OrangeTee's Personal Data Protection Policy

1. As an esteemed customer of OrangeTee.com Pte Ltd ("**OrangeTee**"), your privacy is important to OrangeTee. Therefore, OrangeTee conducts its business in compliance with the Personal Data Protection Act 2012 ("**Act**").

2. OrangeTee asks that you read this Personal Data Protection Policy carefully as it contains important information about how and why OrangeTee collects, uses and discloses your personal data.

3. This policy applies to personal data in OrangeTee's possession or under OrangeTee's control, including personal data in the possession of organisations which OrangeTee has engaged to collect, use, disclose or process personal data for OrangeTee's purposes.

Personal Data

4. The Act has defined "personal data" to be "...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 the organisation has or is likely to have access."

5. OrangeTee does not collect any personal data about you from our website unless you voluntarily choose to allow us do so or if you provide the said data to OrangeTee either directly or through your authorized representative. When providing your personal data to OrangeTee, please ensure that it is accurate and complete.

6. OrangeTee would usually collect the following personal data:

- a) NRIC or official personal identification number;
- b) Full name;
- c) Address (local and/or overseas);
- d) Nationality;
- e) Age and/or date of birth;
- f) Desired language for communication;
- g) Gender;
- h) Race;
- i) Photograph;
- j) Phone/Mobile number;
- k) Email address;
- I) Occupation; and,
- m) Name and particulars of your spouse.

7. Your personal data is collected when you use the services offered on OrangeTee's website (the "**Services**"), to:

- a) enter into a transaction for such Services as permitted under the law;
- b) effectively provide the Services to you;
- c) sending you marketing information about our goods and services;
- d) processing payment;
- e) managing your relationship with OrangeTee;
- f) facilitate any other incidental business purposes related to or in connection with the provision of the Services; and,
- g) provide OrangeTee with your feedback.

8. However, we will only use or disclose the information collected in the manner described in this Personal Data Protection Policy and under the particular terms of the contract governing the transaction that you have entered into with OrangeTee when such disclosure is deemed necessary by OrangeTee. By using or transacting the Services or providing OrangeTee with your feedback, you consent and agree that we may do the foregoing.

9. By accessing OrangeTee's websites, you consent to OrangeTee using "cookies" and also tracking your activity at OrangeTee's websites to improve the user experience.

10. By providing OrangeTee with your personal data, you grant OrangeTee your express consent to send you promotional materials with regards to the Services. However, if you do not wish to receive any promotional material with regards to the Services, kindly do let OrangeTee know in writing of the same and also give OrangeTee at least 30 working days to make the necessary changes to OrangeTee's mailing list/system.

11. Please take note that OrangeTee will be updating/amending its Personal Data Protection Policy as set out herein from time to time. Therefore, you should check the amended/updated policy from time to time. Should you disagree or decide to withdraw your agreement with the updated/amended personal data protection policy, you should inform OrangeTee of the withdrawal of your consent in writing to: dataprotection@orangetee.com. Thereafter, you should give OrangeTee a reasonable period of 30 working days for OrangeTee to put into effect the withdrawal of your consent in OrangeTee's system.

12. Kindly note that your consent for the use by OrangeTee of your personal data shall continue until you have withdrawn the said consent in writing by you or until the said data is deleted by OrangeTee pursuant to the terms as set out herein. Your continued use of the Services constitutes your acknowledgement and acceptance of such policy changes.

Purpose of Use

13. When you do provide us with your personal data, OrangeTee will generally use your personal data to process your request for the services, provide you access to specific information or offers or respond to your feedback.

14. OrangeTee does not sell or market your personal data to third parties. OrangeTee shall proceed to delete your personal data and/or anonymize the same upon the fulfilment of the purpose for which the said data was furnished by you to OrangeTee.

15. If OrangeTee wishes to collect, use or disclose your personal data for purposes additional to that stated in this Personal Data Protection Policy, OrangeTee will inform you of the same in advance. OrangeTee will only collect, use or disclose your personal data for such additional purposes after obtaining your consent.

