### PRIVACY POLICY

#### PERSONAL DATA

In this Personal Data Protection Policy, "Personal Data" refers to any data, 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 we have or are likely to have access, including data in our records as may be updated from time to time.

### 1.DATA PROTECTION OFFICERS

1.1 The DPO have been appointed to oversee compliance with the Act. Employees within the Group may be delegated to act on behalf of the DPO or to take responsibility for the day-to-day collection and processing of Personal Data.

If you have any questions about this Privacy Policy, you may contact the Data Protection Officer at info@spa-1.com.sg or call us at 68461775.

# 1.PURPOSES FOR COLLECTION, USE, DISCLOSURE AND PROCESSING OF PERSONAL DATA

- 2.1. The Personal Data which we collect from you may be collected, used, disclosed and/ or processed for various purposes, depending on the circumstances for which we may/ will need to process Personal Data.
- 2.2. The purposes for which we have been collecting, using, disclosing and processing your Personal Data include:
- 2.2.1. To respond to your queries, requests for support and resolving complaints
- 2.2.2. To manage our administrative and business operations and complying with internal policies and procedures
- 2.2.3. providing and sending you marketing materials and/or documents via any communication to your email addresses, or via electronic messages, SMSes, voice calls and/or facsimiles to your telephone numbers (based on our records), such messages to these telephone numbers only being sent in accordance with the requirements of the PDPA, relating to the Spa-1 Wellness Membership Programs provided, promoted or marketed by us and/or our authorised merchants and agents where you have separately provided consent to us in relation thereto;
- 2.2.4. Conducting investigations relating to disputes, billing or fraud
- 2.2.5. To process transactions (Your information, whether public or private, will not be sold, exchanged, transferred, or given to any other company for any reason whatsoever, without your consent, other than for the express purpose of delivering the purchased product or service requested).

# 1.SPECIFIC ISSUES FOR THE DISCLOSURE OF PERSONAL DATA TO THIRD PARTIES

We respect the confidentiality of the Personal Data you have provided to us.

- 3.1 This website may include links to third party websites. The terms of this Privacy Policy shall not be applicable to such websites, and Spa-1 is not responsible for the privacy practices of these third parties. You are advised to read the privacy policy in these websites before disclosing your Personal Data.
- 3.2 You understand that the transmission of information via the internet is not completely secure. Although we will do our best to protect your Personal Data, we cannot guarantee the security of your Personal Data transmitted to our websites, is at your own risk. Additionally, we cannot assume responsibility for any unauthorised use of your Personal Data by third parties which are wholly attributable to factors beyond our control.

### 1.USE OF COOKIES

- 4.1. We use cookies to identify you, your preferences, and your settings, when you revisit our website. Cookies optimize your browsing experience on our website.
- 4.2 You may control the use of cookies from your browser. However, please note that disabling cookies may result in you being unable to enjoy the complete features offered on our website.

# 1.REQUEST TO WITHDRAW CONSENT AND CORRECTION OF YOUR PERSONAL DATA

- 1. You may withdraw your consent for the collection, use and/or disclosure of your Personal Data in our possession or under our control by emailing your opt-out notice, the extent of your withdrawal of consent. Please email to <a href="mailto:info@spa-1.com.sg">info@spa-1.com.sg</a>. We will process your request within 30 days from such a request for withdrawal of consent being made, and will thereafter not collect, use and/or disclose your Personal Data in the manner stated in your request.
- 2.When promotional messages are sent to your phone by Spa-1, you will have the option to unsubscribe from such promotional messages via a reply SMS.
- 3.If you would like to obtain access and make corrections to your Personal Data records, please contact us in writing as follows:-

### **Spa-1 Wellness Centre Pte Ltd**

511 Guillemard Road, #B1-01, Grandlink Square Singapore 399849

### a.GOVERNING LAW

6.1 This Data Protection Policy and your use of this website is governed by Singapore law

# 7. UPDATES ON PRIVACY POLICY

7.1 As part of our efforts to ensure that we properly manage, protect and process Personal Data provided to us, we will be reviewing our policies, procedures and processes from time to time.

## **8. CONTACTING OUR DPO**

8.1 If there are any questions regarding this Privacy Policy you may email us at info@spa-1.com.sg.