

STAMFLES GROUP PRIVACY POLICY

PERSONAL DATA

In this Personal Data Protection Policy, "Personal Data" refers to any data, whether true or not, about an individual who can be identified (a) from that data; or (b) from that data and other information to which we have or are likely to have access, including data in our records as may be updated from time to time.

Examples of such Personal Data you may provide to us include your name, NRIC, passport or other identification number, telephone numbers, mailing address, email address, network data and any other information relating to any individual which you have provided us in any form you may have submitted to us, or via other form of interaction with you.

COLLECTION OF PERSONAL DATA

Generally, Stamfles Group collects Personal Data, either directly from you or from your authorised representatives (i.e. persons whom you have authorised, persons who have been validly identified as being you or your authorised representative pursuant to our then-current security procedures), from third parties, from publicly available sources or through our website (or any of our other online presence, including Facebook) in the following ways:

1. when you submit a form for registering as a customer on our website or any other forms relating to any of our Products and Services
2. when you interact with us, for example, via telephone calls, letters, face-to-face meetings and emails;
3. when you use some of our services, for example, websites and apps including establishing any online accounts with us;
4. when you request that we contact you, be included in an email or other mailing list;
5. when you respond to our promotions, initiatives or to any request for additional Personal Data;
6. when you are contacted by, and respond to, our marketing representatives and customer service team;
7. when we receive references from business partners and third parties, for example, where you have been referred by them; or
8. when you submit your Personal Data to us for any other reasons.

When you browse our website, you generally do so anonymously, but please note that we use cookies on our website.

We use cookies to identify you, your preferences, and your settings, when you re-visit our website. Cookies optimize your browsing experience on our website. These cookies may either belong to us, or to third party service providers who help us optimize services provided to you.

You may control the use of cookies from your browser. However, please note that disabling cookies may result in you being unable to enjoy the complete features offered on our website.

If you provide us with any Personal Data relating to a third party (e.g. information of your spouse, children, parents, and/or employees), by submitting such information to us, you represent to us that you have obtained the consent of such third party to provide us with their Personal Data for the respective purposes.

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.

PURPOSES FOR THE COLLECTION, USE AND DISCLOSURE OF PERSONAL DATA

Stamfles Group may collect, use and disclose your Personal Data for the following purposes:

1. responding to your queries and requests;
2. managing the administrative and business operations of Stamfles Group and complying with internal policies and procedures;
3. facilitating business asset transactions (which may extend to any mergers, acquisitions or asset sales) involving any of the Companies;
4. matching any Personal Data held which relates to you for any of the purposes listed herein;
5. resolving complaints and handling requests and enquiries;
6. preventing, detecting and investigating crime and analyzing and managing commercial risks;
7. providing media announcements and responses;
8. monitoring or recording phone calls and customer-facing interactions for quality assurance, employee training and performance evaluation and identity verification purposes;
9. organising promotional events;
10. legal purposes (including but not limited to obtaining legal advice and dispute resolution);
11. conducting investigations relating to disputes, billing or fraud;

12. 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 Stamfles Group (including but not limited to responding to regulatory complaints, disclosing to regulatory bodies and conducting audit checks, due diligence and investigations); and
13. purposes which are reasonably related to the aforesaid.

Where permitted under the Personal Data Protection Act (the "Act"):-

1. Stamfles Group may also collect, use and disclose your Personal Data for the following "Stamfles Group Additional Purposes":
 - a. analytics and tracking;
 - b. 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 Stamfles Group's Products and Services, and to improve our service delivery and your customer experience at our touchpoints;
 - c. providing additional Products and Services and benefits to you, including promotions, loyalty and reward programmes from Stamfles Group;
 - d. 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 Stamfles Group;
 - e. leads generation and management for marketing Stamfles Group's Products and Services;
 - f. administering contests, competitions and marketing campaigns, and personalising your experience at Stamfles Group's touchpoints;
 - g. communicating to you advertisements involving details of our Products and Services, special offers and rewards, either to our customers generally, or of which we have identified may be of interest to you (including but not limited to upselling, cross selling and online marketing);
 - h. organising promotional events and corporate social responsibility projects; and
 - i. purposes which are reasonably related to the aforesaid.
2. In addition, where permitted under the Act and subject to the provisions of any applicable law, your Personal Data may be disclosed, for Stamfles Group's Additional Purposes, to the vendors or other third party service providers in connection with promotions, Products and Services offered by Stamfles Group.
3. Stamfles Group may also collect, use and disclose your Personal Data for the following "Preferred Partners' Additional Purposes":
 - a. conducting market research and surveys to enable us to understand and determine customer location, preferences and demographics to develop special offers and marketing programmes with our preferred partners;
 - b. 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 (including promotions, loyalty and reward programmes) by our preferred partners;
 - c. leads generation and management for marketing the products and services offered by our preferred partners;
 - d. administering contests, competitions and marketing campaigns in connection with the products and services offered by our preferred partners;
 - e. communicating to you advertisements involving details of the products, services, special offers and rewards offered by our preferred partners, either to our customers generally, (including but not limited to upselling, cross selling and online marketing); and
 - f. purposes which are reasonably related to the aforesaid.

