

TELECHOICE INTERNATIONAL LIMITED

PRIVACY POLICY

IMPORTANT

Your personal data is important to TeleChoice International Limited (“TeleChoice”).

The purpose of this document (“Privacy Policy”) is to inform you of how TeleChoice International Limited (“TeleChoice”) and its subsidiaries from time to time (together “TeleChoice Group”) manage personal data which is subject to the Personal Data Protection Act, Chapter 53B, of Singapore (“PDPA”) and other applicable data protection laws. Please read this Privacy Policy so that you know and understand the purposes for which we collect, use and disclose your personal data.

By interacting with us, accessing our websites, submitting information to us (whether through our websites or otherwise), or signing up for any products or services offered by us, you consent to TeleChoice and other TeleChoice Group companies, as well as our respective agents, collecting, using, disclosing and sharing amongst ourselves your Personal Data (as explained below), and disclosing such Personal Data to the TeleChoice Group’s service providers and relevant third parties in the manner set out in this Privacy Policy.

A reference to “TeleChoice”, “we”, “our” or “us” in this Privacy Policy shall mean TeleChoice and/or other TeleChoice Group companies, collectively or singly as the context requires.

This Privacy Policy supplements but does not supersede or replace any other consent you may provide or may have previously provided to us nor does it affect any rights which we may have at law in connection with the collection, use or disclosure of your Personal Data. We may from time to time update this Privacy Policy, including where necessary to ensure that this Privacy Policy is consistent with our future development, 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 this Privacy Policy as updated from time to time on our website (www.telechoice.com.sg). Please check back regularly for updated information on the handling of your Personal Data.

For the avoidance of doubt, this Privacy Policy forms a part of the terms and conditions in the TeleChoice International Limited – Website Terms and Conditions (“Terms”) and should be read in conjunction with the Terms.

1. Your Personal Data

1.1 In this Privacy 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.

1.2 The Personal Data that you may provide to us include, depending on the nature of your interaction with us, your name, NRIC, passport or other identification number, date of birth, gender, nationality, contact numbers, residential and/or mailing addresses, email address and any other information relating to yourself and any individuals, which you

have provided us in any forms you may have submitted to us, or via other forms of interaction with you.

2. Collection of Personal Data

2.1 Generally, we may collect your Personal Data in the following ways:

- (a) when you submit any online queries, including through the “Contact Us” page on our website;
- (b) when you submit forms relating to any of the products (“**Relevant Products**”) and/or services (“**Relevant Services**”) we represent, offer, sell or distribute;
- (c) when you purchase or use Relevant Products and/or Relevant Services;
- (d) when you interact with our customer service officers or any of our staff, for example, via face-to-face meetings, business interactions in events and exhibitions, telephone calls, letters, emails, online forms (such as any “Contact Us” forms on our websites) and/or our social media channels;
- (e) when you are contacted by, and respond to, our marketing representatives and agents;
- (f) when you respond to our promotions and other initiatives, or participate in our promotional activities;
- (g) when you subscribe or ask to be included in our email or other mailing lists;
- (h) when you request that we contact you;
- (i) when you enter into an agreement and/or a business relationship with us;
- (j) when you respond to our request for additional Personal Data;
- (l) when you submit a job application to the TeleChoice Group;
- (m) when we receive references from business partners and third parties, for example, where you have been referred by them;
- (n) when your images are captured by us via CCTV cameras while you are within our premises or photographs or videos taken by us or our representatives when you attend events hosted by us at non-public spaces; and
- (o) when you submit your Personal Data to us for any other reason.

2.2 When you browse our websites, you generally do so anonymously but please see Clause 5 (*Use of Cookies*) and Clause 6 (*IP Address*).

2.3 If you provide us with any Personal Data relating to a third party (e.g. information of your spouse, children, parents, and/or employees), or where you refer a third party to us for the purposes of us offering Relevant Products and/or Relevant Services to that third party, by submitting such information to us, you represent and warrant to us that you have obtained the consent of the third party for you providing us with their Personal Data for the purposes set out in this Privacy Policy.

