

## BCG RISE PLATFORM PRIVACY POLICY

### Who we are

This is the Privacy Policy for The Boston Consulting Group, Inc. and its affiliates (BCG or we). This privacy policy was last updated in December 2020. For more detail on BCG's international operations please see <https://www.bcg.com/about/offices/default.aspx>

### Applicability of this Privacy Policy

This Privacy Policy applies only to your use of the RISE Platform (Platform) where access is granted to you by BCG as a Program Partner, as part of the RISE Program, a 6-month program designed to enhance employability by building high-demand business and digital skills.

### Important information about this Privacy Policy

BCG understands that your privacy is important. This Privacy Policy (together any applicable Trainees Terms which you may also be asked to agree to and any additional terms of use incorporated by reference into the Trainees Terms) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. This Platform is not intended for and does not intentionally target or solicit to children or anyone of 18 years of age and younger. Please read the following carefully to understand our practices regarding your personal data and how we will treat it.

### Changes to this Privacy Policy

Please note that BCG may, in its discretion, amend this privacy policy from time to time. To ensure you are able to remain informed about the information we collect and how we use it, material changes to our statement will be reflected here and we will notify you whenever we make a material change to this Privacy Policy. The Platform may contain links to external sites or services which are not governed by this Privacy Policy. BCG does not take responsibility for the privacy practices of any third party sites to which we link. We encourage you to review the privacy policies of any such sites before you submit information there.

### Contact details

Our full details are  
Data Protection Office  
The Boston Consulting Group Singapore LTD  
50 Raffles Place, #44-02/03  
Singapore Land Tower  
Singapore 048623  
[Dataprotectionoffice@bcg.com](mailto:Dataprotectionoffice@bcg.com)

### The data we collect about you

The platform may collect, use, store and transfer the following personal data about you:

First name, last name, email address, date of birth, identity type, gender, ethnicity, national registration identity card, nationality, phone number, educational certifications, National Services status, years of employment, last job title, last drawn income, employment status, employment proof documents (e.g. past employment payslips or letter of employment or letter of offer or CPF contribution history), curriculum vitae, interest for specialisation and other details needed for the objective for learning, operations, compliance and employment assistance under RISE

We also collect, use and share aggregated data such as statistical data for any purpose. Aggregated data could be derived from your personal data but is not considered personal data in law as this data will not directly or

indirectly reveal your identity. For example, we may aggregate the data relating to details of your use of the Platform to calculate the percentage of users accessing a specific Platform feature. However, if we do ever combine or connect aggregated data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this Privacy Policy.

We do not collect any special categories of personal data about you (this includes details about your 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 collect any information about criminal convictions and offences

#### **How your personal data is collected**

We will collect and process the following data about you:

Information you give us. This is information you consent to giving us about you by filling in forms on the Platform, or by corresponding with us (for example, by email or phone). It includes information you or your company provides when you register to the Platform or when you report a problem with the Platform. If you contact us, we will keep a record of that correspondence.

#### **Cookie/Device storage objects**

##### *Facebook pixel*

With your consent, we make use of a pixel from Facebook to collect information including, for example, information on how you came to the Platform, your IP address and how you use the Platform. We use this information to ensure that the recommendations and information that are viewed by you are more relevant to you and your interests.

##### *Sessions cookies and analytics cookies*

We make use of sessions cookies and analytics cookies on the Platform. The sessions cookies are used for system login management for logged in users and assist in the running of the Platform, while the analytics cookies are used to track information such as the number of users and their frequency of use, profiles of users and their preferred sites. Neither of these types of cookies collect personal data about you or enable us to identify you. The cookies also assist in site security, network management and accessibility.

When you first access the Platform, these cookies will be placed on your device for the purposes described in the paragraph above. You may disable these by changing your browser settings, but this may affect how the Platform functions. Without these cookies, some of the services which you would like to access may have reduced functionality or not be available to you.

The way in which cookies can be managed depends on your browser. The following links provide information on how to configure or disable cookies in each browser:

- Google Chrome: <https://support.google.com/chrome/answer/95647?hl=en>
- Mozilla Firefox: <https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences>
- Internet Explorer: <https://windows.microsoft.com/en-SG/internet-explorer/delete-manage-cookies#ie=ie-9>
- Safari: [https://support.apple.com/kb/HT1677?utm\\_source=Agillic%20Dialogue](https://support.apple.com/kb/HT1677?utm_source=Agillic%20Dialogue)
- Safari for iPhone: <https://support.apple.com/kb/ta38619>
- Chrome for Android: <https://support.google.com/chrome/answer/2392971?hl=en>

### How we use your personal data

We will only use your personal data when the law allows us to do so. Most commonly we will use your personal data in the following circumstances:

- Where you have consented on or before the collection, use and/or disclosure of your personal data;
- Where we are otherwise permitted to do so under applicable law.

