

# THE INSTITUTE OF BANKING & FINANCE

## PERSONAL DATA PROTECTION POLICY

This Policy statement was last updated on 30 April 2019.

We are The Institute of Banking & Finance ("**we**", "**our**", "**us**" or "**IBF**") and our registered address is 10 Shenton Way #13-07/08 MAS Building Singapore 079117. IBF is committed to respecting and protecting your personal data. This Personal Data Protection Policy ("**Policy**") sets out the basis on which we collect, use, disclose, store and/or process your personal data. It applies to personal data in our possession or under our control. Please read the following carefully to understand our practices regarding your personal data and how we handle it. By continuing to visit and use this website or our mobile application, or by continuing to participate in our programs and/or utilise our services, you confirm that you understand and consent to the terms of this Policy. For the purpose of the EU General Data Protection Regulation ("**GDPR**") and other applicable data protection laws, we are the data controller of the personal data collected in accordance with this Policy.

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### [PERSONAL DATA WE COLLECT](#)

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1. As used in this Policy, "personal data" means information that identifies you such as name, photo or contact details or data that can be linked with such information in order to identify you. It does not include data where your identity has been removed, known as anonymous data.
2. We may collect, use, store and transfer different kinds of personal data. We have grouped these together as follows:
  - **Identity information** includes, without limitation, an individual's name; date of birth; gender; nationality; age; marital status; passport number (and date and place of issue); personal identification number; driver's licence number and expiration; photographs, audio and other audio-visual material; education information and employment information;

- **Contact information** includes address; telephone numbers; email addresses;
  - **Transaction information** includes payment information; credit and debit card numbers; bank account details;
  - **Technical information** includes the Internet Protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform;
  - **Usage information** includes information about your visit, including the full Uniform Resource Locators (URL) visited; date and time of visit; products or services you viewed or searched for; page response times; download errors; length of visits to certain pages; page-interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page; and
  - **Marketing and Communications information** includes marketing preferences; preferred communication methods.
3. We do not typically collect any special categories of personal data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data), Nor do we typically collect any information about criminal convictions and offences.
  4. If you do not provide the personal data necessary, or withdraw your consent for the processing of your personal data, where this information is necessary for us to provide services to you, we will not be able to provide these services to you. In circumstances where it is not necessary for us to provide services to you, there will be no impact on the services if you do not provide the personal data or withdraw your consent.

## **HOW WE COLLECT PERSONAL DATA**

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5. We may collect personal data directly from you by way of the information that you provide to us on or via our website, our mobile application, or where you contact us directly (e.g. via email, phone call or in person).
6. We may also collect your personal data from our partners and other independent third party sources (e.g. management representatives of financial institutions, IBF-accredited training providers, government agencies; recruitment agencies).
7. In addition, we may also collect voice and video recordings of you in the course of our interactions with you and in connection with the administration of our programs and services. If you attend our events or programmes, we may also collect photographs and videos of you during your attendance at such events or programmes.

## [COOKIES AND OTHER WEBSITE FUNCTIONALITIES](#)

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8. We may automatically collect the Technical and Usage information about you in connection with your visit(s) to our website.
9. When you visit our website, we may assign your computer (or any other device) with cookies (which are small text files created on your computer or device), Local Shared Objects (also known as flash cookies, which can store data more complex than simple text) and Web Beacons (tiny graphics with a unique identifier that are placed in the code of a webpage) (collectively, "**Cookies**"). By accessing our website, you agree that we can place Cookies on your computer or device.
10. The Cookies that we place on your computer or device may be used to facilitate your access to our website, gather statistical data, and personalise your online experience. We currently use Cookies on our website for purposes including, but not limited to, detecting your web browser's multimedia capabilities, recognising you as a previous visitor and saving your website user preferences, maintaining login and password details on secure portions of the website, monitoring the traffic patterns of our website users, tracking which emails have been opened by you, and providing a unique identifier to your computer so that we can generate statistics regarding website usage.
11. You have the option of adjusting your browser settings to restrict or limit the use of various Cookies. However, if you choose to do so, the functionality of the website and your user experience may be affected.

