

## DATA PROTECTION NOTICE

This Data Protection Notice (“Notice”) sets out the basis which Coffee Club 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:

“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. 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 and contact preferences 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 and/or use and/or disclose your personal data when and/or during and/or for any or all of the following purposes:

- a. you register your details with us; you order or complete a sales order or request or application for our products or services by or purchase products or services from us by any means; you submit an enquiry/feedback or interact with our staff (eg. via meetings, emails, websites, mobile app or telephone calls) and/or fill up the feedback forms available at our outlets; you make redemptions of points and/or e-vouchers; you establish any online accounts with us and/or pass us your name card; you request that we contact you, be included in an email or other mailing list; you respond to our promotions, campaigns or other initiatives or attend our events; we receive references from business partners and third parties; you visit our websites and/or use our mobile application; you take part in any contest or survey conducted by us; we receive information about you from third party social networking services when you choose to connect with those services; you provide or contemplate providing security to us for a transaction; you use our services; you subscribe to any of our maintenance or after sales or service programmes; you participate in any surveys or other types of research; you submit your Personal Data to us for any other reasons; and/or when we collect your Personal Data by other lawful means.
- b. to verify your identity and processing your personal particulars;
- c. to perform obligations in the course of or in connection with our provision of the goods and/or services to you or for one of our functions and/or activities and/or for responding to, handling and processing queries, requests, applications, complaints and/or feedback from you;
- d. to manage your relationship with us and generally communicating with you via various means and/or media whatsoever;
- e. to process and manage accounting, billing, payment or credit transactions;
- f. to send you marketing information about our goods or services including to notify you of our marketing events, initiatives and promotions, lucky draws, membership and rewards schemes, to personalise your experience at our customer touchpoints and any other promotions, campaigns and/or activities;
- g. to carry out market research , customer surveys, compile statistics, conduct investigations or audits, to comply 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. from our website when you log in with your personal details or during any mobile application activity through web server logs (save that cookies will only gather anonymous information such as browser type, operating systems and date and time of access) and all related data arising therefrom;
- i. to our officers and employees, related companies and entities, affiliates, service providers, vendors, advisors, and our third party service providers and

agents such as, but not limited to, banks, credit card companies, payment vendors, logistics and courier services, and to any unaffiliated third parties, relevant governmental and/or regulatory authorities, whether in Singapore or abroad, to perform any of the above functions or services or for the aforementioned purposes or otherwise; and

- j. any other purposes for which you have provided the information and/or any other incidental business purposes related to or in connection with the above.
6. The purposes listed in the above clauses are general in nature and not limited in any way and 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).

#### WITHDRAWING YOUR CONSENT

7. 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.
8. 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 ten (10) business days of receiving it.
9. 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 and/or services to you and we shall 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 above.
10. Please note that withdrawing consent does not affect our right to continue to collect, use and disclose personal data where such collection, use and disclosure without consent is permitted or required under applicable laws.

#### ACCESS TO AND CORRECTION OF PERSONAL DATA

11. 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.

12. 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.
13. 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

14. 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.
15. 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 will strive to protect the security of your information.

#### ACCURACY OF PERSONAL DATA

16. 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

17. 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.
18. 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

19. 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.

#### INFORMATION COLLECTED BY COOKIES

20. When you visit this website, our company servers automatically records information that your browser sends whenever you visit a website. This information may include:
- Your computer's IP address
  - Browser type
  - Websites visited before our website
  - Pages visited within our website (including time spent on those pages)
  - Other items and information searched for on our website, access times and dates etc
  - This information is collected for analysis and evaluation in order to help us improve this website, and the services and products we provide. This information will not be used in association with any personal data.

#### DATA PROTECTION OFFICER

21. 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 :

Name : Data Protection Office

Email : [dpo@coffeeclub.com](mailto:dpo@coffeeclub.com)

#### EFFECT OF NOTICE AND CHANGES TO NOTICE

22. 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.
23. 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 : 14/01/2020

Last updated : 14/01/2020