

Intage Data Protection Policy

Our Promise to Protect Your Personal Data

As leaders in the market research industry, Intage Singapore Pte. Ltd. (collectively, “**Intage SG**”, “**we**”, “**us**”, “**our**” or similar expression) takes its responsibility to protect personal data seriously. Your privacy is important to Intage SG and we are committed to complying with applicable law, including the Personal Data Protection Act 2012 of Singapore (the “**PDPA**”).

Section 1: Introduction – About this DPP

1. The purpose of this document (“**Data Protection Policy**”, or “**DPP**”) is to inform you of how Intage SG collects, uses, discloses, processes or otherwise handles (“**Handles**”¹) your personal data, and to let you know how you can exercise your rights in respect of your personal data.

This is the full DPP

2. You may have seen or been referred to shorter summaries of this DPP which were formatted and edited to meet specific purposes, formats or to provide an easy-at-a-glance look at the key or relevant points of the DPP. This is the full DPP and is the authoritative statement of our policy on the handling of personal data.
3. The portion of the DPP that applies to your personal data will depend on the nature of your transactions, agreements or interactions with us.
4. Please note that though we make an effort, as per legal requirements, to provide reasonably adequate information concerning our policies as it pertains to personal data, this DPP is not an exhaustive list of all the situations or scenarios concerning personal data. Feel free to approach Intage SG’s Data Protection Officer (see **Contacting Us – Withdrawal of Consent, Access and Correction of your Personal Data** below) if you need clarification about any specific situation.

We update the DPP from time to time - this version of the DPP was last updated as at 1st Sep 2025.

5. We update the DPP from time to time to ensure that our standards and practices remain relevant, are up to date, comply with applicable laws and guidelines, and remain applicable to industry trends. The latest version of the DPP supersedes and replaces the earlier versions.
6. The public website at www.intage.sg/pages/privacy contains the latest links and most updated editions of the DPP or resources.
7. We encourage and ask all individuals who interact with Intage SG, including any person to whom personal data relates (each a “**data subject**”) to check back to the publicly posted / circulated copies of the DPP.

How this DPP becomes a part of your journey with us

8. The DPP is an integral part of your journey with us. It applies to and forms part of the terms and conditions governing your transactions, agreements or interactions with us, whenever your personal data is Handled by us.

¹ And related expressions “**Handle**”, “**Handled**”, “**Handling**”

9. We bring it to your attention and make it a part of or complementary to your transactions, agreements or interactions with us, in addition to the website and making the copies of this DPP available as mentioned above, by:
 - a. making the DPP available or issuing / providing the DPP to you (or your authorised representatives) upon their first interaction as client, vendor, employee or volunteer following the publication of the DPP;
 - b. making the DPP available upon request;
 - c. including a reference to the DPP in applicable documents / recordings or other media including, generally for all data subjects, agreements, documents, and various forms (e.g. consent forms, data collection forms, feedback forms, application forms, questionnaires, surveys, and any other forms etc.) which may be given to you in the course of your interaction with us.
10. The DPP, having been brought to your attention, becomes binding by your taking any of the following steps:
 - a. proceeding with your transactions, agreements or interactions with us;
 - b. submitting information to us via forms or other data collection means or processes (whether through a form, an interview, undergoing examinations or by other means);
 - c. signing up, applying for, using or attending, as applicable any of our e-marketing platforms, ad-hoc research programmes, mystery shopper programmes, online surveys, location tests, product use tests, focus group sessions and/or depth interviews ("**Our Programmes**");
 - d. attending at our premises for visits;
 - e. interacting with our websites, electronic forms;
 - f. calling or sending messages to us;
 - g. transacting with us, or undergoing any process with us; and
 - h. other means.

Your other / specific agreements

11. This DPP supplements but does not supersede nor replace any other consents you may have previously or specifically provided to Intage SG or any of its applicable related corporations, affiliates and subsidiaries, including Intage Holdings Inc. ("**Intage HQ**"), hereinafter collectively referred to as "**Intage Group Affiliates**", in respect of your personal data, and your consents here are in addition to any consents by you or rights given at law to any of the Intage Group Affiliates to Handle your personal data.

