

## **Privacy Policy (User Registration) - GoSpree (Updated on 18 May 2017)**

### **1. Introduction**

- a. Singapore Retailers Association and our subsidiaries, affiliates, related corporations, associated companies, service providers and agents (“SRA”) take privacy very seriously. We ask that you read this privacy policy (the “Privacy Policy”) carefully as it contains important information about: (i) what to expect when SRA collects personal data (“Personal Data”) about you and how SRA will use your Personal Data; and (ii) how you may use personal data of our shopper (collectively, known as shopper). This Privacy Policy is provided in connection with [the Personal Data Protection Act (Act 26 of 2012) of Singapore (the “PDPA”)], and governed by and construed in accordance with [Singapore] law.
- b. This Privacy Policy applies to information we collect on our mobile app ‘GoSpree’ (the “App”) about:
  - a. visitors to the App;
  - b. users who have registered an account with us through the App;
  - c. users who have provided their email addresses to us through the App; and

### **2. Acceptance Of Privacy Policy**

- a. This Privacy Policy describes how your Personal Data is collected, used, shared, stored and protected by SRA, and how you may use the personal data of our shopper. By continuing to use the App and/or by accessing and using our Services (as defined in our Terms of Use), you agree to be bound by the terms of this Privacy Policy which is subject to our Terms of Use and you give your consent for the collection, use and disclosure of your Personal Data and agree to use the personal data of our shopper in accordance with this Privacy Policy.

### **3. Collection Of Information**

- a. We may obtain data about you when you visit the App. We may monitor your use of this App through the use of cookies and similar tracking devices. For example, we may monitor the number of times you visit our App or which other Apps and/or web-pages you visit. This information helps us to build a profile of visitors to our App and our users. Such data will be aggregated or statistical, which means that we will not be able to identify you individually.
- b. We may collect and store your Personal Data including but not limited to the following:
  - a. personally identifiable information (e.g. your name, mailing address, e-mail address, password to access our App, credit or debit card information, etc.) which you voluntarily provide for the Purposes (as defined below) in connection with your use or access of the Services including, but not limited

to, when you create an account with us, make payments, upload, post, display or otherwise transmit any content on or through the Services, communicate with another person or entity through the Services or contact us by e-mail or telephone; and

- b. non-personally identifiable information (e.g. the URL you last visited or next access, your browser type, your IP address, etc.) which is collected automatically from you when you interact with the App (as defined in our Terms of Use) through the use of software or other automated processes that the App uses.
- c. We will only keep Personal Data for as long as we are either required to by law, for our business, or as is relevant for the purposes for which it was collected.

#### **4. Use Of Information**

- a. We may use your Personal Data for some or all of the following purposes and/or other purposes as notified to you or as permitted by law (the "Purposes"):
  - a. to process your registration for our Services;
  - b. to process orders and payment transactions made by you;
  - c. to respond to enquiries or requests from you and provide customer service;
  - d. to send you information, notices, updates or to otherwise contact you when necessary;
  - e. to help us provide, maintain, develop, test, enhance and personalize our Services to you;
  - f. to diagnose and resolve any problems with the Services;
  - g. to detect or investigate any prohibited, illegal, unauthorized or fraudulent activities;
  - h. to monitor and analyze user activities and demographic data including trends and usage of the Services;
  - i. to generate and/or track anonymous analytics data;
  - j. to back up our systems and allow for disaster recovery;
  - k. to protect the rights, property or personal safety of our staff or the public;
  - l. to facilitate direct business-to-business sales with our partners;
  - m. any other purposes in connection with the Services which we may notify to you or to further your interaction with us; and/or
  - n. to comply with any law, court order or other legal compulsion.

- b. Specifically, when you provide us with Personal Data to, including but not limited to complete a transaction, verify your credit card, place an order, arrange for a delivery or return a purchase, we imply that you consent to our collecting it and using it for that specific reason only.
- c. Furthermore, we may, from time to time, use your Personal Data to contact you to inform you about our latest products and services, promotional offers and other marketing information. You consent to being contacted for such purposes unless you opt out of receiving such information by updating the settings in the App.

