



DATA PROTECTION NOTICE

This Data Protection Notice (“**Notice**”) sets out the basis which Ape Works Pte Ltd. (“**we**”, “**us**”, or “**our**”) may collect, use, disclose or otherwise process personal data of our customers in accordance with the Personal Data Protection Act (“**PDPA**”). This Notice applies to personal data in our possession or under our control, including personal data in the possession of organisations which we have engaged to collect, use, disclose or process personal data for our purposes.

PERSONAL DATA

1. As used in this Notice:

“**personal data**” means data, whether true or not, about a person/ organisation 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.

2. Depending on the nature of your interaction with us, some examples of personal data which we may collect from you include your name and identification information such as your NRIC number, contact information such as your address, email address or telephone number, nationality, gender, date of birth, marital status, photographs and other audio-visual information, employment information and financial information such as credit card numbers, debit card numbers or bank account information.

3. Other terms used in this Notice shall have the meanings given to them in the PDPA (where the context so permits).

COLLECTION, USE AND DISCLOSURE OF PERSONAL DATA

4. We generally do not collect your personal data unless (a) it is provided to us voluntarily by you directly or via a third party who has been duly authorised by you to disclose your personal data to us (your “**authorised representative**”) after (i) you (or your authorised representative) have been notified of the purposes for which the data is collected, and (ii) you (or your authorised representative) have provided written consent to the collection and usage of your personal data for those purposes, or (b) collection and use of personal data without consent is permitted or required by the PDPA or other laws. We shall seek your consent before collecting any additional personal data and before using your personal data for a purpose which has not been notified to you (except where permitted or authorised by law).

5. We may collect your Personal Data in the following ways:

- (a) when you submit online forms relating to any of our products or services, or submit any online queries;
- (b) when you interact with our customer service officers or any of our staff, for example, business interactions in events and exhibitions, telephone calls, letters, online forms (such as any “Contact Us” forms on our websites), social media platforms and emails;
- (c) when you use or purchase our services or products;
- (d) when you request that we contact you;



- (e) when you respond to our request for additional Personal Data;
- (f) when you ask to be included in an email or other mailing list;
- (g) when you respond to our promotions or other initiatives;
- (h) when you respond to our market surveys;
- (i) when you submit a job application;
- (j) when we receive references from business partners and third parties, for example, where you have been referred by them;
- (k) when you submit your Personal Data to us for any other reason;

6. We may use your personal data for any or all of the following purposes:

- (a) managing registration, attendance and redemption procedures;
- (b) providing updates on upcoming and ongoing events;
- (c) verifying your identity;
- (d) performing obligations in the course of or in connection with our provision of the goods and/or services requested by you;
- (e) responding to, handling, and processing queries, requests, applications, complaints, and feedback from you;
- (f) managing your relationship with us;
- (g) processing payment or credit transactions;
- (h) sending you marketing information about our goods or services including notifying you of our marketing events, initiatives and promotions, lucky draws, membership and rewards schemes and other promotions;
- (i) contact tracing and other response measures, in an emergency that threatens the life, health or safety of other individuals
- (j) complying with any applicable laws, regulations, codes of practice, guidelines, or rules, or to assist in law enforcement and investigations conducted by any governmental and/or regulatory authority;
- (k) any other purposes for which you have provided the information;
- (l) transmitting to any unaffiliated third parties including our third-party service providers and agents, and relevant governmental and/or regulatory authorities, whether in Singapore or abroad, for the aforementioned purposes; and
- (m) any other incidental business purposes related to or in connection with the above.



7. We may disclose your personal data:

- (a) where such disclosure is required for performing obligations in the course of or in connection with our provision of the goods or services requested by you; or
- (b) to third party service providers, agents and other organisations we have engaged to perform any of the functions listed in clause 6 above for us.

8. The purposes listed in the above clauses may continue to apply even in situations where your relationship with us (for example, pursuant to a contract) has been terminated or altered in any way, for a reasonable period thereafter (including, where applicable, a period to enable us to enforce our rights under any contract with you).

USAGE OF COOKIES ON OUR WEBSITE

9. Cookies are small files which are placed on your computer when you access a website or app – amongst other things; they help the website user to navigate efficiently between pages and the website operator to track usage of the site. You can find out more about cookies at www.allaboutcookies.org.

10. Our website uses cookies to distinguish you from other users of our website by storing, generally non-personally identifiable, information (e.g. session information such as the number of times you visit our website and the location from which you are accessing the website). Note that some limited information is personally identifiable for the purposes of:

- managing and customizing your experience on the website/platform;
- analysing trends and improving our site for our users; and
- delivering content tailored to your interests and the manner in which you browse our websites and platforms.

11. Any other information is anonymized and/or aggregated to produce statistical reports that enable us to evaluate the use of our website; and to make improvements to and increase efficiency when you browse our website.

12. We use cookies: (i) to track your activities on our website; and (ii) the purposes described in this Privacy Statement, but they will not generally allow us to obtain information of a personal nature such as your name and address. We will only be aware of such information if you provide the information to us or you have set the preferences in your browser to provide this information automatically.

