

Sunseap

Data Protection Policy

Sunseap Group of Companies respect the privacy of all our customers. We are committed to protecting the personal information you provide to us.

We conduct our business in compliance with the Personal Data Protection Act (PDPA) and has implemented measures to protect your personal information.

1. Your Personal Data

- 1.1. This Policy is based on the Singapore Personal Data Protection Act 2012, and all associated regulations and guidelines as may from time to time be issued by the Personal Data Protection Commission (PDPC) of Singapore.
- 1.2. By providing your personal data to us, you agree to the terms of this Policy. Please review this Policy carefully before providing us with any of your personal data.

2. Collection of Personal Data

2.1. Examples of such Personal Data you may provide to us include (depending on the nature of your interaction with us):

- (i) Full Name;
- (ii) NRIC/ Passport Number / Any other Identification Number;
- (iii) Residential Address in Singapore and/or overseas;
- (iv) Contact details such as telephone number(s), email address, mailing address;
- (v) Gender;
- (vi) Nationality;
- (vii) Date of Birth;
- (viii) Credit card information;
- (ix) Information about your interaction and usage of our services;

2.2. We may collect Personal Data in the following ways:

- (i) When you submit forms relating to any of our products and services;
- (ii) When you register for or use any of our services on websites owned and/or operated by us when you register as a member of websites owned and/or operated by us, or use services on such websites, or participate in any of our social media offerings, such as through our Facebook pages;
- (iii) When you use our services;
- (iv) When you request that we contact you, to be included in an email or other mailing list;
- (v) When you purchase or obtain third party services through us;
- (vi) When you respond to our request for additional Personal Data;
- (vii) When you interact with our personnel from our sales personnel, business development personnel, marketing representatives, customer service officers;
- (viii) When you are contacted by, and respond to, our sales personnel, business development personnel, marketing representatives, and customer service officers;
- (ix) When you subscribe or ask to be included in our email or other mailing lists;
- (x) When you respond to our promotions and other initiatives;
- (xi) When you respond to our market surveys;
- (xii) When you enter into an agreement with us;

2.3. If you provide us with any Personal Data relating to a third party (eg: information of your business partner and/or employees), by submitting such information to us, you represent to us that you have obtained the consent of the third party to provide us with their Personal Data for the respective purposes.

2.4. You should ensure that all Personal Data submitted to us is complete, accurate, true, and correct. Failure on your part to do so may result in our inability to provide you with the products and services you have requested.

3. Purpose for the Collection, Use and Disclosure of Your Personal Data

3.1. In general, we collect, use, and disclose your Personal Data for the following purposes:

- (i) To provide you with the products and services that you have requested;
- (ii) To communicate with you and respond to your queries, requests and complaints;
- (iii) Managing the administrative and business operations, and complying with internal policies and procedures;
- (iv) To help us profile, review, develop, manage, and enhance our products and services, as well as analyzing future customers' needs;
- (v) To provide you with on-going information about our products and services which may be relevant to you;
- (vi) To handle disputes, conduct and facilitate investigations and proceedings;
- (vii) To protect and enforce our contractual and legal rights and obligations;
- (viii) To prevent, detect, and investigate suspected illegal activities, including fraud and money-laundering, and to analyze, as well as manage commercial risks;
- (ix) Providing media announcements and responses;
- (x) Meeting or complying with any applicable rules, laws, regulations, codes of practice, or guidelines issued by any legal or regulatory bodies which are binding on Sunseap;
- (xi) To facilitate any proposed or actual business transactions involving Sunseap;
- (xii) To comply with applicable rules, laws and regulations, codes of practice or guidelines, or to assist in law enforcement and investigations by relevant authorities;
- (xiii) Purposes which are reasonably related to the aforesaid.