Who will comply with this DPP

12. We ask and require that each of the following parties / persons to abide by this DPP:
 - a. Intage SG;
 - b. all Intage SG employees;
 - c. all volunteers and participants in Our Programmes;
 - d. third parties (including third party partners, service providers, or affiliates) whom we work with and who have agreed to abide by this DPP.

About the PDPA

13. Intage SG is subject to the PDPA, as well as specific legislation or regulations concerning relevant transactions, agreements or interactions with us. More information about the PDPA can be found at the website of the Personal Data Protection Commission ("**PDPC**") at www.pdpc.gov.sg.

Other Legislation

14. The PDPA is a baseline law that ensures a common standard of protection for individuals' personal data across organisations in Singapore.

Section 2: Your personal data

What kind of data will this DPP apply to

15. This DPP applies to "personal data", which, in this DPP and in line with the PDPA, refers to any data, whether true or not, about an individual (i.e. the data subject) who can be identified (a) from that data; or (b) from that data and other information to which we have or are likely to have access to, including data in our records as may be updated from time to time.
16. The exact type of personal data that may apply in your case will vary depending on the how you have interacted with us. Examples of such personal data you may provide to us include (depending on the nature of your interaction with us) your name, NRIC, passport or other identification number, telephone number(s), mailing address, email address, location data, photographs, audio recordings and/or video recordings of you, and any other information relating to any individuals which you have provided us in any forms you may have submitted to us (including in the form of biometric data), or via other forms of interaction with you.
17. NRIC, passport and other state issued numbers (national identification numbers, or "**NIN**") may be requested for and, if so requested, are Handled in accordance with applicable PDPA guidelines. NIN Handling is necessary where the establishment of identity to a high degree of fidelity is needed.

What is not personal data

18. Personal data does not include data about a data subject which has been anonymised. Anonymisation is the process of removing identifying information such that the remaining data does not identify any particular individual. Techniques can include pseudonymisation², aggregation, replacement, data reduction³, data suppression⁴, data shuffling⁵, or masking⁶.

Section 3: Consent

What this DPP enables you and us to do

19. By applying this DPP, you:
 - a. consent to Intage SG and the relevant person(s) (see "**Who will comply with this DPP**" above) Handling your personal data in ways which enable us to serve you, provide you with the relevant services, attend to the relevant transaction, or to facilitate our interactions with you;

² Replacing identifiers with other references. For example, replacing an individual's name with a tag or reference number.

³ Removing values that are not required for the purpose. For example, removing 'Ethnicity' from a data set of individuals' attributes.

⁴ Banding or hiding the value within a given range. For example, replacing age '43' with the range '40-50'.

⁵ Mixing up or replacing values with those of the same type so that the information looks similar but is unrelated to the actual details. For example, the surnames in a customer database could be sanitised by replacing them with those drawn from another database.

⁶ Removing certain details while preserving the look and feel of the data. For example, representing a full string of numbers on a credit card as 4346 XXXX XXXX 5379 instead of '4346 6454 0020 5379'.

- b. enable the exercise of your rights under the PDPA in an operative and applicable framework, including securing the right to access your personal data, withdraw (or manage) your consents and preferences as to your personal data.
- 20. Your consent may not be necessary or required in some situations as there may be applicable law or regulation which renders this unnecessary, or where certain permissions or rights or duties have been accorded to Intage SG which enable / require us to Handle the personal data. Where such law or regulation applies, we will act in accordance with those other laws and regulations.