13. We use the information collected to analyse trends and improve our site for our customers, as more particularly described below.

MANAGING COOKIES IN YOUR BROWSER

14. By using our website, you agree to the use of cookies and other technologies as set out in this Privacy Statement. If you do not agree to such use, please either refrain from using the relevant website.



15. Your browser will enable you to disable, control or delete cookies if you wish. Further information can be found in the “Help” section of your browser or at www.allaboutcookies.org. However, you should note that if you choose to do this, it may have an impact on the quality of your browsing experience.

WITHDRAWING YOUR CONSENT

16. The consent that you provide for the collection, use and disclosure of your personal data will remain valid until such time it is being withdrawn by you in writing. You may withdraw consent and request us to stop using and/or disclosing your personal data for any or all of the purposes listed above by submitting your request in writing or via email to our Data Protection Officer at the contact details provided below.

17. Upon receipt of your written request to withdraw your consent, we may require reasonable time (depending on the complexity of the request and its impact on our relationship with you) for your request to be processed and for us to notify you of the consequences of us acceding to the same, including any legal consequences which may affect your rights and liabilities to us. In general, we shall seek to process your request within thirty (30) business days of receiving it.

18. Whilst we respect your decision to withdraw your consent, please note that depending on the nature and scope of your request, we may not be in a position to continue providing our goods or services to you and we shall, in such circumstances, notify you before completing the processing of your request. Should you decide to cancel your withdrawal of consent, please inform us in writing in the manner described in clause 8 above.

19. Please note that withdrawing consent does not affect our right to continue to collect, use and disclose personal data where such collection, use and disclose without consent is permitted or required under applicable laws.

ACCESS TO AND CORRECTION OF PERSONAL DATA

20. If you wish to make (a) an access request for access to a copy of the personal data which we hold about you or information about the ways in which we use or disclose your personal data, or (b) a correction request to correct or update any of your personal data which we hold about you, you may submit your request in writing or via email to our Data Protection Officer at the contact details provided below.

14. Please note that a reasonable fee may be charged for an access request. If so, we will inform you of the fee before processing your request.

15. We will respond to your request as soon as reasonably possible. Should we not be able to respond to your request within thirty (30) days after receiving your request, we will inform you in writing within thirty (30) days of the time by which we will be able to respond to your request. If we are unable to provide you with any personal data or to make a correction requested by you, we shall generally inform you of the reasons why we are unable to do so (except where we are not required to do so under the PDPA).

PROTECTION OF PERSONAL DATA

16. To safeguard your personal data from unauthorised access, collection, use, disclosure, copying, modification, disposal or similar risks, we have introduced appropriate administrative, physical and



technical measures such as up-to-date antivirus protection, encryption and the use of privacy filters to secure all storage and transmission of personal data by us, and disclosing personal data both internally and to our authorised third party service providers and agents only on a need-to-know basis.

17. You should be aware, however, that no method of transmission over the Internet or method of electronic storage is completely secure. While security cannot be guaranteed, we strive to protect the security of your information and are constantly reviewing and enhancing our information security measures.

ACCURACY OF PERSONAL DATA

18. We generally rely on personal data provided by you (or your authorised representative). In order to ensure that your personal data is current, complete and accurate, please update us if there are changes to your personal data by informing our Data Protection Officer in writing or via email at the contact details provided below.

RETENTION OF PERSONAL DATA

19. We may retain your personal data for as long as it is necessary to fulfil the purpose for which it was collected, or as required or permitted by applicable laws.

20. We will cease to retain your personal data, or remove the means by which the data can be associated with you, as soon as it is reasonable to assume that such retention no longer serves the purpose for which the personal data was collected, and is no longer necessary for legal or business purposes.

TRANSFERS OF PERSONAL DATA OUTSIDE OF SINGAPORE

21. We generally do not transfer your personal data to countries outside of Singapore. However, if we do so, we will obtain your consent for the transfer to be made and we will take steps to ensure that your personal data continues to receive a standard of protection that is at least comparable to that provided under the PDPA.

DATA PROTECTION OFFICER

22. You may contact our Data Protection Officer if you have any enquiries or feedback on our personal data protection policies and procedures, or if you wish to make any request, in the following manner:

Data Protection Officer
Low Fang Xiang
fangxiang@ape.sg
(O) +65 6225 9069

See Wyndee
wyndee@ape.sg
(O) +65 6225 9069



EFFECT OF NOTICE AND CHANGES TO NOTICE

23. This Notice applies in conjunction with any other notices, contractual clauses and consent clauses that apply in relation to the collection, use and disclosure of your personal data by us.

24. We may revise this Notice from time to time without any prior notice. You may determine if any such revision has taken place by referring to the date on which this Notice was last updated. Your continued use of our services constitutes your acknowledgement and acceptance of such changes.

Effective date: 17 March 2020

Last updated: 17 March 2020