process 'Customer Data' on behalf of our customers and in accordance with their instructions provided in the applicable Services agreement with us. We use the data to provide services as per the service agreement. We are recipients of data in this context, and we use such data only for the underlying purpose as aforesaid.
- To send emails and other communications. We may send you service and operationsrelated emails. We may also contact you to inform you about changes in our Services and our Services offerings. These communications are considered part of the Services.
- For any other purpose as provided for in the Services Agreement between us and the customer or as otherwise authorized by the customer.

**Other Data** - It is used by us to communicate with you by responding to your requests, comments, and questions.



- We may send you service-related messages or marketing / promotional materials. You
  may choose to restrict the collection or use of your personal information.
- We will update you with improvements in our services, and new features and from time
  to time also carry out direct marketing of our products and services. Direct marketing is
  carried out only if you consent to receive such communication from us.

## Lawful Basis for Processing

We have lawful bases to process your personal data. We also use your consent as a basis for lawfully processing your personal data. We process your personal data only when we have a lawful basis.

**Consent -** We process your data only if you have given your consent freely for the same. Where you have consented to a particular processing, you have a right to withdraw the consent at any time. You may withdraw consent by contacting us with a request using the details set out in the "Contact Information" section below.

**Contractual necessity -** We process your personal data only when it is necessary for the performance of a contract. For example, if the processing is necessary in order to fulfill our commitments under the applicable terms of service. Presently, we use the Performance of Contract (i.e., to deliver the services to our customers).

**Legal Obligation -** We process your data only if the use of your information is necessary for compliance with a legal obligation.

**Legitimate Interest -** We process your data on the grounds of legitimate interest for example to provide our services, to occasionally send marketing information like updates on products and services, and to monitor the performance of the products/services.

## Our Policy Towards Children

The Sites and Services do not knowingly collect personal information from users under the age of 16. If you are under the age of 16, you are not permitted to use the Sites and Services or to disclose Personal Information. If we learn we have collected or received Personal Information from a child under 16, we will delete that information. If you believe we might have any information



about or about a child under 16, please contact us using the details in the Contact information section of this notice.

#### Retention of Personal Information

We will retain your personal information for as long as is needed to fulfil the purposes outlined in this Privacy Policy, unless a longer retention period is required or permitted by law (such as tax, accounting or other legal requirements).

**Customer Data -** We will retain 'Customer Data' in accordance with a customer's instructions, including any applicable terms in the Customer Agreement and as required by applicable law. When you decide to stop using our services, we delete all personal information about you.

**Other Data -** We retain your information for as long as necessary for the purposes that we have described in this policy.

## Who would we disclose your information to and why

Your data will be shared with other recipients in order to provide you with services.

'Customer Data' will be processed as per the agreed scope of work and SLAs agreed with our customers who share the data with us as aforesaid. It may so happen that we may use certain third-party applications and tools for rendering such services. We exercise adequate safeguards whilst doing this, and we have data processing agreements that outline the safeguards that need to be exercised by the owners of such third-party applications and also limit the terms of usage of the data shared.

While we aim to limit the sharing of your data, at times, it is necessary to share your data with certain service providers. Examples of when and for what purpose your data is shared include data center/hosting services, HRMS services, etc.

The following categories of recipients will most likely receive your data in order for us to provide services to you.

Third Party Data Center Services



Third Party platforms to deliver our services, such as payroll and account processing.

We have data processing agreements with all third-party processors for implementing adequate controls for safeguarding your data and using it only for the purpose for which data is shared with them.

We remain accountable and liable for data shared with third parties.

**To Comply with Laws -** If we receive a request for information, we may disclose if we reasonably believe disclosure is in accordance with or required by any applicable law, regulation, or legal process.

#### Cross-Border Data Transfers

Your Personal data may be transferred to and maintained on, computers located outside of your state, province, country, or other governmental jurisdiction where the privacy laws are different from the laws of your country.

Your data may be stored on Cloud Platforms as per agreements signed with the Service Providers. We have taken care to ensure that such Service Providers are already compliant with all applicable regulations.

These international transfers of your personal information are made pursuant to the appropriate safeguards such as the standard data protection clauses adopted by the country.

We offer contractual clauses as may be applicable on a customer-by-customer basis and where the customer is located in a certain geography, such clauses take into account the requirements of local laws in such geographies.

## Security Measures to Protect Your Data

**Security Measures -** We implement security controls to prevent breaches and unauthorised access to your data.

We maintain reasonable and appropriate security measures to protect 'Customer Data' from loss, misuse, unauthorized access, disclosure, alteration, and destruction.

Examples of security measures include encryption of the data at rest and while transferring, restricted, role-based physical access as well as access to the data, monitoring for threats and vulnerabilities, periodic backup, etc.

Security controls for our applications are customized based on our customer's requirements.



**Protection of personal information -** We take all measures reasonably necessary to protect against the unauthorized access, use, alteration or destruction of potentially personally-identifying and personally-identifying information.

## Your Rights

We act as a data processor or data sub-processor for 'Customer Data' and data controller for the data collected through its website.

Wherever we are a data processor or data sub-processor, We will respond only to the data controller's request with respect to exercising data subject rights and will not receive any direct requests from data subjects.

Wherever we are a data controller, we strive to give you ways to access, update/modify your data quickly or to delete it unless we have to keep that information for legal purposes.

These rights can be exercised by contacting us using the details set out in the "Contact Information" section below.

**The Right to Access -** You have the right to access personal data and supplementary information. You can ask us for a copy of your personal information.

The Right to Rectification/Correction - You can ask us to change, update or fix your data in certain cases, particularly if it is inaccurate.

#### Contact Information

Please feel free to contact Asset Vantage if you have any questions or concerns about this Privacy Policy or data processing or if you are seeking to exercise any of your statutory rights.

You may contact us at <a href="mailto:info[at]pierianservices[dot]com">info[at]pierianservices[dot]com</a>

### Changes to Privacy Policy

Any information that we collect is subject to the privacy policy in effect at the time that Information is collected.



We may, however, modify and revise this Privacy Policy from time to time. If we make any material changes to this Privacy Policy, we will notify you of those changes by posting them on the Services or by sending you an email or other notification at our sole discretion, and we'll indicate when those changes will become effective.

