# **Privacy Policy**

# 1. Personal Data Protection Policy

1.1 This Personal Data Protection Policy sets out the basis which Old Chang Kee Ltd. and our group companies, affiliates, associated entities, branches, subsidiaries and offices (collectively referred to herein as "Old Chang Kee", "us", "we" or "our") may collect, use disclose or otherwise process personal data of our customers in accordance with the Singapore Personal Data Protection Act (Act 26 of 2012) ("PDPA"). This policy applies to personal data in our possession or under our control, including personal data in the possession of organisations which we engaged to collect, use, disclose or process personal data for our purposes.

#### 2. Personal Data

- 2.1 As used in this Personal Data Protection Policy, "customer" means an individual who (a) has contacted us through any means to find out more about any goods or services we provide, or (b) may, or has, entered into a contract with us for the supply of any goods or services by us; and "personal data" means data, whether true or not, about a customer 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.
- 2.2 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. Collection, Use and Disclosure of Personal Data

- 3.1 Old Chang Kee generally does not collect your personal data unless it is provided to us voluntarily by you directly or via a third-party who has been duly authorised by you (or your authorised representative) to disclose your personal data to us after (a) you (or your authorised representative) have been notified of the purposes for which the data is collected, and (b) you (or your authorised representative) have provided written consent to the collection and usage of your personal data for those purposes.
- 3.2 We may collect personal data from you via publicly available sources or through our website and other sites that we own and operate, or any of our other online presence such as mobile apps or social media platforms.
- 3.3 Generally, we collect and use your personal data for any or all of the following purposes:
  - (a) performing obligations in the course of or in connection with our provision of the goods and/or services requested by you;
  - (b) verifying your identity;
  - (c) responding to, handling, and processing queries, requests, applications, complaints, and feedback from you;
  - (d) managing your relationship with us;

- (e) processing payment or credit transactions;
- 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;
- (g) 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;
- (h) any other purposes for which you have provided the information;
- (i) 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
- (j) any other incidental business purposes related to or in connection with the above.

#### 3.4 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 and 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 3.3 above for us.

# 4. Accuracy of Personal Data

4.1 Old Chang Kee generally relies 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 us in writing or via email at the contact details provided below in clause 11.

# 5. Withdrawing Your Consent

- 5.1 The consent that you provide to us for the collection, use and disclosure of your personal 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 us at the contact details provided below in clause 11.
- 5.2 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 the manner described in clause 5.1 above.

## 6. Retention of Personal Data

6.1 We will 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.

### 7. Protection of Personal Data

7.1 To safeguard your personal data from unauthorised access, collection, use, disclosure, copying, modification, disposal or similar risks, we strive to introduce appropriate measures 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.

7.2 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.

#### 8. Use of Cookies

8.1 We may use "cookies" to track your preference and activities on our website and other sites that we own and operate. Cookies are small data files transferred to your computer's hard-drive by a website. They keep a record of your preferences making your subsequent visits to the site more efficient. Cookies may store a variety of information, including, the number of times that you access a site, registration information and the number of times that you view a particular page or other item on the site. The use of cookies is a common practice adopted by most major sites to better serve their clients. Most browsers are designed to accept cookies, but they can be easily modified to block cookies. Therefore, do see your browser's help files for details on how to block cookies, how to know when you have received cookies and how to disable cookies completely. You should note, however, that without cookies, some of the website's functions will not be available, and the user will lose some of the benefits of the site.

# 9. Third-Party Websites

9.1 Our website or other sites that we own and operate, may contain links to other websites operated by third parties. We are not responsible for the privacy practices of websites operated by third parties that are linked to our website or other sites that we own and operate. We encourage you to learn about the privacy policies of such third-party websites. Once you have left our website or other sites that we own and operate, you should check the applicable privacy policy of such third parties at their respective websites to determine how they will handle any personal data which they may collect from you.

# 10. Changes to this Policy

10.1 Old Chang Kee may revise this Personal Data Protection Policy 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 Policy was last updated. Your continued use of our services via our website or any other sites that we own and operate, or any of our other online presence such as mobile apps or social media platforms, shall constitute your acknowledgement and acceptance of such changes.

10.2 Effective date: 1 April 2019

10.3 Last updated: 24 March 2022

# 11. Contact Us

11.1 You may contact us if you have enquiries or feedback on our personal data protection policies and procedures, or if you wish to make any request, via the following contact details:

Mailing Address:

Old Chang Kee Singapore Pte. Ltd.

No. 2 Woodlands Terrace Singapore 738427

Email:

contact@oldchangkee.com