

1 Introduction

1.1 Introduction

We at Edenred Global Rewards Singapore Pte. Ltd. and all its business units and subsidiaries (“Edenred Global Rewards”) respect the privacy and confidentiality of the personal data of our clients, customers, associates, partners, visitors, and other individuals whom we interact with from time to time or in the course of providing our products and services. We are committed to implement policies, practices, and processes to safeguard the collection, use and disclosure of the personal data you provide us, in compliance with the Singapore Personal Data Protection Act 2012 (“PDPA”) and the European General Data Protection Regulation (“GDPR”).

This Privacy Notice describes how Edenred Global Rewards collects, processes, and uses your personal information.

Edenred Global Rewards reserves the right to change its Privacy Notice at any time without notice. We advise that you occasionally review the current version. Where possible we will notify you if significant changes are made.

1.2 How Do We Collect your Personal Data?

Personal data refers to any information that can uniquely identify an individual either (a) on its own (e.g. NIRC No., FIN No.) or (b) when combined with other information (e.g. Full Name + Email Address).

We collect your personal data when you:

- Visit our websites and leave behind your contact information;
- Provide us with feedback on our services or quality of service;
- Communicate with us via emails or written correspondences;
- When you request that we contact you;
- When you respond to our promotions and other initiatives;
- When you are the Participant of any of our clients;
- When you submit your Personal Data to us for any other reason.

1.3 Why Do We Collect Your Personal Data?

- Responding to your queries and requests and responding to complaints;
- Verifying your identity;
- Preventing, detecting and investigating crime, including fraud and money-laundering, and analyzing and managing other commercial risks;
- Protecting and enforcing our contractual and legal rights and obligations;
- Conducting audits, reviews and analysis of our internal processes, action planning and managing commercial risks;
- Compliance with any applicable rules, laws and regulations, codes of practice or guidelines or to assist in law enforcement and investigations by relevant authorities; and/or
- Any other purpose relating to any of the above.

We are committed to ensuring that the information we collected and used is appropriate for its proposed purpose and does not constitute an invasion of your privacy. Edenred Global Rewards will only use the information you

provide in a manner that is compatible with applicable data protection legislation. At all times we will endeavour to keep your information accurate and up to date.

If you do not have a commercial relationship with us, we may hold limited personal information about you to communicate and promote our services.

Unless stated otherwise, our current Privacy Notice applies to all the personal information we obtain from or about you.

1.4 Types of Personal Data We Collect

The types of personal data we collect about you include:

- Personal contact information (Name, Phone No., Email Address, Company Information)

1.5 How We Use Your Personal Data

We use the personal data you provide us for one or more of the following purposes:

- Investigate complaints, claims and disputes
- Manage and improve our business and operations to serve you better or enhance client experience
- Fulfil legal requirements

1.6 Who We Disclose Your Personal Data To

Your personal information will be only be accessible to authorised personnel who have been granted access rights based on their need to perform their job role to deliver the service. All authorised personnel are bound by a contractual non-disclosure agreement.

We disclose some of the personal data you provide us to the following entities or organisations outside Edenred Global Rewards in order to fulfil our services to you:

- Our associated and affiliated companies

We require third parties to safeguard the security of your data in accordance with applicable data protection laws. All Edenred Global Rewards third party service providers are contractually required to take appropriate security measures to protect your personal information. Edenred Global Rewards will only share the minimum personal information required to provide the third-party service. Third parties are only allowed to use your personal data for provision or promotion of that service.

Edenred Global Rewards will ensure that your personal information is not disclosed to unauthorised third parties, including family members, and friends. Edenred Global Rewards will not sell, rent, or trade your personal data. Data protection legislation does however permit certain disclosures without consent when the information is requested for one or more of the following purposes:

- To safeguard national security
- Prevention or detection of crime including the apprehension or prosecution of offenders
- Assessment or collection of tax duty
- Discharge of regulatory functions (includes health, safety, and welfare of persons at work)
- To prevent serious harm to a third party
- To protect the vital interests of the individual, this refers to life and death situations

1.7 How Do We Manage the Collection, Use and Disclosure of Your Personal Data?

Wherever possible, your personal data will not be obtained, held, used, or disclosed unless you have been informed (and where required given your consent) for it to be shared with Edenred Global Rewards. Your employer or affiliated organisation is responsible for taking the necessary steps to achieve this. Depending on the service provided we may act as a data processor, a joint data controller or a data controller in our own right to manage and improve the service.