## [HOW WE USE PERSONAL DATA WE COLLECT](#)

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12. We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:
  - where we need to perform the contract we are about to enter into or have entered into with you (or your organisation, as applicable)
  - to the extent permitted by applicable law, where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests
  - where we need to comply with a legal or regulatory obligation; or
  - where we have your consent to do so (for example, if we obtain your consent for marketing communications)
13. In practice, this means that we will use your personal data for the following purposes:
  - to verify your identity where necessary
  - to manage the user account that you may have set up with us

- to communicate with you and to process and respond to your questions/ comments and/or feedback
- to provide our services to you, including without limitation our career advisory services
- to process and review any applications that you may submit to us
- to administer our various training grant schemes, IBF certification, Continuing Professional Development (CPD) schemes and other competency programmes
- to suggest training and other competency programmes which may be of interest to you
- to evaluate your eligibility and determine the quantum of any training grants/ salary and/or course fees support that may be granted
- to register you for examinations and to carry out all functions necessary for us to administer and enable you to sit for such examinations
- to prepare aggregated examination and industry reports which may be disclosed, where necessary, to relevant examination boards, industry workgroups, and regulators
- to provide you with and allow you and other relevant third parties to verify information regarding any records you may hold with IBF (e.g. CPD, training, funding, certification, accreditation, and examination records, amongst others)
- to process relevant payments and transactions in connection with your participation in our programs and utilisation of our services
- to contact you regarding any industry engagements which may be of interest to you
- to inform you of and invite you to upcoming IBF events
- to keep you updated on the latest developments at IBF
- to conduct research, analysis and development activities (including but not limited to data analytics/ surveys) for management reporting and generation of customised reports
- to process and evaluate any job applications that you may send to us
- to carry out due diligence or other screening activities including security and background checks
- to investigate any fraud, unlawful activity or omission or misconduct, whether or not there is any suspicion of the aforementioned; dealing with conflict of interests or dealing with and/or investigating complaints
- to comply with a court order or other legal process or other statutory and/or regulatory requirements of any governmental and/or regulatory authorities;
- where you specifically consent, to market our services, examinations and other programmes
- in a national emergency or security concern in compliance with applicable law
- any other purpose permitted by applicable law, or as may be described to you from time to time at the point of collection of your personal data, (collectively, the "**Purposes**").

14. We do not envisage that any decisions will be made about you solely using automated means. However, we will notify you if this position changes.

## **WHO WE SHARE PERSONAL DATA WITH**

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15. We only share your personal data for the purposes set out above. We may share your personal data (including your name, the organisation that you belong to, photographs, resumes, examination results, certification status and CPD status), with :

- our affiliates and subsidiaries
- our third-party service providers, including data storage providers, cloud service providers; auditors and professional advisors
- your prospective and/or current employers
- recruitment agencies
- relevant government agencies and/or regulatory authorities, whether in Singapore or abroad

in connection with the aforementioned Purposes. However, we will not share your personal data with any third party for direct marketing purposes unless we have your consent to do so.

16. We may share your personal data with third parties to comply with a legal obligation; when we believe in good faith that an applicable law requires it; at the request of governmental authorities conducting an audit or investigation; to verify or enforce our contractual rights or other applicable policies; to detect and protect against fraud, or any technical or security vulnerabilities; to respond to an emergency; or otherwise to protect the rights, property, safety, or security of third parties, visitors to the our website, our business or the public.

## **TRANSFERS OF PERSONAL DATA OVERSEAS**

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17. In connection with the Purposes, your personal data may be transferred overseas including to our third-party data storage service providers whose cloud servers and data centres may be located overseas.

18. If you are located in the European Economic Area (EEA) or Switzerland, we may need to transfer personal data outside of the EEA or Switzerland, including to Singapore, Hong Kong, Japan, Malaysia, South Korea, Ireland, Netherlands and United States. If you are located outside of the EEA, we may also need to transfer personal data outside of the country you are located in, including to [the same countries listed above].

19. In situations where we transfer your personal data to countries overseas, we will take steps to ensure that appropriate levels of protection necessary to maintain the security and integrity of your personal data are in place. We will always ensure that there is a proper legal agreement that covers the data transfer. If a country is not considered to have laws that are equivalent to EU data protection standards, we will ask the third party service provider to enter into a legal agreement that reflects those standards.