Withholding / Withdrawing Consent

- 21. You are entitled under applicable law to withhold / withdraw consent to the collection, use or disclosure of personal data, and Intage SG will respect your choices in this regard. You may withhold consent at any juncture that you are asked for consent, and you may also apply the process / method to withdraw consent as stated in this DPP (see **Contacting Us – Withdrawal of Consent, Access and Correction of your Personal Data** below).
- 22. However, as is recognised by and provided for under the PDPA, it may be that any choice you make to withhold or withdraw consent may impact our ability to proceed with your transactions, agreements or interactions with us, and in particular:
 - a. in some cases, it may also become unsafe or unlawful for us to transact or interact (or continue to transact or interact) with you without the ability to collect, use or disclose personal data;
 - b. it may not be possible, without undue risk, cost or liability to Intage SG, to proceed with a particular transaction, agreement or interaction with you, and we may be left with no choice but to cease or refrain from the same.
- 23. Intage SG will take the approach that best safeguards us, you and others from risks, and we may well have no choice but to decline to proceed with the transaction, agreement or interaction in question to avoid causing harm or exposing us, you or others to risk.
- 24. At the same time, it should be noted that your withholding / withdrawal of consent will not prevent us from exercising our legal rights (including any remedies, or undertaking any steps as we may be entitled to at law).

Section 4: Collection of Personal Data

How we collect personal data

- 25. Generally, depending on the situation, we may collect personal data in the following ways:
 - a. when you submit any form, including but not limited to consent forms pursuant to your participation in Our Programmes;
 - b. when you undergo any of Our Programmes where photographs, audio recordings, video recordings or location data, etc. are provided (whether as a participant or volunteer etc. of our tests, research, mystery shopper and other programmes), such that this is linked with other data in any way such that you can be identified;
 - c. when you interact with our staff, including customer service officers, research personnel, and other representatives etc. via telephone calls (which may be recorded), letters, fax, face-to-face meetings and email;

- d. when your images and/or audio are captured by our CCTV cameras while you are within our premises, or by audio, photographs or videos taken by us or our representatives when you attend events hosted by us;
- e. when you present yourself and/or submit identification documents at our premises, in which event we may take a photo or image capture of the same for display and retrieval at front counter, concierge or service counters;
- f. when you attend Intage SG's events (e.g. public forums and corporate events) and your voice and image data is captured on our audio and video recordings;
- g. when you use our services provided through online and other technology platforms, such as kiosks, websites and apps, including through the use of any online platforms / technologies or tools (e.g., web portals, e-marketing platforms, security tokens, biometric technologies);
- h. when you are contacted by, and respond to, our customer service officers, research personnel, representatives, agents and other service providers;
- i. when you make payment or provide details to facilitate payment
- j. when you browse any Intage SG website (you generally do so anonymously but please see the section below on cookies), and you provide such information or login with your account credentials;
- k. from publicly available sources including public social media or information you make available to the public; and
- l. when you submit your personal data to us for any other reasons.

Collection of personal data about you from third parties, & collection of data about third parties from you

26. We may also collect personal data about you from third parties such as:
- a. your representatives / intermediaries / agents or your next-of-kin who may either be doing so on your behalf, or in connection with their own transactions, agreements or interactions with us (in which event we will endeavour to collect only such personal data as may be relevant);
 - b. your employers; and
 - c. your service providers (e.g. your insurers, your bank, etc.).
27. If you provide us with any Personal Data relating to a third party (e.g. information of your next-of-kin, spouse, children, parents, and/or employees), by submitting such information to us, we rely on you and will assume that you are representing to us that you have obtained the consent from the third party to provide us with their personal data for the respective purpose for which we are collecting this personal data.

Accuracy of personal data we collect from you

28. We also rely on you and will assume that you have ensured that all personal data submitted to us is complete, accurate, true and correct.

Risks of relying on data we collect from you that is without consent or which is inaccurate

29. If consents are not procured or if you fail to provide us with complete and accurate information, we may, in some situations, be prevented from responding to or fulfilling your request, or from engaging you as a participant or volunteer of Our Programmes.
30. Intage SG will take the approach that best safeguards us, you and others from risks, and we may well have no choice but to decline to proceed with the transaction, agreement or interaction in question to avoid causing harm or exposing us, you or others to risk.

How much personal data we collect

31. Intage SG will endeavour to limit the collection of personal data to what is reasonable or necessary for such applicable purposes as described in this DPP.

