

Privacy Notice

1 Notice

1.1 This is the Privacy Notice ("**Notice**") of NTUC FairPrice Co-operative Limited, a co-operative society registered in Singapore ("**NTUC FairPrice**"), and its Affiliates (each an "**Affiliate**" and collectively, the "**FairPrice Group**"). The terms "we" and "our" in this Notice refer to the FairPrice Group, NTUC FairPrice and/or each of the Affiliates. For the purpose of this Notice, "**Affiliates**" means the subsidiaries of NTUC FairPrice which are either wholly-owned or majority owned or controlled by NTUC FairPrice, in each case from time to time. Such Affiliates include Cheers Holdings (2004) Pte. Ltd, Grocery Logistics of Singapore Pte Ltd, NTUC Link Private Limited, Origins Healthcare Pte Ltd, Kopitiam Investment Pte Ltd and NTUC Foodfare Co-operative Limited.

1.2 Application. NTUC FairPrice and each Affiliate have different channels of collecting personal data, but each is committed to complying with this Notice in its collection, use and disclosure of personal data, to ensure that there is accountability and uniformity in the way we protect your personal data. Although this Notice is in common use by NTUC FairPrice and the Affiliates, each is responsible to you to the extent of its own collection, use and disclosure of your personal data, and its own actions.

1.3 Compliance with this Notice. This Notice applies to all personal data you provide to us, or that we may collect about you. Please do not provide any personal data to us if you do not accept this Notice.

We may also require you to accept this Notice when you contact, interact, transact or deal with us, or when you access and use our websites, applications or services. If you notify us that you do not accept this Notice, we may not be able to establish a relationship with you or be able to service your requests.

1.4 Concerns and Contacting Us. If you have any feedback or issues in relation to your personal data, or about this Notice, or wish to make a complaint to us, you may contact our Data Protection Officer at dpo@fairprice.com.sg.

1.5 Amendment to this Notice. We may amend this Notice from time to time without notice to you, to comply with applicable laws or as we update our data usage and handling processes. The updated Notice will supersede earlier versions and will apply to personal data provided to us previously. The amended Notice will take effect when made available at the respective Affiliate's website(s) and/or application(s) or when notified to you in writing.

2 Personal Data

2.1 What personal data we collect. The personal data we collect depends on the purposes for which we require the personal data and what you have chosen to provide. This may include your name, address, contact information (e.g. telephone number and email address), identification number, photograph, video image and any other information that may identify you or is personal to you.

2.2 How we collect personal data. We collect personal data relevant to our relationship with you. We may collect your personal data directly or indirectly through various channels, including when :

- you use our services or enter into transactions with us (or express interest in doing so);
- you apply to be a member of any of our loyalty programs, respond to our promotions, or subscribe to our mailing lists;
- you visit our websites, download or use our mobile applications;
- you register an account with us through our websites or applications or via our business partners. For the purpose of this Notice, a “**business partner**” includes but not limited to our joint-venture partner, collaborator and an individual/organisation who has entered into a legal contract with the FairPrice Group to manage a business and to share responsibilities and resources of such business, associated companies of the FairPrice Group and companies of which the FairPrice Group is a shareholder;
- you transact with us, contact us or request that we contact you through various communication channels, for example, through social media platforms, messenger platforms, face-to-face meetings, telephone calls, emails, fax and letters;
- your images are captured via photographs or videos taken by us or our representatives when you are within our premises or attend events organised by us;
- you participate in events and programmes, competitions, surveys, contests or games organised by us;
- you apply for a job with us;
- we seek information about you and receive your personal data in connection with your relationship with us, for example, if you are a customer, investor, member or shareholder;
- we generate or derive information about you based on our analysis of the data we collect, or from combining such data with other data or information in our possession (such as the data provided to us by our business partners); or
- you submit your personal data to us for any other reason.

Depending on your relationship with us, we may also collect your personal data from third parties, including:

- from other organisations and social enterprises which are part of NTUC Enterprise (see <http://ntucenterprise.sg/>) (collectively “**NTUC Enterprise group of social enterprises**”);
- from the National Trades Union Congress and NTUC Club;
- from our business partners whom you consented to their sharing of your personal data to us;
- from your family members, job placement agents or friends who provide your personal data to us on your behalf; and
- from public agencies or other public sources.

Our websites and applications may also contain or involve certain technologies that automate the collection of data (including personal data). These technologies include cookies, web beacons and web analytics. If you do not wish to have your data collected through such technologies you may disable the operation of these technologies on your devices (where possible), or you may refrain from using our websites and applications.

2.3 Voluntary provision of personal data. Your provision of personal data to us is voluntary and you have the right to withdraw your consent for us to use your personal data at any time by contacting and submitting a request to us. Your withdrawal will take effect after your request is processed. However, if you choose not to provide us with the personal data we require, it may not be possible for us to fulfil the purposes for which we require the personal data, including providing products and services which you need from us.

