

Rockwills's Personal Data Privacy Policy

ABOUT THIS POLICY

Please take a moment to read this Personal Data Privacy Policy as they may have important consequences for you.

This is Rockwills's Personal Data Privacy Policy for all our clients and users of our website.

This purpose of this Personal Data Privacy Policy ("**Policy**") is to let you understand the processes involved in protecting your Personal Data in accordance with the Personal Data Protection Act 2012 ("**PDPA**") as well as the EU's General Data Protection Regulation ("**GDPR**"). Please read this Policy so that you understand the purposes for which we collect, use, disclose or process your Personal Data.

In this Policy, ("**we**", "**us**", "**our**" or "**Rockwills**") means the Rockwills International Group of Companies, including:-

- 1) **Rockwills Singapore Group of Companies** - Rockwills Corporation Pte Ltd, Rockwills Corporate Services Pte Ltd, Rockwills Trustee Ltd, Rockwills Institute Pte Ltd, Rockwills Incorporations Pte Ltd, Estate Planning Practitioners Limited;
- 2) **Rockwills Malaysia Group of Companies** - Rockwills International Sdn Bhd, Rockwills Corporation Sdn Bhd, Rockwills Trustee Bhd, Rockwills Business Solutions Sdn Bhd, Rockwills Wealth Planner Sdn Rhd, Rockwills Advisory Services Sdn Bhd, MTrustee Bhd;
- 3) its related corporations and affiliates.

("**REP**") means our certified Rockwills Franchisee, or Rockwills Estate Planner.

By submitting information to us or signing up for any promotions, services or products offered by us, you agree and consent to Rockwills, as well as our REP to collecting, using, disclosing and processing of your Personal Data amongst themselves, and disclosing such Personal Data to Rockwills' authorized service providers and relevant third parties in the manner set forth in this Policy.

This Policy applies to Personal Data in our possession or under our control, including Personal Data in the possession of Rockwills which we have engaged to collect, use, disclose or process for our purposes.

Rockwills is deeply concerned and wishes to ensure proper data privacy is maintained for your benefit. Under this policy, please be assured that your Personal Data shall only be used for Rockwills' businesses and services only. Where necessary, we will require any person to whom we provide your Personal Data to agree to comply with our Personal Data Privacy Policy.

We may also amend this policy from time to time to ensure that this policy is consistent with any developments to the way Rockwills uses your Personal Data or any changes to the laws and regulations applicable. We will make available the updated policy on our website and will only notify you of the changes where required by law to do so.

All communications, transactions and dealings with us shall be subject to the latest version of this notice in force at the time.

1. Personal Data

- 1.1. In this Policy, (“**Personal Data**”) means any data or information about you, whether true or not, from which you can be identified; or from that data and other information to which Rockwills has or is likely to have access.
- 1.2. Personal Data we collect shall be used for Rockwills’ businesses and services only.
- 1.3. Personal Data we collect and for what purpose will depend on the type of services provided to you and may include:
 - 1.3.1. Full name, including aliases.
 - 1.3.2. National Registration Identification Card number (“**NRIC**”).
 - 1.3.3. Passport number and country of issue.
 - 1.3.4. Nationality.
 - 1.3.5. Family / beneficiary details.
 - 1.3.6. Tax residency & Tax Identification Number.
 - 1.3.7. Occupation information including name of employer, position held, address of business and nature of employment.
 - 1.3.8. Contact details including house phone number, mobile phone number, email address and mailing address; and
 - 1.3.9. Any other Personal Data derived from any legal documentation including Insurance Policies, Letter of Administration, Grant of Probate, Power of Attorney, Birth Certificate and Death Certificate.

2. Collection of Personal Data

- 2.1. We generally collect Personal Data from you directly but we may also collect Personal Data from third parties such as:
 - 2.1.1. Your REP.
 - 2.1.2. Your agents and representatives.
 - 2.1.3. Other professional service providers that provide services to you.
 - 2.1.4. Other third parties.
- 2.2. Personal Data is collected:
 - 2.2.1. When you sign up to purchase our products and services from us or our REP.
 - 2.2.2. When you register your interest with us or our REP to purchase the products and services.
 - 2.2.3. When you attend our public talk and seminars.
 - 2.2.4. When you visit our websites or social networking sites.
 - 2.2.5. From any company within the Rockwills International Group.
 - 2.2.6. Pursuant to any transaction or inquiry or communication made with or to us or our REP.
 - 2.2.7. From third party sources such as credit reference agencies, fraud prevention agencies and publicly available sources of information.

