

# **PAYASIA**

# **Privacy Policy**

**PA-POL-105**

**Classification: Public**

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Document Control

Process Owner(s)	Process Review	Process Approval	Effective Date
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Revision History

Ver no.	Change Description	Prepared by	Reviewed by	Approved by	Date
1.0	First Version	Priyanka	Sunil Girdhar	Sunil Girdhar	01-June-2014
1.1	Revision of version number only	Venkat	Chris Brunton	Chris Brunton	01-Nov-2017
2.0	Revision of version number only	Venkat	Chris Brunton	Chris Brunton	02-Nov-2018
3.0	Revised to address GDPR requirements	Venkat	Chris Brunton & Luke Peach	Mark Samlal	19-June-2019
3.1	Revised Contact number of our DPO and representation of data subjects in EU or UK region in Contact us section	Venkat	Chris Brunton & Rebecca Bada	Mark Samlal	11-Jan-2021
3.2	Revised UK GDPR representative's address to Mortlake High Street	Venkat	Chris Brunton	Mark Samlal	07-Oct-2021

## 1. Objective

PayAsia is strongly committed to protecting personal data. This Privacy policy describes the privacy and data protection principles followed by PayAsia Pte Ltd (hereinafter referred to as “PayAsia”) and its entities around the world with regards to the personal information of its customers, partners, employees (current or former employees, trainees), applicants, contractors, prospects and vendors and current or former members of the Board of Directors, whose personal information are processed by PayAsia ("Data Subjects").

This Privacy policy explains the use and protection of personal information collected by PayAsia. It applies to any personal information you provide to PayAsia and, subject to local law, any personal information we collect from other sources.

Throughout this Privacy policy, “PayAsia” refers to PayAsia Pte Limited, including its affiliates and subsidiaries (also referred to as “we”, “us”, or “our”).

## 2. Scope:

This Privacy policy covers our information practices, including how we collect, use, share and protect the personal information you provide to us, through our web site that links to this Privacy policy. This Privacy policy also covers our information practices, including how we collect, use, share and protect the personal information of our customer’s employees.

## 3. Personal information of data subjects that is collected from our customers

PayAsia’s policy is to collect only the personal data necessary for the purpose of providing our services. We ask our clients only to share personal data with us where it is strictly needed.

PayAsia processes many categories of personal data, including:

Personal details (e.g. name, age/date of birth, gender, marital status, country of residence);  
Contact details (e.g. email address, contact number, postal address);  
Financial details (e.g. salary, payroll details and other financial-related details such as income, investments and other financial interests, benefits, tax status); and  
Job details (e.g. role, grade, experience and other information about employees).  
Special Categories of Personal Data (E.g., Reasons for Leave may reveal health information)  
Dependent’s information (E.g. Dependent’s Name, Relationship, Date of Birth, ID number, Age, Nationality. These are collected for payroll purposes). This data may be of children below 13 years of age also.

Generally, we collect personal data from our clients or from a third party acting on the instructions of the relevant client. For employees of our clients, the responsibility of obtaining and managing consent lies with our client contacts. The client contact is also responsible for the accuracy of the personal information provided to us.

We provide the following professional services

Payroll Processing (Business Process Outsourcing)  
HR Portal Management (SaaS based services including Payslip Distribution, Claim & Leave Management facilities)  
HR Services (additional services above Payroll Processing)  
Payment Processing (Salaries, Deductions, Taxation and other disbursements)

Some of our services require us to process personal data in order to provide advice and deliverables.

This is necessary for the purposes of the legitimate interests pursued by PayAsia in providing professional services.

We retain the personal data for as long as is considered necessary for the purpose for which it was collected (including as required by applicable law, regulation or contractual commitment).

In the absence of specific legal, regulatory or contractual requirements, our baseline retention period for records and other documentary evidence created in the provision of services is a minimum Five (5) years.

Personal data may be held for longer periods where extended retention periods are required by law or regulation and in order to establish, exercise or defend our legal rights.

The details of our processors (such as IT service providers, Payroll Partners) will be listed in our service contract with our customers, as these are engagement specific.

