

Privacy Notice

This privacy notice was last reviewed or revised on February 23, 2024.

We, RXM Advisory Pte Ltd, Singapore, and its subsidiaries and affiliates (collectively, “RXM,” “us,” or “we”) understand that your privacy is important to you. We are committed to respecting your privacy and protecting your personal data. This privacy notice describes how we handle and protect your personal data (the “Privacy Notice”) when we collect it through RXM’s websites, applications, and digital assets (collectively, our “Sites”) and through our externally facing business activities, such as service offerings, events, surveys, and communications, when we interact with you and collect data from you for use by and on behalf of RXM (i.e., when RXM is acting as a data controller or similar term under applicable privacy law).

If you are an employee of a RXM client or a RXM service provider, we may receive your personal data from your employer. Our use of your personal data is governed by our agreement with your employer.

You are not required to share your personal data with us, but failing to do so may result in RXM being unable to properly provide you with our full range of services or a good user experience with our solutions, websites services or newsletters.

Please see our [terms of use](#) for more information about other terms and policies applicable to the use of our Sites.

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1. Data controller

When RXM collects and processes your personal data in accordance with this Privacy Notice, we do so as authorized under applicable data privacy laws, whether as data controller or joint controller (similar terms may be used under applicable law), which means that we determine and are responsible for how your personal data is collected, used, protected, disclosed, and disposed of.

Depending on the jurisdiction you are located in or made contact with RXM, the local RXM entity may be your main data controller.

2. How do we collect your personal data?

RXM collects personal data in the course of our business activities directly from you and from third parties:

- RXM collects personal data about you in the course of our routine business activities:
 - When you interact with our Sites, including when you manage your cookie preferences, as described in our [Cookie Notice](#);
 - When you use RXM Insights and any other RXM mobile apps;
 - When you create or log into a user profile in our Sites;
 - When you register to receive RXM newsletters and alerts and when you interact with those newsletters and alerts;
 - When you sign up for and participate in RXM conferences and events;
 - When you participate in public content posting areas, such as bulletin boards, discussion forums, and RXM social media sites;
 - When you participate in a survey, panel discussion, or individual discussion conducted by RXM; or
 - When you interact with RXM or its employees on its Sites, by email, or telephone, to ask a question, request information, or otherwise seek a response from RXM.
- RXM may also receive personal data about you from **third parties**, including service providers and data vendors in the course of our business activities. When we collect personal information from third parties, the data consists primarily of publicly available personal information compiled from business websites, public-facing social media platforms, and other widely used public sources. We also acquire deidentified datasets from certain service providers that we maintain in deidentified form. In each instance, we do our best to confirm that the third party has lawfully collected the data from appropriate sources and is authorized to share the data with RXM for the uses intended by RXM in accordance with [section three](#) below.

Sensitive personal data – We may also collect sensitive personal data directly from you, for instance when you respond to a survey or panel discussion conducted by RXM and provide us

with demographic or other personal data or when you provide information to permit us to accommodate your specific request at a conference or event. We use sensitive personal data only with your consent unless another legal basis exists (e.g., public health requirements). When we collect and use sensitive personal data for research, data analysis, and statistical purposes, we use it to produce reports and publications based on deidentified datasets.

We may combine personal data that we receive directly from you with personal data that we receive from third parties, to the extent that all such collection and use of personal data and sensitive personal data is consistent with this Privacy Notice and with the purposes and data access as described in [section three](#) below.

3. Why and how are we using your personal data?

RXM uses your personal data for different purposes and may combine data from multiple sources to accomplish those purposes. The table below summarizes the purposes for which we process your personal data, the categories of personal data that we use for each purpose, and the legal grounds on which each data processing activity is based, along with who has access to the personal data.

Managing our business relationship with you

Purpose: As an employee of a RXM client, you receive information regarding our services and solutions, including proposals, invoices, etc.

Categories of personal data: Name, pronouns, email, location, professional or employment related information like job title, position, or employer.

Legal basis for use: Legitimate interest for the provision of services.

Data access: RXM subsidiaries and affiliates and third-party service providers as disclosed in [section five](#) of this Privacy Notice.

RXM.com account

Purpose: If you create an account in RXMAdvisory.com, you receive access to newsletters, alerts, unlimited articles download and personalized content in our application.

Categories of personal data: User ID, password; name, pronouns.

