### PRIVACY POLICY

Your privacy is important to us. The purpose of this Privacy Policy is to inform you of how Animal Wellness Centre Pte. Ltd. (UEN No. 201918407Z) ("AWC", "we", "us" or "our") manages your Personal Data (as defined below) in accordance with the Personal Data Protection Act 2012 ("PDPA").

Please read this Privacy Policy carefully. By accessing and continuing to access our website at <u>http://animalwellness.sg/</u> ("**Website**"), using any of our facilities, signing for any of services and purchasing any products from us ("**Facilities, Products and/or Services**"), and/or submitting any Personal Data to us thereon, you acknowledge and consent to the terms of this Privacy Policy.

This Privacy Policy supplements but does not supersede nor replace any other consents you may have previously provided to us nor does it affect any rights which we may have at law in connection with the collection, use and/or disclosure of your Personal Data. We may from time to time update this Privacy Policy to ensure that this Privacy Policy is consistent with our future developments, industry trends and/or any changes in legal or regulatory requirements. Subject to your rights at law, you agree to be bound by the prevailing terms of the Privacy Policy as updated from time to time on our Website.

# 1. Collection of Personal Data

- 1.1. In this Privacy Policy, "**Personal Data**" refers to any data and/or information about you from which you can be identified either (a) from that data; or (b) from that data and other information to which we have or are likely to have access. Depending on the nature of your interaction with us, the Personal Data that we may collect from you include:
  - (a) your name, NRIC, passport or other identification number, telephone number(s), mailing address, email address and any other information relating to you which you have provided us, or in other forms of interaction with you;
  - (b) your payment related information, such as your bank account or credit card information; and
  - (c) information about your use of our Website, Facilities, Products and/or Services, but only to the extent that we can identify you from such information;
  - (d) information (including identification and medical information) about your pets which you have provided us; and
  - (e) information about your usage of and interaction with our Website, Facilities, Products and/or Services.

# 2. Use of Personal Data for Business Purposes

- 2.1. We may use your Personal Data for our business purposes, such as:
  - (a) providing and delivering our Facilities, Products and/or Services to you;

- (b) assessing and processing your registration forms, applications, instructions or requests from you in relation to our Facilities, Products and/or Services;
- (c) monitoring the Facilities, Products and/or Services provided by or made available to you through us;
- (d) carrying out research, planning and/or statistical analysis;
- (e) managing our infrastructure, business operations and complying with internal policies and procedures;
- (f) communicating with you, including providing you with updates on changes, promotions, upcoming events and/or news to our Facilities, Products and/or Services;
- (g) providing you with the customer service in relation the Facilities, Products and/or Services, including responding to your queries and/or feedback;
- (h) addressing or investigating any complaints, claims or disputes;
- (i) verifying your identity for the purposes of providing you our Facilities, Products and/or Services;
- (j) facilitating any proposed or confirmed merger, acquisition or business asset transaction involving AWC and/or its related corporations, or corporate restructuring process;
- (k) in connection with performance of duties when seeking consultancy or professional advice, including legal advice; and/or
- (I) complying with all applicable laws, regulations, rules, directives, orders, instructions, guidance and requests from any local or foreign authorities, including regulatory, governmental, tax and law enforcement authorities or other authorities.

### 3. Use of Personal Data for Marketing Purposes

- 3.1. We may use your Personal Data for marketing purposes to offer you our Facilities, Products and/or Services, including special offers or promotions that may be of interest to you or for which you may be eligible. Such marketing messages may be sent to you in various modes including but not limited to electronic mail, direct mailers, short message service, telephone calls and/or other mobile messaging services. In doing so, we will comply with the applicable laws and regulations, including the PDPA and other applicable data protection and privacy laws, such as the European Union General Data Protection Regulation ("GDPR") (where applicable).
- 3.2. In respect of sending telemarketing messages to your Singapore telephone number via short message service, telephone calls and/or other mobile messaging services, please be assured that we shall only do so if:
  - (a) you have provided your clear and unambiguous consent in writing or other recorded form for us to do so; and

- (b) you have not indicated to us in our ongoing relationship that you do not wish to receive telemarketing messages sent to your Singapore telephone number and you have not registered that number with the National Do Not Call Registry.
- 3.3. We may, as part of our ongoing relationship with you, send marketing messages to you. You may at any time request that we stop contacting you for marketing purposes.

# 4. Disclosure and Sharing of Personal Data

- 4.1. Your Personal Data will not be disclosed by us to any third party, unless we have your consent, or we are under a legal obligation or duty, to do so, except for disclosure to the following individuals or entities which you hereby agree to:
  - (a) our related and affiliated companies (including those in different jurisdictions);
  - (b) government authorities or regulators;
  - (c) our professional advisers, including without limitation our lawyers, accountants and auditors;
  - (d) our third party service providers and sub-contractors (including those who provide payment, administrative or other services to us in connection with the operation of our Website and/or of our business) or our data processors; and
  - (e) any agent acting on our behalf.
- 4.2. We will ensure that the use of your Personal Data will be kept to what is adequate, relevant and limited to what is necessary for us to carry out the purposes set out above. Please be assured that when we disclose your Personal Data to such parties, we require them to ensure that any Personal Data disclosed to them are kept confidential and secure.
- 4.3. We wish to emphasise that we do not sell Personal Data to any third parties and we shall remain fully compliant of any duty or obligation of confidentiality imposed on us under the applicable agreement(s) and/or terms and conditions that govern our relationship with you or any applicable law.
- 4.4. We are not likely to transfer, store, process and/or deal with your Personal Data outside Singapore, but if we do so (to the limit necessary for us to carry out the purposes set out above), we will comply with the PDPA and other applicable data protection and privacy laws, such as the GDPR.