#### **4. Personal information that is collected by PayAsia when you visit our website**

We do not collect any personal information through web contact form(s). However, you may email us requesting for information of our services. In such cases, we may collect personal information such as your First Name, Last Name, E-mail Address, Job Title, Organization Name, Country, City and Phone Number. When you provide information, it enables us to respond to your request for services, we will, wherever permissible by relevant laws, collect, use and disclose this information to third parties for the purposes described in this Privacy policy.

In some instances, PayAsia automatically collects personal information pertaining to you when you visit our websites and through e-mails that we may exchange. We may use automated technologies including the use of web server logs to collect IP addresses, device details and cookies. The collection of this information will allow us to improve the effectiveness of the PayAsia website and our marketing activities. Please see our Cookies Policy for more details.

By using PayAsia's website, you agree to the processing of your information as explained in this Privacy policy.

## **Personal information that is collected from third party sources by PayAsia**

PayAsia may provide links to third-party websites for your convenience and information. If you access those links through the PayAsia website, you will leave the PayAsia website. As PayAsia does not control those sites or their privacy practices, which may differ from PayAsia's practices, we do not endorse or make any representations about third-party websites. The personal information you choose to provide to or that is collected by these third parties, including any social media websites featured on our website, is not covered by the PayAsia's Privacy Policy. We encourage you to review the privacy policy or policy of any website before submitting your personal information.

We may also provide social media features on our website that enable you to share PayAsia information with your social networks and to interact with PayAsia on various social media sites. Your use of these features may result in the collection or sharing of information about you, depending on the feature. We encourage you to review the privacy policies and settings on the social media sites with which you interact to make sure you understand how the information provided by you could be used or shared by those sites.

When you engage with us through social media sites, you may allow us to have access to certain information from your social media profile based upon your privacy preference settings on such platform.

## **Access our Websites through Mobile Devices**

If you access our websites on your mobile device, we may collect your personal information such as your First Name, Last Name, E-mail Address, Job Title, Organization Name, Country, City, Phone Number, IP address and Device details.

When you provide us your mobile phone number, you consent to the use of your mobile phone number for the purposes identified in this Privacy Policy. If you choose to refrain from receiving any text notifications from us on your mobile, we will not be using your mobile number for such purposes unless required to meet legal requirements or legitimate business purposes. We do not collect more information than we need to fulfil our stated purposes and will not retain it for longer than is necessary.

## **How We Use your Data:**

The personal information we collect may be used to:

- provide information and services as requested by you;
- assess queries, requirements, and process requests for providing our services;
- conduct data analysis;
- assess web site performance and usage analysis
- maintain leads
- run marketing or promotional campaigns
- create brand awareness
- market our services based on legitimate business interest under the applicable law;
- or
- conduct processing necessary to fulfil other contractual obligations for the individual.

With your consent, we may also use your personal information for additional purposes. Instances where sensitive personal information is collected will warrant explicit consent.

### **Sharing of personal information with the third parties:**

PayAsia does not share personal information about you with affiliates, partners, service providers, group entities and non-affiliated companies except: (a) to provide services you've requested; (b) when we have your permission; or (c) under the following circumstances:

- We may share information with affiliated entities/subsidiaries/branch offices for legitimate business purposes.
- We may provide the information to trusted entities who work on behalf of or with PayAsia under strict confidentiality agreements. These entities may use your personal information to help PayAsia communicate with you about offers from PayAsia and for other legitimate business purposes. However, these companies do not have any independent right to further share or disseminate this information;
- We may share information with statutory authorities, government institutions or other bodies where required for compliance with legal requirements.
- We may use the information to respond to subpoenas, court orders, or legal process, or to establish or exercise our legal rights or defend against legal claims;
- We may share information where we believe it is necessary in order to investigate, prevent, or take action against any illegal activities, suspected fraud, situations involving potential threats to the physical safety of any person, or as otherwise required by law.
- We may share information where we believe it is necessary in order to protect or enforce PayAsia's rights, usage terms, intellectual or physical property or for safety of PayAsia or associated parties.

We will endeavour to protect the quality and integrity of your personally identifiable information.