20. If you would like further information, please contact our Data Protection Officer (see "Contact us" below).

## **HOW YOU CAN WITHDRAW CONSENT**

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21. If you do not want your personal data to be collected, used, and/or disclosed by us in the aforementioned manner, you may withdraw your consent, including a withdrawal of consent for marketing purposes, by writing to our Data Protection Officer at the address indicated below. Please note that we may not be able to continue to provide you with certain services in the event that you choose to withdraw your consent.

## **YOUR RIGHTS**

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22. By law, you have a number of rights when it comes to your personal data.

23. If you are located in the EEA or Switzerland, your rights include the following:

<b>Rights</b>	<b>What does this mean?</b>
The right to object to processing	You have the right to object to certain types of processing, including processing for direct marketing (i.e. if you no longer want to be contacted with potential opportunities).
The right to be informed	You have the right to be provided with clear, transparent and easily understandable information about how we use your information and your rights. This is why we're providing you with the information in this privacy policy.
The right of access	You have the right to obtain access to your information (if we're processing it), and certain other information (similar to that provided in this privacy policy).  This is so you're aware and can check that we're using your information in accordance with data protection law.
The right to rectification	You are entitled to have your information corrected if it's inaccurate or incomplete.
The right to erasure	This is also known as 'the right to be forgotten' and, in simple terms, enables you to request the deletion or removal of your information where there's no compelling reason for us to keep using it. This is not a general right to erasure; there are exceptions – for example, this does not apply if processing of data is necessary for IBF to comply with legal obligations or handle legal claims.
The right to restrict processing	You have rights to 'block' or suppress further use of your information. When processing is restricted, we can still store your information, but may not use it further. We keep lists of people who have asked for further use of their information to be 'blocked' to make sure the restriction is respected in future.
The right to data portability	You have rights to obtain and reuse your personal data for your own purposes across different services. For example, if

	you decide to switch to a new provider, this enables you to move, copy or transfer your information easily between our IT systems and theirs safely and securely, without affecting its usability.
The right to lodge a complaint	You have the right to lodge a complaint about the way we handle or process your personal data with your national data protection regulator.

24. If you wish to exercise any of your rights, please contact our Data Protection Officer at the address indicated below. For a request to access or correct your personal data, once we have sufficient information from you to deal with the request, we will seek to respond to your access or correction request without undue delay and within 30 days. Where we are unable to respond to you within the said 30 days, we will notify you of the soonest possible time within which we can provide you with the information requested. To the extent permitted by applicable law, a reasonable administrative fee may be payable for the handling and processing of any access or correction requests made by you.

## **HOW LONG WE RETAIN PERSONAL DATA**

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25. Personal data may be retained by us for as long as necessary for the purpose for which the personal data was collected, where it is in our legitimate interest, or to comply with our legal obligations, even in circumstances where you have closed your account with us. We will cease to retain personal data once the above reasons no longer apply.

26. When determining the relevant retention periods, we will take into account factors including:

- our contractual obligations and rights in relation to the information involved
- legal obligation(s) under applicable law to retain data for a certain period of time
- our legitimate interest where we have carried out a balancing test
- statute of limitations under applicable law(s)
- (potential) disputes
- if you have made a request to have your information deleted; and
- guidelines issued by relevant data protection authorities

## **HOW WE KEEP YOUR DATA SECURE**

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27. We take reasonable care and have implemented technical, administrative, procedural and other measures to protect your personal data from unauthorised access, improper use or disclosure, unauthorised modification, unlawful destruction or accidental loss. However, we cannot assume responsibility for any unauthorised use of your personal data by third parties which are wholly attributable to factors beyond our control.

## **CHANGES TO POLICY**

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28. We may update this Policy from time to time and when we do so, we will notify you by posting a notice on this website. You should check this website regularly to ensure that you are familiar with any changes.
  
29. Your continued use of our website or mobile application and continued dealings with us for the provision of our products and services, after any changes to this Policy has been made, constitutes your acceptance to such changes.

## **CONTACT US**

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30. If you have any questions in relation to how your personal data is handled by us, please contact our Data Protection Officer at [dpo@ibf.org.sg](mailto:dpo@ibf.org.sg).