Legal basis for use: Your consent, when creating a user profile.

Data access: RXM subsidiaries and affiliates and third-party service providers as disclosed in [section five](#) of this Privacy Notice.

Newsletters and alerts

Purpose: If you register for RXM newsletters and alerts, you receive business, management, or industry-specific information.

Categories of personal data: User ID, pronouns, name and email address, phone number.

Legal basis for use: Legitimate interest for the provision of our services.

Data access: RXM subsidiaries and affiliates and third-party service providers as disclosed in [section five](#) of this Privacy Notice.

Conferences and events

Purpose: Sign up for and process your requests to participate in conferences and events, including webcasts.

Categories of personal data: Name, pronouns, email, location, professional or employment-related information like job title, position, employer, dietary information, or health-related information to accommodate for any special requirements, including disabilities, or authorizations for audio and video material if we are taking pictures or videos.

Legal basis for use: Legitimate interest to provision you access to our conferences and events and based on your consent, where legally required, when signing up for conferences and events with regards to participating in audio or video, webcasts or other media events.

Data access: RXM subsidiaries and affiliates and third-party service providers as disclosed in [section five](#) of this Privacy Notice.

Public user posts and surveys

Purpose: Participate in public user posting areas, including bulletin boards and discussion forums, and participate in surveys for research or other business-related purposes. For each survey, we provide you with specific information concerning which personal data is collected and how the processing activity is carried out.

Categories of personal data: Your personal preferences and information you provide about you, comments, statements, or posts.

Legal basis for use: Your consent provided when posting in such forums and participating in surveys.

Data access: RXM subsidiaries and affiliates and third-party service providers as disclosed in [section five](#) of this Privacy Notice.

Benchmarking and analytics

Purpose: Conduct benchmark and data analytics activities, such as analysis of recruiting practices across an industry, detecting fraud patterns in connection with financial transactions, and consumer traffic in retail environments.

Categories of personal data: Specific business information related to you, location, behavioural data, etc.

Legal basis for use: Our legitimate interest in doing research and analytics activities as part of our business and, when needed, your consent to RXM or the third parties that provide us with the information.

Data access: RXM subsidiaries and affiliates and third-party service providers as disclosed in [section five](#) of this Privacy Notice.

Maintain and provide RXM's services

Purpose: Provide our services or products to our clients, including benchmarking products.

Categories of personal data: Access data, email, and your name for communication with you, preferences on website or app use, etc.

Legal basis for use: Legitimate interest in promoting and protecting RXM, provision of our services and building and maintaining relationships.

Data access: RXM subsidiaries and affiliates and third-party service providers as disclosed in [section five](#) of this Privacy Notice.

Legal compliance and legal actions

Purpose: Comply with all applicable regulations, exercise legal actions and legal defence at courts, prevent fraud, and enforce RXM's agreements, this Privacy Notice, the Cookie Notice, and our terms of use, as well as complying with corporate reporting obligations.

Categories of personal data: Data will depend upon specific legal requirement.

Legal basis for use: Compliance with all applicable laws and regulations.

Data access: RXM subsidiaries and affiliates and third-party service providers as disclosed in [section five](#) of this Privacy Notice.

Applications security and data analytics.

Purpose: Collect data from your use of our applications, websites, and services to analyse user activity, fix errors, monitor usage, and improve the security and performance of our websites, service, & mobile applications. For example, RXM receives reports on some of our mobile applications' aggregate usage and browsing patterns. RXM also receives reports on errors occurring within mobile applications.

Categories of personal data: Aggregated data on browsing patterns and mobile app usage, including information about the type of device used, articles accessed, and other events occurring within our apps.

Legal basis for use: Legitimate interest to improve functionality and ensure security of users' data and our business

Data access: RXM may use third-party service providers as disclosed in [section five](#) below.

RXM Knowledge app

Purpose: Offer, via RXM Knowledge app a personalized list of recommendations directing you to RXM content that we think you will find interesting.

Categories of personal data: Recommendations are based solely on what you have viewed in the Insights app. A unique user identifier that is generated by the app helps personalize your app experience and tracks the articles that you read in the app.

Legal basis for use: Legitimate interest for the provision of our services and running our business.

Data access: We do not share your viewing history or trends through the Knowledge app with other users or any external third parties (i.e., persons or entities that are not affiliates or third-party service providers of RXM).