We will make a sincere effort to respond in a timely manner to your requests to correct inaccuracies in your personal information. To correct inaccuracies in your personal information, please return the message containing the inaccuracies to the sender.

PayAsia's websites are not directed at nor targeted at children. Any person who are below the age of thirteen shall not use our website unless supervised by an adult. By accessing our website, you represent and warrant that you are 13 years of age or older.

### **Data Subject Rights**

Your ("Data Subjects") rights with respect to your personal information:

We respect your right to be informed, access, correct, request deletion or request restriction, portability, objection, and rights in relation to automated decision making and profiling, in our usage of your personal information as required by applicable law. We also take steps to ensure that the personal information we collect is accurate and up to date.

- You have the right to know what personal information we maintain about you

- We will provide you with a copy of your personal information in a structured, commonly used and machine-readable format on request
- If your personal information is incorrect or incomplete, you have the right to ask us to update it
- You have the right to object to our processing of your personal information
- You can also ask us to delete or restrict how we use your personal information, but this right is determined by applicable law and may impact your access to some of our services
- You can have the right to access your personal information
- You have a right to object to processing of your personal information where it is so conducted by automated means and involves any kind of decision-making

### **Right to opt out**

PayAsia respects your privacy considerations and hence provides an option to you, to not provide the data or information sought to be collected.

Further, you can also withdraw your consent which was earlier given to PayAsia, and the same must be communicated to PayAsia in writing.

### **Access and rectification**

You have a right to request access to your personal information. You may send us a request for access in any format, however it is encouraged that the request is provided in writing.

You also have the right to correct any inaccuracies in your personal information. You can send us a request to rectify your data in the same way. We will comply with both rights within 30 days.

Further, you have the option to file a complaint for suspected or actual violations of your data protection rights with the relevant supervisory authority.

### **Retention of personal information:**

We will retain your personal information for as long as necessary to provide the services you have requested, or for other essential purposes such as performance of a contract, complying with our legal obligations, resolving disputes, and enforcing our policies.

### **International transfer of Personal Information:**

PayAsia may transfer certain personal information across geographical borders to PayAsia entities or service providers in other countries working on our behalf in accordance with applicable law. A Transfer of personal information has a broad meaning and occurs when information is communicated, moved, accessed or otherwise sent to another country.

In cases where personal information would need to be transferred outside of a country where PayAsia operates, towards other jurisdictions, specific requirements may apply for such Transfer to be allowed.

PayAsia may transfer personal information to a Third Party located outside the EEA without having to implement the above measures where one of the following conditions is met:

- the Data Subject has given her/his consent to PayAsia for the Transfer her/his Personal Information;



- PayAsia needs to carry out the transfer of personal information to perform or conclude a contract with the Data Subject; the transfer of personal information is necessary (i) to protect the Data Subject's vital interests (i.e. in case of a life or death situation), or (ii) to allow PayAsia to establish, exercise or defend a legal claim, or (iii) for reasons of public interest;
- the Transfer covers personal information publicly available (for instance from a public register).

PayAsia ensures the “same level of data protection” as per applicable data protection laws and regulations when it transfers your personal information to any other body corporate or a person in any country

Email:

You can contact us at the e-mail or postal address listed in the "Contact Us" section at the bottom of this Policy. Please include your current contact information, the information you are interested in accessing and your requests with regard to the same if any. We will endeavour to respond to your request, subject to reasonable limitations provided by law, unless it infringes on the privacy of other individuals.

If we are unable to entertain your request, we will provide you with the reason for refusal and inform you of any exceptions relied upon.

## **5. Anti-Spam policy:**

PayAsia recognizes the receipt, transmission or distribution of spam emails (i.e. unsolicited bulk emails) as a major concern and has taken reasonable measures to minimize the transmission and effect of spam emails in our computing environment. All emails received by PayAsia are subject to spam check. Any email identified as spam will be rejected with enough information to the sender so necessary actions can be taken. With this measure, along with other technical spam reduction measures, PayAsia hopes to minimize the effect of spam emails. PayAsia reserves the right to reject and/or report any suspicious spam emails, to the authorities concerned, for necessary action.