Purpose Limitation

16. OrangeTee shall collect, use or disclose your personal data only for the purposes disclosed to you unless the disclosure of your personal data is made in the following circumstances:

- (a) where the disclosure is expressly permitted by you;
- (b) where the disclosure is permitted and/or pursuant to this Personal Data Protection Policy and/or under the particular terms of the contract governing the transaction that you have entered into with OrangeTee, and is reasonably appropriate in the circumstances;
- (c) where the disclosure is necessary to establish or preserve a legal claim or defence;
- (d) where disclosure is necessary to obtain legal advice;
- (e) where you have applied to join OrangeTee as an employee or as a salesperson;
- (f) in the event OrangeTee believes that you are involved in any illegal or harmful conduct, or if OrangeTee is required or permitted to do so by law or by any regulatory authority, or if OrangeTee believes that the disclosure is necessary under the law or to prevent fraud or to protect any personal safety, right or property, OrangeTee may, at OrangeTee's discretion, disclose your personal data to any appropriate investigative third party; and/or
- (g) in the event that OrangeTee employ other companies to provide services for us in connection with the Services or with regards to your feedback to fine tune the Services or to make improvements to the Services.

Security

17. OrangeTee has put in place security procedures and technical and organizational measures to protect your personal data against accidental or unlawful destruction, loss or alteration and against unauthorized disclosure or access. However, OrangeTee is not in a position to ensure that that the data you transfer online/electronically to OrangeTee is done so in a secure manner and OrangeTee shall not be held liable for any such breach stemming from any such online/electronic transmission of personal data to OrangeTee.

18. Please note that OrangeTee's website may contain links to other websites. Please note that OrangeTee is not responsible for the personal data policies/practices of such other websites/third parties and advise you to read the privacy statements of each website you visit which may collect your personal data.

19. Please also note that OrangeTee shall be at liberty to store your personal data overseas if deemed necessary under the circumstances. In such instances, OrangeTee shall comply with the provisions of the Act and ensure that such data is stored safely and securely while OrangeTee maintains control over the said data.

20. You should be aware, that no method of transmission over the Internet or methods of electronic storage is completely secure. OrangeTee is only able to strive to protect the security of your information and shall constantly review and enhance OrangeTee's information security measures.

Access

21. If you would like a copy of your personal data that you have directly provided to

OrangeTee and which is being retained by OrangeTee, please approach our Personal Data Protection Officer in person. Please bring along your identification card; fill up an application form; and also have your particulars verified. You will also be required to make payment of the following at the point of making the request:

- (a) If you are requesting for information on your personal data held by OrangeTee, the fees chargeable for the request is S\$80.00; and,
- (b) If you are requesting for information on your personal data held by OrangeTee as well as a copy of such data, the fees chargeable for the request is S\$160.00.

22. OrangeTee will need 30 working days to process your request for access/information regarding your personal data.

23. For date that you have provided to third parties to be furnished to OrangeTee, you should contact the said third party with regards to the data that you have provided to the said third party.

Correction

24. If you would like to update or correct your personal data that is held by OrangeTee, please write to OrangeTee and include the following information:

- (a) Your full name and NRIC No. (which OrangeTee would be liberty to verify to establish your identity by viewing the original document);
- (b) Your contact details;
- (c) Name of our associate or department by whom your personal data was collected; and
- (d) Details of your requested correction.

25. By providing to us the complete set of information, OrangeTee will be able to update or correct your personal data as soon as possible. Alternatively, you may wish to submit your request by filling up an application form available at OrangeTee's office. Our Personal Data Protection Officer will confirm the receipt of your request within 5 working days from the date of submission of your request.

26. Please note that OrangeTee shall not held liable to you or any third party if the data that you have provided to OrangeTee is inaccurate and or not updated.

Personal Data Protection Officer and Your Feedback

27. OrangeTee has created a Personal Data Protection Management Office to ensure that we comply with the Act. OrangeTee's Personal Data Protection Officer is Mr Keith Sim.

28. If you have any question or concerns relating to OrangeTee's policies relating to the Act, please contact OrangeTee's Personal Data Protection Officer by email or by post:

Email address: <u>dataprotection@orangetee.com</u> Postal address: 430 Lorong 6 Toa Payoh, #01-01 OrangeTee Building, Singapore 319402

29. For general queries and feedback relating to OrangeTee's policies, you should expect a reply within 7 working days of OrangeTee receiving your feedback. For other feedback requiring further investigation and/or evaluation, OrangeTee will reply within 30 working days of OrangeTee receiving your feedback.

30. As previously mentioned herein above, OrangeTee regularly reviews and update its Personal Data Protection Policy. Whenever OrangeTee updates its Personal Data Protection Policy, the latest version will be available on this website. Please check this page regularly to keep up-to-date with OrangeTee's Personal Data Protection Policy.

Governing Law

31. Any dispute or claim arising out of, or in connection with this policy and/or its subject matter shall be governed by, and construed in accordance with, the laws of Singapore and parties agree to be subject to the exclusive jurisdiction of the Singapore Courts.