



## PRIVACY POLICY

Last Updated On: 15 Nov 2022

This Privacy Policy sets forth how AiR Digital Solutions Pte Ltd (“us”, “we”, or “our”) collect, use, disclose, and/or process your personal data through your use of our website and our mobile and web-based digital solutions platform named “AiR Digital” (the “Platform”).

By installing, using or accessing any part of our website or Platform, you hereby agree to be bound by the terms of this Privacy Policy. If you do not agree to be bound by this Privacy Policy, you should not access or use our website or Platform or disclose any personal data through our website or Platform.

This Privacy Policy is incorporated into and is subject to our Terms of Service, which is available at <https://www.airdigital.sg/terms-of-service/>. Capitalised terms used but not defined in this Privacy Policy shall have the meaning given to them in the Terms of Service.

### 1. Personal Data that We May Collect

We may collect the following personal data about you when you access or use our website or Platform:

- (a) Information that you may provide when filling in forms on the website or Platform, or otherwise submit or make available to us. This includes but is not limited to any information provided for any services such your name, email address and contact details.
- (b) Information that you may provide when you interact with our customer service team.
- (c) Financial account information, such as credit card numbers and other payment information.
- (d) Technical data collected when you visit our website or Platform, which may include URL information, cookie data, web beacons and other tracking technology information, your IP address, the types of devices you are using to access or connect to our services, unique device IDs, device attributes, network connection type (e.g., Wi-Fi, 5G, LTE, Bluetooth) and provider, network and device performance, browser type, language, and operating system.

### 2. How We Use Your Personal Data

You agree and consent to us processing, collecting, using and disclosing your personal data for the following purposes:

- (a) To process, administer and/or manage your account information;
- (b) To verify your identity;
- (c) To provide you with any services and products that you may request from us from time to time and to communicate with you in relation to those services and products;
- (d) To deliver to you any administrative notices, updates, notifications, alerts and communications relevant to your use of our website or Platform

- (e) To store, host and/or back up (whether for disaster recovery or otherwise) your personal data;
  - (f) For record-keeping purposes;
  - (g) To conduct research, analysis and development activities (including but not limited to data analytics, surveys and/or profiling) to improve our website and Platform;
  - (h) To respond to any legal processes, pursue legal rights and remedies, and manage any complaints or claims.
  - (i) To respond to requests for information from public and governmental/ regulatory authorities, statutory boards, related companies and for audit, compliance, investigation and inspection purposes;
  - (j) To comply with any applicable law, regulation, codes of practice, guidelines, or rules, or to assist in law enforcement and investigations conducted by any governmental and/or regulatory authority, whether within or outside Singapore;
  - (k) Any third party in connection with (i) the sale of any of our business or assets, in which case we may disclose your personal data to the prospective buyer of such business or assets; or (ii) the acquisition of us or substantially all of our assets by a third party, in which case personal data held by us about you and our other customers will be one of the transferred assets; and
  - (l) To achieve any other incidental business purposes related to or in connection with the above.
- (collectively, the “Purposes”).

### **3. Who We Disclose Your Personal Data To**

You agree and consent that your personal data may be used, disclosed, maintained, accessed, processed and/or transferred to the following third parties, whether sited in Singapore or outside of Singapore, for one or more of the Purposes or otherwise permitted/required by law:

- (a) Our affiliates to enable us to provide you with our website and Platform;
- (b) Third party vendors or service providers which require the processing of your personal data, for example, third party service providers which have been engaged by us to: (i) to provide and maintain any IT equipment used to store and access your personal data; (ii) to host and maintain the Platform; or (iii) otherwise in connection with the provision of our website and Platform;
- (c) Our advisors including auditors and legal advisors;
- (d) Financial institutions, credit card companies and payment processors;
- (e) Public and governmental/regulatory authorities, statutory boards, industry associations; and
- (f) Any third party in connection with (i) the sale of any of our business or assets, in which case we may disclose your personal data to the prospective buyer of such business or assets; or (ii) the acquisition of us or substantially all of our assets by a third party, in which case personal data held by us about you and our other customers will be one of the transferred assets.

(collectively, the “**Permitted Parties**”).

The Permitted Parties listed above may continue to apply even in situations where your relationship with us has been terminated or altered in any way, for a reasonable period thereafter.

#### **4. Third Party Websites**

In addition, our website and Platform may, from time to time, contain links to and from the websites of other third parties (the “**Third Party Websites**”). If you follow a link to any of these Third Party Websites, please note that these Third Party Websites have their own privacy policies. As these Third Party Websites are not owned or operated by us, we do not accept any responsibility or liability for the contents of these Third Party Websites and their privacy policies and you access and provide your personal data to these Third Party Websites at your own risk. Please check these policies before you submit any personal data to any such Third Party Websites.

#### **5. Disclosure of Third Party Personal Data**

If you choose to disclose the personal data of any third party to us in the course of your use or access of our website or Platform, you hereby represent and warrant that you would have, prior to disclosing such personal data to us, informed these third parties that their personal data will be disclosed to, and obtained the consent from these individuals for their personal data to be disclosed to, us for one or more of the Purposes.

#### **6. Accuracy of Personal Data**

Where you submit personal data through our website or Platform, you should try to ensure such personal data is accurate, and let us know if such personal data changes so that we are not holding any inaccurate personal data about you.

#### **7. Protection of Personal Data**

We will take appropriate administrative, physical, and technical measures to safeguard your personal data from unauthorised access, collection, use, disclosure, copying, modification, disposal or similar risks, and the loss of any storage medium or device on which personal data is stored.

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 personal data, and are constantly reviewing and enhancing our security measures.

#### **8. Your Rights**

You may withdraw your consent for us to use your personal data for one or more of the Purposes by writing to our Data Protection Officer using the contact details below. Upon receipt of your written request to withdraw your consent, we may require a reasonable period of time to process and respond to your request. However, please note that your failure to supply certain personal data to us or depending on the nature and scope of your request to withdraw your consent, it may result in us being unable to continue providing you with our website and Platform to you. You may request to access and/or correct the personal data currently in our possession by writing to the Data Protection Officer using the contact details provided below. Please note that we may charge you a reasonable fee for the handling and processing of your requests to access your personal data. If so, we will inform you of the fee before processing your access request.

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.

## **9. Changes to this Privacy Policy**

The terms of this Privacy Policy may be revised from time to time by us. We will use commercially reasonable methods to notify you of such revisions, such as by posting a revised version of this Privacy Policy on our website and/or Platform. Your continued access to or use of our website or Platform after such notice had been given and such revised Privacy Policy had come into effect shall constitute your acceptance of the revised Privacy Policy.

## **10. How Long We Retain Your Personal Data**

We may retain your personal data for as long as it is necessary to fulfil the Purposes, or as required or permitted by applicable laws.

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.

## **11. Data Protection Officer**

If you want to contact us with specific queries or concerns in relation to this Privacy Policy, request to access and/or correct your personal data in our possession, or if you have any questions or complaints as to how your personal data is collected, used, disclosed and/or processed by us, please contact our Data Protection Officer at

By mail:               7 Temasek Boulevard  
                              #16-01 Suntec Tower One  
                              Singapore 038987  
                              Attention: The Data Protection Officer

By email:             dpo@airdigital.sg