3. Usage of Personal Data

- 3.1. As our estate planning services covers the preparation of Wills and Trusts, we will process the Personal Data collected for the following purposes;
 - 3.1.1. To facilitate the drafting of wills and other legacy planning instruments as instructed by you.
 - 3.1.2. To facilitate the drafting of trusts as instructed by you.
 - 3.1.3. For billing and financial purposes, including payments for Rockwills services (and all transactions related thereto), accounting and tax.
 - 3.1.4. For administrative purposes.
 - 3.1.5. To comply with legal and statutory requirements.
 - 3.1.6. For contact purposes.
 - 3.1.7. For responding to your enquires.
 - 3.1.8. To conduct research and statistical analysis.
 - 3.1.9. To help us monitor and improve our product and service offerings.
 - 3.1.10. For providing you with regular communications relating to services provided by Rockwills, its related companies and partners from time to time.
 - 3.1.11. For direct marketing purposes.
 - 3.1.12. For providing you with information and updates on the products and services.
- 3.2. Please also note that depending on the product and services required, we are compelled by law to collect and retain your Personal Data, including NRIC for:
 - 3.2.1. Identification and verification purposes.
 - 3.2.2. Fulfilling our Anti Money Laundering and Combating the Financing of Terrorism obligations.
- 3.3. Use of Personal Data for marketing purposes; we may use your Personal Data for marketing purposes, including:
 - 3.3.1. Monitoring and improving our product and service offerings.
 - 3.3.2. Providing you with regular communications relating to services provided by Rockwills from time to time.
 - 3.3.3. For direct marketing purposes.
 - 3.3.4. Providing you with information and updates on products and services.
- 3.4. Such marketing messages may be sent to you in various modes including:
 - 3.4.1. Electronic mail.
 - 3.4.2. Direct mailers.
 - 3.4.3. Short message service.
 - 3.4.4. Telephone calls.
 - 3.4.5. Facsimile.
- 3.5. The information required by us are necessary and mandatory which you must provide in order to accurately identify the relevant parties and in compliance with the relevant regulations such as Anti Money Laundering and Combating the Financing of Terrorism, failing which, we may not be able to provide you with the estate planning products and services and relevant updates or information.

4. Disclosure and sharing of Personal Data

- 4.1. To facilitate the purpose above and the provision of products and services to you, we may process, use and disclose your Personal Data to the following classes of third parties:
- 4.2. Companies within the Rockwills International Group.
 - 4.2.1. Our REP and service providers (including those located overseas) providing services relating to the purposes for which the Personal Data is collected.
 - 4.2.2. Our service providers, consultants, auditors and advisors on a need to know basis.
 - 4.2.3. Your other professional advisers, subject to your approval.
 - 4.2.4. Regulatory authorities and enforcement agencies.
 - 4.2.5. Any court of law or any relevant party in connection with any claim or legal proceedings; and
 - 4.2.6. Any person who is under a duty of confidentiality who has undertaken to keep such Personal Data confidential.

5. How does Rockwills protect your Personal Data

- 5.1. The security and protection of Personal Data is of utmost importance. In Rockwills, we have internal policies and controls in place to ensure that Personal Data is prevented from unauthorised disclosure, use, alteration or destruction.
- 5.2. Your Personal Data is not accessible except by our trained staff and managers who will act honestly and proper in the performance of their duties.
- 5.3. Whenever applicable, we will also use encryption and other technologies that can assist in securing the Personal Data provided to us.

6. How long will your Personal Data be kept for?

- 6.1. Your Personal Data will be retained for as long as necessary to fulfil the business or legal purposes we collected it for.
- 6.2. Once your business relationship with us has ended, or when retention is no longer necessary, we will securely delete or destroy your Personal Data in accordance with our data retention policy and applicable laws and regulations unless retention is required to satisfy legal or regulatory requirements.
- 6.3. Depending on the business product, we might have to retain your Personal Data for up to 7 years.

7. What rights do you have in respect to your Personal Data?

- 7.1. The following individual rights are provided in the GDPR and may not be applicable if you are not an EU person. However, Rockwills will provide the same rights to you on the basis that they do not prevent or hinder us from:
 - 7.1.1. Complying with the legal obligations we have; and
 - 7.1.2. Providing you with the requested products and services.
- 7.2. As a data subject, you have the following rights in respect to the Personal Data we collected about you:
 - 7.2.1. Right to be informed – Rockwills will inform you about the collection and use of your Personal Data through various forms and letters of engagement. Other information regarding how your Personal Data will be used can be found in this notice.
 - 7.2.2. Right of access – You can request us to give you a copy of your Personal Data that you provided to us.
 - 7.2.3. Right of rectification – You can request us to update or rectify your Personal Data if they are incomplete or incorrect.
 - 7.2.4. Right of erasure – You can request us to delete or remove your Personal Data if our business relationship has ended, or when retention is no longer necessary. However, please note that depending on the business product, we might have a legal obligation to retain your Personal Data for up to 7 years.
 - 7.2.5. Right to restrict processing – You can request the restriction or suppression of your Personal Data in certain circumstances. For example, you can request for us to stop processing your Personal Data during the retention period (due to legal obligations) before we can erase your Personal Data.
 - 7.2.6. Right to data portability – You can request for your Personal Data to be obtained and reused across different services. For example, you can request for your Personal Data stored with Rockwills to be shared with a third party providing professional services to you.
 - 7.2.7. Right to object – You have the right to object to the processing of your Personal Data in certain circumstances. For example, you have an absolute right to opt out from our use of your Personal Data for direct marketing purposes.
 - 7.2.8. Rights related to automated decision making including profiling – This right is not applicable as Rockwills's products do not relate to any of this provision.

8. Access and correction of Personal Data

- 8.1. If you would like to make any enquiries, or wish to exercise any of the above rights, you may contact our Personal Data Protection Officer by writing to the following address:

Personal Data Protection Officer,
10 Anson Road,
#06-17 International Plaza,
Singapore 079903

Alternatively, you can contact us at email@rockwills.com.

9. Governing Law

- 9.1. This Policy shall be governed in all respects by the Laws of Singapore.