3. Use and Disclosure of your Personal Data

3.1 In general, TeleChoice collects, uses and discloses your Personal Data for the following purposes:

- (a) to provide you with Relevant Products and/or Relevant Services that have been requested;
- (b) to help us profile, review, develop, manage and enhance the Relevant Products and/or Relevant Services, including by analysing future customer needs;
- (c) to communicate with you and respond to your queries, requests and complaints;
- (d) to provide ongoing information about Relevant Products and/or Relevant Services;
- (e) to handle disputes and conduct and facilitate investigations and proceedings;
- (f) to protect and enforce our contractual and legal rights and obligations;
- (g) to prevent, detect and investigate crime, including fraud and money laundering, and to analyse and manage other commercial risks;
- (h) to manage the business operations of the TeleChoice Group and to comply with our contractual obligations to third parties (including third parties on whose behalf we may be collecting, using and disclosing your Personal Information) and/or internal policies and procedures;
- (i) to process your job application;
- (j) to facilitate any proposed or actual business transactions (which may extend to any reorganisation, merger, acquisition or sale) involving the TeleChoice Group;
- (k) to facilitate any proposed or actual business assignment, transfer, participation or sub-participation of any of our rights and obligations in respect of your relationship with us;
- (l) to comply with any applicable rules, laws and regulations, codes of practice or guidelines or to assist in law enforcement and investigations by relevant authorities; and
- (m) purposes which are reasonably related to the aforesaid.

3.2 Without prejudice to Clause 3.1, if you are a vendor, a prospective vendor or a contractor or an employee thereof:

- (a) to manage the outsourcing relationship;
- (b) to conduct background checks and due diligence;
- (c) to process any payments of invoices and claims including payments to any accounts payable;
- (d) to ensure the security of our premises; and
- (e) any other purpose directly relating to any of the above.

- 3.3 Without prejudice to Clause 3.1, if you submit an application to us as a candidate for employment:
- (a) to process your application, including pre-recruitment checks;
 - (b) to provide or obtain employee references or other references where relevant for background screening/vetting;
 - (c) to collect information about your suitability for the position applied for;
 - (d) to organise training and staff development programs;
 - (e) to assess your performance;
 - (f) to administer benefits and payroll processing;
 - (g) to provide you with tools to facilitate or as required for you to do your job;
 - (h) to communicate with you as required by TeleChoice to comply with its policies and processes, including for business continuity purposes; and
 - (i) any other purposes relating to the aforesaid.
- 3.4 In relation to particular Relevant Products and/or Relevant Services or in your interactions with us, we may also have specifically notified you of other purposes for which we collect, use or disclose your Personal Data. If so, then we will collect, use and disclose your Personal Data for these additional purposes as well, unless we have specifically notified you otherwise.
- 3.5 Your Personal Data will be protected and kept confidential, but subject to the provisions of any applicable law, this Personal Data may, depending on the product or service concerned and for the purposes listed above (where applicable), be disclosed to the following parties:
- (a) companies within the TeleChoice Group, our associated companies and our joint venture partners;
 - (b) agents, contractors, third party service providers and specialist advisers who have been contracted to provide the TeleChoice Group with administrative, operational or other goods and services, such as telecommunications, information technology, payment, payroll, processing, training, market research, storage, or archival;
 - (c) any third-party business partners who offer goods and services or sponsor contests or other promotional programs, whether in conjunction with us or not;
 - (d) insurers and credit providers;
 - (e) where relevant, any debt collection agencies or dispute resolution centres;
 - (f) any business partner, investor, assignee or transferee (actual or prospective) to facilitate business transactions (which may extend to any reorganization, merger, acquisition or sale) involving TeleChoice;
 - (g) our professional advisors, including our auditors and lawyers;

- (h) relevant government, statutory or regulatory authority (including securities exchange) or law enforcement agency in order to comply with any laws or rules and regulations imposed by such authority or agency or any order, notice, directive or judgment of any court, tribunal, arbitration or mediation body;
- (i) anyone to whom we assign or transfer or may assign or transfer any of our rights and duties;
- (j) banks, credit card companies and their respective service providers; and
- (k) any other party as may be consented to by you, as specified by that individual or the contract.

4. Do Not Call ('DNC') Provisions

If you have provided us with your Singapore telephone number(s) and have indicated that you consent to receiving marketing or other promotional information via your Singapore telephone number(s), then from time to time, we may contact you using such Singapore telephone number(s) (including via voice calls, text, fax or other means) with information about our products, services (including discounts and special offers), and other event invitations even if these telephone number(s) are registered with the DNC Registry. You may however advise in writing should you wish not to be contacted by us at your telephone number(s) for such purposes.