Aggregation, anonymization, and deidentification of your data

Purpose: Aggregate, deidentify, or anonymize your personal data so that, depending on and in compliance with applicable law, your data is no longer considered as personal data. We may use such data for the provision of our services, including research or statistical analysis, and may share such data with our clients or other business parties.

Categories of personal data: Personal data, personal data, including as identified for other purposes in this chart.

Legal basis for use: Legitimate interest for the provision of our services and to protect your privacy.

Data access: See [section four](#) below. RXM maintains deidentified personal data in deidentified form and does not use or permit others to use deidentified data in any way that would identify or reidentify individuals in the data set.

Marketing communications

Purpose: Based on your preferences and opt in when you sign up for newsletters, events, and similar activities, we may send you newsfeeds or updates about RXM in relation to your interests. You can opt out of those communications at any time.

Categories of personal data: Name, email address, title, company.

Legal basis for use: Your consent when signing up for newsletters, events, and similar activities.

Data access: RXM subsidiaries and affiliates and third-party service providers, as disclosed in [section five](#) of this Privacy Notice.

Whenever the legal ground is our legitimate interest, RXM only processes your personal data after assessing the adequacy, proportionality, and legitimacy of the data-processing activity.

If consent as a legal basis for processing has been relied upon and you have withdrawn it, we may not be able to properly provide you with our full range of services and a good user experience.

RXM does not use automated decision making to make decisions that have legal impact on you or that significantly affect your rights and liberties. All automated processing activities are conducted with appropriate human supervision and review.

RXM's use of cookies and other tracking technologies. RXM may use first- and third-party cookies and other tracking technologies, including web beacons, to manage our Sites and services, and to collect analytics about how you use them. RXM may collect information about whether you open or click any links in the knowledge, research, or event communications that we send you. You have options regarding our use of cookies and other tracking technologies. Please refer to our [Cookie Notice](#) for more details and to manage your choices.

In addition, we use tools and applications that reduce security threats and reduce the risk of access by bots and automated devices, but we do not use those tools and applications for non-security purposes.

4. What do we *not* do when we collect and process your personal data?

We do not acquire, use, or allow others to use deidentified data with the intent of identifying or reidentifying individuals. When we receive deidentified data or transform personal data that we have collected into deidentified data, we make the following commitments:

- RXM will maintain deidentified data in deidentified form.

- Except to the extent necessary to confirm that personal data has been transformed into deidentified data, RXM will not attempt to identify or reidentify specific individuals within a deidentified dataset or otherwise use deidentified data to attempt to associate specific individuals with individual characteristics and will not permit any entity or individual acting on RXM's behalf to do so.
- To the extent, if any, that RXM provides access to or otherwise discloses a deidentified dataset to a non-RXM recipient, for example, a service provider or a client, it will require each such recipient to agree to maintain the deidentified data in its deidentified form and not attempt, or permit others to attempt, to identify or reidentify specific individuals within the deidentified dataset or otherwise use deidentified data to attempt to associate specific individuals with individual characteristics.

5. Who has access to your personal data? Data recipients and international data transfers

Personal data collected in the course of RXM business activities may be transferred and made available to RXM entities, service providers, and third parties as necessary to accomplish the specific business purposes for which the personal data were collected and to support our interactions with you, and otherwise as required to comply with applicable law. The RXM entity that collects your personal data may provide access to and transfer your data to the following categories of data recipients, for the business purposes described in [section three](#), above:

- To RXM's subsidiaries and affiliates and personnel across our global organization;
- To RXM's service providers and personnel;
- To RXM's legal and professional advisors;
- To third parties in the following circumstances;
 - If we are required to do so by law or legal process;
 - To law enforcement authorities or other government officials pursuant to lawful request;
 - When we believe disclosure is necessary or appropriate to prevent physical harm or financial loss or in connection with an investigation of suspected or actual illegal activity;
 - If disclosure is necessary to protect the vital interests of a person;
 - To enforce our [terms of use](#).
 - To protect our property, services, and legal rights;
 - To prevent fraud against RXM, our subsidiaries, affiliates and/or business partners;
 - To aid in RXM's investigation of an actual or suspected security incident, such as a breach involving confidential information or personal information or a violation of RXM policy;
 - To support auditing, compliance, and corporate governance functions;
 - To comply with any and all applicable laws.
- To a successor or different business entity in the event of a reorganization, merger, sale, joint venture, assignment, or other transfer or disposition of all or any portion of our business.