2.4 Providing personal data belonging to others. In certain circumstances, you may also provide the personal data of persons other than yourself (including your family members). If you do so, you are responsible for informing him/her of the purposes for which we require his/her personal data and warrant that you are validly acting on behalf of him/her to consent to our collection, use and disclosure of his/her personal data.

2.5 Accuracy and Completeness of personal data. You must ensure that all personal data that you provide is true, accurate and complete and promptly inform us of any changes to the personal data.

2.6 Minor. If you are a child, minor or not of legal age, please inform and seek the consent of your parent or guardian, before you provide your personal data to us. If you are a parent or guardian and you have reason to believe your child or ward has provided us with their personal data without your consent, please contact us to request for erasure of their personal data.

3 Purposes

3.1 We collect, use and disclose your personal data where:

- you have given us consent;
- necessary to comply with our legal or regulatory obligations;
- necessary for our legitimate business interests, provided that the benefits outweigh any adverse effect to you; and/or
- necessary to perform a contract or transaction you have entered into with us, or provide a product and/or service that you have requested or require from us or from our business partners.

3.2 **General purposes.** Generally, we collect, use and disclose your personal data for purposes connected or relevant to our business, including:

- processing your account application with us or with our business partners;
- processing your transactions with us, or to provide products and services to you;
- managing your relationship with us;
- facilitating your use of our and our business partners' platforms, products and services;
- assisting you with your requests, enquiries and feedback;
- allowing data matching with our business partners;
- administrative purposes, e.g. accounting, risk management and record keeping, business research, data, planning and statistical analysis, and staff training;
- collecting the physical location of your mobile device by using satellite, cell phone tower or Wi-Fi signals, etc. We may use your mobile device's physical location to provide you with personalised location-based services and content;
- security and safety purposes, e.g. protecting our platforms from unauthorised access or usage and to monitor for security threats, and your image may be captured by security cameras;
- carrying out research, data and statistical analysis;
- compliance with laws and regulations, internal policies and procedures, e.g. audit, accounting, risk management and record keeping;
- enforcing legal obligations involving us, or responding to complaints, litigation or investigations involving us;
- managing and engaging third parties or data processors that provide services to us, e.g. IT services, data analytics, marketing, and other professional services;
- (if you are a job applicant) assessing and evaluating your suitability for employment in any current or prospective position within the FairPrice Group;

- such purposes that may be informed to you when your personal data is collected;
- carrying out our legitimate business interests (listed below); and/or
- any other reasonable purposes related to the aforesaid.

3.3 Marketing purposes. We collect, use and disclose your personal data for purposes of:

- managing and/or administering your request to receive news (including events and product launches), promotions and marketing information from us, NTUC Enterprise group of social enterprises and/or our business partners;
- analysing and/or profiling your purchases, transactions and/or likes or dislikes so as to be better able to send you relevant or targeted news (including events and product launches), promotion and marketing information from us, NTUC Enterprise group of social enterprises and/or our business partners; and/or
- contacting you or sending you news (including events and product launches), marketing information and promotions from us, NTUC Enterprise group of social enterprises and/or our business partners, via various mode of communications including mail, e-mail, phone calls, text messages, pop-up notifications (when you are using our applications) and social media platforms.

3.4 Legitimate business interests. Our legitimate business interests include:

- managing our business and relationship with you, and providing products and services to our users and customers;
- protecting our rights and interests and those of our users and customers;
- preventing and investigating possible misuse of our websites, applications and services;
- understanding and responding to inquiries and feedback;
- understanding how our users use our websites, applications and services;
- identifying what our users want and improving our websites, applications, products and services and offerings;
- enforcing obligations owed to us, or protecting ourselves from legal liability;
- analysing and/or profiling your purchases, transactions and/or likes or dislikes so as to be better able to (i) improve, enhance or develop new products and services; (ii) improve, enhance or develop new methods or processes for our operations; (iii) learn and understand your behavior and preferences in relation to our products and services; and (iv) identify products and services that may be suitable for you or personalising such products and services for you; and/or
- sharing data in connection with acquisitions and transfers of our business.

3.5 Purposes involving the National Trades Union Congress, NTUC Club, FairPrice Group and/or NTUC Enterprise group of social enterprises. Without prejudice to the generality of

other provisions in this Notice, for administrative efficiencies and to allow us to better serve your needs, your personal data will also be collected, used and disclosed to the National Trades Union Congress and NTUC Club (if you are a NTUC union member) as well as an organisation which are part of the FairPrice Group and/or NTUC Enterprise group of social enterprises for the following purposes:

- facilitating the provision of centralised administrative and management services;
- facilitating use of centralised resources e.g. shared information technology resources and systems;
- facilitating internal audits, reporting and management of our operations; and/or
- facilitating the conduct of centralised business activities and functions e.g. data analytics.