## **5. Disclosure Of Information**

- a. We will only share your Personal Data with parties with whom we have a contractual or other relationship (unless otherwise agreed by you) including but not limited to, third parties that require such information as is reasonably necessary for the Purposes. Such third parties may include the service providers, contractors, consultant, agents and/or representatives who provide services to the Company in connection with the business and/or operation.
- b. The parties with whom we share your Personal Data will be under reasonable confidentiality terms not to use your personally identifiable information for any purpose not specified in this Privacy Policy. Notwithstanding the foregoing, we do not control and shall not be responsible or liable in any way for the collection, use and protection of your Personal Data by any party with whom we share your Personal Data including any businesses, other entities and/or third-party service providers that we may conduct direct business-to-business sales with. Where you require us to provide Personal Data to any third party, it shall be your responsibility to read the privacy policy of such parties before providing any Personal Data to them.

## **6. Information To Third-party Services**

- a. Once you leave our App or are redirected to a third-party webApp or application, you are no longer governed by this Privacy Policy or our App's Terms of Use.
- b. Specifically, once a link is clicked and you are directed away from our App, we will no longer be responsible for the privacy practices of other Apps and encourage you to read their privacy statements.

## **7. Security**

- a. To protect your Personal Data, we take commercially reasonable precautions, maintain appropriate safeguards and follow industry practices with respect to security and privacy of information, to minimise risk of loss, misuse or unauthorised alteration of such information under our control. Notwithstanding the foregoing, while we strive to protect your Personal Data, we cannot guarantee the security or privacy of such information, or that such information will not be accessed, disclosed, altered or destroyed by third parties without our permission, due to factors beyond our control.

- b. All credit card information provided to us is encrypted using secure socket layer technology (SSL) and stored with an AES-256 encryption. We follow all PCI-DSS requirements and implement additional generally accepted industry standards to reasonably protect and safeguard all credit card information provided to us.

## **8. Withdrawal, Access And Correction Of Your Personal Data**

- a. Should you wish to withdraw your consent to use of your Personal Data or obtain access to or make corrections to your Personal Data records, please give SRA reasonable notice by sending a written request to [gospree@sra.org.sg](mailto:gospree@sra.org.sg) or to SRA at 1 Coleman Street, The Adelphi #05-11B, Singapore 179803. We reserve the right to charge a reasonable administrative fee for retrieving your personal data records.
- b. SRA will cease to collect, use or disclose the Personal Data within 7 working days upon receipt of such withdrawal request unless otherwise permitted or required by the PDPA or other applicable laws and regulations.
- c. Please note that if you withdraw your consent to any or all use of your Personal Data, depending on the nature of your request, SRA may not be in a position to continue to provide Services to you and this may result in the termination of any contractual relationship in place. SRA's legal rights and remedies in such event are expressly reserved.

## **9. Cookies**

- a. We may use cookies, web beacons and other similar tracking technology in connection with your access to or use of the App. Cookies are text files placed on your computer to collect standard Internet log information and visitor behaviour information. The information is used to track visitor use of the App and to compile statistical reports on App activity and allow us to improve the App. Cookies also enable you to use or access certain features or services of our App or Service, including the shopping cart and check-out features. It may be possible for you to disable some but not all cookies through your device or browser settings, but doing so may affect your ability to access or use the App.

## **10. Age of Consent**

- a. By using this App, you represent that you are at least the age of majority in your country, state or province of residence, or that you are the age of majority in your country, state or province of residence and you have given us your consent to allow any of your minor dependents to use this App.

## **11. Changes To This Privacy Policy**

- a. We reserve the right, at our sole discretion, to modify or update this Privacy Policy at any time and all changes will take effect immediately upon posting. If we make material changes to this Privacy Policy, we will notify you via the App that it has been updated.

- b. If SRA is acquired or merged with another company, your information may be transferred to the new owners to enable the continued provision of Services in accordance with the Terms of Use and this Privacy Policy.