### Purposes for which we will use your personal data

We process your personal information for the following purposes:

Managing access to the Platform, monitoring usage of the Platform and providing support related to accessing and using the Platform; Informing you about updates to the Platform; Tailoring your experience at the Platform with relevant materials; Understanding the Platform's user population, identifying subject areas of interest, and determining whether the Platform is designed to work with the Device settings of a majority of our visitors; and Improving our Platform content and navigation. Insofar as you have granted us consent to the processing of personal information for specific purposes (including registration on the Platform), the lawfulness of such processing is based on your consent. You may withdraw your consent to the extent permitted by applicable law, by sending an email contact@bcg-rise.com

We will not sell, share, or rent or otherwise make available your personal information to other parties, except that we may disclose the information to third parties who perform services on our behalf and have a need to access the information in connection with those services. Any third parties will only process this information to the extent to which and within the limits that BCG itself is permitted to process that data.

### Disclosures of your personal data

The third parties with whom we may need to share personal information to help us provide the Platform are: our subsidiaries or affiliates; our advisors; our business partners; Singapore Government Agencies who may have access to your personal information in relation to the Program completion of your learning tasks.; third-parties for maintenance; our third-party service providers who process information on our behalf to provide training content, assessment and operations help run some of our internal business operations including IT services and IT infrastructure and cloud storage capabilities to enable the Platform to function or any other third parties that we appoint to supersede such service providers; and law enforcement bodies in order to comply with any legal obligation or court order.

Because BCG is a global organization we need to transfer personal information which is collected by the Platform or through other means across the BCG group of companies <https://www.bcg.com/about/offices/default.aspx> to help operate our business efficiently. This also includes third parties located in different countries around the world, including outside Singapore. These arrangements may involve your personal information being located in various countries around the world where privacy laws differ. We only make these arrangements or transfers where we are satisfied that adequate levels of protection are in place to protect information held in that country. In addition, the Platform may be viewed and accessed anywhere in the world including countries that may not have laws regulating the use and transfer of personally identifiable information. By using the Platform or or submitting personal information to BCG through other means you voluntarily consent to such international transfer and hosting of such information to those countries and parties.

### Compliance with law

BCG complies with all applicable privacy laws and regulations. BCG may be compelled to surrender personal user or customer information to legal authorities if presented with a court subpoena or similar legal or administrative order, or as required or permitted by the laws, rules and regulations of any nation, state or other applicable jurisdiction. Also, in the event of a violation of the terms and conditions of use of the Platform or a violation of

any restrictions on use of materials provided in or through the Platform, we may disclose personal user information to authorities.

#### **Data security**

All information you provide to us is stored on our secure servers operated by our third-party hosting providers, BCG has in place appropriate technological and operational security processes designed to protect personal data from loss, misuse, alteration or destruction. Only authorized employees and contractors will have access to any data provided by you, and that access is limited by need. Each employee or contractor having access to any personal data is obligated to maintain its confidentiality. Although we take steps that are generally accepted as industry standard to protect your personal data, BCG cannot guarantee that your personally-identifiable information will not become accessible to unauthorized persons and BCG cannot be responsible for any actions resulting from a breach of security when information is supplied over the internet or any public compute network. We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator when we are legally required to do so.

#### **Data retention**

BCG retains your personal information for so long as is necessary to fulfil the purpose for which it was collected. We may retain your personal information for longer if they may be the subject of a legal claim, or may otherwise be relevant for future litigation.

In some circumstances we will anonymise and/or aggregate your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

#### **Your legal rights**

In accordance with applicable data protection laws you have a right to request a copy of the personal information we hold about you and details of how we use that information. If any of the information held about you is incorrect or out of date, you have the right to amend or rectify it, please follow the process outlined below and we will amend our records where appropriate. You also have the right to require us to erase your personal data, stop processing your personal data, restricting the processing of your personal information, right of portability of your personal information and/or to withdraw your consent to processing. This may not apply if there are other legal justifications to continue processing. If you think we may have incorrect personal information, or would like a copy of the personal information we hold on you, or to exercise any other data protection right, please contact us. Please note that we need you to prove who you are before we can provide you with any information.