









SINGAPORE PRIVACY NOTICE – CUSTOMERS

This Privacy Policy (“Policy”), pursuant to art. 20 of Personal Data Protection Act of Singapore 2012 (the ‘**PDPA**’), as amended by Personal Data Protection (Amendment) Bill 2020 (the Amendment Bill); and Personal Data Protection Regulations 2021 (PDPR), sets out how **Boffi Singapore Pte. Ltd** (“Company,” “we,” “us,” or “our”) collects, use and share your personal information and the basis on which we process your personal information. Please read the following carefully to understand our practices regarding your personal information and how we will treat it. By entering in a contract or precontract with us and by providing your Personal Information to us you acknowledge you have read, understand the terms of this Policy and you allow the Company to transfer, store or process your Personal Information pursuant to this Policy.



	WHO COLLECT AND PROCESS YOUR PERSONAL DATA? HOW CAN YOU CONTACT HIM? BOFFI SINGAPORE PTE LTD , with registered office in 123 Penang #01-13 Regency House, Singapore 238465, in person of its legal representative. Contact details: t. +65 9654 5209 - email: boffi_singapore@resguard-solutions.com
	DATA PROTECTION OFFICER (DPO) The DPO has been appointed in accordance with Article 11(3) of PDPA. You can reach our DPO, by writing to the DPO's contact email: boffi_singapore@resguard-solutions.com





We will only collect, use or disclose personal data about you, only for purposes that a reasonable person would consider appropriate for the circumstances below indicated and that we notify you with this policy (art. 18 and 20):

 PURPOSES FOR THE COLLECTION, USE OR DISCLOSURE	 LEGAL JUSTIFICATIONS	 HOW LONG DO WE RETAIN YOUR PERSONAL INFORMATION? DATA RETENTION
A) To perform a contract we have entered into or are trying to enter into with you (contractual and precontractual obligations) and to comply with legal requirements and obligations to which we are subject (legal obligations and administrative/accounting purposes relate to the execution or the ceasing of contract). We collect or use your information to provide services and goods, including delivery; to comply with the operation of customer accounts and guarantees; for dealing your requests (queries, complaints or claims); to communicate with you.	Art. 15 e 15A (PDPA) Art. 17 (PDPA) The process is necessary to: perform a contract or fulfill a contract entered into with you and to comply with applicable legal and regulatory obligations. You voluntarily provide the personal data to our organisation.	We will only retain your personal information for as long as reasonably necessary to fulfil the purposes for which we collected it, including to meet any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal information for a longer period in the event of a complaint or if we reasonably believe that there is a prospect of litigation concerning our relationship
B) Management of legal aspects relating to our defence in case of precontractual or contractual disputes judgment	Art. 17 (PDPA) The process is necessary for us to exercise and enforce our rights or in defense of legal claims.	

 PURPOSES FOR THE COLLECTION, USE OR DISCLOSURE	 LEGAL JUSTIFICATIONS	 HOW LONG DO WE RETAIN YOUR PERSONAL INFORMATION? DATA RETENTION
C) Management of your requests and choices about your personal information collect, use and disclose by us (data rights pursuant to art. 16, 20, 21, 22, 26 of PDPA)	Art. 15 e 15A (PDPA) Art. 17 (PDPA) The process is necessary to comply with applicable legal and regulatory obligations	

If you need details of the specific circumstance and business or commercial purposes process your personal data, please contact our DPO boffi_singapore@resguard-solutions.com