5. Use of Cookies

- 5.1 When you interact with us on our website, we automatically receive and record information on our server logs from your browser. When you visit our website, we may assign one or more cookies to your computer. A cookie is a small encrypted text file placed in the 'Cookies' folder on your computer's hard disk, and may be used to collect information and statistics relating to your access to our website, including information on how you arrive at our website, what kind of browser you are on, what operating system you are currently using, your IP address, and your click stream information and time stamp (for example, which pages you have viewed, the time the pages were accessed and the time spent per web page on our websites). The cookie will provide a unique identifier to your computer and each time you visit our website from the same computer, our server will recognise a return visitor and allow us to increase the functionality of our website on your computer.
- 5.2 The cookies placed by our server are readable only by us, and cookies cannot access, read or modify any other data on your computer.
- 5.3 Most browsers automatically accept cookies, but cookies can be enabled or disabled by modifying the settings in your browser. If you choose not to allow us to place a cookie on your computer, you may be restricted from some services offered on our website, and some of the interactive features on our website may be similarly restricted or be rendered inoperable.

6. IP Address

- 6.1 An IP address is a number that is automatically assigned to your computer when you sign up with an Internet Service Provider.

- 6.2 When you visit our website, your IP address is automatically logged in our server. We may use your IP address to help analyse trends, administer our website, and track users' movements. From your IP address, we may identify the general geographic area from which you are accessing our website. However, we will not be able to pinpoint the exact geographic location from which you are accessing our website. Generally, we do not link your IP address to anything that can enable us to identify you unless it is required by applicable laws and regulations.

7. Third-Party Sites

Our websites may contain links to other websites operated by third parties, such as our business partners. We have no control over and are not responsible for the privacy practices of websites operated by third parties that are linked to our websites. We encourage you to learn about the privacy policies of such third-party websites. Once you have left our website, you should check the applicable privacy policy of the third-party website to determine how they will handle any information they collect from you.

8. Data Transfer

In the event it is necessary to share information about you within the TeleChoice Group and third party service providers, some of which may be outside of your country of residence, we will take reasonable steps to ensure that your Personal Data transmitted outside of your country of residence is adequately protected. In addition, we will ensure that such transfers comply with the requirements of the applicable data protection laws.

9. Data Retention

We may retain your Personal Data for as long as it is necessary for the purposes it has been collected, and in most cases, up to 7 years, unless otherwise permitted by applicable law or in order to defend legal claims. Where we no longer require your Personal Data for those purposes, we will cease to retain such Personal Data.

10. Your Rights

- 10.1 You may, subject to applicable law, request to access and/or correct your Personal Data in our possession.
- 10.2 You may withdraw your consent for the collection, use and/or disclosure of your Personal Data in our possession. If you withdraw your consent to any or all use of your Personal Data in our possession, depending on the nature of your request, TeleChoice may not be in a position to continue to continue its existing relationship with you.
- 10.3 Where mandated under the applicable data protection laws, your exercise of the rights described or referred to above shall be free of charge. In all other situations, we may charge a fee to cover the cost of verifying the request and locating, retrieving and copying any material requested.
- 10.4 If you want to exercise any of your rights or if you wish to raise a complaint, you may contact our Data Protection Officer at the contact details set out in Clause 11 (*How to contact us*).

11. How to contact us

If you have any questions about this Policy or any queries relating to your Personal Data, or you would like to withdraw your consent or access and/or correct your Personal Data records, you can:

- (a) email to the Personal Data Protection Officer at gohsp@telechoice.com.sg; or
- (b) write in to:

Personal Data Protection Officer
TeleChoice International Limited
6 Serangoon North Avenue 5
#03-16
Singapore 554910

12. Policy Review

This Privacy Policy will be reviewed from time to time by us. We may also from time to time update this Privacy Policy to take account of new laws and technology, changes to our operations and practices and the changing business environment. If you are unsure whether you are reading the most current version, please contact us.

13. Governing Law

This Personal Data Policy shall be governed in all respects by the laws of Singapore.

(Version as at 1 January 2020)