Withholding information

32. If you withhold information, this can have the same effect as when you withdraw consent (see **"Withholding / Withdrawing Consent"** above), and as stated in the **"Risks of relying on data we collect from you that is without consent or which is inaccurate"** section above, we may well have no choice but to decline to proceed with the transaction, agreement or interaction in question to avoid causing harm or exposing us, you or others to risk.

Section 5: Why we Handle Your Personal Data (i.e. the "Purposes") & to Whom We Disclose It to

33. **Generally**, Intage SG Handles your personal data for the purposes set out in this section. Any one or more of the listed purposes may apply to your personal data, depending on the actual situation. The following does not purport to be an exhaustive listing, although an effort is made to set out as many salient purposes as may be applicable.
34. In the sub-sections that follow we set out some of the Purposes which apply to collection or use of personal data in certain scenarios and also identify some of the relevant recipients in the disclosure of personal data. We would also highlight that while a party may be listed as a recipient or source of personal data in these sections, that same party may also be a recipient or source (albeit not listed or mentioned expressly) in other scenarios.

For emergency prevention of injury or death

35. We may also disclose personal data in emergency situations affecting (or causing serious threats to) the health, life, safety of any individual. Such disclosures will be made to such persons as may be necessary to address or respond to the situation.

For Intage SG operations

36. We may Handle your personal data in order to execute our day-to-day operations. In brief, this relates to planning, execution, administration and implementation of functions or things which are necessary to run Intage SG.
37. Purposes under this heading include:
- a. acknowledging, responding to, processing and handling your complaints, queries, requests, feedback (including your experience with Our Programmes, and including for purposes of improving services, or recognising service achievements, which, in each case, participation would include us reaching out to you and/or responding to your feedback) and suggestions;
 - b. managing the administrative and business operations of Intage SG, including file management, tracing of old reports and audit studying and improving efficiency, standards and quality of Intage SGs' services and operations;
 - c. personalising your experience at the Intage SG's touchpoints;
 - d. matching any personal data held which relates to you for any of the Purposes;
 - e. recording conversations (including overseas calls) or inquiries via photography, audio recording or video recording under any of Our Programmes;

- f. requesting feedback or participation in surveys;
 - g. processing and billing for services delivered and collecting payment on debts;
 - h. handling potential legal claims, manage litigation cases and review legal cases;
 - i. analysis for statistical, profiling or other purposes for us to conduct category analysis, financial analysis, investigate service lapses, and to review, develop and improve the quality of Our Programmes;
 - j. quality improvement projects and/or data analytics for service enhancement and improvement, including workload management, efficiency requirements, process re-engineering or management / introduction of new processes or technologies to enhance / supplement service delivery, and all associated interactions with service providers, regulatory bodies or related companies to facilitate or support such purposes;
 - k. to study workflows for efficiency and effectiveness including data capture and processing;
 - l. undertaking preventative measures to safeguard any individual, property or defend and maintain legal rights;
 - m. to clarify issues or matters which have arisen in connection with existing or potential disputes;
 - n. to clarify and resolve discrepancies or reconcile information and establish accurate records;
 - o. to carry out root cause analysis of issues for the compilation of reports to management and to address investigations;
 - p. ensuring the safety of the Intage SG's staff and operations;
 - q. data mining to track transactions and usage patterns;
 - r. to identify and establish ways to improve or deliver more appropriate products, services or developments to better address the needs of data subjects;
 - s. to combine, collate, compile, analyze, review or submit reports or recommendations to meet the Purposes listed above;
 - t. to ensure that staff, volunteers, are properly trained to provide execute their functions in the context of Intage SG's operations generally;
 - u. to meet organisational auditing, accreditation and compliance requirements concerning service standards;
 - v. sending staff for occupational health reviews; and
 - w. all other purposes reasonably related to the aforesaid.
38. For these purposes, disclosures may be made to Intage SG's staff who have a need to know, such as administrators, executive / administrative staff, as well as persons who can assist Intage SG in undertaking these purposes such as analysts, consultants, advisors, or other similar persons.
39. Disclosures for this purpose can also be to Intage Group Affiliates who may monitor performance for certain operational indicators, or to the Intage SG's service providers. In the case of other Intage Group Affiliates, the Handling of personal data will be under the framework of intra-group agreements / policies that ensure that the standards in this DPP are followed / applied.
40. Disclosures may also be to agents, debt collection agencies, contractors or third party service providers who provide operational services to Intage SG, such as courier services, telecommunications, information technology, payment, payroll, processing, training, market research, storage, archival, customer support investigation services or other services to Intage SG, data intermediaries or other vendors or other third party service providers in connection with services offered by Intage SG.
41. In some situations, it may be necessary to disclose personal data records to a shared third-party service provider, data intermediary or vendor, or via another Intage Group Affiliate, in order to obtain the services of that vendor. In such instances, reasonable safeguards will be taken to ensure the confidentiality of your personal data records.