3.2. On top of the above, where permitted under the Act, we may also collect, use, and disclose your Personal Data for the following purposes:

- (i) Conducting market research and surveys to enable us to understand and determine customer location, preferences, and demographics to develop special offers and marketing programmes in relation to Sunseap's products and services, and to improve our service delivery and your customer experience;
- (ii) Providing additional products and services and incentives to you, including promotions, loyalty and reward programmes from Sunseap;
- (iii) Matching Personal Data with other data collected for other purposes and from other sources (including third parties) in connection with the provision, marketing or offering of products and services by Sunseap;
- (iv) Leads generation and management for marketing Sunseap's products and services;
- (v) Communicating to you advertisements involving details of our products and services, special offers and rewards;
- (vi) Organizing promotional events and corporate social responsibility projects;
- (vii) Purposes which are reasonably related to the aforesaid.

3.3. If you have provided your Singapore telephone number(s) and have indicated that you consent to receiving marketing or promotional information via your Singapore telephone number (s), then from time to time, Sunseap may contact you using such Singapore telephone number(s) with information about our products and services, or those products and services offered by our preferred partners:

3.4. In relation to particular products and services, or in your interactions with us, we may also have specifically notified you of other purposes for which we collect, use, and disclose your Personal Data. If so, we will collect, use, and disclose your Personal Data for these additional purposes as well, unless we have specifically notified you otherwise.

3.5. You have a choice to withdraw your consent for receiving marketing or promotional materials/communication. You may contact us using the contact details found below (please see 6).

3.6. Please be aware that once we have received confirmation that you wish to withdraw your consent for marketing or promotional materials/communication, it may take up to 30 working days for your withdrawal to be reflected in our systems. Therefore, you may still receive marketing or promotional materials/communication during this period of time. Please note that even if you withdraw your consent for the receipt of marketing or promotional materials, we may still contact you for other purposes in relations to the products and services that you have hold or have subscribed to with Sunseap.

4. Disclosure of Personal Data

4.1. We will take reasonable steps to protect your Personal Data against unauthorized disclosure. Subject to the provisions of any applicable law, your Personal Data may be disclosed, for the purposes listed above (where applicable), to the following:

- (i) Companies in the Sunseap Group;
- (ii) Business partners and vendors that we work with to deliver the products and services you have subscribed to;
- (iii) Industry regulators and other government organizations, as required by local laws and regulations;
- (iv) Financial institutions for purposes such as facilitating debit card and/or credit card payments;
- (v) Research institutions for market analysis purposes;
- (vi) Relevant government regulators, statutory boards, authorities, or law enforcement agencies to comply with any laws, rules, guidelines, and regulations or schemes imposed by any government authority;
- (vii) Our professional advisors such as auditors and lawyers;
- (viii) Any other party to whom you authorize us to disclose your Personal Data to.

We will also ensure that overseas organizations we work with will observe strict confidentiality and data protection obligations.

5. Respecting your contact preference

5.1. Sunseap is committed to complying with the Do Not Call (DNC) provisions. We have always been mindful in engaging our customers in a more targeted and relevant way.

We may send marketing messages to your Singapore telephone number if:

- (i) You have given us consent, or;
- (ii) You have not registered with the national DNC Registry, or;
- (iii) The sending of such messages is permissible under applicable laws and regulations.

Our marketing messages aim to update you about our exclusive offers, rewards programme, and special deals from our preferred partners.

6. Withdrawal of Consent, Access, and Correction of your Personal Data

6.1. If you:

- (i) Have any questions or feedback relating to your Personal Data or our Data Protection Policy;
- (ii) Would like to withdraw your consent to any use of your Personal Data as set out in this Data Protection Policy;
- (iii) Would like to obtain access or make corrections to your Personal Data information,

please contact Sunseap as follows:

Email: dpo@sunseap.com

6.2. Please note that if your Personal Data has been provided to us via a third party, you should contact that organization or individual to make queries, complaints, access, and correction requests to Sunseap on your behalf.

6.3. If you withdraw your consent to any or all use of your Personal Data, depending on the nature of your request, Sunseap may not be in the position to continue to provide our product and services to you, administer any contractual relationship in place, which in turn may also result in the termination of any agreements with Sunseap, and you being in breach of your contractual obligations or undertakings. Sunseap legal rights and remedies in such event are expressly reserved.

7. Governing Law of Singapore

7.1. This Data Protection Policy and your use of this website shall be governed in all respects by the laws of Singapore.