



Global Master Privacy Policy

At Robert Bird Group (“RBG”) we highly value your privacy.

1. Purpose

This policy specifies the privacy and data protection principles followed by RBG around the world regarding the personal information of our website visitors, clients and partners. RBG is committed to the protection of the personal data we process in line with the principles set out in the UK General Data Protection Regulation, the EU General Data Protection Regulation (together the “GDPR”), the Data Protection Act 2018 (“DPA18”), and the relevant legislation in Australia, New Zealand, Hong Kong and the UAE.

2. Applicable to

This policy covers:

- how and why we collect and use your personal data;
- your individual rights as a data subject;
- who we share your personal data with: and
- how we protect your personal data.

In the UK and EU, Robert Bird and Partners Limited is the controller of your personal data, registered in the UK with the information Commissioners Office, registration number Z1869771. In all other regions Robert Bird Group Pty Ltd is the controller of your personal data.

3. Policy

As an information-led business, we place great importance on ensuring the quality, confidentiality, integrity and availability of the personal data we hold and in meeting our data protection obligations when processing personal data. RBG are committed to protecting the security of your personal data. We use a variety of technical and organisational measures to help protect your personal data from unauthorised access, use or disclosure.

We update this policy from time to time in response to changes in applicable laws and regulations, to our processing practices, and to the products and services we offer. When changes are made to this policy, we will amend the date at the top of the document. Please review this policy periodically to check for updates.

If you have any questions relating to this policy, please contact our Privacy Officer (see below).

3.1. What information do we process?

We only collect personal information that is necessary for us to carry on our business functions.

We process all information you provide to us, either through <https://www.robertbird.com/> (“our website”), social media pages, or by corresponding with us directly by telephone, email or otherwise. We may also obtain personal information about you from third parties, in which case we will take all reasonable steps to notify you of our receipt of such information.

If we receive personal information from a third party that we are not able to lawfully use, we will take all reasonable steps to destroy, delete or permanently de-identify the personal information (if it is lawful to do so).

The personal information we process may include identifying information such as your name and contact details, details about your profession, occupation or job title and your banking, financial or credit/debit card details.

3.2. Cookies and Web Beacons

RBG uses cookies on our website and web beacons in some emails. Cookies are small text files and web beacons are small graphic images. They are downloaded to your device when you visit a website or receive certain emails, unless you have set your browser to reject them.

We use cookies to remember your preferences, display content that is more relevant to you and improve your overall experience of our site. We use web beacons to track the actions of individuals (such as email recipients) and measure the success and response rates of our marketing campaigns.

To learn more about cookies, web beacons and what you can do to opt out of receiving them, please go to <https://www.allaboutcookies.org/>.

3.3. Purposes and bases for processing your personal data

We may use your personal data for the following purposes and on the following lawful bases:

Purpose	Lawful Bases for Processing
Responding to correspondence from you	It is in our legitimate interest to respond to enquiries made via our website, by email, through our social channels or any other means
Maintaining the business relationship between RBG, our clients and partners	When processing the personal data of our clients and partners, we do so under the contract between the parties
Sending you information such as RBG news and industry information which may be of interest	When we send business to business marketing information, we will rely on our legitimate interests to do so
Business management, forecasting and statistical purposes	It is our legitimate interest to identify areas for managing current business relationships, develop new products and services, and for managing our business
Improving our website and the overall website visitor and user experience	It is our legitimate interest to allow analytics and search engine providers to help improve and optimise our website
Improving our website and the overall website visitor and user experience	We use cookies on our website with your consent and as detailed above

3.4. Your right to withhold personal information

You are not obliged to provide any information requested by us, but if you choose to withhold requested information, we may be unable to provide you any services that depend on the collection of this information (particularly where our collection of this information is required by law).

3.5. Marketing

Where permitted by law, we (and our agents) may use your personal information to advise you of events, industry updates, new services or promotions. If you do not wish to receive such information from us or our agents, you may remove your name from our mailing list by choosing to unsubscribe or by contacting our Privacy Officer.



3.6. Sharing your personal information

We use a range of third-party service providers and partners to help us maximise the quality of our services and business operations. This means that other individuals and organisations may sometimes have access to your personal information and may process this on our behalf. We require all service providers and partners to adhere to strict privacy obligations, including to comply with all relevant privacy laws.