3.6 Use permitted under applicable laws. We may also collect, use, disclose and process your personal data for other purposes, without your knowledge or consent, where this is required or permitted by law.

3.7 Contacting you. When using your personal data to contact you for the above purposes, we may contact you via mail, e-mail, phone call, text message, pop-up notification (when you are using our applications), social media platform or any other means.

We will not contact you for marketing purposes unless with your consent, or where we are exempted by applicable law from having to obtain consent. When contacting you for marketing purposes, we will not contact you through your telephone number, unless you have specifically consented to such a mode of communication. If you do not wish to receive any communication or information from us, or wish to restrict the manner by which we may contact or send you information, you may contact us to do so, or update the marketing communication preference setting in your account with us via the applicable websites and/or applications.

4 Disclosure of Personal Data

4.1 Disclosure to the National Trades Union Congress, NTUC Club, NTUC Enterprise group of social enterprises and organisations which are part of the FairPrice Group. We may disclose or share your personal data with the National Trades Union Congress and NTUC Club (if you are a NTUC union member), NTUC Enterprise group of social enterprises and/or organisations which are part of the FairPrice Group for the purposes described in paragraphs 3.2, 3.3, 3.4 and 3.5.

4.2 Other Disclosures. We may also disclose or share your personal data in connection with the purposes described in paragraphs 3.2, 3.3 and 3.4 above, including to the following parties:

- third parties who are appointed to provide services to us, e.g. IT vendors, marketing companies and event organisers;
- third parties that we conduct joint marketing and cross promotions with;
- business partners; and/or
- regulatory authorities and public agencies.

When disclosing personal data to third parties, we will (where appropriate and required by applicable law) enter into contracts with these third parties to protect your personal data in a manner that is consistent with applicable laws and/or ensure that they only process your personal data in accordance with our instructions.

5 Cross Jurisdiction Transfers of Personal Data

5.1 Safeguards. We may transfer your personal data out of Singapore for the purposes set out in paragraph 3 above. When transferring personal data outside Singapore, we will require recipients of the personal data to protect personal data at a standard comparable to that under the laws of Singapore. For example, we may enter into legally enforceable agreements with the recipients to ensure that they protect your personal data.

6 Protection of Personal Data

6.1 Period of retention. We keep your personal data only for so long as we need the data to fulfil the purposes we collected it for, and to satisfy our business, compliance and legal purposes, including archival, audit, accounting or reporting requirements. How long we keep your personal data depends on the nature of the data, e.g. we keep personal data for at least the duration of the limitation period for bringing claims if the personal data may be required to commence or defend legal proceedings. Certain information may also be retained for longer, e.g. where we are required to do so by law. Typically, our data retention period is from 6 years upwards, depending on the limitation period.

6.2 Anonymised data. In some circumstances we may anonymise your personal data so that it no longer identifies you, in which case we are entitled to retain and use such anonymised data without restriction, including for data analytics.

6.3 Unauthorised access and vulnerabilities. While we take reasonable precautions to safeguard your personal data in our possession or under our control, we cannot be held

responsible for unauthorised or unintended access that is beyond our control, including hacking or cybercrimes. We also do not guarantee that our websites and applications are invulnerable to security breaches, or that your use of our websites and applications is safe and protected from viruses, worms, Trojan horses, and other vulnerabilities.

7 Your Rights

7. 1 You enjoy certain rights at law in relation to your personal data that we hold or control. These rights include:

- **Withdrawal of consent:** You may withdraw consent for our use of your personal data by requesting to terminate your account via the webform at <https://help.fairprice.com.sg/hc/en-us> and under "Manage orders and account". Upon receipt of your request, we will terminate your account, and anonymise or delete your personal data unless we need to keep it to satisfy our business, compliance or legal purposes.
- **Correction.** You may request that any incomplete or inaccurate data that we hold or control be corrected.
- **Access.** You may ask if we hold or control your personal data and if we are, you can request access to such data.

7.2 Exercising your rights. If you have an account with us, you may access or correct your personal data at any time by accessing your account on our website(s) and/or application(s). If you do not have an account with us but would like to request for access or correction of your personal data in our possession or control, please use the Request Form for Access of Personal Data which can be obtained [here](#). Where permitted by law, we may charge you a fee to process your request.

7.3 Limitations. We may be permitted under applicable laws to refuse your request to exercise your rights, for example, we may refuse (a) a request for erasure where the personal data is required for in connection with claims; or (b) an objection request and continue processing your personal data based on compelling legitimate grounds for the processing.