42. In the case of third-party entities, Intage SG will ensure that agreements in place with such third parties to hold them to the standards in this DPP.

To leverage the use of information technology tools and platforms as may be appropriate to provide services

43. Intage SG is progressive and continually exploring ways to advance the seamless and efficient delivery of our market research services, and information technology ("IT") tools and platforms are central to this drive.
44. For this purpose, Intage SG may Handle personal data using IT platforms and tools promulgated by Intage HQ. Intage SG applies and requires the application of reasonable and defensible security and access controls in the use of such systems, such that organisations other than the Intage SG treating or transacting with you have only such access as is on a need to know basis for purposes and in a manner consistent with this DPP and/or where (and to the extent) necessary to meet your needs.
45. Intage SG also works with data intermediaries who run IT services within Intage SG. Such IT services include establishing the scope and requirements of projects, testing systems / applications, fulfilling IT support and service requests, and managing changes and configurations in IT infrastructure. Personal data may be shared with these data intermediaries under appropriate agreements which ensure that Intage SG only accesses or Handles personal data as our data intermediary on a need-to-know basis for the purposes and in a manner consistent with this DPP.
46. Intage SG may also, as part of the efforts to increase security and efficiency around operations or the handling of any information including personal data, make use of third-party IT platforms and services. Where so, Intage SG will ensure that such engagements are made with appropriate legal, operational, technological and security controls.

To comply with applicable law / regulations

47. To comply with any directions, laws, rules, guidelines, regulations or schemes issued or administered, Intage SG may disclose the relevant personal data to government regulators, government ministries, registries for diseases and illnesses, statutory boards or authorities and/or law enforcement agencies, whether local or overseas, including but not limited to:
- a. Ministry of Manpower; and
 - b. Singapore Department of Statistics.
48. In addition, Intage SG may be required to collect, use or disclose personal data for the purposes of facilitating business asset transactions (which may extend to any merger, acquisition or asset sale); and in order to comply with any applicable rules, laws and regulations, codes of practice or guidelines or to assist in law enforcement and investigations by relevant authorities.

To make payment and/or facilitate claims for reimbursement etc.

49. We may Handle your personal data to bill and receive payment for services that we or others provide to you.
50. The purposes connected with such Handling of the personal data include:
- a. authorising payment instructions;
 - b. payment administration with financial s such as your banks / payment service providers;

- c. liaising with financial s (including banks, credit card service providers) or other payment service providers to facilitate and administer payments, payments instructions, clearing or settling payment transactions; and
- d. all other purposes reasonably related to the aforesaid.

Section 6: Other Contact Persons

51. The PDPA places an emphasis on the rights of the data subject and obliges Intage SG to respect that data subject's wishes. Intage SG seeks always to balance the need to respect the interests of the data subjects as required by law, with the rights of such persons connected to the data subject.