We may share your personal information with the wider RBG Group, including our Australian, United Kingdom, United Arab Emirates, Hong Kong, Malaysian, Indian and New Zealand subsidiaries and business units, as well as entities within the Surbana Jurong group (being Surbana Jurong Private Limited and all subsidiaries including the RBG Group) or related companies and affiliates of Surbana Jurong. We only give these entities secure access to the personal information they require to perform their functions.

We do not disclose personal information to any other third parties. We may share non-personal, de-identified and aggregated information for our own research or promotional purposes. We will not sell your details to marketing agencies without your consent. We will not use or disclose any personal information about you without your consent unless:

- required or authorised by law;
- it is permitted by this Policy;
- we believe this is necessary to provide you with the services you have requested;
- it is necessary to implement our terms of service; or
- it is necessary to protect the rights, property or personal safety of RBG or a RBG employee, another client or any member of the public.

We will not use your personal information for purposes unrelated to the services we provide without your consent.

We will also provide access to your personal information when requested, unless we are restricted from doing so by law.

Once your personal information is no longer required for the purpose it was obtained, we will take all reasonable steps to destroy, delete or permanently de-identify your personal information.

3.7. Your Rights

The GDPR provides you with certain rights in relation to the processing of your personal data, including to:

- request access to personal data about you (a "subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are processing it lawfully;
- request rectification, correction, or updating to any of the personal data that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected;
- request personal data provided by you to be transferred in machine-readable format ("data portability");
- request erasure of personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove personal data where you have exercised your right to object to processing (see below);
- request the restriction of processing of your personal data. This enables you to ask us to suspend the processing of personal data about you (e.g., if you want us to establish its accuracy or the reason for processing it);

- object to the processing of your personal data in certain circumstances. This right may apply where the processing of your personal data is based on the legitimate interests of RBG.

Some of these rights are not absolute and are subject to various conditions under applicable data protection and privacy legislation, laws, and regulations to which we are subject. If at any time you decide that you no longer wish to be contacted for marketing purposes, or if you would like to exercise any of your rights as set out above, you can contact us at privacy@robertbird.com. You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

In addition to the above, please note that you have the right to make a complaint at any time to the appropriate data protection regulator (in the UK, the Information Commissioner's Office) if you are concerned about the way in which we are handling your personal data.

If you have any queries relating to this Policy, please contact our Privacy Officer.

3.8. Security

Your personal information may be stored electronically or in hard copy. We only keep your personal information to satisfy our business operations needs and to comply with our legal, accounting and reporting obligations. RBG takes all reasonable steps to ensure that your personal information is secure, including by using physical access restrictions, network structures, passwords and only allowing certain team members to access your personal information for our business purposes. We have also ensured that any credit or debit card payments are made through a secure gateway service.

We take all reasonable steps to:

- ensure that the personal information we collect, use or disclose is accurate, complete and up to date;
- protect your personal information from misuse, loss or unauthorised access, modification or disclosure; and
- destroy, delete or permanently de-identify your personal information if it is no longer needed or on written request by you.

Information transfers over the internet cannot be guaranteed to be 100% secure. While we use our best efforts to protect your personal information, we cannot ensure or warrant the security of any information transmitted from you to us. You use our websites at your own risk. Once we receive your personal information, we take steps to ensure its security on our systems.

We have no control over, and take no responsibility for, the privacy practices of third-party websites that are linked to our website via hyperlinks or banner advertising.

3.9. Data Retention

We will retain your personal data for as long as is necessary to provide you with our products and ongoing services and for a reasonable period thereafter, to enable us to meet our contractual and legal obligations and to deal with complaints and claims.

At the end of the retention period, your personal data will be securely deleted in accordance with the RBG Personal Data Retention and Destruction Policy and Schedule.

3.10. Use of Reveal Software

If you are a client using Robert Bird Group proprietary Reveal software as part of our services then, in addition to this policy, your use of Reveal is subject to the privacy policy found here: <https://vagon.io/privacy>.

3.11. Contact

You can contact the Robert Bird Group Privacy Officer for issues relating to data protection or this privacy policy by emailing privacy@robertbird.com for issues relating to data protection within the UK and Europe, or b-c-anz-legal@surbanajurong.com for any other issue.

3.12. Where can you get additional privacy information?

Australia - Federal Privacy Commissioner at <http://www.oaic.gov.au/>.

Hong Kong - Office of the Privacy Commissioner for Personal Data at www.pcpd.org.hk.

New Zealand - Privacy Commissioner's Office at <http://www.privacy.org.nz>.

United Arab Emirates (DIFC) - Data Protection Commissioner.

United Kingdom – Information Commissioner's Office <https://ico.org.uk/>

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