

SIMPLYGJ PTE. LTD. Privacy Policy

Updated Date: 03/07/2025

SIMPLYGJ PTE. LTD. ("**SIMPLYGJ**", "**we**", "**our**", or "**us**") respects your privacy and is committed to protecting your personal data. This Privacy Policy explains how we collect, use, disclose, and safeguard your personal data in accordance with Singapore's Personal Data Protection Act 2012 ("**PDPA**") and other applicable laws. It also satisfies Facebook's Lead Ads privacy-disclosure requirements and applies to all of our websites, contact forms, newsletters, and other online or offline interactions (collectively, the "**Services**").

1. Personal Data We Collect

We may collect and process the following categories of personal data:

Category	Examples
Identity & Contact Data	Full name, email address, telephone number
Professional Data	Company name, company industry
Technical & Usage Data	IP address, device/browser information, referring URLs, pages viewed, time spent, cookies and similar tracking data

We do **not** knowingly collect data from persons under 16 years of age.

2. How We Collect Personal Data

1. **Direct interactions** – When you complete forms on our websites or otherwise contact us (e.g., Facebook Lead Ads, email, events).
2. **Automated technologies** – Through cookies, pixels, and similar technologies (see Section 6).
3. **Third-party sources** – Marketing and analytics platforms (e.g., HubSpot, Google Analytics 4, Meta Pixel) when permitted by law.

3. Purposes for Collection, Use & Disclosure

We collect, use, and/or disclose your personal data only for purposes that a reasonable person would consider appropriate in the circumstances, including to:

1. **Provide Services & Support** – respond to enquiries, deliver content requested by you, manage relationships.
2. **Marketing & Newsletters** – send newsletters, promotional emails, updates, and event invitations. You may opt out at any time (see Section 9).

3. **Analytics & Improvement** – understand user behaviour, measure campaign effectiveness, and improve our Services.
4. **Administrative & Legal** – maintain business records, detect or prevent fraud, comply with laws and regulations, and exercise legal rights.

We will **never sell** your personal data to any third party.

4. Legal Basis (PDPA)

We rely on one or more of the following grounds under the PDPA:

- **Consent** – e.g., where you voluntarily provide data in a form.
 - **Deemed consent** by conduct – e.g., where data is reasonably necessary to provide the Services you requested.
 - **Legitimate interests / business improvement** – balanced against your interests and rights.
 - **Legal obligation** – where required to comply with law or regulatory requests.
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5. Disclosure to Third Parties

We may disclose your personal data to:

1. **Service providers** – cloud hosting, email delivery, analytics, marketing, and CRM platforms (e.g., HubSpot, Google Workspace, Google Analytics 4, Meta Pixel), all bound by confidentiality obligations.
2. **Professional advisers** – lawyers, auditors, insurers.
3. **Regulators and authorities** – where required by law or court order.

We do **not** share personal data beyond what is necessary for the above purposes and do not allow our service providers to use it for their own marketing.

6. Cookies & Similar Technologies

We use:

- **Strictly Necessary Cookies** – enable core functionality (e.g., CSRF protection).
- **Analytics Cookies** – Google Analytics 4 to analyse website usage.
- **Marketing Cookies/Pixels** – Meta Pixel to measure ad performance and build custom audiences.

You can disable cookies via your browser settings and opt out of Meta advertising preferences through Facebook settings. If you disable cookies, some features may not function properly.

7. Cross-Border Transfers

Your personal data may be stored on servers located outside Singapore (e.g., United States, Europe) by our service providers such as Google, Meta, and HubSpot. When we transfer data internationally, we ensure it receives a comparable level of protection as required under the PDPA, including through contractual clauses and other safeguards.

8. Data Security

We implement reasonable administrative, physical, and technical safeguards, including encryption in transit and at rest, access controls, regular security reviews, and staff training.

9. Data Retention

We retain personal data for as long as necessary to fulfil the purposes for which it was collected, or as required or permitted by law, whichever is longer. After that, we will securely delete or anonymise the data.

10. Your Rights & How to Exercise Them

Subject to exceptions under the PDPA, you have the right to:

- Request access to your personal data
- Request correction of errors or omissions
- Withdraw consent to our continued use/disclosure of your data

Please submit requests in writing to our Data Protection Officer (see Section 11). We will respond within the timelines prescribed by the PDPA and may charge a reasonable fee where permitted.

11. Data Protection Officer

We have appointed a Data Protection Officer ("DPO") responsible for overseeing compliance with this Policy, please contact us via:

Email: privacy@simplygj.com

12. Updates to This Policy

We may update this Policy from time to time. Changes take effect when posted on our website. The "Updated Date" above indicates when this Policy was last revised.

13. Contact Us

If you have questions about this Policy or our handling of your personal data, please contact:

SIMPLYGJ PTE. LTD. Email: privacy@simplygj.com

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