Section 7: Other Purposes & Recipients

52. Subject to the provisions of any applicable law, your personal data may also be provided, for any and all of the Purposes listed above (where applicable), to the following entities or parties, whether they are located overseas or in Singapore:
- a. other Intage Group Affiliates, including Intage HQ;
 - b. private companies, data intermediaries and industry sponsors involved in Our Programmes;
 - c. counterparties and their respective banks in relation to fund transfers, payments, drawing of cheques, and other transactions;
 - d. social media platforms, including Facebook;
 - e. companies providing services relating to insurance and/or reinsurance to Intage SG;
 - f. banks, credit card companies and their respective service providers;
 - g. our professional advisers such as our auditors and lawyers; and
 - h. any other party to whom you authorise us to disclose your personal data to.
53. In addition, where permitted under the PDPA, we may also collect, use and disclose your personal data for the further purposes which we may describe in our documents and agreements, for which we will seek consent.

Section 8: Security, Retention & IT matters

Security

54. Intage SG will take reasonable efforts to protect personal data in our possession or control by making reasonable security arrangements to prevent unauthorised access, collection, use, disclosure, copying, modification, disposal or similar risks. However, we cannot completely guarantee security of any personal data we may have collected from or about you. E.g., that no harmful code will enter our website (for example viruses, bugs, trojan horses, spyware or adware).

Retention

55. Intage SG retains such personal data as may be required for business or legal purposes, and such purposes do vary according to the circumstances.

IT Matters

56. While we strive to protect your personal data, we cannot ensure the security of the information you transmit to us via the Internet, and we urge you to take every precaution to protect your personal data when you are on the Internet. We recommend that you change your passwords often, use a

combination of letters and numbers, and ensure that you use a secure browser.

57. If applicable, you undertake to keep your username and password secure and confidential and shall not disclose or permit it to be disclosed to any unauthorised person. Please inform us as soon as reasonably practicable if you know or suspect that someone else knows your username and password or believe the confidentiality of your username and password has been lost, stolen or compromised in any way or that actual or possible unauthorised transactions have taken place. We are not liable for any damages resulting from any security breaches, on unauthorised and/or fraudulent use of your username and password.

Cookies

58. When you interact with us on our websites, we automatically receive and record information on our server logs from your browser. We may employ cookies in order for our server to recognise a return visitor as a unique user including, without limitation, monitoring information relating to how a visitor arrives at the website, what kind of browser a visitor is on, what operating system a visitor is using, a visitor's IP address, and a visitor's click stream information and time stamp (for example, which pages they have viewed, the time the pages were accessed and the time spent per web page).
59. Cookies are small text files placed in the 'Cookies' folder on your computer's hard disk and allow us to remember you. The cookies placed by our server are readable only by us, and cookies cannot access, read or modify any other data on a computer. All web-browsers offer the option to refuse any cookie, and if you refuse our cookie then we do not gather any information on that visitor.
60. Should you wish to disable the cookies associated with these technologies, you may do so by changing the setting on your browser. However, you may not be able to enter certain part(s) of our website.

Third-Party Sites

61. Our website may contain links to other websites operated by third parties. We are not responsible for the privacy practices of websites operated by third parties that are linked to our website. We encourage you to learn about the privacy policies of such third-party websites. Some of these third-party websites may be co-branded with our logo or trademark, even though they are not operated or maintained by us. Once you have left our website, you should check the applicable privacy policy of the third-party website to determine how they will handle any information they collect from you.

Section 9: Contacting Us – Withdrawal of Consent, Access and Correction of your personal data

62. If you have any questions or feedback relating to your personal data or our DPP, would like to withdraw your consent to any use of your personal data as out in this DPP; or would like to obtain access and make corrections to your personal data records, please contact our DPO, as follows:

Name	DPO Email	Contact Address
Danny LAI	danny-l@intage.com	105 Cecil Street, Singapore 069534

63. Please note that if your personal data has been provided to us by a third party (e.g. general practitioners who refer you to us), you should contact such party directly to make any queries, feedback, and access and correction requests to the Intage SG on your behalf.
64. This Data Protection Policy and your use of this website shall be governed in all respects by the laws of Singapore. As part of our efforts to ensure that we properly manage, protect and process

Personal Data provided to us, this Policy will be reviewed from time to time by Intage SG. We may also from time to time update this Policy to take account of new laws and technology, changes to our operations and practices and the changing business environment. If you are unsure whether you are reading the most current version, please contact us.