To protect personal data that is transferred internationally, RXM complies with all applicable data transfer laws, including incorporating required data transfer terms into our agreements with RXM affiliates, subsidiaries, service providers, and third parties.

6. Security

RXM protects and safeguards your personal data globally, in accordance with applicable law, our privacy and data security policies, and this Privacy Notice. We use generally accepted standards of technical and operational security to protect your personal data against accidental or unlawful loss, misuse, alteration, or destruction, in consideration of the risks associated with the personal data and its processing, and we require the same level of protection and safeguarding from our subsidiaries and affiliates, our service providers, and third parties. Only authorized personnel of RXM and of our service providers are permitted to access personal data, and these employees and service providers are required to treat this information as confidential. Despite these precautions however, RXM cannot guarantee that unauthorized persons will not obtain access to your personal data.

7. How long do we keep your personal data?

RXM keeps your personal data only as long as necessary to accomplish the business purposes for which it was collected to meet our legal or contractual obligations and in compliance with RXM's data-retention policy. We will securely delete your personal data promptly after the purposes described above cease to apply in accordance with the prevailing market practice for such destruction.

If you request that we delete your personal data, RXM will comply with applicable law and will make reasonable attempts to delete all instances of the personal data, subject to our right to keep a copy of such data for the purposes mentioned above. For requests for access, corrections, or deletion, especially where the processing is based on your consent, please refer to [section nine](#) of this Privacy Notice.

8. Data collection from children

RXM does not intentionally use its Sites and business content to collect or maintain personal data from individuals under the age of 16. To the extent that any of our non-site business activities may involve collecting or maintaining personal data from or about individuals under the age of 16, we would do so only with the required legal consent from the parent, guardian, or individual and in accordance with applicable law.

9. What are your data protection rights, and how can you exercise them?

9.1. Your data protection rights.

Subject to applicable law, including exceptions, you have the following rights with regard to the personal data that we collect about you:

- Right to request information about the personal data that we hold about you, including information about how we use your personal data, who has access to it, and the terms under which third parties have access to your personal data;
- Right to request a copy of the personal data that we hold about you;
- Right to request portability of your data to permit you to provide a copy of your personal data in a structured, commonly used, and machine-readable format and to transmit that personal data to another controller;
- Right to request that we correct or otherwise amend your personal data if it is not correct or otherwise not complete, timely, and accurate for the purposes for which we are using it;
- Right to request deletion of your personal data;
- Right to request that we cease processing or restrict or limit the processing of your personal data;
- Right to withdraw your consent to our processing of your personal data where the basis of our processing is your consent;
- Right to not be discriminated against for exercising your individual rights regarding your personal data;
- Right to request review by RXM's Global Protection Officer and, if applicable, RXM's data protection officer for your jurisdiction, of our response to your request to exercise your individual data protection rights; and
- Right to seek additional legal remedies regarding our response to your request to exercise your individual data-protection rights, depending upon your jurisdiction, by lodging a complaint with your data-protection authority or initiating a legal proceeding.

9.2. How do you exercise your data protection rights?

You can contact the Data Protection Officer for your jurisdiction at general@rxmadvisory.com.

If you would like to exercise your data protection rights regarding your personal data, you can do so by:

- Emailing your request to us at: [Data Protection](#)

Upon receipt of your request to exercise your data-protection rights, we will acknowledge receipt within the time period required by applicable law and provide you with information about the next steps in the process and the timing. To help protect your privacy and security, we may take reasonable steps to verify your identity before acting on certain data protection rights, in accordance with applicable law. If you are using an authorized agent to exercise your data protection rights and that agent does not provide a power of attorney with the initial request, we may request further evidence of the agent's right to act on your behalf, including valid written authorization or contacting you to verify the request.

Please note that applicable laws include exceptions to assertions of data protection rights that may prevent us from providing access to your personal data or otherwise fully complying with your request. If we believe exceptions apply, we will respond to your request to the

extent we are able to do so, and we will provide an explanation of the basis for not complying wholly or partially with your request.

9.3. How to unsubscribe to RXM newsletters and alerts?

If you receive RXM newsletter or alerts, or if you receive invitations to surveys or events from RXM and if you would prefer not to receive future email communications from us, you may unsubscribe by:

- Emailing us at general@rxmadvisory.com