Edenred Global Rewards will only use your personal information to perform our contractual obligations with you, your employer or affiliated organisation and to pursue our legitimate interests delivering, maintaining, improving, and promoting the required service. Should the need arise we may also be required to use your personal information to comply with our legal and regulatory obligations.

1.7.1 Obtaining Consent

Before we collect, use, or disclose your personal data, we will notify you of the purpose of why we are doing so. We will obtain written confirmation from you on your expressed consent. We will not collect more personal data than is necessary for the stated purpose. We will seek fresh consent from you if the original purpose for the collection, use or disclosure of your personal data has changed.

Under certain circumstances, we may assume deemed consent from you when you voluntarily provide your personal data for the stated purpose, e.g. when you order a product off one of our platforms.

1.7.2 Withdrawal of Consent

If you wish to withdraw consent, you should give us reasonable advance notice. We will advise you of the likely consequences of your withdrawal of consent, e.g. without your personal contact information we may not be able to contact you relating to our new services or follow up with you on our client-related matters.

Your request for withdrawal of consent can take the form of an email or letter to us.

1.7.3 Use of Cookies

We may use “cookies” to collect information about your online activity on our website or online services. A cookie is a small text file created by the website that is stored in your computer to provide a way for the website to recognize you and keep track of your preferences. The cookie makes it convenient for you such that you do not have to retype the same information again when you revisit the website or when you fill in electronic forms.

Most cookies we use are “session cookies”, which will be deleted automatically from the hard disk of your computer at the end of the session.

You may choose not to accept cookies by turning off this feature in your web browser. Note that by doing so, you may not be able to use some of the features and functions in our web applications.

1.8 How Do We Ensure the Accuracy of Your Personal Data?

We will take reasonable steps to ensure that the personal data we collect about you is accurate, complete and kept up to date.

From time to time, we may do a data verification exercise for you to update us on any changes to the personal data we hold about you. If we are in an ongoing relationship with you, it is important that you update us of any changes to your personal data (such as a change in your mailing address).

1.9 How Do We Protect Your Personal Data?

We have implemented appropriate information security and technical measures (such as data encryption, firewalls, and secure network protocols) to protect the personal data we hold about you against loss; misuse; destruction; unauthorised alteration/modification, access, disclosure; or similar risks.

We have also put in place reasonable and appropriate organisational measures to maintain the confidentiality and integrity of your personal data and will only share your data with authorised persons on a 'need to know' basis.

We have also put in place appropriate encryption solution to protect your personal data we store and/or transmit. Such encryption solutions are under review in accordance with the technology advancement. Our employees are educated from time to time on the use and importance of encryption to ensure your personal are well protected through.

1.10 How Do We Retain Your Personal Data?

We have a document retention policy that keeps track of the retention schedules of the personal data you provide us, in paper or electronic forms. We will not retain any of your personal data when it is no longer needed for any business or legal purposes.

We will dispose of or destroy such documents containing your personal data in a proper and secure manner when the retention limit is reached.

1.11 How You Can Access and Make Correction to Your Personal Data?

You may write to us to find out what personal data about you that we have in our possession or under our control and how it may have been used and/or disclosed by us in the previous one year. Before we accede to your request, we may need to verify your identity by checking your NRIC or other legal identification document. We will respond to your request as soon as possible, or within 30 days from the date we receive your request. If we are unable to do so within the 30 days, we will let you know and give you an estimate of how much longer we require. We may also charge you a reasonable fee for the cost involved in processing your access request.

If you find that the personal data we hold about you is inaccurate, incomplete or not up-to-date, you may ask us to correct the data. Where we are satisfied on reasonable grounds that a correction should be made, we will correct the data as soon as possible, or within 30 days from the date we receive your request.

1.12 Contacting Us

If you have any query or feedback regarding this Data Protection Notice, or any complaint you have relating to how we manage your personal data, please contact us through our webform, [Data Subject Access Request](#).

Any query or complaint should include, at least, the following details:

- Your full name and contact information
- Brief description of your query or complaint

We treat such queries and feedback seriously and will deal with them confidentially and within reasonable time.

1.13 Changes to this Data Protection Notice

We may update this Data Protection Notice from time to time. We will notify you of any changes by posting the latest Notice on our website. Please visit our website periodically to view the latest notice or changes.

Changes to this Notice take effect as and when they are posted on our website.

1.14 More Information on PDPA and GDPR

For more information about PDPA and GDPR generally, please visit the Personal Data Protection Commission's website at <http://www.pdpc.gov.sg> and the General Data Protection Regulation's website at <https://gdpr-info.eu/> respectively.

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