In addition, where permitted under the Act and subject to the provisions of any applicable law, your Personal Data may be disclosed, for Preferred Partners' Additional Purposes, to the vendors or other third party service providers in connection with promotions and services offered by Stamfles Group's preferred partners.

If you have provided your Singapore telephone numbers, Stamfles Group may contact you using such Singapore telephone numbers (including via voice calls, SMSes, fax or other means) with information about our Products and Services or those products and services offered by our preferred partners (including discounts, flash sales and special offers).

If you have provided your email address, Stamfles Group may contact you using the email address with information about our Products and Services or those products and services offered by our preferred partners (including discounts, flash sales and special offers).

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 or 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.

DISCLOSURE OF PERSONAL DATA

Stamfles Group will take reasonable steps to protect your Personal Data against unauthorised 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:

1. Stamfles Group's related corporations and employees who provide content, Products and Services to you, address your questions and requests in relation to your customer accounts, subscription and billing or order arrangements with us as well as our Products and Services, to activate, deactivate, install, maintain and operate our systems and/or services;
2. companies who provide insurance and consultancy services to Stamfles Group;
3. agents, contractors or third party service providers who provide operational services to Stamfles Group, such as courier services, telecommunications, information technology, payment, printing, billing, payroll, processing, technical services, training, market research, call centre, security or other services to Stamfles Group;
4. vendors or third party service providers who provide marketing promotions and services offered by Stamfles Group or its preferred partners;
5. commercial shops and retailers who provide rewards and benefits in partnership with Stamfles Group;
6. any business partner, investor, assignee or transferee (actual or prospective) who facilitates business asset transactions (which may extend to any merger, acquisition or asset sale) involving any of the companies under the Stamfles Group which we are part of;
7. our professional advisers such as auditors and lawyers;
8. relevant government regulators, statutory boards or authorities or law enforcement agencies to comply with any laws, rules, guidelines and regulations or schemes imposed by any governmental authority; and
9. any other party to whom you authorise us to disclose your Personal Data to.

WITHDRAWAL OF CONSENT

Should you wish to withdraw your consent for us to send you sales, marketing or promotional information via a specific mode, please inform us in the following manner:

1. to withdraw consent from receiving SMS promotions: please unsubscribe by following the steps provided in the promotional SMS; and
2. to withdraw consent from receiving promotional material by email or mail: please email us, with the words "PERSONAL DATA" in the subject line, to our email address - info@stamfles.com.

Please be aware that once we receive confirmation that you wish to withdraw your consent for marketing or promotional materials/communication, it may take up to thirty (30) 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 through a specific mode, we may still contact you for other purposes in relation to the Products and Services that you have requested from or subscribed with Stamfles Group.

Otherwise than stated above, if you wish to withdraw any consent given in respect of the collection, use or disclosure of your Personal Data, please contact our Data Protection Officer ("DPO") at info@stamfles.com. Please note that such withdrawal of consent may affect our ability to provide our Products and Services you have requested or may request in the future.

ACCESS AND CORRECTION OF PERSONAL DATA

If you wish to request for access to and/or correction of your Personal Data we have in possession or control over, please contact our DPO at the following email address: info@stamfles.com. Our DPO may require you to fill up a form for such requests. Unless prohibited by law, we will provide access or make the correction to your Personal Data as soon as reasonably possible.

Please note that Stamfles Group reserves the right to charge a reasonable fee in order to meet your requests.

TRANSFER OF PERSONAL DATA OVERSEAS

Your Personal Data may be transferred overseas to our preferred partners, affiliates, agents, vendors or third party service providers. In this case, we will contractually demand that our such preferred partners, affiliates, agents, vendors or third party service providers comply with the requirements in the Act in dealing with your Personal Data.

CHANGES TO THIS POLICY

Stamfles Group reserves the right to amend any of the terms in this Privacy Policy. You should refer to these terms regularly. In continuing to view or use our website, you shall be deemed to agree with the amended terms. If you do not agree to the amended terms and wish to withdraw your consent given to us, please contact our DPO at info@stamfles.com.

THIRD PARTY WEBSITE

This website may include links to third party websites. The terms of this Privacy Policy shall not be applicable to such websites, and Stamfles Group is not responsible for the privacy practices of these third parties. You are advised to read the privacy policy in these websites before disclosing your Personal Data.

GOVERNING LAW

This Personal Data Protection Policy and your use of this website shall be governed by and construed in all respects in accordance with the laws of the Republic of Singapore. You shall submit to the non-exclusive jurisdiction of the Singapore courts.

CONTACTING OUR DPO

You may contact our DPO at the following email address: info@stamfles.com, if you wish to:

1. request for more information on our policies and practices in protecting your Personal Data;
2. make a complaint with respect to our obligations under the Act.