	<p>WHO WE SHARE INFORMATION WITH</p> <p>We don't sell our customers' personal information to others. For the purposes listed above, we may disclose your personal data to:</p> <ul style="list-style-type: none"> ❓ Our affiliated companies, group companies (including holding company) and business partners in the supply chain; ❓ Service providers and Contractors, including those who provide IT and telecommunications services in connection with e-mails boxes, services, websites, platforms and other professional services such as consulting services (such as professional or legal advisors and consultants; firms or Companies in the context of tax assistance and consultancy as well as administrative/accounting management relationships; business information companies evaluating solvency and payment habits and/or relating to debt collection) ❓ Banks; ❓ External auditors or inspectors; ❓ Subjects providing Audits or other certifications; ❓ Organisations and Public bodies we're legally obliged to share personal information with; ❓ Competent authorities for compliance with legal obligations and V or provisions of public bodies, upon request. <p>We do not allow our third-party service providers to use your personal data for their own purposes and only allow them to process your personal data for specific purposes and in accordance with our instructions. We require all third parties to implement and maintain commercially reasonable technical, organizational, and administrative measures to protect the security of your personal information and to treat it in accordance with the law. In the event of a merger or sale of business or assets, we may disclose your personal information to third parties to whom we may choose to sell, transfer or merge a portion of our business or assets. We may also seek to acquire or merge with other businesses. If there is a change in our business, the new owners will be able to use your personal data in the same way as set out in this privacy policy. You will notify if the new owner uses your personal data differently. We may disclose your personal information if we are required to do so by law enforcement, or if we are otherwise under a legal obligation to make the disclosure. We may also disclose personal information if it is necessary to comply with the law or to protect the rights, property, and safety of Elevate, our users, and others.</p> <p>If you need more details about the disclosure of your personal data or the subjects to whom we may disclose your personal data with, please contact our DPO boffi_singapore@resguard-solutions.com</p>
	<p>TRANSFER OF YOUR PERSONAL DATA</p> <p>Boffi Singapore Pte. Ltd a corporation located in Singapore with related companies in Europe and the holding Company in Italy.</p> <p>We may transfer your personal data to countries outside of Singapore for the purposes described in this Privacy Notice. In particular, your personal data may be stored on external servers located in other jurisdictions or may be transferred internationally where it is necessary to share your personal data with our related corporations, business units, and third-party service providers. However, if we do so, we will take steps to ensure that your personal data continues to receive a standard of protection that is at least comparable to that provided under the</p>

	<p>PDPA.</p> <p>In particular, your personal data, collected for the purposes above indicated, may be transferred to (art. 26): Organisation name: Boffi s.p.a. Category of recipient: Company of the Group (holding) Country the personal information is sent to: Italy. Here your personal information is safe because the EU GDPR applies. Companies of the Group have regulated data transfers through the SCC (Standard Contractual Clauses).</p> <p>For further information or to obtain a copy of the appropriate safeguard for any of the transfers above indicated, please contact us by writing an email to boffi_singapore@resguard-solutions.com</p>
	<p>YOUR RIGHTS ABOUT PERSONAL DATA</p> <p>Under the PDPA, you have the following rights:</p> <ul style="list-style-type: none"><input type="checkbox"/> Right to request access to your personal data (art. 21);<input type="checkbox"/> Right to request corrections to inaccurate or incomplete personal data (art. 22);<input type="checkbox"/> When requested, right to withdraw consent at any time, subject to legal or contractual restrictions (art. 16);<input type="checkbox"/> When applicable, right to portability of personal data (art. 26 H – 26 L) <p>To exercise the your rights or for assistance with any of these rights or for further inquiries, please contact our Data Protection Officer (DPO) in writing via email: boffi_singapore@resguard-solutions.com</p>
	<p>HOW TO COMPLAIN</p> <p>You have the right to lodge a complaint with the Personal Data Protection Commission (PDPC) if you believe that your personal data has been mismanaged, in accordance with the rules and procedures set by the PDPC. You can find more information through the PDPC's official website https://www.pdpc.gov.sg/.</p>
	<p>SECURITY (art. 24)</p> <p>We protect your personal data in our possession or under our control, by using reasonable security arrangements, both technical and organizational, to prevent unauthorised access, collection, use, disclosure, copying, modification or disposal, or similar risks and the loss of any storage medium or device on which personal data is stored.</p>
	<p>We reserve the right to change this Policy. When we do, we will also revise the "Last Review" at the bottom of this Policy. Any changes we may make to this Policy will be effective upon being posted on this page. We encourage you to periodically review this Policy to keep up to date on how we are handling your Personal Information.</p>

BOFFI SINGAPORE PTE. LTD