## **6. Data Protection and Confidentiality:**

PayAsia has implemented reasonable and adequate physical, technical and administrative security measures to protect personal information from loss, misuse, alteration or destruction.

We adhere to internationally recognised security standards and our information security management system relating to client confidential data is independently certified as complying with the requirements of ISO/IEC 27001: 2013. We have a framework of policies, procedures and training in place covering data protection, confidentiality and security and regularly review the appropriateness of the measures we have in place to keep the data we hold secure.

PayAsia discloses information to third parties only for legitimate purposes such as our service providers and agents who are bound to maintain the confidentiality of personal information and may not use the information for any unauthorized purpose. PayAsia will

ensure through contracts that the service providers are committed to “same level of data protection” as applicable data protection laws and regulations.

PayAsia may make disclosures to law enforcement authorities or regulatory bodies subject to applicable law.

PayAsia will take reasonable steps to ensure that all dealings in Personal Information, shall:

- be processed fairly & lawfully;
- be obtained only with the consent of the information provider;
- be collected, only when:
  - the information is collected for a lawful purpose connected with a function or activity of PayAsia; and
  - the collection of the sensitive personal data or information is considered necessary for that purpose.
- be available for review by the information provider, as and when requested.
- be kept secure against unauthorized or unlawful processing and against accidental loss, destruction or damage, as per the prescribed standards.

## **7. Authenticity:**

PayAsia shall not be responsible for the authenticity of the personal information supplied to it by its service providers or our customers, whose duty it is to ensure that the information provided by it or its employees is authentic.

## **8. Grievance Redressal:**

Any grievance or complaint, in relation to processing of personal information, should be sent to PayAsia in writing to the email ID given in Contact us section given below. Grievance shall be redressed as expeditiously as possible.

## **9. Effective Date:**

This Privacy Policy is effective from 1<sup>st</sup> June 2019 and it supersedes all existing policies on the subject matter.

## **10. Changes to this Privacy Policy:**

Please note that this Privacy Policy may be subject to change from time to time. The revised Privacy Policy will accordingly be published on this page. We will not reduce your rights under this Privacy Policy without your explicit consent. Please regularly check this Privacy Policy to ensure you are aware of the latest updates with respect to the same.

This Privacy Policy was last updated on 11<sup>th</sup> Jan 2021.

## **11. Contact Us**

If you have any questions or comments regarding this Privacy Policy or processing of your personal information,

Please contact our Data Protection Officer, at 01438 532 815. Alternatively, you may reach us by writing to him to [dpo@payasia.asia](mailto:dpo@payasia.asia)

**Representation for data subjects in the EU or in the UK:**

We value your privacy and your rights as a data subject and have therefore appointed Prighter as our privacy representative and your point of contact.

Prighter gives you an easy way to exercise your privacy-related rights (e.g. requests to access or erase personal data). If you want to contact us via our representative Prighter or make use of your data subject rights, please visit: <https://prighter.com/q/18464045>

**Data subjects in the EU:**

PrighterGDPR-Rep by Maetzler Rechtsanwalts GmbH & Co KG

c/o PayAsia Pte Ltd (Singapore)

**Address:**

Schellinggasse 3/10  
1010 Vienna  
AUSTRIA

**Website:**

<https://prighter.com>

Please add the following subject to all correspondence: ID-18464045

**Data Subjects in the UK:**

PrighterUK-Rep by Prighter Ltd

c/o PayAsia Pte Ltd (Singapore)

**Address:**

20 Mortlake Mortlake High Street  
London, SW14 8JN  
UNITED KINGDOM

**Website:**

<https://prighter.com>

Please add the following subject to all correspondence: ID-18464045

<https://prighter.com>

Please add the following subject to all correspondence: ID-18464045

**Data Subjects from outside EEA region:** Please contact us at

**PayAsia Pte Ltd**

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#14-00, Singapore,  
Tel: +65 6230 7360  
Fax: +65 6327 4097  
[gdpr@payasia.asia](mailto:gdpr@payasia.asia)