### 5. Cookies and Related Technologies

5.1. Our Website uses cookies. A cookie is a small text file placed on your computer or mobile device when you visit a website. Cookies collect information about users and their visit to the website, such as their Internet protocol (IP) address, how they arrived at the website (for example, through a search engine or a link from another website) and how they navigate within the

website. We use cookies and other technologies to facilitate your internet sessions, offer you Facilities, Products and/or Services according to your preferred settings, track use of our Website and to compile statistics about activities carried out on our Website.

- 5.2. A pixel tag, also known as a web beacon, is an invisible tag placed on certain pages of our Website but not on your computer. Pixel tags are usually used in conjunction with cookies and are used to monitor the behaviour of users visiting our Website.
- 5.3. You may set up your web browser to block cookies which will in turn disable the pixel tags from monitoring your website visit. You may also remove cookies stored from your computer or mobile device. However, do note that if you enable blocking of cookies and pixel tags, it may limit certain features and functions in your use of our Website.

#### 6. Other Websites

6.1. Our Website may contain links to other websites which are not maintained by us. This Privacy Policy only applies to our Website. When visiting these third party websites, you should read their privacy policies which will apply to your use of those websites.

# 7. Protection of Personal Data

- 7.1. We wish to assure you that your Personal Data will be protected by high standards of security, and we will take all reasonable steps to keep secure any Personal Data we hold about you on secure servers.
- 7.2. Notwithstanding our best efforts to protect your Personal Data, the nature of the Internet is such that data transmission over the Internet can never be fully secure. Hence, we cannot be responsible for events arising from unauthorised third parties gaining access to your Personal Data. It is solely your responsibility to maintain the secrecy of your user identities and password(s) at all times.

#### 8. Retention, Access and Correction of Personal Data

- 8.1. Your Personal Data is retained as long as the purpose for which it was collected remains and until it is no longer necessary for any other legal or business purposes.
- 8.2. You may request access or make corrections to your Personal Data held by us. We may charge a fee for processing your request for access. Such a fee depends on the nature and complexity of your access request.
- 8.3. The GDPR also provides relevant individuals with additional rights including the right to obtain information on how we process your Personal Data, receive certain information provided in an electronic format and/or request that these be transmitted to a third party, request for your information to be erased, object or restrict the use or processing of your information in some circumstances. These will be subject to ongoing obligations imposed on us pursuant to any applicable law or regulation, and/or our legitimate reason or entitlement to continue processing your information, and/or to refuse that request.

# 9. Withdrawal of Consent

- 9.1. You may, at any time, withdraw your consent to our continued collection, use and disclosure of your Personal Data by contacting our data protection officer, the details of which are as set out in Paragraph 12.1 below. If you decide that you do not want us to collect, use your personal data and/or to disclose your personal data to third parties, you understand that this may in some cases impact on the availability of the Facilities, Products and/or Services that we may provide to you and may mean that the Facilities, Products and/or Services provided to you (if possible at all) by us may not be customised for your use, may be less user-friendly and less efficient.
- 9.2. Further, in withdrawing your consent, you acknowledge and agree that if we are no longer able to provide certain Facilities, Products and/or Services to you as a consequence, we will be entitled to cease the provision of such Facilities, Products and/or Services to you without incurring any liability on our part.

# **10.** Amendments and Updates of this Privacy Policy

- 10.1. We may amend this Privacy Policy from time to time to ensure that this Privacy Policy is consistent with any developments to the way we use your Personal Data or any changes to the laws and regulations applicable to us. We will make available the updated policy on our Website.
- 10.2. All communications, transactions and dealings with us shall be subject to the latest version of this Privacy Policy in force at the time.

### **11.** Governing Law and Dispute Resolution

11.1. Irrespective of the country from which you access or use our Website or our Facilities, Products and/or Services, to the extent permitted by law, this Privacy Policy shall be governed in accordance with the laws of Singapore without regard to choice or conflicts of law principles, and you hereby agree to submit to the exclusive jurisdiction of the courts of Singapore to resolve any claims or disputes which may arise in connection with this Privacy Policy. Any disputes concerning this Privacy Policy and claims concerning breach or inadequacy of Personal Data protection raised by any personnel from the European Union will be dealt with in accordance (to the maximum permissible extent) with the GDPR.

#### 12. How to Contact Us

12.1. If you have any questions or comments about this Privacy Policy, please send your questions and feedback to our data protection officer, Ms Kelly Chen, who can be contacted at +65-6694 6383.