

Privacy Policy

The use of the Website entails various types of personal data being provided for various purposes. Under the Personal Data Protection Act (No. 26 of 2012) (the PDPA), "personal data" means data, whether true or not, about an individual who can be identified from that data; or from that data and other information to which the organisation has or is likely to have access. The PDPA governs and protects the collection, use, disclose and care of personal data. Organisations will have to comply with the PDPA as well as the common law and other relevant laws that are applied in the specific industry that they belong to, when handling personal data in their possession.

By accessing the Website and creating a user account with Smartly, Users agree and consent to Smartly and assigns collecting, using, disclosing personal data in accordance with the Privacy Policy.

1. COLLECTION OF PERSONAL DATA

1.1 Users may browse the Website anonymously. However, Users will have to create a user account in order to start investing towards a portfolio recommended to them.

1.2 When creating a user account with Smartly, provided by VCG Partners Pte. Ltd. ("VCG"), Users consent to provide their personal data, including but not limited to:

1.2.1 name;

1.2.2 email address;

1.2.3 mailing address; and

1.2.4 phone number.

1.2.5 personal identification

1.2.6. bank account information

1.3 Users may create a user account using personal information as provided for on the Website from time to time. In doing so, Users consent to VCG collecting personal data that may be available through social media networks, including but not limited to Facebook.

1.4 Smartly may store such personal data for the purposes provided for in paragraph 2 and if applicable, verify such credentials with the relevant social media network.

1.5 If Users provide VCG with any personal data relating to a third party, by submitting such information to VCG, Users represent to VCG that they have obtained the consent of the third party to provide VCG with such personal data for the purposes stated in paragraph 2.1.

1.6 Users shall ensure that all personal data submitted to VCG is complete and accurate. Any omission or failure to do so may prevent VCG from fulfilling the purposes stated in paragraph 2.

2. USE OF PERSONAL INFORMATION

2.1 VCG uses personal data for the following purposes: i. to personalise User experience and respond to individual needs; ii. to improve and receive feedback on the Website; iii. to improve customer service and provide support services; iv. to send periodic emails, including but not limited to portfolio performance, news, updates and related information.

3. DISCLOSURE

3.1 VCG may disclose personal data to other third party service providers in connection with the services provided by Smartly on the Website, on condition that the disclosed personal data is kept confidential and not further disclosed.

3.2 VCG may disclose personal data for legal purposes (including but not limited to compliance, enforcement of legal rights and obligations and to obtain legal advice).

3.3 VCG employs security measures to protect personal data. All personal data collected on the Website is transmitted via Secure Socket Layer (SSL) technology and then encrypted into the gateway provider's database only to be accessible by those authorized with special access rights who are required to keep the personal data confidential.

4. COOKIES

4.1 Cookies are small files that a website or service provider transfers to computer hard drives through a web browser that enables the website or service provider's systems to recognize the browser and record certain information.

4.2 VCG uses cookies on the Website to record Users' usage patterns and trends and customize User experience. VCG may engage third party service providers to assist in such purposes. However, such third party service providers may not disclose personal data obtained in the course of their engagement to any other parties.

4.3 Users may disable the processing of cookies on their web browsers but this may prevent Users from maximising the services provided by Smartly.

5. THIRD PARTY WEBSITES

5.1 VCG shall not be responsible for the collection, use, disclosure and care of personal data by any third party websites linked to the Website.

6. WITHDRAWAL OF CONSENT

6.1 Users may contact VCG at support@smartly.sg to withdraw their consent to the use of personal data by VCG, following which VCG shall cease to further collect, use and disclose personal data of that User.

6.2 Users should be aware that the withdrawal of consent may prevent them from utilising the services provided by VCG.

7. CHANGES TO PRIVACY POLICY

7.1 Upon any amendments to the Privacy Policy, VCG shall update the Website and notify Users if it deems the changes substantial.

8. FEEDBACK

8.1 Users may contact VCG at support@smartly.sg if there are any questions or feedback regarding the Privacy Policy.

9. GOVERNING LAW AND JURISDICTION

9.1 The Privacy Policy shall be governed by and in accordance with the laws of Singapore.